

MEXICO

REGULATORY TRENDS: NATIONAL INVENTORY OF CHEMICAL SUBSTANCES

By: Cristina Caro Tovar
International Regulatory Attorney
Washington, D.C. July 2021

AGENDA

1. Background; Inventory of 2009

2. Administration of Inventory

3. New Guidelines – Inventory

4. National Policy for Chemical
Management

5. USMCA

I. BACKGROUND: INVENTORY OF 2009

Creation in 2009 by INECC – SEMARNAT

Identifies 5852 Substances

Data provided by several agencies:

SEMARNAT

Office of Environment Protection
(PROFEPA)

National Association of Industrial Chemicals
of Mexico (ANIQ)

Collaboration of Environment Canada and
US-EPA

MEXICO: NATIONAL INVENTORY OF CHEMICAL SUBSTANCES (INSQ)

Current problems:

Inconsistency on sources of information/data:

- a) Annual Operations Report (RETC) (SEMARNAT) Emissions Inventory
- b) Import-export documents (customs-SAT)
- c) Confidentiality issues (agencies not sharing information)

2. ADMINISTRATION OF INVENTORY (INSQ)

Ministry of Environment and Natural Resources (SEMARNAT-INECC)

With the participation of other agencies:

Ministry of Health (Cofepris)

Ministry of Agriculture

Ministry of Economy

Customs Office (Aduanas – SAT)

Ministry of Labor (STPS - GHS)

INVENTORY INECC

The screenshot shows a web browser window displaying the INECC website. The page title is "Sistema de Inventario Nacional de Sustancias Químicas". The search results for "benceno" are displayed in a table format. The table includes the following information:

Nombre Químico	
No. CAS:	14838-15-4
Nombre Químico:	1 Bencenometanol, Alfa - [(1R)-aminoetil] -, (Alfa S)-rel-
Fórmula Química:	C9H13NO
Trazabilidad:	Listado TEC y ANIQ
Inventario Estados Unidos (TSCA):	Incluido
Sustancias Vinculadas con Emergencias Químicas (De la PROFEPA):	No Incluido
Nombre Comercial:	- Fenilpropanolamina (+)-Fenilpropanolamina (+)-Norephedrin - Ref. Chemical Abstracts Service (+)-Norephedrine - Ref. Chemical Abstracts Service (+)-Phenylpropanolamine - Ref. Chemical Abstracts Service benzenometanol Benzenometanol alpha -(1-aminoethyl)- (R* S*) - Ref. Chemical Abstracts Service dl-Norephedrine - Ref. Chemical Abstracts Service dl-Phenylpropanolamine - Ref. Chemical Abstracts Service

On the right side of the page, there are two panels with expandable sections:

- Introducción**
 - Identidad Química
 - Número CAS
 - Número ONU
 - Nombre Químico
 - Sinónimo o Nombre Comercial
- Datos Ecotoxicológicos**
 - Biodegradación
 - Persistencia
 - Toxicidad
 - Solubilidad

The Windows taskbar at the bottom shows the time as 7:12 AM on 10/2/2018.

3. NEW GUIDELINES – CATALOGUE - INVENTORY

Guidelines for the Creation of New Catalogue
(October 16, 2018)

NOM-018-STPS-2015 GHS Implementation
(October 9, 2018)

Purposes:

- Harmonize nomenclature – CAS number
- Provide scientific base of reference
- Create instruments to prevent and manage risks
- Concentration of data: all agencies involved
- Control measures: environmental protection

INSTRUMENTS TO
CREATE THE NEW
CATALOGUE/INVENTORY

Current Inventory (INSQ-
2014)

NMX-R-019-SCFI-2011
NOM-018-STPS-2015 (GHS)

NOM-165-SEMARNAT-2013

NOM-052-SEMARNAT-2005

4. NATIONAL POLICY FOR
CHEMICAL MANAGEMENT
NOV-2019

Enactment of General Law for Chemical Substances
Management (LGGISQ)

**National Registry of Chemical Substances
(ReNaSQ) (INSQ)**
(inventory, catalogue, registry)

Environment: Monitor System

Prioritize Chemicals

International Cooperation

IMPLEMENTATION OF THE NATIONAL REGISTRY OF CHEMICAL SUBSTANCES

ReNaSQ – Inventory
- Catalogue

Integration of pilot
registries
(SEMARNAT and
CICOPLAFEST)

Preliminary Inventory

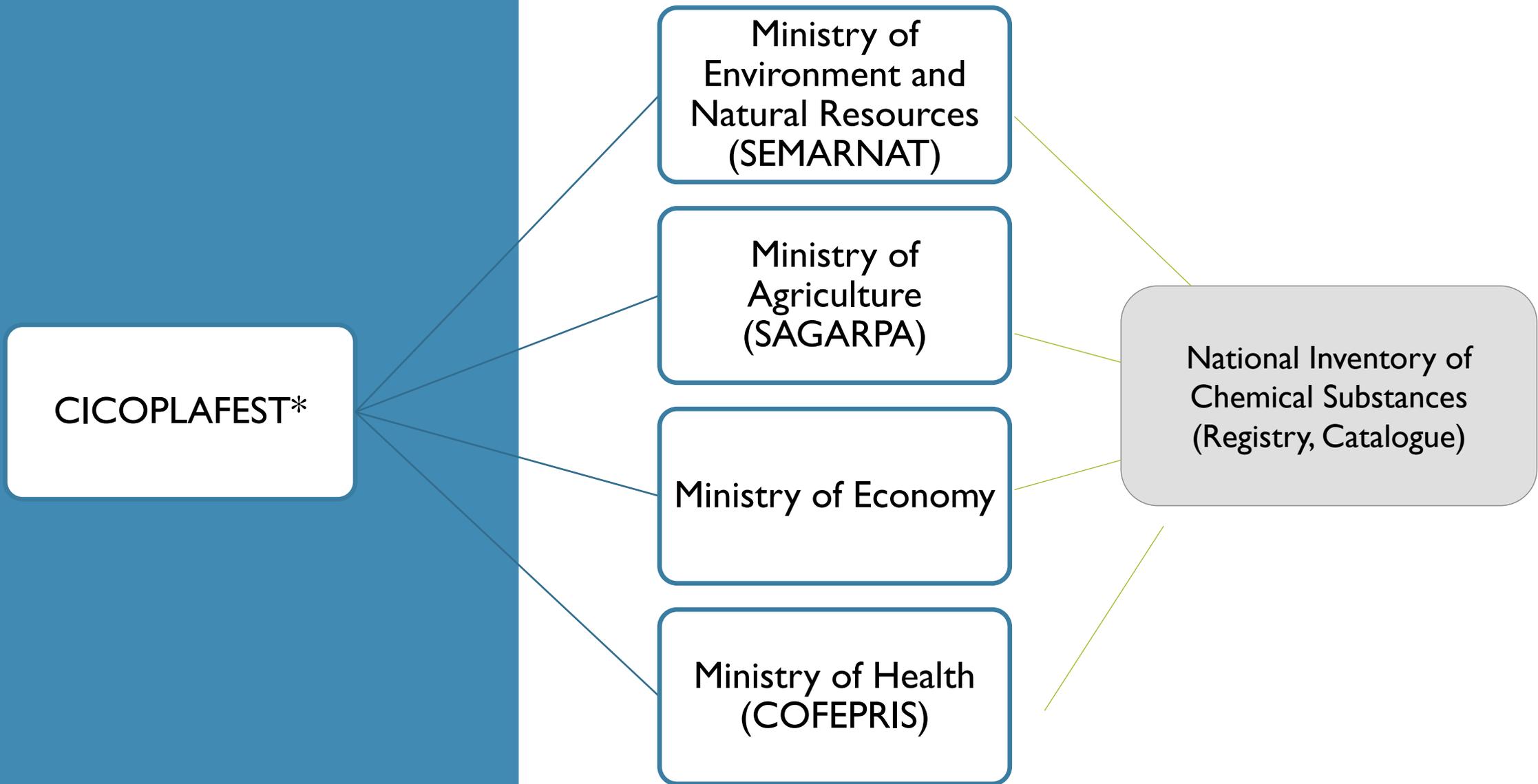
Risk analysis

Integration of the
new registry model

Training (agencies
involved)

First phase of
implementation
(2021)

Second phase of
implementation:
follow up and
improvement (2022)



*Comisión Intersecretarial para el Control del Proceso y Uso de Plaguicidas, Fertilizantes y Sustancias Tóxicas.

5. USMCA – TRADE AGREEMENT

Mexico's Commitments under USMCA – Chapter 24

- (a) the prevention, abatement, or control of the release, discharge, or emission of pollutants or environmental contaminants;
- (b) the control of environmentally hazardous or toxic chemicals, substances, materials, or wastes, and the dissemination of information related thereto; or
- (c) the protection or conservation of wild flora or fauna,¹ including endangered species, their habitat, and specially protected natural areas,²



INTERNATIONAL COMMITMENTS CHEMICALS

CANADA CMP – DSL

US - TSCA Inventory

MEXICO - INSQ (non-mandatory)

WHAT IF MY CHEMICAL IS NOT LISTED IN THE NATIONAL INVENTORY?

The regulation on imports-exports of pesticides, chemicals and toxic or hazardous materials* allows the use of studies on the physicochemical, toxicological, and Ecotoxicological properties of the chemical by international organizations:

International organizations:

- OECD Test Guidelines for Chemicals
- US-EPA Test Guidelines for Pesticides and Toxic Substances
- If the substance is authorized in Canada, US, or Europe provide the evaluations of your chemical done in those regions **BUT look for exceptions.**

Example: Mexico bans imports and use of glyphosate under the precautionary principle.

**CONCLUSION:
WHAT IS THE FUTURE IN MEXICO FOR
CHEMICAL MANAGEMENT?**

Enactment of new law in chemicals management

Creation of Registry – Inventory

Risk assessment – risk management

Prioritize chemicals: reduction or elimination

Alignment with other nation's chemical lists

THANK YOU

Cristina Caro Tovar

International Regulatory Attorney

Cristina.carotovar@gmail.com

Washington, D.C.

July 2021

