



PGM CLP meeting

Brussels, 2 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



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1. Introduction

Objective of the day

Introduction of CLP



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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



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3. Proposed ENV classifications

See CLP reports



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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)



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6. AOB and concluding remarks



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Thank you!

See you:

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