CLP regulation & 2015 deadline for mixtures

CEFIC REACH Information and Experience Exchange Forum
Zaventem, 18 December 2013

Maurits-Jan Prinz
European Commission
DG Enterprise & Industry
Table of contents

- Introduction to the CLP regulation
- Changes to the CLP regulation
- 2015 deadline: advice for companies
- Raising awareness
CLP: what is it about?

- Introducing United Nations' criteria for Classification and Labelling of chemicals.
- Replacing previous systems (orange pictograms).
- Transitional period 2010 – 2015 (*both classification systems can be used*).
CLP is not my business: are you sure?

CLP applies horizontally to all dangerous substances and mixtures. Some examples: detergents, cement, paints, glues, dishwasher tablet, fertilizers, essential oils etc.
CLP main responsibilities

- Manufacturers, importers and downstream users **shall classify substances and mixtures** before placing them on the market (obligatory classification is called harmonised classification Annex VI CLP) and **shall notify ECHA** about hazardous substances;

- Suppliers placing a substance or a mixture on the market, **shall label and package them in accordance with the CLP classification**.
CLP labelling

- pictograms, e.g.
- hazard statements, e.g.
  H320 – causes eye irritation
  H332 – harmful if inhaled
- precautionary statements, e.g.
  P210 – keep away from heat
  P262 – do not get on skin
Table of contents

- Introduction to the CLP regulation
- Changes to the CLP regulation
- 2015 deadline: advice for companies
- Raising awareness
Adaptations to Technical Progress (ATP) to the CLP Regulation

- Adaptations to Technical Progress allow for the revision of the Annexes (and certain articles)
- Main reasons:
  - Revisions of the Globally Harmonised System (GHS)
  - New harmonised classification & labelling for substances

Compilation of tables with all CLH opinions from the past year

Consultations & notifications (e.g. WTO)

Drafting of legal text of ATP

REACH committee vote

Adoption of ATP if no objection from co-legislators
Update on forthcoming ATPs

- **6th ATP**
  - Main objective: New substances (Annex VI)
    - 23 new or revised entries (including Formaldehyde and Styrene)

- **7th ATP**
  - Main objective: New substances (Annex VI 2013 RAC opinions)

- **8th ATP**
  - Main objective: Alignment with 5th revision of GHS
    - New test method for oxidising solids
    - Amended criteria for skin corrosion/irritation, severe eye damage/irritation, and aerosols
    - Revised and simplified C&L summary tables
    - Amendments in information for safety datasheets (SDS)
Table of contents

- Overview of CLP regulation
- Latest legislative developments
- **2015 deadline: advice for companies**
- Raising awareness
What are the timelines?

1) CLP entry into force  
   Jan 2009

2) Substances to be classified & labelled according CLP  
   Dec 2010

3) Mixtures to be classified & labelled according CLP criteria  
   June 2015

4) Transitional period for products already in the supply chain until  
   June 2017
Time to update your label!

June 2015 deadline to classify, label & package mixtures according to the CLP regulation is approaching fast.

Re-classification & re-labelling of large numbers of mixtures may be time-consuming for formulators, so it is important to start on time!
CLP for companies: 10 things to do

1. Check your product's label (*Does it contain pictograms, risk phrases, Hazard statements?*);

2. Check Safety Data Sheet (*SDS, MSDS Section 2 contains C&L information*);

3. Contact your supplier (*you can use its classification and labelling if you do not change the composition Art.4 CLP*);

4. Contact your association, sectorial organisation (*they can support you and guide you*);

5. Contact your National CLP helpdesk (*you can obtain information on CLP in your mother tongue*);
CLP for companies: 10 things to do

6. Consult ECHA C&L Inventory *(you will learn how a substance is classified and if it has a Harmonised classification)*;
7. Consult ECHA CLP guidances, FAQ, fact sheets, Helpdesk etc *(ECHA website contains a wealth of information on CLP)*;
8. Apply the harmonised classification for substances *(It is an obligation to follow the harmonised C&L)*;
9. Notify to Poison centres components of your mixture *(information used for emergency health response)*.
10. Notify substances to the C&L Inventory *(1 month after placing on the market)*.
C&L inventory

Search Classification and Labelling Inventory

**Search Criteria**

**Substance Name**
- Starts with...
- Contains
- Matches exactly with...

**Other Identifier**

- Search only harmonised substances

**Classification Details**

- **Physical hazards**
  - Disc. Gas
  - Expl. 1.1
  - Expl. 1.2
  - Expl. 1.3
  - Expl. 1.4

- **Health Hazards**
  - Acute Tox. 4
  - Acute Tox. 5
  - Asp. Tox. 1
  - Asp. Tox. 2

- **Environmental Hazards**
  - Aquatic Chronic 2
  - Aquatic Chronic 3
  - Aquatic Chronic 4
  - Ozone 1

You may select one or more of the above values by using the Control (CTRL) key.

In order to perform a search you need to read through and agree to this [legal disclaimer](#).
<table>
<thead>
<tr>
<th>Classification</th>
<th>Hazard Class and Category Code(s)</th>
<th>Hazard Statement Code(s)</th>
<th>Hazard Statement Code(s)</th>
<th>Hazard Statement Code(s)</th>
<th>Supplementary Hazard Statement Code(s)</th>
<th>Pictograms, Signal Word Code(s)</th>
<th>Specific Concentration limits, M-Factors</th>
<th>Notes</th>
<th>Number of Notifiers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acute Tox. 4</td>
<td>H302</td>
<td>H302</td>
<td></td>
<td></td>
<td></td>
<td>GHS06, GHS08, Dgr</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Skin Irrit. 2</td>
<td>H315</td>
<td>H315</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eye Irrit. 2</td>
<td>H319</td>
<td>H319</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute Tox. 3</td>
<td>H331</td>
<td>H331</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STOT SE 3</td>
<td>H335</td>
<td>H335</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>45</td>
</tr>
<tr>
<td>Carc. 1B</td>
<td>H350</td>
<td>H350</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute Tox. 4</td>
<td>H302</td>
<td>H302</td>
<td></td>
<td></td>
<td></td>
<td>GHS06, GHS08, Dgr</td>
<td></td>
<td></td>
<td>34</td>
</tr>
<tr>
<td>Skin Irrit. 2</td>
<td>H315</td>
<td>H315</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eye Irrit. 2</td>
<td>H319</td>
<td>H319</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute Tox. 3</td>
<td>H331</td>
<td>H331</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STOT SE 3</td>
<td>H335</td>
<td>H335</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carc. 1B</td>
<td>H350</td>
<td>H350</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute Tox. 4</td>
<td>H302</td>
<td>H302</td>
<td></td>
<td></td>
<td></td>
<td>GHS06, GHS08, Dgr</td>
<td></td>
<td></td>
<td>Note E</td>
</tr>
<tr>
<td>Skin Irrit. 2</td>
<td>H315</td>
<td>H315</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>Eye Irrit. 2</td>
<td>H319</td>
<td>H319</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute Tox. 3</td>
<td>H331</td>
<td>H331</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STOT SE 3</td>
<td>H335</td>
<td>H335</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carc. 1B</td>
<td>H350</td>
<td>H350</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table of contents

- Overview of CLP regulation
- Latest legislative developments
- 2015 deadline: advice for companies
- Raising awareness
Increasing awareness

Some new hazard pictograms are well recognised by the general public whilst others are not.

Unsurprisingly, the new CLP pictograms, with no similar 'predecessor' under the previous EU legislation, are scarcely known or understood by the general public.
Increasing awareness

Recent studies carried out by the Commission have shown that awareness raising activities are needed to enhance safe use of chemicals by EU citizens.

European Commission and ECHA will organise awareness raising activities in preparation for the 2015 deadline.

Please share your experiences & best practices!
Thank you for your attention

Questions?
E-mail: maurits-jan.prinz@ec.europa.eu
Website: http://ec.europa.eu/enterprise/sectors/chemicals/