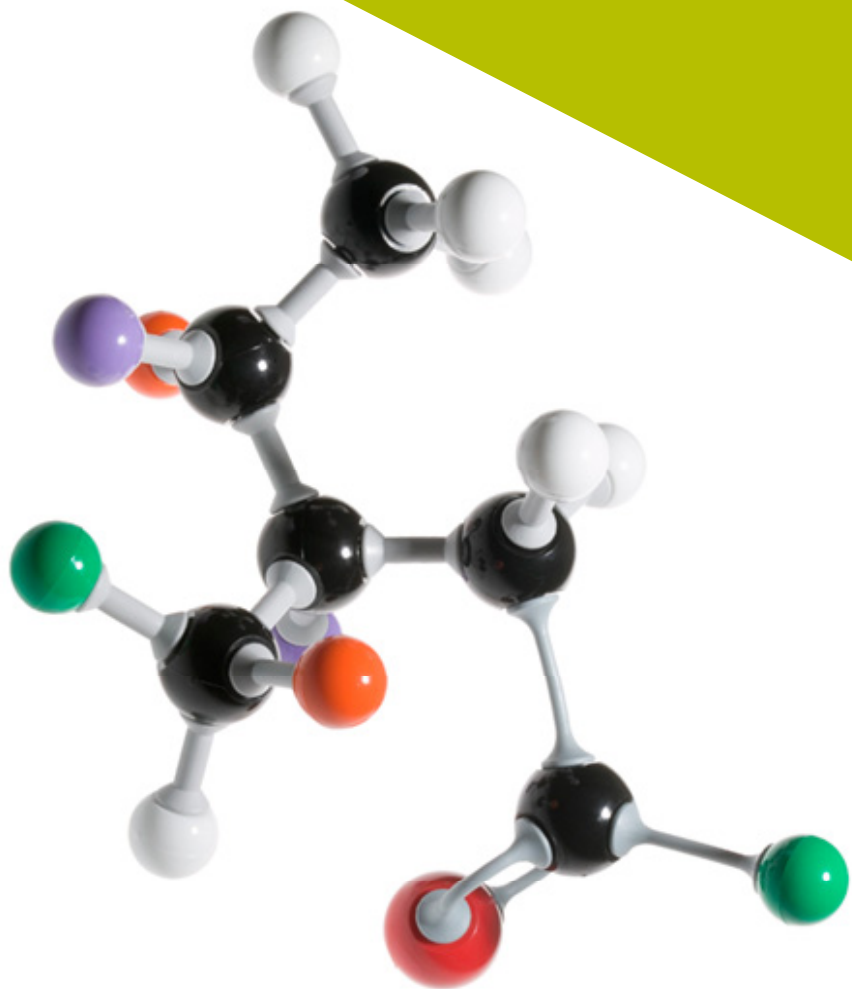


CSC

CSC REACH AWARENESS 201. ADVANCED COURSE



Month Day, 2009

Where Are We?

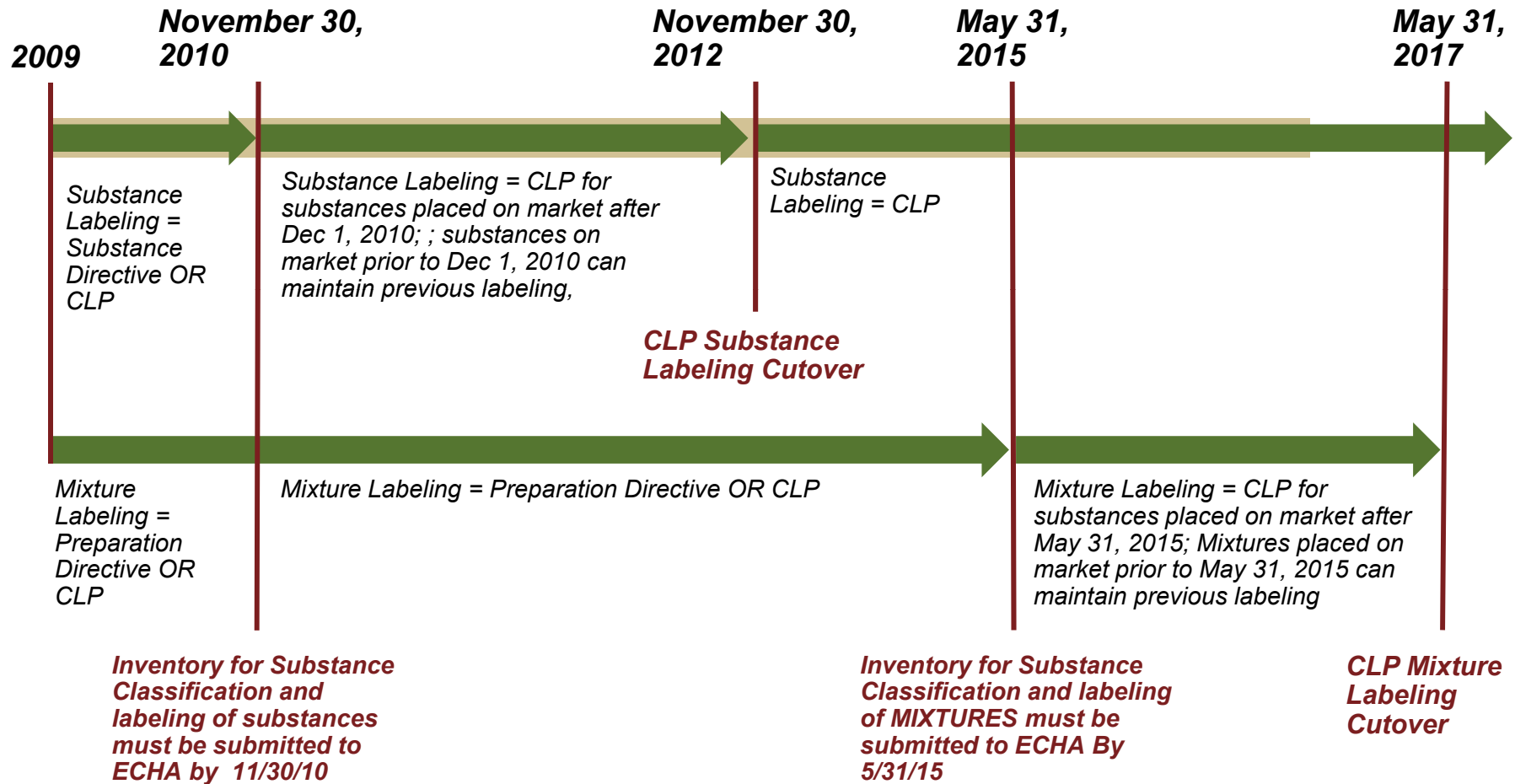
Classification and Labeling



Classification and Labeling

- Classification and Labeling is integrated with REACH but is actually governed by:
 - REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006
 - This regulation can be found through links on ECHA website
- The older Directives being replaced/amended are also known as Substance Directive and the Preparation Directives
- Is also intended to be in line with the Global Harmonization System
 - Although there is an EU specific version of the GHS
- Additional Guidance on Classification and Labeling I available through the <http://ecb.jrc.ec.europa.eu/classification-labelling/>

Classification and Labeling



Classifications

- ALL preregistered/registered substances in the inventory must be sent
 - Substance classification (according to the CLP rules) is November 30, 2010, and for mixture classification (according to the CLP rules) is May 31, 2015
- Until these dates, the Dangerous Substances Directive (67/548/EEC) and the Dangerous Preparations Directive (1999/45/EC) will still be applicable; they will only be repealed on June 1, 2015
- This is not connected to the phase in date for substance registration!

Harmonized Classification and Labels

- The new EU regulation on classification, labeling and packaging of substances and mixtures, the so called CLP Regulation (EC) No 1272/2008 entered into force on January 20, 2009
- Harmonized classification and labeling
- Suppliers of chemicals (substances and mixtures) across the European Union have a legal obligation to evaluate the hazards of chemicals and to classify and label them in an appropriate way before placing them on the market
- In addition, individual EU Member States (competent authorities) or industry may ask for the classification and labeling of a substance to be harmonized across Europe. This may happen in three situations:
 - Where the substance is either: Carcinogenic; mutagenic; toxic for reproduction; and/or a respiratory sensitizer
 - When the substance is an active substance in a biocidal or plant protection products or
 - When there is a need to harmonize the classification at the EU level, for example when the suppliers classify the same substance in a different way

C&L Overview of Obligations

- Existing substances need to notify by Nov 30, 2010. Existing Preparations notifications must be sent by May 31, 2015
- Previous substance and mixture classifications must ALSO be maintained until June 1, 2015
- CLP Labeling is optional for existing substances through Dec, 1, 2012; New substances placed on market must follow new labeling Dec, 1, 2010
- CLP is optional for existing mixtures through June 1, 2017; New mixtures must have CLP labeling by June 1, 2015
- Language of the Label has to be in the language of the country being placed on the market unless there is an exception otherwise
- Manufacturers and importers may classify a substance differently from the classification already included in the classification and labeling inventory, provided they submit the reasons for the classification to the Agency together with the notification in accordance with Article 40
- Labeling guidelines and classifications are spelled out in the actual regulations

Ongoing Classification and Labeling Obligations

- Suppliers must notify ECHA of the classifications before placing new substances on the market
- The supplier shall ensure that the label is updated, without undue delay, following any change to the classification and labeling of that substance or mixture, where the new hazard is more severe or where new supplemental labeling elements are required under Article 25, taking into account the nature of the change as regards the protection of human health and the environment. Suppliers shall cooperate in accordance with Article 4(9) to complete the changes to the labeling without undue delay
- Where labeling changes are required other than those referred to in paragraph 1, the supplier shall ensure that the label is updated within 18 months
- END USERS:
 - Change workplace instructions to meet new classifications and labeling instructions — find how much time in place
 - Change existing chemical policies to meet new classifications and labeling instructions



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