

BUSINESSEUROPE



# **Classification and labelling, responsibilities and opportunities for industry**

ECHA's Third Stakeholders' Day

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# C&L responsibilities for industry - 1

CLP entered into force on 20 January 2009 with transitional provisions. Three key dates:

1 December 2010

C&L of substances according to CLP

31 December 2010

(ECHA: de facto 3 January 2011)

Obligation to notify C&L of substances

1 June 2015

C&L of mixtures according to CLP



## **C&L responsibilities for industry - 2**

1. Review datasets, identify data gaps, provide appropriate classification proposals.
2. Ensure communication on the hazards of substances, e. g. by updating communication tools like SDS.
3. Ensure understanding of CLP, impacts on other legislation, principles of C&L for ecotox, human health, physical hazards under CLP and differences on the globe.



## C&L responsibilities for industry - 3

4. High workload due to implementation activities worldwide.
5. Due to building block approach GHS is not „harmonised“ yet.



# C&L opportunities for industry - 1

1. Moving towards global harmonisation of C&L shall facilitate communication on hazard, exchange of information, trade. CLP takes a significant step in that direction.
2. Review existing data in order to update current classifications.
3. Use new concepts and methodologies to come to most appropriate classification for some types of complex materials like ores, concentrates, alloys, etc.



## C&L opportunities for industry - 2

4. Benefits are expected in the future as the GHS is seen as a long term objective.
5. We presume that current investment will result in future advantages.



# Concerns and need for action - 1

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1. Adaptation to C&L is a further challenge for industry, apart from current registration work in SIEFs, etc., especially for SMEs.
2. Huge amount of notifications expected with C&L inventory (~ 20 Mio. in Jan. 2011)
  - *Need for tailored tools, e.g. bulk upload, per legal entity, reduced requirements for small amounts and research, joint notification, mass threshold.*



## Concerns and need for action - 2

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3. Endpoint check without resulting in a respective harmonised classification

→ *to be pointed out in C&L inventory or Annex VI via separate lists.*

4. If nota H not assigned

→ *supplier requested to self-classify for those hazard classes and differentiations, incl. any differentiations as to route of exposure not part of the harmonised entry in Annex VI to CLP*





## Concerns and need for action - 3

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5. Classification data for substances listed in Annex VI of CLP Regulation is not so “reliable” like entries in Annex I of the old DSD.
6. If no dangerous transport labels are required on the package outside, as well no CLP label should be required.
7. Criteria of the Seveso Directive to be aligned on CLP Regulation.



## Concerns and need for action - 4

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### Specific issue: Safety Data Sheet (SDS)

Six different structures will appear during transition periods of CLP depending on whether SDS is for substance or mixture:

1. *„Normal SDS“ without CLP-elements  
(substances until 2010 and mixtures until 2015)*
2. *„Normal SDS“ with simple\* CLP-elements  
(substances until 2010 and mixtures until 2015)*



## Concerns and need for action - 5

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3. *„Normal SDS“ with CLP-elements acc. to annex II draft proposal (UN-GHS format: new headers and structure)*
4. *„extended SDS“ without CLP-elements*
5. *„extended SDS“ with simple\* CLP-elements*
6. *„extended SDS“ with CLP-elements acc. to Annex II draft (UN-GHS format: new headers and structure)*



## Concerns and need for action - 6

And in addition:

Exposure scenarios with three different structures in addition: industry, professional and consumer use!

"Simple CLP elements" are those changes which are requested by the CLP (double classification, new labelling information)

**→ Reasonable transition periods needed, best until 2015. However, the issue of the last 4 digits of the registration number in the SDS needs to be solved soon.**



# Industries activities on compliance

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All industrial sectors are currently preparing for this demanding task:

- E.g. the metals and mining industry are actively preparing the issue of alloys, ores and concentrates
- Change of C&L can impact other duties under downstream legislation
- Training staff
- Strengthening of IT-Systems



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Thank you for your attention

