

Communication Challenges: CLP transition and supply chain compliance (Part 2)

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Summary of Part 1:

REACH 2013

REACH – Are you ready for 2013?

- REACH requires the Registration of all chemicals above 1 ton/year/manufacturer or importer
- Registration must be done by an EU entity:
 - Only Representatives of non-EU manufacturers
 - Roles in the supply chain
- REACH 2013:
 - The deadline for substances > 100 t
 - Preparing and submitting a registration dossier
 - “No data, no market”
- Requirements for articles



Introduction to CLP

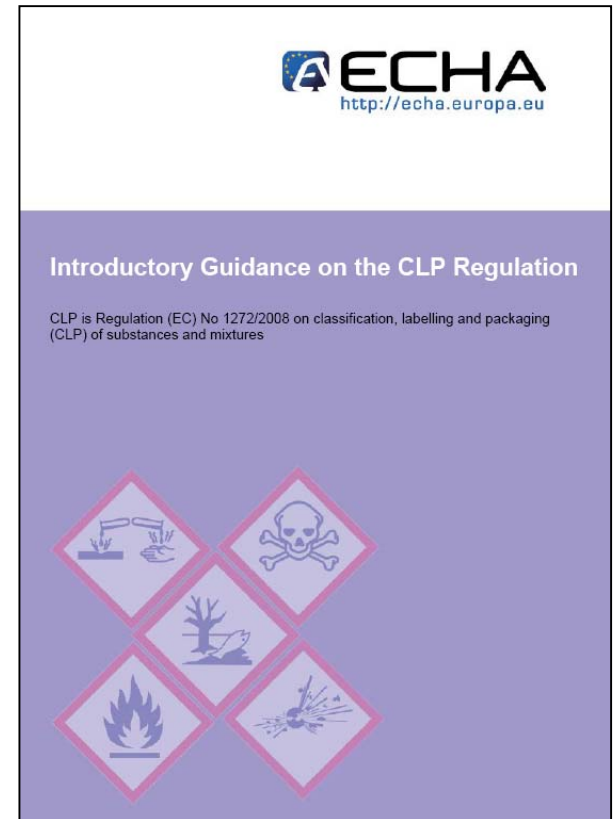
Classification, Labeling and
Packaging Regulation (1272/2008)

What is CLP?

- [Regulation](#) on the **C**lassification, **L**abeling and **P**ackaging of chemicals entered into force on 20 January 2009
- CLP is the European version of the U.N. GHS system
- CLP replaces:
 - EU Directive 67/548/EEC (Dangerous Substances Dir., DSD)
 - EU Directive 1999/45/EC (Dangerous Preparations Dir., DPD)
- **Transitional period 2010 – 2015**
 - Both classification systems to be used

Complying with CLP

- CLP is about the **hazards** of chemicals and the **communication** of these hazards
- You should **classify**, **label** and **package** substances and mixtures according to CLP before placing them on the EU market
- Define your CLP classification and update your labels: [See guidance on CLP](#)



Harmonization of classification and labeling

The classification and labelling of chemicals is changing!

Know the symbols!

Read the labels!

Avoid accidents at home and at work!

Die einstufung und kennzeichnung von chemikalien ändert sich!

Machen Sie sich mit den Symbolen vertraut!

Achten Sie auf die Kennzeichnung!

Vermeiden Sie Unfälle zu Hause und am Arbeitsplatz!

La classification et l'étiquetage des produits chimiques changent!

Sachez reconnaître les symboles!

Lisez les étiquettes!

Évitez les accidents à la maison et au travail!



Gas under pressure
Gas unter Druck
Gaz sous pression



Explosive
Explosionsgefährlich
Explosif



Oxidising
Brandfördernd
Comburant



Flammable
Entzündbar
Inflammable



Corrosive
Ätzend
Corrosif



Health hazard
Gesundheitsgefahr
Dangereux pour la santé



Acute toxicity
Akute Toxizität
Toxicité aiguë



Serious health hazard
Ernsthafte Gesundheitsgefahr
Très dangereux pour la santé



Hazardous to the environment
Umweltgefährlich
Dangereux pour l'environnement

Source: European Chemicals Agency

Notification of C&L

- Chemicals that are hazardous or subject to REACH registration must be notified to the **Classification & Labeling Inventory**
- C&L Inventory will be publicly available on the ECHA website mid-December
- C&L notification under CLP ≠ SVHC notification under REACH

Communication in the supply chain

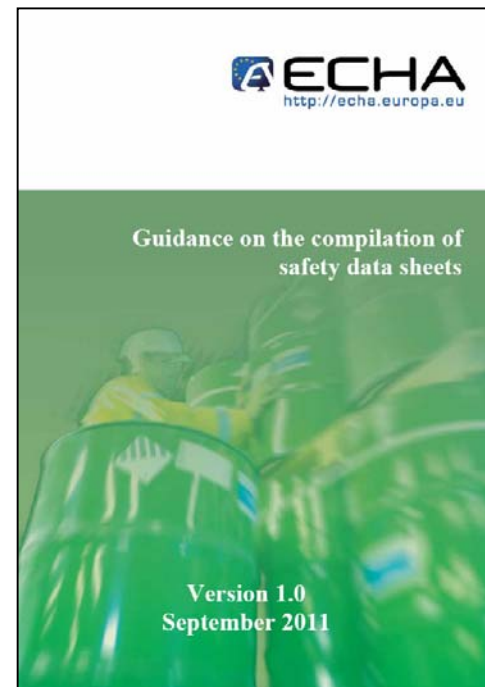
REACH and CLP are all about Communication

The main instrument for this communication is the **Safety Data Sheet** (SDSs or MSDSs):

- Communication down the supply chain:
 - SDS provide information that users need to ensure chemicals are safely managed
- Communication up the supply chain:
 - Downstream users must make their uses known to their supplier so that they are covered in SDS

Communication via Safety Data Sheets

- To be REACH compliant, a SDS must include:
 - The information detailed in REACH Annex II (amended by [Regulation n. 453/2010](#))
 - The new **CLP classification**
 - REACH registration number (if applicable)
- **New! Extended Safety data Sheets (eSDS):**
 - Include **exposure scenarios**
 - Required for hazardous substances > 10 t
- SDSs must be drafted in the national language
- Update your SDS: see [Guidance](#)



Communication about SVHCs

- Substances of very high concern
- Duty to pass SVHC information down the supply chain:
 - Suppliers of articles which contain substances on the **Candidate List** in a concentration **above 0.1%** (w/w) have to provide sufficient information to their customers to allow safe use of the article
 - This information must contain as a minimum the name of the substance
 - Immediate duty (as soon as the substance is on the Candidate List)
- More on SVHC communication (REACH article 33):
 - [Guidance on substances in articles](#)

Thank you!

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<http://export.gov/europeanunion/reachclp/index.asp>