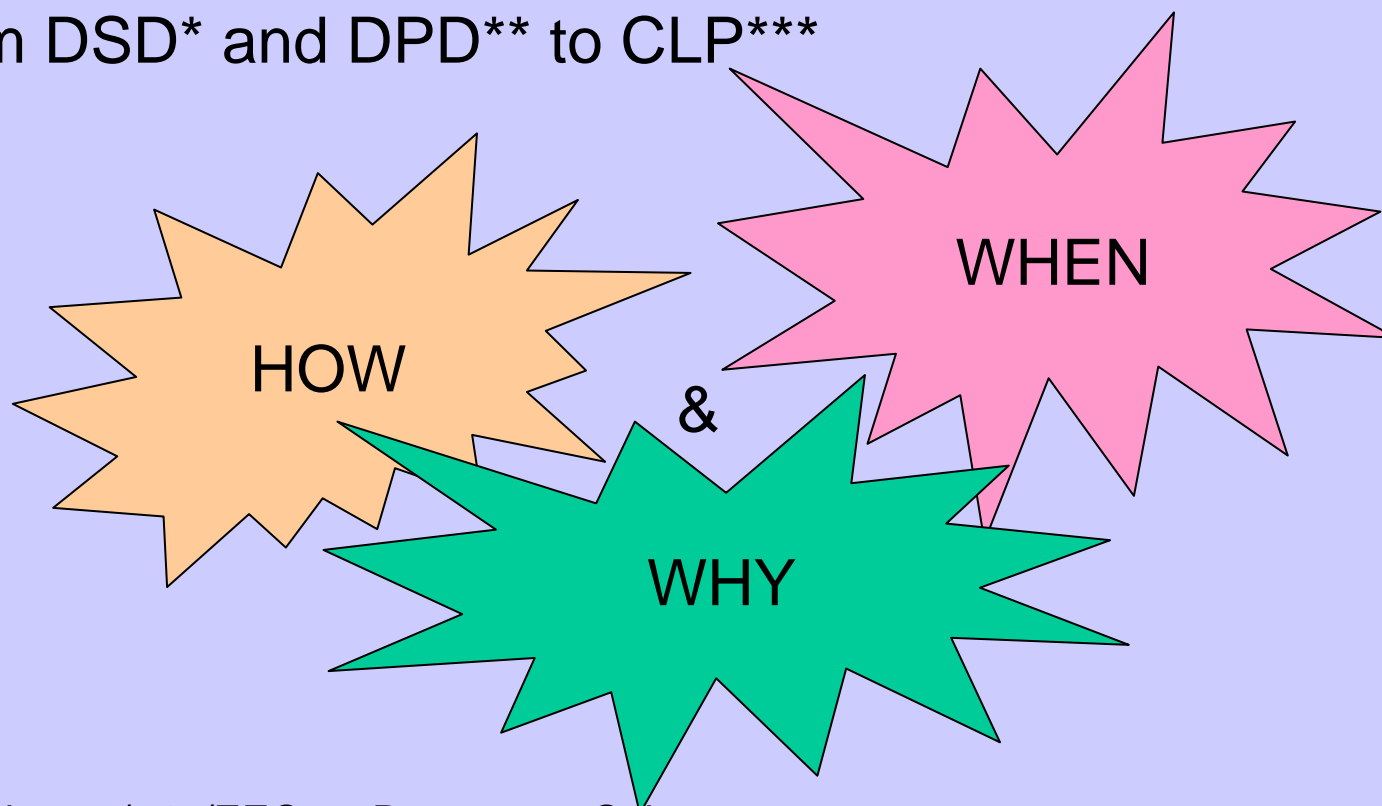


Guidance to Annex VII and other issues related to the CLP guidance document

Presented by Elisabet Berggren (DG JRC) at the Conference on EU and world-wide rules for classification, labelling and packaging of chemicals, Brussels, 17 June 2009



From DSD* and DPD** to CLP***



*Directive 67/548/EEC on Dangerous Substances

**Directive 1999/45/EC on Dangerous Preparations

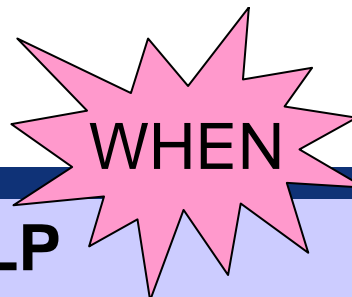
***Regulation 1272/2008 on Classification, Labelling and Packaging of substances and mixtures

From DSD and DPD to CLP

WHY

A GLOBALLY HARMONISED SYSTEM

GHS



From DSD and DPD to CLP

1 December 2010

1 June 2015

Substances and Mixtures

Classification in accordance
with DSD & DPD:
OBLIGATORY

Classification in accordance
with CLP: OPTIONAL

In case of OPTIONAL Classification:
Labelling in accordance with CLP
and
Classification on SDS in accordance
with CLP and DSD/DPD

Substances

Classification and Labelling
in accordance
with CLP: OBLIGATORY*

Classification on SDS:
Both in accordance
with CLP and DSD/DPD.

Mixtures

Classification in accordance
with DSD & DPD:
OBLIGATORY

Classification in accordance
with CLP: OPTIONAL

In case of OPTIONAL Classification:
Labelling in accordance with CLP
and
Classification on SDS in accordance
with CLP and DSD/DPD

Substances and Mixtures

Classification and Labelling
in accordance
with CLP: OBLIGATORY**

DSD and DPD repealed – no
further legal status

*Derogation for substances
already
placed on the market:
1.12.2012

**Derogation for mixtures
already
placed on the market: 1.6.2017

From DSD and DPD to CLP

HOW

ANNEX VII –
TRANSLATION TABLE

CLP, Article 61(5)

Where a substance or mixture has been classified in accordance with Directive 67/548/EEC or 1999/45/EC before 1 December 2010 or 1 June 2015 respectively, **manufacturers, importers and downstream users may amend the classification of the substance or mixture using the conversion table in Annex VII to this Regulation.**

CLP, Annex VII

This Annex includes a table to assist translation of a classification made for a substance or a mixture under Directive 67/548/EEC or Directive 1999/45/EC, respectively, into the corresponding classification under this Regulation. **Whenever data for the substance or mixture are available, an evaluation and classification shall be done in accordance with Articles 9 to 13 of this Regulation.**

From DSD and DPD to CLP

HOW

ANNEX VII –
TRANSLATION TABLE

Physical hazards - for most hazard classes no direct translation is possible but it is possible to use transport classifications (table provided in the CLP Guidance Document)

Health hazards - for most hazard classes direct translation is possible, and when not, as for Acute Toxicity, it is possible to use a recommended minimum classification

Environmental hazards - direct translation possible

From DSD and DPD to CLP

HOW

ANNEX VII –
TRANSLATION TABLE

Some substances or mixtures not classified under DSD and DPD that triggers classification under CLP:

Certain explosives

Self-reactive substances or mixtures

Flammable aerosols

Gases under pressure

Self-heating substances or mixtures

Substances or mixtures that are corrosive to metals, but not corrosive to skin

Mixtures containing substances with non-additive effects for skin corrosion/irritation and eye damage/irritation

From DSD and DPD to CLP

HOW

ANNEX VII –
TRANSLATION TABLE

Mixtures not classified under DSD and DPD that triggers classification under CLP:

Mixtures containing	10 – 20%	of substances classified with	R38 (→Skin Irrit.2)
	1-3%		R34 (→ Skin Irrit.2 & Eye Irrit.2)
	3-5%		R34 (→ Skin Irrit.2 & Eye Dam.1)
	10 – 20%		R36 (→Eye Irrit.2)
	3 - 5%		R62 or R63 (→Repr.2)
	0.3-0.5%		R60 or R61 (→Repr.1A or 1B)

From DSD and DPD to CLP **HOW**

THE CLP GUIDANCE

In addition to the criteria and guidance included in CLP a CLP Guidance Document has been developed by ex-ECB (IHCP, DG JRC) under RIP 3.6 (REACH Implementation Project 3.6)

...with support of 4 Working Groups with experts from MS Competent Authorities and Industry. **September 2007 – February 2009**

The CLP Guidance Document was approved by the RIP 3.6 Stakeholder Expert Group (SEG). **March – April 2009**



The CLP Guidance Document is subject to endorsement by CARACAL (Competent Authorities for REACH and Classification and Labelling)

June 2009 ?

The CLP Guidance Document will be handed over to ECHA for inclusion in the ECHA Guidance

From DSD and DPD to CLP

HOW

THE CLP GUIDANCE

PART 1 – General introduction

PART 2 – Physical hazards

PART 3 – Health hazards

PART 4 – Environmental hazards

PART 5 – Labelling

From DSD and DPD to CLP HOW

THE CLP GUIDANCE

PART 1 – General introduction

1.1 INTRODUCTION

1.2 THE SIGNIFICANCE OF THE TERMS 'FORM OR PHYSICAL STATE' AND 'REASONABLY EXPECTED USE' WITH RESPECT TO CLASSIFICATION ACCORDING TO CLP

1.3 SPECIFIC CASES REQUIRING FURTHER EVALUATION – LACK OF BIOAVAILABILITY

1.4 USE OF SUBSTANCE CATEGORISATION (READ ACROSS AND GROUPING) AND (Q)SARS FOR CLASSIFICATION AND LABELLING

1.5 SPECIFIC CONCENTRATION LIMITS AND M-FACTORS

1.6 MIXTURES

1.7 THE APPLICATION OF ANNEX VII

From DSD and DPD to CLP

HOW

PART 2 – Physical hazards

THE CLP GUIDANCE

2.1 INTRODUCTION

2.2 EXPLOSIVES

2.3 FLAMMABLE GASES

2.4 FLAMMABLE AEROSOLS

2.5 OXIDISING GASES

2.6 GASES UNDER PRESSURE

2.7 FLAMMABLE LIQUIDS

2.8 FLAMMABLE SOLIDS

2.9 SELF-REACTIVE SUBSTANCES

2.10 PYROPHORIC LIQUIDS AND SOLIDS

2.11 SELF-HEATING SUBSTANCES AND MIXTURES

2.12 SUBSTANCES AND MIXTURES WHICH, IN CONTACT
WITH WATER, EMIT FLAMMABLE GASES

2.13 OXIDISING LIQUIDS AND OXIDISING SOLIDS

2.14 ORGANIC PEROXIDES

2.15 CORROSIVE TO METALS

From DSD and DPD to CLP HOW

THE CLP GUIDANCE

PART 3 – Health hazard

- 3.1 ACUTE TOXICITY
 - 3.2 SKIN CORROSION/IRRITATION
 - 3.3 SERIOUS EYE DAMAGE/EYE IRRITATION
 - 3.4 RESPIRATORY OR SKIN SENSITISATION
 - 3.5 GERM CELL MUTAGENICITY
 - 3.6 CARCINOGENICITY
 - 3.7 REPRODUCTIVE TOXICITY
 - 3.8 SPECIFIC TARGET ORGAN TOXICITY –
SINGLE EXPOSURE (STOT-SE)
 - 3.9 SPECIFIC TARGET ORGAN TOXICITY –
REPEATED EXPOSURE (STOT-RE)
-

From DSD and DPD to CLP HOW

THE CLP GUIDANCE

PART 4 – Environmental hazards

4.1 HAZARDOUS TO THE AQUATIC ENVIRONMENT

ANNEX I AQUATIC TOXICITY

ANNEX II RAPID DEGRADATION

ANNEX III BIOACCUMULATION

ANNEX IV METALS AND INORGANIC METAL COMPOUNDS

From DSD and DPD to CLP HOW

THE CLP GUIDANCE

PART 5 – Labelling

5.1 EXAMPLES ON HOW TO LABEL

ANNEX V SELECTION OF PRECAUTIONARY STATEMENTS

You have listened to

Guidance to Annex VII and other issues related
to the CLP guidance document

Presented by Elisabet Berggren (DG JRC)

THANK YOU FOR THE ATTENTION!

