

# Overview of REACH and CLP obligations for suppliers of mixtures

Mixture classification and communicating safe use of mixtures. Advice for formulators and importers

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# Main roles of a company in REACH & CLP



- Manufacturer: manufactures a **substance**



- Importer: **imports** hazardous chemicals from outside the EU



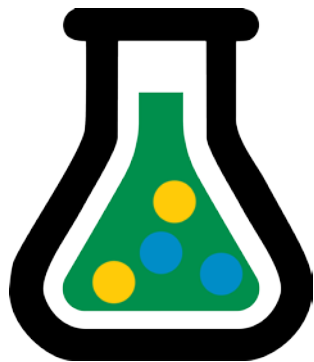
- Downstream user: **uses** chemicals, such as formulating or transferring mixtures



- Distributor: stores/distributes chemicals

***A company may have multiple roles***

# Suppliers of mixtures



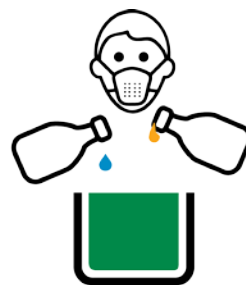
Suppliers of **mixtures** play a key role in enhancing the safe use of hazardous mixtures



Importers



Distributors



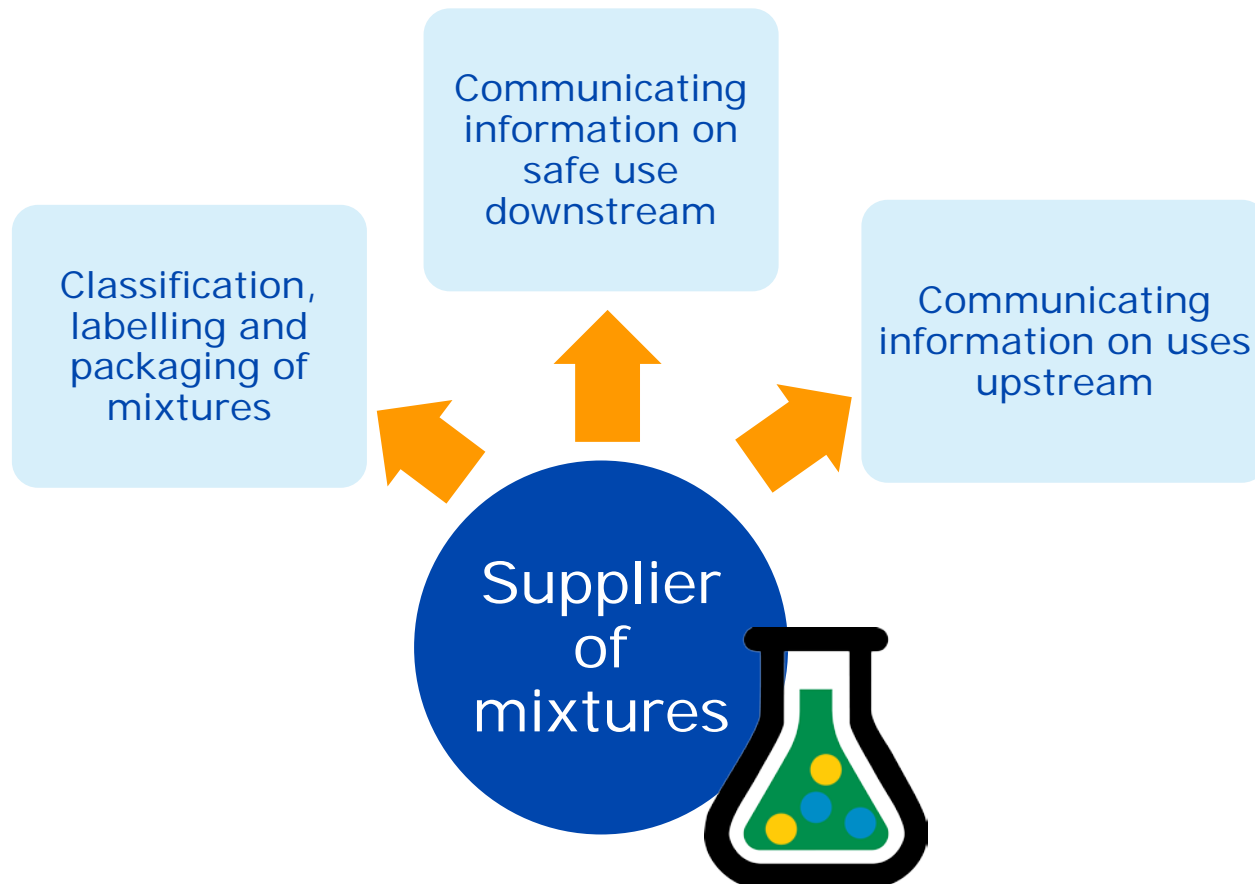
Formulators



Re-fillers

**Downstream users** placing a substance or mixture on the market

# Main roles of suppliers of mixtures





## CLP – key obligations for suppliers of mixtures



- You must classify, label and package mixtures in accordance with CLP before placing them on the market
- If you are formulating or **changing the composition of a mixture**, you must derive the classification of the mixture
- If you **do NOT change the composition** of a mixture, you may take over the classification for the mixture already derived by another actor in the supply chain
- **If you import a hazardous mixture**, you must classify the ingredient substances according to CLP and notify the C&L Inventory (if they lead to or contribute to the classification of the mixture).

# Timelines for change from DPD to CLP



CLP implements the Globally Harmonised System of classification and labelling of chemicals (GHS, UN 2007) in the EU

DPD: Dangerous Preparations Directive

# REACH – key obligations on information in the supply chain

REACH describes:

- **when, what** and **how** to communicate information **downstream** in the supply chain and on the hazards and risk reduction measures
- obligations related to **safety data sheets (SDS)**, **exposure scenarios (ES)**, and other forms of communications when SDS/ES are not required.
- **when and what** to communicate **upstream**

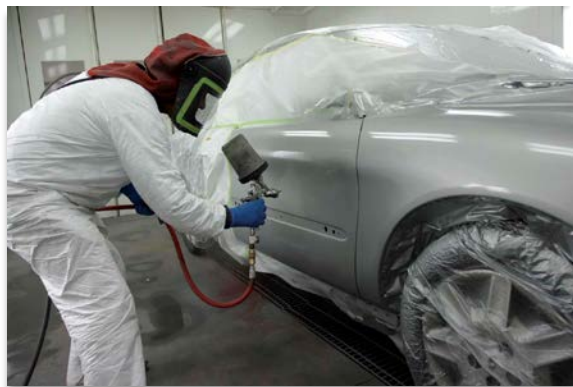
*REACH sections of particular relevance to suppliers are Title IV and Annex II. This replaces SDS Directive 91/155/EEC*

# REACH – key obligations for downstream users



On receipt of information on substances and mixtures, downstream users are obliged to:

- **identify** appropriate risk reduction measures
- **apply** them to their own use
- **recommend** relevant risk reduction measures to their customers





# Distributors



**Distributors** (including retailers) store and place chemicals on the market for third parties. REACH & CLP obligations are limited to forwarding information in the supply chain.



If they also **import** hazardous chemicals from outside the EU: **importer obligations** related to classification and notification to ECHA.



Formulators



Re-fillers

If they also **use** chemicals: **downstream user obligations** under REACH

If they change the composition: **classify** under CLP

# Thank you

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