

## What is CLP Directive?

CLP stands for the Regulation (EC) No 1272/2008 on the Classification, Labeling and Packaging of substances and mixtures. CLP introduces the United Nations Globally Harmonized System (UN GHS) for classification and labeling of chemicals into Europe. CLP entered into force on 20<sup>th</sup> January 2009. **All substances and mixtures have to comply to the CLP regulation which aims to determine whether a substance or mixture displays properties that lead to a classification as hazardous**

The regulation requires companies to appropriately classify, label and package their substances and mixtures before placing them on the market. It aims to protect workers, consumers and the environment by means of labeling which reflects possible hazardous effects of a particular chemical. It also takes over provisions of the REACH Regulation regarding the notification of substances. It introduces new classification criteria, hazard symbols (pictograms) and labeling phrases, while taking account of elements which are part of the current EU legislation.

## Highlights

- All existing substances (being placed on the European markets) have to comply with this regulation by 1<sup>st</sup> Dec' 2010
- The new requirements of CLP applies to the substances irrespective of the tonnage (It is applicable to substances even below one ton)
- CLP notification is a one time process with no recurring expenditure
- Chemicals that are preparations (formulations) have a later deadline till 1<sup>st</sup> June' 2015 for CLP Notification

## How is CLP linked with REACH and other EU Directives?

CLP complements: the REACH Regulation (EC No. 1907/2006)  
 CLP replaces: The Dangerous Substances Directive (DSD) (67/548/EEC) and the Dangerous Preparations Directive (DPD) (1999/45/EC).  
 The provisions of CLP apply in full to: any substance or mixture whose marketing and use is controlled by Directive 98/8/EC (BPD) on biocidal products or by Council Directive 91/414/EEC on plant protection products (PPPD). However, CLP in no way replaces the provisions of the BPD or those of the PPPD

## Is CLP notification mandatory?

The CLP Regulation is legally binding across the 27 Member States of European Union. It is directly applicable to the industry. The notification requirement applies to all hazardous substances and mixtures under the scope of CLP and includes substances of all tonnages on their own or contained in mixtures, irrespective of the tonnage exported to Europe.

## Timelines for notifications:

Hazardous substance(s) placed on the EU market	C&L notification deadline
Before 1 December 2010	Must be notified by 3 January 2011
After 1 December 2010	Must be notified within one month after being placed on

## What are Non-European manufacturer's obligations within CLP Directive?

Non-EU manufacturers, who place chemical substance on the European markets, will have to notify certain information, in particular the substance identity and the classification and labeling of that substance to ECHA, which will be included in the Classification and Labeling Inventory.

## How do non-European manufacturers notify substances within CLP?

- Appoint an "only representative", (OR) who is a European legal entity
- Provide the OR with necessary technical information to finalize the CLP notification dossier
- OR shall compile the CLP notification dossier in the IUCLID software
- The CLP notification dossier shall then be submitted to ECHA through the REACH-IT system

## How Sustainability Support Services (Europe) AB (SSS) can help you?

SSS will:

- Help you classify your substances and mixtures according to CLP,
- Submit C&L notifications to the ECHA (C & L inventory) and acquire C&L notification number.
- Provide regulatory advice on the implications of CLP for your company;

## About Sustainability Support Services (SSS)

SSS is based in Sweden.

- SSS has a core team of 25 professionals who specialize in EU regulations and provide compliance management and advisory services.
- SSS is presently working with various EU regulations that includes - REACH (chemical); RoHS (EEE); WEEE (EEE); ELV (Automobile); ErP (Energy); CLP (Chemicals) etc.



- SSS has strong technical tie-ups with several other EU organizations.
- SSS also provides capacity building/ training programs on various EU regulations.
- SSS also offers REACH compliant material safety data sheet (MSDS) preparation service

## **Other services offered by SSS**

### **REACH “Only Representative” Services:**

“Sustainability Support Services” SSS based in Sweden (Europe) offers “only representative” services through its sister concern REACH Support based in India. The various services on offer include:

- Late Pre-registration
- Communication up and down the supply chain
- SIEF participation
- Registration with ECHA

### **Late Pre-registration**

This provision has been made by the ECHA for the first time manufacturers and exporters. This provision; available from the 5th Jan' 09 on the ECHA's REACH-IT portal on a continuous basis shall enable the industries that shall be exporting for the first time to Europe to submit their Pre-registration. The late Pre-registrants can also take advantage of the extended Registration deadlines within REACH.

### **Classification & Labeling and Packaging (CLP) regulation compliance**

“Sustainability Support Services” SSS based in Sweden (Europe) offers “only representative” services through its sister concern REACH Support based in India. The various services on offer include:

- CLP notification to ECHA
- Preparing the CLP notification dossiers
- Communication up and down the supply chain

### **Technical dossier preparation - complete & mini**

With our efficient IUCLID knowledge, we offer services to prepare the complete technical dossier for the REACH registration. We also offer the preparation of mini dossiers for the companies going for the joint registration within REACH. We also offer the preparation of CLP notification dossier for the European legal entities to comply with New CLP regulation.

### **IUCLID - 5 Training Program by certified IUCLID Trainer**

International Uniform Chemical Information Database (IUCLID 5) is the official tool for REACH data collection, and with around 9000 user input fields, requires voluminous and accurate data entry. The training offers hands-on experience and one will learn through undertaking practical exercises under the expert guidance of our professionals. We have provided the training program to high level management professional from more than 30 industries.

### **REACH and CLP compliant Material Safety Data Sheet (MSDS)**

We offer services to prepare the REACH and CLP compliant MSDS for the companies.

### **One to one technical consultation on various REACH & CLP related issues**

We offer one to one consultation for companies to answer company specific REACH and CLP related queries. Company can visit to REACH support office and even discuss their queries with the technical professionals.

### **Technical support services to European legal entities**

We offer technical services to companies with the European legal entities to comply with the REACH and CLP regulation. REACH Support does the technical work at the back office in India on behalf of the European legal entity.

### **Dossier Validation**

We offer services for the technical evaluation of the dossiers prepared by the companies and suggest the modifications to successfully run on the technical completeness check (TCC) tool provided by ECHA.

### **Request for Quote**

For a most competitive quote for CLP notification services, please SSS (Europe) AB by writing to the following contacts

[or@reach-onlyrep.eu](mailto:or@reach-onlyrep.eu);  
[mio@reach-onlyrep.eu](mailto:mio@reach-onlyrep.eu)