



## Au + PM CN- CLP meeting

Brussels, 1 Dec 2010



## Agenda

1. Introduction
2. HH classifications
3. ENV classifications
4. Physico-chemical classifications
5. Submission of CLP notifications
6. AOB and closing remarks



Ag



Au



Ir



Os



Pd



Pt



Re



Rh



Ru

## 1. Introduction

Objective of the day

Introduction of CLP



Ag



Au



Ir



Os



Pd



Pt



Re



Rh



Ru

## Objective of the day

1. To present proposed classifications  
→ WCA
2. To clarify outstanding questions  
→ All!
3. To conclude on agreed classifications  
→ Members
4. To present approach towards CLP notification submission process  
→ PMC Secretariat



## Introduction to CLP



- CLP stands for Classification, Labelling and Packing Directive (EC 1272/2008)
- Aims at harmonising C&L in EU (as part of wider GHS initiative)
- Replaces Dangerous Substance/Preparations Directive (DSD = EC 67/548 and DPD = EC 88/379):
  - New endpoints (e.g.: STOT)
  - New ENV classification categories + default/safety net classifications
  - New HH categories (categories 1, 2 and 3 become 1A, 1B and 2 with different triggering levels in some cases)



## CLP notification



- Must be submitted:
  - For each substance/ transported intermediate not REACH registered **no matter the volume of manufacture/import**
  - By 3 Jan 2011 (by June 2015 for mixtures)
  - By each manufacturing/importing legal entity - Only Representatives cannot !
  - Through REACH-IT
  - To the ECHA
- Must contain classification for all required physico-chemical and (eco-)tox endpoints based on:
  - Available + generated info for phys-chem
  - Available info for (eco-)tox
- Must be updated with revisions of GHS/CLP and newly available data

**Note REACH-IT is down over X-mas holidays !**

**Including expert judgement !**



## Harmonised C&L



- May exist for some substances and some endpoints:
  - Cannot propose an alternative classification, only complete existing one
  - Majority of PM and Re materials do not yet have a harmonised classification
    - But some companies have implemented precautionary classifications on a voluntary basis
- Where no existing C&L, proposed C&L:
  - Must ideally be achieved by sector groups (e.g.: PMC) before notification
  - Can be composed of more than one classification if justified on the basis of:
    - Impurities
    - Particle size
    - Other
  - May attract authorities' attention who will require/impose harmonisation if agreement is not reached among notifiers



## 2. Proposed HH classification

See CLP reports



Ag



Au



Ir



Os



Pd



Pt



Re



Rh



Ru

### 3. Proposed ENV classifications

See CLP reports



Ag



Au



Ir



Os



Pd



Pt



Re



Rh



Ru

### 4. Proposed phys-chem classifications

See handouts



## 5. Submission of CLP notifications



## Who, What, How and When?

- **Who** is involved?
  - A lead notifier, followed by individual co-notifiers
- **What** do notifiers need?
  - A C&L proposal, PMC guidance and ECHA guidance
- **How** is it done?
  - Through REACH-IT, following one of the three possible routes:
    - Bulk submission: if many notifications
    - REACH-IT: if only a few substances with one classification
    - IUCLID 5: if more than one classification
- **When** to notify?
  - Before X-mas 2010 (REACH-IT is closed between X-mas and CLP deadline of 3 Jan 2011)



## Who?



- **Lead notifiers** (2-5 companies) - will **submit** agreed C&L proposal before anyone else from PMC
  - To facilitate logistics behind CLP notification
  - To reduce workload for co-notifiers
- **Co-notifiers** - will **accept** agreed C&L submitted by lead notifier after it has been submitted by lead notifier



## What?



### Agreed C&L proposals



- This means:
  - Companies (lead and co-notifiers):
    - Finalised matrices
  - PMC Secretariat & Companies:
    - Finalised CLP reports including all final classification and associated justifications



## How?



- Need to have:



- REACH-IT account (for each notifying legal entity)



- Agreed CLP proposal in the form of:



- Part of bulk submission (lead notifiers)
- As a standalone proposal (co-notifiers for REACH-IT type submission)
- IUCLID 5 file (only if more than one classification per substance)



- PMC & ECHA **Guidance** documents



## When?



- Lead notifiers: ideally by 15 Dec 2010



- Co-notifier: before 24 Dec 2010





## Proposed way forward and timeline



|    | Action  | When?           |
|----|---|-----------------|
| 1. | PMC Members agree on classification proposals   | 1-3 Dec 2010    |
| 2. | WCA finalise CLP matrices   | w/c 6 Dec 2010  |
| 3. | PMC secretariat circulates CLP matrices for final check/submission preparation and identifies companies which agree to submit CLP notifications for those materials not notified by Umicore | w/c 6 Dec 2010  |
| 4. | Lead notifiers submit notifications   | w/c 13 Dec 2010 |
| 5. | PMC secretariat informs PMC Members and SIEF about submitted notifications  | w/c 13 Dec 2010 |
| 6. | Co-notifiers submit their own notification  | B4 24 Dec 2010  |



## Proposed lead notifiers



### 5 PMC Members proposed



- Thx to Umicore who has agreed to submit most of notifications as part of their bulk submission:
- 11 materials need other Lead notifier, proposed to work with REACH Lead Registrants: JM (2), Heraeus (5), Vale (3), C. Hafner (1)



## 6. AOB and concluding remarks



## Thank you!

See you:

- Tomorrow (PGM WG CLP meeting), and/or
- Friday (Re WG meeting), and/or
- On 11 Jan (PM Refiners WG meeting), and/or
- On 12 Jan (PMC Assembly meeting)