Classification and Labelling notification - tips

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Key issues

• Deadline for C&L notification on 3 January 2011

• Practical steps - How to prepare for notification

• Information and guidance in 22 languages
CLP section of ECHA web site updated

Links to manuals in 22 languages under “Further information”

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C&L Notification - When and What?

• Deadline for C&L notification
  – Within 1 month after placing on market on or after 1/12 2010
  – First deadline: 3 January 2011

• Exemptions
  – No notification is required if the same information has already been submitted in a registration dossier

• Which substances? (CLP, Art. 39)
  – Substances subject to registration under REACH
  – Other substances meeting classification criteria on their own or in a mixture above concentration limit → No tonnage trigger!

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C&L notification – Who?

- “Any manufacturer or importer, or group of manufacturers or importers … who places on the market a substance … shall notify to the Agency …” (CLP, Art. 40(1))

- Group of Manufacturers / Importers
  - Group of M/I not further specified in CLP

- Only representatives (OR) have no role under CLP
  - Not entitled to notify C&L
  - If OR registers the substance, no need for notification by importers (in case CLP C&L is included)
  - If OR is an importer, he can notify on behalf of “Group of Manufacturers / Importers”

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C&L notification by SIEF members

• SIEF members registering after the Dec 2010 deadline have to submit C&L notifications

• “I agree” button in the on-line tool to agree with the C&L submitted by the lead registrant
  – The C&L fields are automatically filled in
  – C&L for the same substance may differ e.g. due to different impurity profile or form of the substance

• SIEF members may notify as a group of M/I the agreed C&L of a substance
  – C&L notification becomes obsolete for all group members once the “group leader” registers his substance

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Practical steps for the notification

• **Practical guide 7**: How to notify substances in the Classification & Labelling Inventory
  - Available on the CLP section of ECHA web site in 22 languages

• **Basic information on C&L notification, e.g.**
  - Helps to identify industry obligations
  - Provides general information on C&L notification
  - Advises how to prepare for C&L notification
  - Describes basic features of the different notification tools (incl. limitations)
  - **CLP concentration limits for notification of substances in mixtures**
  - Includes useful links to related guidance and other documents

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What information is needed?

• Name and contact details of the notifier
• Substance ID (sections 2.1 to 2.3.4 of Annex VI of REACH)
• Classification of the substance according to CLP
• “Reason for no classification”
• Label elements (hazard pictograms, signal words, hazard statements and supplemental hazard statements)
How to prepare for notification

1. List the substances and mixtures you manufacture or import
2. Clarify if any are exempted from CLP (cf. Art 1)
3. Check if any are subject to REACH registration
4. Collect all information on your substances’ identity and composition
5. Name your substances in line with the guidance on SID
6. Check if your substances are listed in Annex VI to CLP
7. Gather all available and reliable information on the hazardous properties of your substance if the C&L is not harmonised

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How to prepare for notification

8. Classify your substances by comparing the available information with the classification criteria

9. Prepare a scientific justification if you specify a M-factor or set a specific concentration limit (SCL)

10. Decide if you want to establish or join a group of manufacturers and/or importers

11. Create your C&L notification in the appropriate format

12. Create your REACH-IT account (if not done already) and submit your notification

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Notification tools

- Different tools for preparing C&L notifications
  - IUCLID 5
  - XML creation and Bulk Submission (for companies with many notifications)
  - Online creation and submission via REACH-IT (for companies with few notifications, e.g. SMEs)

- Submission always via REACH-IT
  - REACH-IT account is needed

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Where to find information and guidance?

• Web sites of your National helpdesk and Competent Authority

  – Introductory Guidance on the CLP Regulation
  – Guidance on the Application of the CLP Criteria
  – Practical Guide 7 on C&L notification
  – FAQ
  – Guidance on the Identification and Naming of Substances under REACH
  – Industry User Manuals (IUM) for C&L notification
  – ECHA Lead Registrant webinar presentations on C&L
Thank you for your attention!

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