

CLP – CLASSIFICATION, LABELLING AND PACKAGING REGULATION 1272/2008/EC



Objectives

- Bit of History.
- Where are we now?
- What does it mean to us?
- What will we see?
- What should we start to do now?



Lets see why we need to label chemicals!



- [napo-sgh-00-start-eng.avi](#)

A bit of History



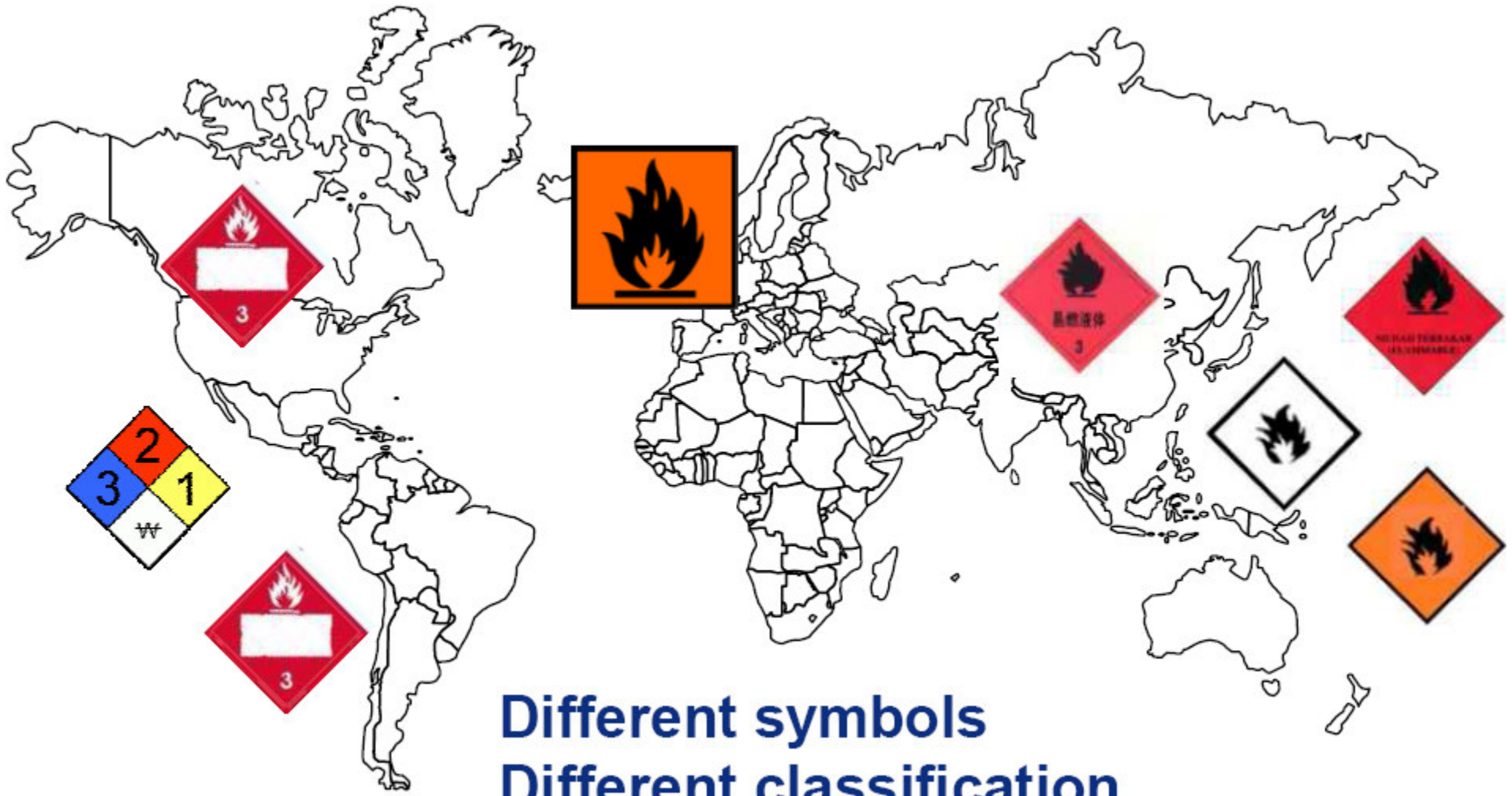
- For the last 40 years chemicals in the EU governed by:
 - DSD – **D**angerous **S**ubstances **D**irective (67/548/EEC)
 - DPD – **D**angerous **P**reparations **D**irective (1999/45/EC)
- Some chemicals/substances have hazardous properties so DSD / DPD requires an assessment to protect health and the environment.
- Must classify, label, package and inform users of the hazards.
- Did this through:
 - Labelling
 - SDS (**S**afety **D**ata **S**heet)
 - Packaging

So what was wrong?



- Nothing wrong with EU system.
- Globally we are all working from a different book.
- Classifications of a substance were different across the world.
- Needed a pathway to a harmonised system.
- In 1992 UN Conference identified the world-wide harmonisation of classification and labelling of chemicals as one of 6 action programs in Chapter 19 of the UNCED Agenda 21.
- GHS was born:
 - Globally Harmonised System of Classification and Labelling of Chemicals
- CLP is the EU implementation of GHS.
- European Chemicals Agency (ECHA) will govern CLP
- http://echa.europa.eu/clp_en.asp

Where we were - symbols



Different symbols
Different classification

Where we were - classifications

- For the same toxicity with a lethal dose in rats of 257mg/kg
- These are the different classifications:
 - Australia **harmful**
 - Canada **toxic**
 - China **not hazardous**
 - EU **harmful**
 - India non toxic
 - Japan **toxic**
 - Malaysia **harmful**
 - New Zealand **hazardous**
 - USA **toxic**
- Need a world standard and consistency of labels and classifications for substances.



CLP

Classification, Labelling and Packaging Regulation 1272/2008/EC



- EU regulation fully implemented into member states.
- EU first to implement GHS.
- Introduces new system of classification of substances.
- Requires manufacturers / importers to:
 - Re-**classification** of substances
 - Re-**labelling** of substances / products
 - Re-**packaging** of substances / products
 - Update of **safety data sheets** (SDS)
- Sits alongside REACH .

What will change – Labels



- New GHS pictograms will appear on packaging to illustrate hazards.
- Mandatory in the EU from December 2010, any stock on the shelf will have until 2012, then the labelling should sit alongside old EU “orange” labels until December 2015.
- From December 2012 all chemicals in stock should carry the white pictograms.
- From June 2015 all substances should show the new pictograms, any new substances already in the supply chain will have another two years.
- The new GHS pictograms do not always translate directly from the old EU orange labels.

What will change – Classification

- This will appear on containers/packaging and Safety Data Sheets (SDS).
- If there is a change, we will receive an updated SDS.
- Possible that a change in classification, as well as new terminology, may “grade” the chemical as being more harmful than it was before.
- Handle this as you would any other changed SDS
 - Conduct a review of the COSHH assessment
 - COSHH Assessors – ensure the SDS is the most up to date version
- May need to review storage arrangements.

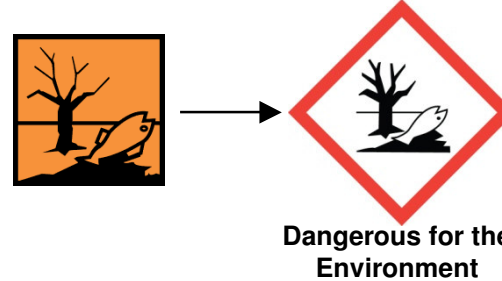
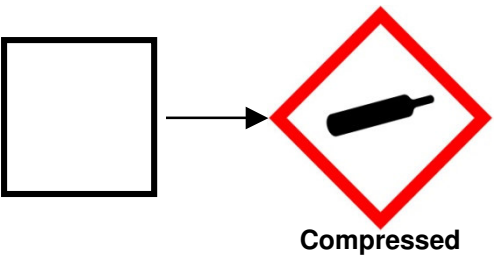
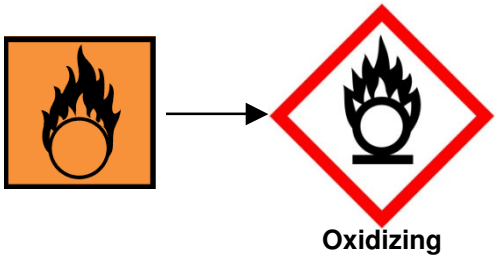
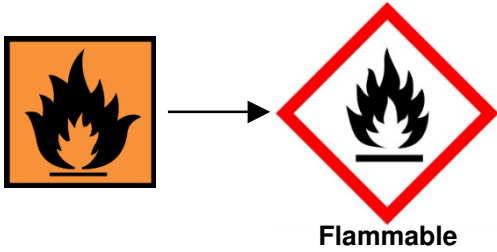
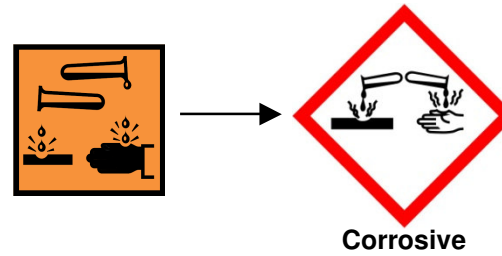
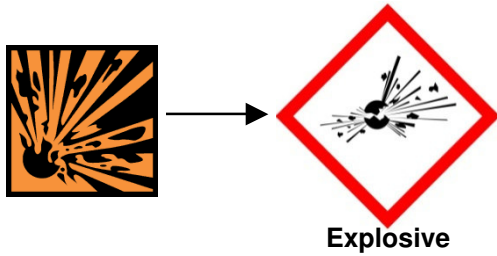


What will change – Risk/Safety Phrases



- In the EU Risk Phrases and Safety Phrases from 2015 will be no more.
- New Hazard Statements and Precautionary Statements will be used respectively.
- Not all R phrases will directly transpose to H statements, likewise for S phrases to P statements.
- EUH statements used to cover R phrases not covered by CLP.
- H statements split into Physical, health & Environment hazards.
- P statements split into Prevention, Response, Storage & Disposal.

What will change – Pictograms

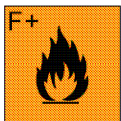


Example Label change

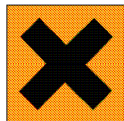
- See the example below and how the label will contain very different symbols and text.
- Awareness is required to understand these changes.

and according to the EC-Directive (67/548/EEC):

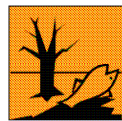
Isoheptane, EC-number: 250-610-8



Highly flammable



Harmful



Dangerous for the environment

R11: Highly flammable. R65: Harmful: may cause lung damage if swallowed.
 R67: Vapours may cause drowsiness and dizziness. R38: Irritating to skin.
 R50/53: Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment. S9: Keep container in a well-ventilated place. S16: Keep away from sources of ignition - No smoking. S29: Do not empty into drains. S33: Take precautionary measures against static discharges. S60: This material and its container must be disposed of as hazardous waste.
 S61: Refer to instructions/safety data sheets. S62: If swallowed, do not induce vomiting: seek medical advice immediately and show this container or label.

Name, address and telephone number of an EEA based supplier

Example: Hazard label for Heptane according to the new CLP-Regulation

Isoheptane, EC-number: 250-610-8





Danger

H225: Highly flammable liquid and vapour. H304: May be fatal if swallowed and enters airways.
 H315: Causes skin irritation. H336: May cause drowsiness or dizziness.
 H410: Very toxic to aquatic life with long lasting effects.
 P210: Keep away from heat/sparks/open flames/hot surfaces. – No smoking.
 P261: Avoid breathing dust/fume/gas/mist/vapours/spray.
 P280: Wear protective gloves/protective clothing/eye protection/face protection.
 P301+P310: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician.
 P302+P352: IF ON SKIN: Wash with plenty of soap and water.
 P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.
 P273: Avoid release to the environment.

Name, address and telephone number of an EEA based supplier

Difference between old and new

DSD / DPD	CLP
<p>Symbols</p> 	<p>Pictograms</p> 
<p>Risk (R) and Safety (S) R50/53 – very toxic to aquatic organisms</p>	<p>Hazard (H) and Precautionary (P) H400 – very toxic to aquatic life</p>
<p>12 categories of danger 1 category for flammable</p>	<p>28 hazard classes divided flammability classes liquids, gases</p>
<p>Flammable liquid: Flashpoint between 21°C and 55°C</p>	<p>Flammable liquid: Flashpoint point <60°C (dangerous products will increase)</p>
<p>No C&L notification obligation</p>	<p>C&L notification obligation</p>
<p>No signal words</p>	<p>Signal words – DANGER & WARNING</p>
<p>Preparation</p>	<p>Mixture</p>


Wall chart of pictograms and hazard labels

The European Approach

PHYSICAL HAZARDS

Hazard classes and hazard categories*

Explosives
 • Unstable explosives
 • Explosives, divisions 1.1 to 1.3
 Self-reactive substances, mixtures, types A, B
 Organic peroxides, types A, B

 H200
 H201, H202, H203
 H240, H241
 H240, H241

Danger

Explosives, division 1.4

 H204

Warning

Flammable gases, category 1
 Flammable aerosols, category 1
 Flammable liquids, category 1

 H220
 H222
 H224

Danger

Flammable liquids, category 2
 Flammable solids, category 1
 Flammable solids, category 2

 H224
 H228
 H228

Warning

Flammable aerosols, category 2
 Flammable liquid, category 3

 H223
 H228

Warning

Pyrophoric liquids, category 1
 Pyrophoric solids, category 1
 Substances, mixtures which in contact with water emit flammable gases, categories 1, 2 and category 3

H240
 H240
 H260
 H261
 H261

Danger

Self-reactive substances, mixtures, type B
 Self-reactive substances, mixtures, types C, D and types E, F

 H241
 H242
 H242
 H242

Warning

Self-heating substances, mixtures, category 1 and category 2

Organic peroxides, type B
 Organic peroxides, types C, D
 Organic peroxides, types E, F

H241
 H242
 H242

Warning

Oxidizing gases, category 1
 Oxidizing liquids, categories 1, 2 and category 3

 H270
 H271, H272
 H272


Danger

Oxidizing solids, categories 1, 2 and category 3

 H271, H272
 H272

Warning

Gases under pressure
 - Compressed gases
 - Liquefied gases
 - Refrigerated liquefied gases
 - Dissolved gases

 H280
 H281
 H281
 H280

Warning

Corrosive to metals, category 1

 H290

Warning

*Based on Annex I Regulation (EC) No 1272/2008 for all hazard categories with GHS pictograms

**Based on the stipulation table of Annex VII Regulation (EC) No 1272/2008

Label elements | OLD

 (R2, R3) Explosive

No classification

 (R12) (R12) (R12) Extremely flammable

 (R11) (R11) (R11) Highly flammable

No symbol (R10) (R10) Flammable

No classification (R10) (R10) Flammable

 (R17) (R17) (R17) (R17) (R17) (R17) (R17) Highly flammable

 (R12) (R12) (R12) Highly flammable

 (R7) (R7) Oxidizing

 (R8) (R8) (R8) (R8) (R8) (R8) Oxidizing

No classification

No classification

***Specific Target Organ Toxicity

HEALTH HAZARDS

Hazard classes and hazard categories*

Acute toxicity, categories 1, 2
 • Oral
 • Dermal
 • Inhalation

 H300
 H310
 H330

Danger

Acute toxicity, category 3

• Oral
 • Dermal
 • Inhalation

 H301
 H311
 H331

Danger

Germ cell mutagenicity, categories 1A, 1B
 Carcinogenicity, categories 1A, 1B
 Reproductive toxicity, categories 1A, 1B
 STOT***, single exposure, category 1
 STOT***, repeated exposure, category 1

 H340
 H350
 H360
 H370
 H372

Danger

Respiratory sensitization, category 1
 Aspiration hazard, category 1

 H334
 H304

Danger

Germ cell mutagenicity, category 2
 Carcinogenicity, category 2
 Reproductive toxicity, category 2
 STOT***, single exposure, category 2
 STOT***, repeated exposure, category 2

 H341
 H351
 H361
 H371
 H373

Warning

Acute toxicity, category 4

• Oral
 • Dermal
 • Inhalation

 H302
 H312
 H332

Warning

Skin corrosion, categories 1A, 1B, 1C

 H314

Danger

Serious eye damage, category 1

 H318

Danger

Skin irritation, category 2
 Eye irritation, category 2
 Skin sensitization, category 1
 STOT*** after single exposure, category 3
 • Respiratory tract irritation

 H315
 H319
 H317
 H335

Warning

• Nontoxic effects

 H336

Warning

ENVIRONMENTAL HAZARDS

Hazardous to the aquatic environment, acute, category 1

Hazardous to the aquatic environment, chronic, category 1

 H400
 H410

Warning

Hazardous to the aquatic environment, chronic, category 2

 H411

Warning

Label elements | OLD

 R28
 R27
 R28 Very toxic

 R26
 R24
 R23 Toxic

 R48
 R49
 R80, R81
 R29
 R48 Toxic

 R42
 R86

Danger

 R68
 R40
 R62, R63
 R66
 R48 Harmful

 R22
 R21
 R20

Warning

 R34, R35 Corrosive

 R41 Irritant

 R38
 R39
 R43 Irritant

No symbol R57

 R50
 R50/53

Dangerous for the environment

 R51/53

Dangerous for the environment

What is Tata Steel doing now?



- Integrate into current H&S and Environment Systems.
- Managers, Safety, Environment, Hygienists will be aware of CLP.
- COSHH Assessors will ensure their SDS are current versions.
- COSHH Assessors will make sure that SDS should be to the new Standard from December 2012 at the latest 2015.
- Departments will look at chemical stocks with a view to all having new symbols in place by 2012.
- On site solutions (eg lab solutions in hand bottles) will comply with new signage by December 2010.
- Pictograms on COSHH databases will be modified in line with new pictograms.
- We will ensure that our substance suppliers are compliant with new requirement.

**A Further Message from from our
friend Napo!!**



[napo-sgh-05-toxic-eng.avi](#)



- [GHS home](#)
- [Background](#)
- **[EC regulation \(CLP Regulation\)](#)**
- [CLP Regulation - implications and guidance](#)
- [CLP Regulation – Live Issues \(including Notification\)](#)
- [UN developments](#)
- [SMEs](#)
- [Documents & links](#)

[View consultation document](#)

European Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation), adopting in the EU the Globally Harmonised System (GHS)

- ▶ [New - CLP Regulation - Live Issues](#)
- ▶ [New - CLP Regulation – Notification deadline approaching!!!](#)
- ▶ [New European Regulation \(EC\) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures \(CLP Regulation\)](#)
- ▶ [Guidance on CLP Regulation](#)
- ▶ [CLP Regulation - transitional arrangements](#)
- ▶ [Impact on the CHIP 4 regulations](#)
- ▶ [Consultation on CLP Regulation](#)

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CLP – Classification, Labelling and Packaging of substances and mixtures