

Q To confirm whether apparatus, or containers and packaging similar to those sold, etc. before June 1, 2020* conform to the Positive List System, we the relevant business operators are asking industry associations for the issuance of confirmation certificates, etc., and also are confirming the conformation of imports of such apparatus, or containers and packaging to the Positive List System. However, we cannot expect to receive the confirmation before June 1, 2025. In this case, is it acceptable to proceed with the confirmation even on and after June 1, 2025?

(Answer)

Yes, it is acceptable. In this case, the business operators must make a specific plan for the confirmation and carried it out promptly. As a result of the confirmation, if it is found that apparatus, or containers and packaging do not conform to the Positive List System, the apparatus, or containers and packaging must be promptly replaced with ones that conform to the System. The apparatus, or containers and packaging those had been sold, manufactured or imported for the purpose of marketing, or used in business by that time is excluded from this measure.

For imported apparatus, or containers and packaging those are similar to those sold, etc. before June 1, 2020 and that are under confirmation of the Positive List System, it is preferable for the importers to confirm that such apparatus, or containers and packaging also conform to the Positive List System in other countries, such as European countries and the United States.

* “apparatus, or containers and packaging similar to those sold, etc. before June 1, 2020” refer to apparatus, or containers and packaging manufactured using substances (limited to raw materials of synthetic resin) that were used in apparatus, or containers and packaging that was sold, manufactured or imported for the purpose of marketing, or used in business before June 1, 2020 within the range in which they were used in the apparatus, or containers and packaging; or refer to the imports of such apparatus, or containers and packaging.