

REACH 2018

Classifying your substance: dos and don'ts

12th Stakeholders' day

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Why classify and label?

- Worker and consumer health and safety
- Environmental protection
- Ensure correct **storage/handling/transport**
- **Prevent consumer access** to most dangerous substances and mixtures
- Prevent **accidents** and response
- Instructions for handling and discarding **waste**

Classification and labelling vital for REACH



Classification leads to...

- Effective communication of identified hazards in safety data sheets (SDS) and on labels
 - Hazard pictograms
 - Signal word
 - Warning (Wng), Danger (Dgr)
 - Hazard statement, e.g.
 - H200 – Unstable explosives
 - H301 – Toxic if swallowed
 - Precautionary statements, e.g.
 - P201 – Keep out of reach of children
 - P372 – Explosion risk in case of fire



Classification leads to...

- Solid basis for REACH registration dossier and chemical safety report
- Downstream consequences on uses of substances:
 - CMRs: prohibited in toys, cosmetics, materials in contact with food, medical devices...
 - CMRs exposure reduction at work, in particular for young people
 - Active substances in plant protection or biocidal products



New hazard pictograms

Physical hazards



Explosive



Flammable



Oxidising



Gases



Corrosive

Health hazards



Acute Tox.
Categories
1-3



Serious
Health
hazard



Health
hazard



Corrosive

Environmental hazards



Hazardous to
the environment



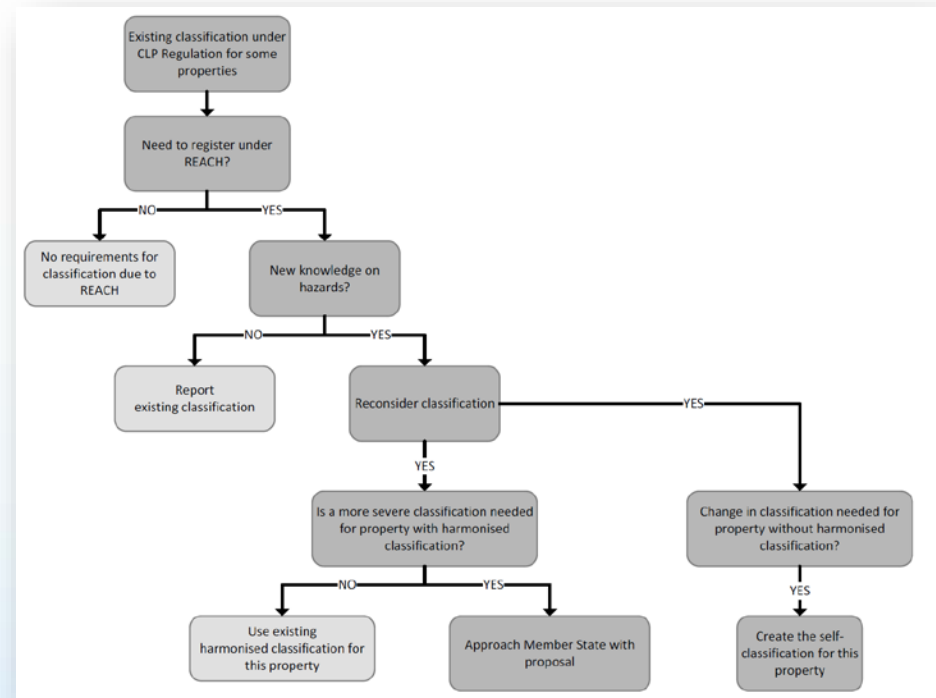
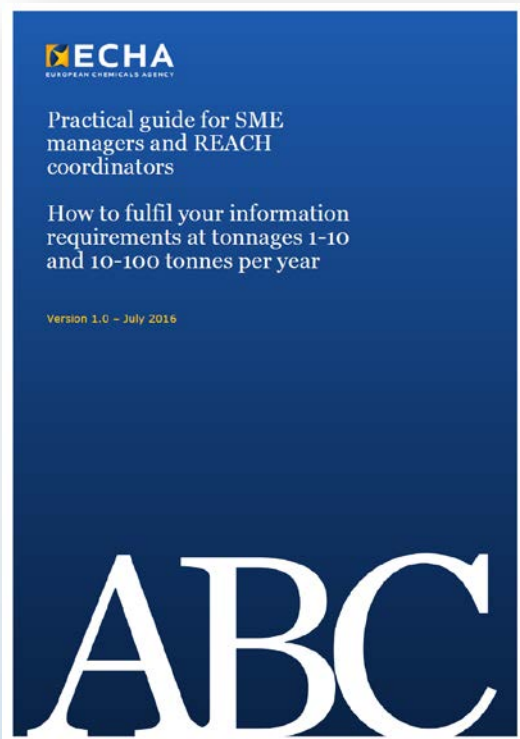
Hazardous to
the ozone layer

Dos: classification

- Apply existing harmonised classification and labelling (CLH) in Annex VI of CLP
- Verify existing harmonised classification and labelling (CLH):
 - [EURLEX](#)
 - [Our search for chemicals](#)
 - [C&L inventory](#)
 - [REACH registration database](#)

Dos: classification

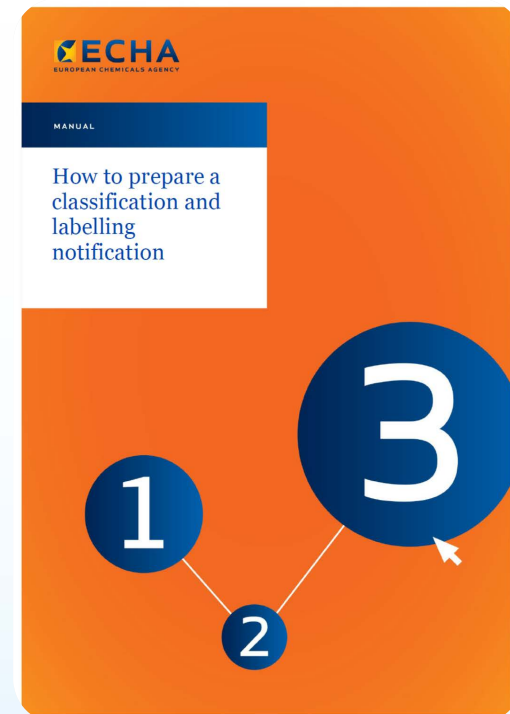
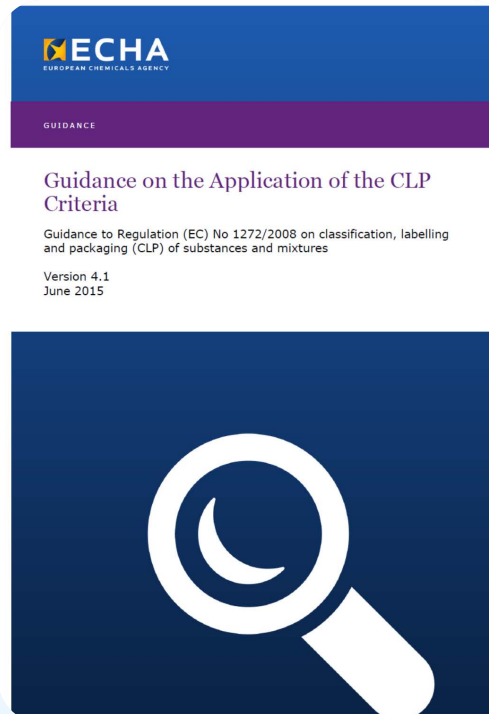
- Use decision scheme for revising existing (self)-classification



Dos: self-classification

Self-classify if no harmonised classification exists

- Identically to other REACH registrants and/or notifiers of same substance
- Differently from registrants and/or notifiers only if justifiable, e.g. own data, constituents, impurities



Dos: self-classification

- Collect and assess available data for:
 - Physico-chemical hazard properties
 - Human health hazard properties
 - Environmental hazard properties
- Compare data with classification and labelling [criteria](#)

Dos: self-classification

- Conclude on most appropriate classification and labelling. Record:
 - Data lacking
 - Data inconclusive
 - Data conclusive but not sufficient for classification
- Fill in IUCLID using [manual](#) for preparing classification and labelling notifications
- Submit your classification and labelling as part of your REACH registration or update your notification

Don't...

- Use the Dangerous Substance Directive (DSD) system for classifying substances
- (Over)classify if your substance does not present hazardous properties



Don't...

- Forget to specify categories related to specific hazard classes, e.g:
Skin Sens. 1A or 1B or 1
- Classify less severely in case of minimum classification in Annex VI of CLP

International Chemical Identification	EC No	CAS No	Classification		Labelling		
			Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)
carbon monoxide	211-128-3	630-08-0	Flam. Gas 1 Press. Gas Repr. 1A Acute Tox. 3 * STOT 1 1	H220 H360D *** H331 H372 **	GHS02 GHS04 GHS06 GHS08 Dgr	H220 H360D *** H331 H372 **	



Classify at least as Acute Tox. 3

Dos: after notification or registration

- Ensure registration and classification and labelling inventory notifications are up-to-date
- Submit a harmonised classification and labelling proposal to ECHA's Risk Assessment Committee via a Member State or ECHA:
 - Industrial chemicals only and under certain conditions (fees may apply)
 - Possibility to classify, to update or to remove your substance from Annex VI of CLP
 - Non-confidential data only, based on REACH dossier and possibly data submitted during Public Consultation
 - Opinion by Risk Assessment Committee, decision by Commission

Dos: classifying your mixture

- Classify all mixtures on the market according to legal deadline:
1 June 2017
- Classify all mixtures according to **tiered** approach for hazard classes where appropriate

Dos: classifying your mixture

Tiered approach

Classification based on concentration of ingredients

- With formulas (acute toxicity, environmental hazards)
- With concentration limits as published in CLP

Bridging principles

- Annex I, part 1
- Sufficient data available for similar tested mixtures and individual hazardous ingredients

Dos: classifying your mixture

Tiered approach

Testing: conditional as per CLP and as the latest alternative

- Test data as primary source, when available
- Existing information on whole mixture, tested with adequate, reliable and scientifically valid method
- Classify according to same criteria as for substances



Don't...

- Use the Dangerous Preparation Directive (DPD) classification system



Conclusions

- Communicate and assess consequences of classification and labelling for your workplace control scheme and for supply chain
- Anticipate possible regulatory actions by ECHA or Member States (restriction, authorisation) and consequences under other EU or national legislation
 - Check regularly if your substance is under scrutiny on our website (CoRAP, PACT, Registry of intentions for CLH, SVHC or restriction)
- Investigate possible substitution

Conclusions

- Health and safety concerns can be avoided
- Likelihood of unjustified regulatory attention reduced
- Helps you to be proactive: consider possible long-term consequences and innovation

Take-home messages

- Compulsory to classify and label substances
- Better supply chain communication
 - Better understanding of customer needs and demands
- Increased predictability of regulatory action
 - Helps focus on marketing and safer use
- Better domestic and international reputation
- Better public perception



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