



# The Classification and Labelling Inventory

## Cefic's viewpoint



Marie-Pierre Rabaud  
RIEF III – Brussels – 24 June 2014





# The C&L Inventory

---

- Improvement of the C&L Inventory is a need
- Industry to consider ways to improve
- Suggestions to ECHA ?



# The C&L Inventory

---

- First released by ECHA on 13 February 2012
- 6.1 million notifications, 115 000 substances (May 2014)
- In 2013, about 25 % of the substances had different classifications notified
  - “ Good reasons ” (different data sets, different physical forms, different impurity profiles, variable presence of constituents in UVCBs or multi-constituents substances etc...)
  - But also “surprises” not related to presence of impurities, different forms,...



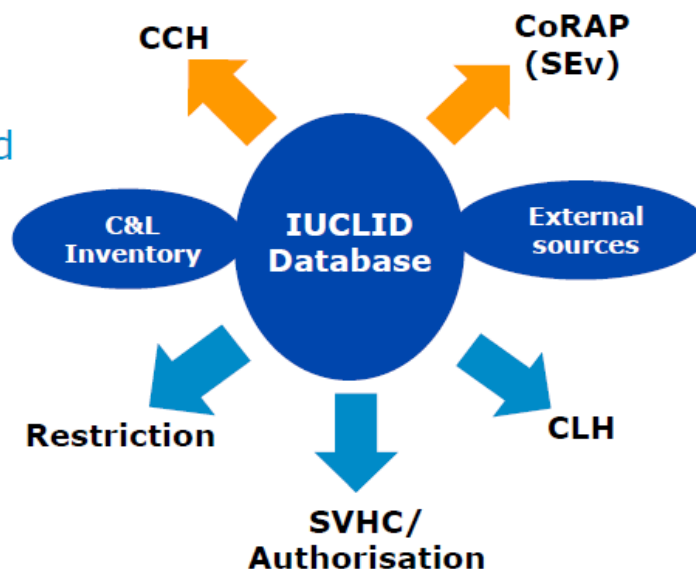
# The C&L Inventory (con't)

---

- Reminder :
  - **Industry's obligation to come to an agreement on entries (CLP Art. 41)**
- Don't forget and prepare for :
  - **CLP classification of mixtures from 1 June 2015**
  - **REACH Registrations by 1 June 2018**
- Look ahead :
  - **C&L notification data used in mass screening to identify substances of concern**

# Mass screening to identify substances of concern

- To find potential candidates for ECHA processes:
  - Compliance check
  - Substance evaluation (SEv)
  - Harmonised classification and labelling (CLH)
  - Identification of SVHCs (possibly leading to Authorisation)
  - Restriction



# Industry to consider ways to improve

---



- Use **harmonised** classification if available
  - Harmonised classification = **Annex VI of CLP** = mandatory (unless minimum with (\*)) for the concerned hazard class(es)
  - If new information (registration dossier) related to a harmonised classification → submit a proposal to a Member State (CLP Art 37.6) to modify Annex VI entry
  - CLP notifications or REACH registration dossiers are not proposals for harmonised classification !

# Industry to consider ways to improve (2)

---



- Check already submitted notifications and update, if needed
- Consider the available information (e.g SDS) in order to select the most appropriate classification – **do not pick necessarily the most severe one**
- Within a supply chain or an industry sector, **“cooperate”** to meet the CLP requirements (CLP Annex 1)

# Industry to consider ways to improve (3)

---



- Apply own classification only where there are justified reasons
  - *Remember* : the notified C&L should be based on information and data available (this needs to be documented and made available on request e.g to national enforcement authorities (CLP Art 49))
  - If M/I classify a substance differently from existing entries in the C&L Inventory, *remember* to submit the reasons for doing so together with the notification (CLP Art 16(1))
  - Downstream User to report to ECHA if he applies his own classification (REACH Art 38(4))





# Suggestions for improvement to ECHA ?

## The C&L Inventory

---

- **ECHA's disclaimer** " The information in the C&L Inventory (...) comes from the C&L notifications. This information has not been reviewed or verified by the Agency or any other authority ".
- **But some practical solutions ?**
  - In case of harmonised classification (CLP Annex VI entry), highlight a diverging classification with a note in a different colour ?
  - Display on top of C&L Inventory agreed entries from the registration dossiers and pre-agreed notifications (Art 40)
  - Emphasize that these entries are **agreed**
  - Establish a process to aid the correction of obvious errors and mistakes
    - If not possible for legal reasons or through automated rules, ECHA should be permitted to contact notifier/registrant to initiate a correction
    - Target information for importers (confusion with non-EU GHS requirements)
  - Archive unsupported entries (companies no longer existing, ...)



## Suggestions for improvement to ECHA ? The C&L Platform

---

- ECHA launched the C&L Platform in January 2013
- It is a web-based discussion forum which allows notifiers/registrants of the same substance to discuss and agree on classification
- So far, it shows little activity with 168 discussions ongoing vs 30 000 possible
- Industry is supportive of the concept
- But safeguards need to be improved with regard to Antitrust, Cyber Security, Trade Sanctions, Data Privacy and Cookies Directive
- Cefic Guidance shared with ECHA in July 2013



# Conclusion

---

- The C&L Inventory includes harmonised and self-classified substances in the EU
- The C&L Inventory needs to be more reliable to be used a real tool
- Industry and ECHA joint effort should allow improvement of the information in the C&L Inventory



**THANK YOU  
FOR YOUR ATTENTION !**