



Nordic CLP project

Forum 16 , Agenda item 10.2



Gro Hagen, Norway

Content of the presentation

- Objectives
- Background
- Work method
- Results



Objectives

Main focus for the project:

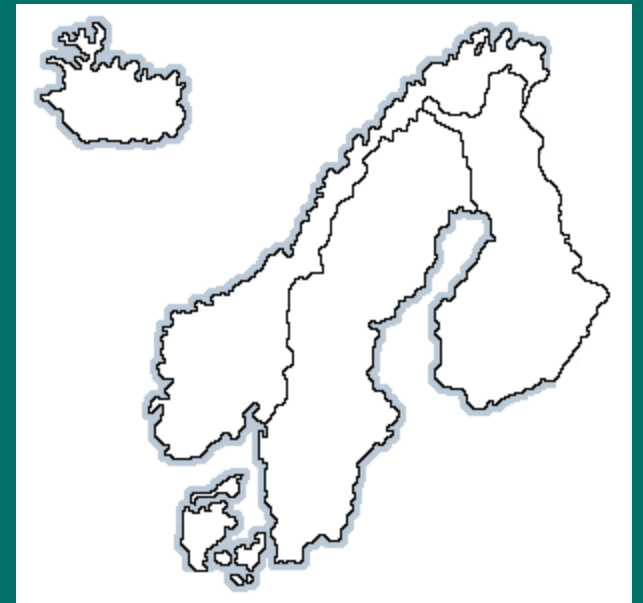
- Checking compliance of substances according to the CLP regulation (classification and labeling)

Other topics examined:

- Checking compliance of mixtures according to the CLP regulation (classification and labeling)
- Notification obligation (CLP art 40)
- Safety data sheet - section 2, 3 and 12



Background



Project Funding

- Project Funding from the Nordic Chemicals Group (NKG), a working group organized under the Nordic Council of Ministers for the Environment.
- NKG funds Nordic enforcement projects based on annual priorities.



Participants in the project

- Nordic Enforcement Group (a subgroup under NKG) has planned and performed the project
- Enforcement authorities for chemicals in Denmark, Finland, Sweden and Norway



- Project group: 2 inspectors from each country
- Project leader: Norway

Work method

Project schedule

- **Timeline:** May 2012-June 2013
- **Preparatory phase:** May 2012 - November 2012
1 day meeting in Helsinki, project plan, check list and pilot inspections (Sweden)
- **Operational phase:** December 2012-February 2013
Inspections (SE, DK, NO) and desk top study (FIN)
- **Reporting Phase:** Mars 2013 - June 2013
Workshop in Oslo (1 ½ day) - the project group discussed the results and wrote chapters for the report
Final report - June 2013
Report published - 9 October 2013

Inspection topics

- Notification to the C & L inventory (CLP art 40)
- Control of classification and labeling according to CLP, both on the label and in the SDS
- Compliance between information provided in SDS, on the label and in C & L inventory

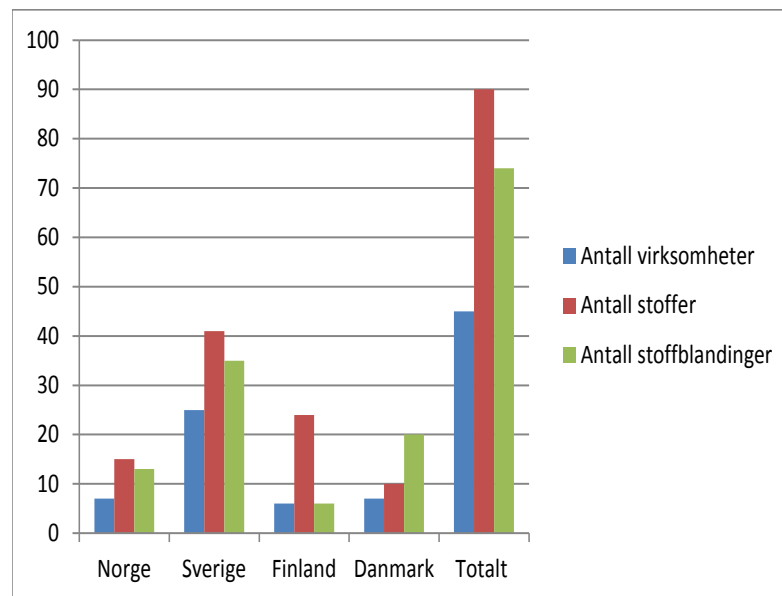
Results

Inspections

Totally 45 inspected companies in 4 countries (No, S, Fin, DK).

Totally 164 chemicals inspected

- 90 substances
- 74 preparations



Classification

- Only 1 of 90 controlled substances lacked CLP classification
- All the controlled substances with harmonized classification, had correct harmonized classification according to CLP Annex VI (substance list)
- 27 of 30 companies already classifies preparations according to CLP
- 10 of 74 controlled preparations were classified wrong

Labeling

- Totally 138 labels inspected
- 28 % of the labels had one or more mistakes
- Most mistakes related to:
 - Hazard pictogram
 - Hazard statements
 - Precautionary statements

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Spezifikační list	1 l = 1.09 kg
Identifikace	
Název	
Chemická složení	
Formaldehyd	37.3 - 39.3 %
Metanol	0 - 10 %
Formaldehyd	jevoeno hod
Metanol	jevoeno hod
Formaldehyd	0 - 0.001 %
Metanol	1.000 - 1.000 g/kg
Formaldehyd	0 - 0.001 %
Metanol	0 - 0.001 %
Formaldehyd	0 - 0.001 %
Metanol	0 - 0.001 %
Formaldehyd	0 - 0.001 %
Metanol	0 - 0.001 %
Formaldehyd	0 - 0.001 %
Metanol	0 - 0.001 %

pro analysi ACS, Reag. Ph Eur
Formaldehyde solution min. 37%
 GR for analysis stabilized with about 10% methanol
Formaldehydlösung min. 37%
 Aldéhyde formique en solution
Formaldehido en solución min. 37%
 Formaldehyde oplossing min. 37%

Fa. Mustrer KG, Mustrerhof, Germany
 Tel.: +49(0)5234 56 7890
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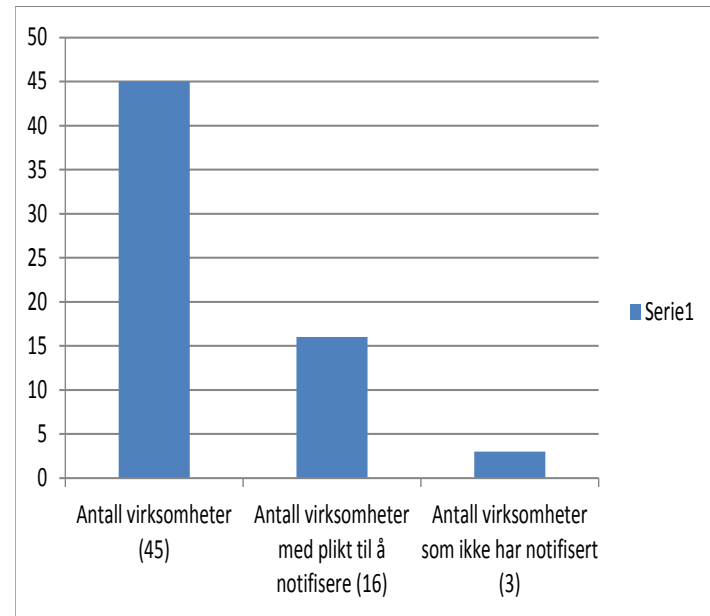
UN 2209

Danger. Toxic if swallowed. Toxic in contact with skin. Toxic if inhaled. Causes severe skin burns and eye damage. Damages or irritates clothes. Causes allergic reactions. May cause an allergic skin reaction. If swallowed it may be fatal. Irritates and is a POISON/TOXIC or decompression. H 302, H 314, H 332, H 334, H 335, H 373, H 410, H 411, H 501, H 502, H 503, H 504, H 505, H 506, H 507, H 508, H 509, H 510, H 511, H 512, H 513, H 514, H 515, H 516, H 517, H 518, H 519, H 520, H 521, H 522, H 523, H 524, H 525, H 526, H 527, H 528, H 529, H 530, H 531, H 532, H 533, H 534, H 535, H 536, H 537, H 538, H 539, H 540, H 541, H 542, H 543, H 544, H 545, H 546, H 547, H 548, H 549, H 550, H 551, H 552, H 553, H 554, H 555, H 556, H 557, H 558, H 559, H 560, H 561, H 562, H 563, H 564, H 565, H 566, H 567, H 568, H 569, H 570, H 571, H 572, H 573, H 574, H 575, H 576, H 577, H 578, H 579, H 580, H 581, H 582, H 583, H 584, H 585, H 586, H 587, H 588, H 589, H 590, H 591, H 592, H 593, H 594, H 595, H 596, H 597, H 598, H 599, H 600, H 601, H 602, H 603, H 604, H 605, H 606, H 607, H 608, H 609, H 610, H 611, H 612, H 613, H 614, H 615, H 616, H 617, H 618, H 619, H 620, H 621, H 622, H 623, H 624, H 625, H 626, H 627, H 628, H 629, H 630, H 631, H 632, H 633, H 634, H 635, H 636, H 637, H 638, H 639, H 640, H 641, H 642, H 643, H 644, H 645, H 646, H 647, H 648, H 649, H 650, H 651, H 652, H 653, H 654, H 655, H 656, H 657, H 658, H 659, H 660, H 661, H 662, H 663, H 664, H 665, H 666, H 667, H 668, H 669, H 670, H 671, H 672, H 673, H 674, H 675, H 676, H 677, H 678, H 679, H 680, H 681, H 682, H 683, H 684, H 685, H 686, H 687, H 688, H 689, H 690, H 691, H 692, H 693, H 694, H 695, H 696, H 697, H 698, H 699, H 700, H 701, H 702, H 703, H 704, H 705, H 706, H 707, H 708, H 709, H 710, H 711, H 712, H 713, H 714, H 715, H 716, H 717, H 718, H 719, H 720, H 721, H 722, H 723, H 724, H 725, H 726, H 727, H 728, H 729, H 730, H 731, H 732, H 733, H 734, H 735, H 736, H 737, H 738, H 739, H 740, H 741, H 742, H 743, H 744, H 745, H 746, H 747, H 748, H 749, H 750, H 751, H 752, H 753, H 754, H 755, H 756, H 757, H 758, H 759, H 760, H 761, H 762, H 763, H 764, H 765, H 766, H 767, H 768, H 769, H 770, H 771, H 772, H 773, H 774, H 775, H 776, H 777, H 778, H 779, H 780, H 781, H 782, H 783, H 784, H 785, H 786, H 787, H 788, H 789, H 790, H 791, H 792, H 793, H 794, H 795, H 796, H 797, H 798, H 799, H 800, H 801, H 802, H 803, H 804, H 805, H 806, H 807, H 808, H 809, H 810, H 811, H 812, H 813, H 814, H 815, H 816, H 817, H 818, H 819, H 820, H 821, H 822, H 823, H 824, H 825, H 826, H 827, H 828, H 829, H 830, H 831, H 832, H 833, H 834, H 835, H 836, H 837, H 838, H 839, H 840, H 841, H 842, H 843, H 844, H 845, H 846, H 847, H 848, H 849, H 850, H 851, H 852, H 853, H 854, H 855, H 856, H 857, H 858, H 859, H 860, H 861, H 862, H 863, H 864, H 865, H 866, H 867, H 868, H 869, H 870, H 871, H 872, H 873, H 874, H 875, H 876, H 877, H 878, H 879, H 880, H 881, H 882, H 883, H 884, H 885, H 886, H 887, H 888, H 889, H 890, H 891, H 892, H 893, H 894, H 895, H 896, H 897, H 898, H 899, H 900, H 901, H 902, H 903, H 904, H 905, H 906, H 907, H 908, H 909, H 910, H 911, H 912, H 913, H 914, H 915, H 916, H 917, H 918, H 919, H 920, H 921, H 922, H 923, H 924, H 925, H 926, H 927, H 928, H 929, H 930, H 931, H 932, H 933, H 934, H 935, H 936, H 937, H 938, H 939, H 940, H 941, H 942, H 943, H 944, H 945, H 946, H 947, H 948, H 949, H 950, H 951, H 952, H 953, H 954, H 955, H 956, H 957, H 958, H 959, H 960, H 961, H 962, H 963, H 964, H 965, H 966, H 967, H 968, H 969, H 970, H 971, H 972, H 973, H 974, H 975, H 976, H 977, H 978, H 979, H 980, H 981, H 982, H 983, H 984, H 985, H 986, H 987, H 988, H 989, H 990, H 991, H 992, H 993, H 994, H 995, H 996, H 997, H 998, H 999, H 1000.

Notification

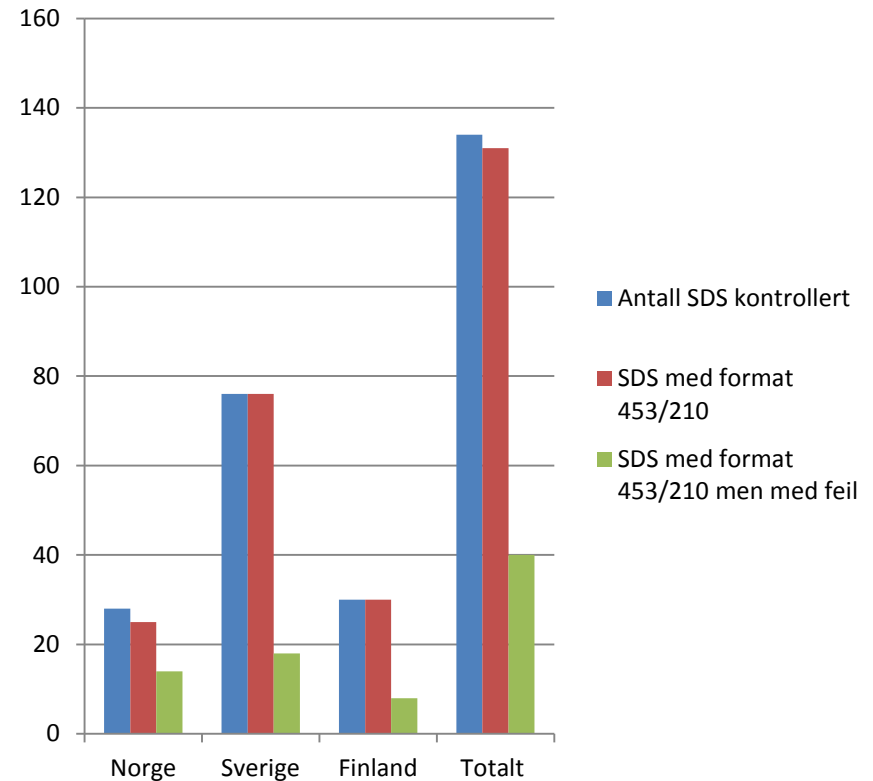
Obligation to notify substances according to CLP art 40

- 16 of 45 companies had obligations to notify
- 3 of 16 companies had not fulfilled their obligations to notify



Safety Data Sheet (SDS)

- 3 of 134 inspected SDS (substances and mixtures) were not according to 453/2010
- 40 of 131 SDS had mistakes in the inspected sections (2,3 og 12)



Summary

- The results from the project identified no serious discrepancies
- It appears that companies have succeeded so far with the transition to CLP for substances
- Classification and labeling of preparations appear to be more challenging

Lessons learnt from the project

- + Limited scope
- + Common project place on web for all the documents
 - + Always latest version of the documents available
 - + No need to send documents via e-mail
- + Pilot inspections to verify whether the checklist is working
- + Common reporting tool (excel sheet) =>
 - + Each country filled in their own results
- + Project was completed on schedule (12 months)

<http://www.norden.org/en>

<http://www.norden.org/no/publikationer/publikasjoner/2013-565/>

Thank you for your attention!