



Update on CLP

REACH 2012



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CLP Update



- ✦ Companies **should have** initiated changes under the CLP requirements on the 1st December 2012.
- ✦ The requirements, required companies manufacturing or selling hazardous substances to use labels and packages in accordance with the CLP Regulations.
- ✦ The continued classification according to the Dangerous Substances Directive as well as the requirements under CLP must continue until 1st June 2015.

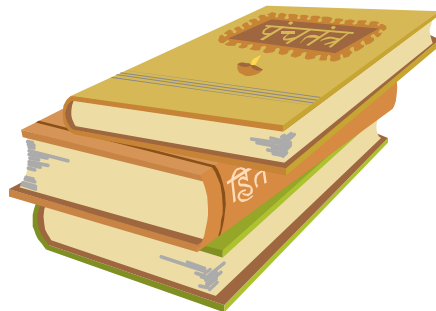


CLP Update



Further CLP requirements to take account of in the next twelve months or before:

- ✚ **Third ATP** - Regulation 618/2012, 10 July 2012 and must come into force at or before 1.12.2013
- ✚ It contains **16 new or revised entries on substances.**(5 amended and 11 new)



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The Fourth ATP is under discussion proposing modified criteria for **explosives, flammable gases, flammable aerosols, oxidizing gases, gases under pressure, unstable gases and mixtures**. Modification of some precautionary statements and consolidation classification for aerosols.

The on-going issue regarding pictograms for **corrosive to metal** will change if a solution at the UN SCE GHS is found?

Additional topics which may be included in the 4th ATP:

- ✚ **Labelling exemptions for small packaging**
- ✚ **How to deal with the differentiation on toxic to reproduction.**

CLP Update



Review of Article 45(4) CLP (Poison Centers)

This year the Commission sent their position to CARACAL where it was discussed in March. They requested:

- ✚ Examples of Product Categorization Systems.
- ✚ Examples of Unique Product Identifiers.
- ✚ Proposal how to distinguish between industrial and other mixtures.

Other issues added to the Poison Centre agenda:

- ✚ Determine the use of concentration ranges for hazardous ingredients.
- ✚ Determine a threshold for non-hazardous ingredients.

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The last meeting took place 29th November 2012

The discussion on concentration ranges/bands was initiated with a presentation of the European Association of Poisons Centers and Clinical Toxicologists, EAPCCT proposals which modifies their earlier guideline.

Industry did not agree to the proposed sliding bands.

It was agreed that a minimum threshold is required and this was set at 0.1% or lower if a specific concentration band is set.

(substances below this level should be reported where they are added intentionally)

R&D products were regarded as exempt based on the number of submissions potentially required





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Threshold for notifying non-hazardous substances in mixtures

EAPCCT proposed 1% as a threshold for notifying this was countered by industry who proposed 10%

The participants agreed that 1% of substances or included mixture should be adopted.

Industrial or other mixtures

Industry showed a large amount of data on industrial mixtures and also by comparison the small number of enquiries to PC's

Participants did agree that industrially used products should be considered different to other products

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- ✦ A small group was established to consider how to define industrially used products as opposed to other uses
- ✦ They will consider if these groups either require no notification or a notification using the safety data sheet requirements.
- ✦ Unfortunately, our original proposal for exempting all products requiring an official safety data sheet was not accepted.



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Product Categorization System

Participants from the German speaking areas presented their TDI categorization system. This was followed by a proposal from the Nordic Product Register.

Industry proposed utilizing the REACH Product Categories.

Again a small group was formed to work on developing high level groupings



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Unique Product Identifiers

- ✦ The Nancy Poison Centre (France) presented their proposal which appealed to all a very practical well thought through system
- ✦ Industry have major concern in that we would have to generate a new UPI for each change to a formulation and that this issue should be included in the industrial use exemption/requirements
- ✦ The use of UPI's will be used in conjunction with the product name.
- ✦ Again a small working group was formed to develop this issue



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The working groups must finish their proposals by the end February 2013 for discussion at a meeting of the full group in April 2013.

Thank you for your attention

