



## CLP - classification and labelling of chemical products

The present communication is to inform you that the regulation on the classification, labelling and packaging of substances and mixtures (CLP regulation: EU regulation 1272/2008) came into force in January 2009 and is based on the global harmonized system of the United Nations (UN GHS).

The regulation replaces two previous legislative acts, i.e. the dangerous substances directive (67/548) and the dangerous preparations directive (1999/45), with a transition period until 6/1/2015.

As a result of this, **since 6/1/2015 it will no longer be allowed to produce new mixtures** (in our case coatings and thinners) **using the old classification**. Instead, they shall be classified and labelled in accordance with the new CLP, with a transition period for the products already placed on the market before the 6/1/2015 and until 6/1/2017.

After that date, only products with CLP classification can be produced and marketed.

For your information, please note that the CLP regulation and subsequent notes of the body set up by the European Union for its implementation (ECHA), has defined as "placed on the market" the supply or the availability to third parties, of substances or mixtures, whether paid or distributed for free.

The new regulation, differently from the previous ones, classifies products using more symbols and warning notes; therefore, for the same products, there may be differences not due to product modifications, but simply determined by the difference in the classification criteria between the two regulations.

For example, products with a flash point between 21° and 55° C, which previously had no symbol if not the word "flammable"; now also have a flame symbol, similarly to those with a flash-point up to 60° C.

Please note that since April we started labelling the products according to the new regulation and this communication will be sent to customers for their information and knowledge.

In order to support you in responding to possible questions from Customers, we are enclosing a FAQ document with ready questions and answers.

For more information on this subject, please consult the website: <http://echa.europa.eu/it/>

## FAQ

### 1. What is CLP?

The CLP Regulation (acronym for Classification, Labelling and Packaging) concerns the classification, labelling and packaging of substances and mixtures; it is the European transposition of the UN's GHS regulation (Globally Harmonized System).

### 2. What does it replace?

It replaces two previous law directives, i.e. the dangerous substances directive (67/548) and the dangerous preparations directive (1999/45), with a transition period up to 6/1/2015.

### 3. When will it enter into force?

By 6/1/2015 new mixtures (in our case paints and thinners) can no longer be produced with the old classification, but all must be classified and labelled in accordance with the new CLP, with a transition period for the goods already placed on the market before 6/1/2015 until 6/1/2017.

After that date, only products with CLP classification can be detained and marketed.

### 4. What are the benefits of this new classification?

- It standardizes the world classification of chemicals, both for transport system and waste disposal.
- Provides more information on the specific risks in the use of chemicals.

### 5. How do the symbols (pictograms) change?

#### OLD SYMBOLS



#### NEW SYMBOLS



### 6. What does the symbol mean, as it is one of the main CLP innovations?

It is a symbol representing all the most serious dangers: carcinogenic, mutagenic, toxic for reproduction, may cause **sensitization** by inhalation and may be toxic to specific organs.

### 7. How do the related warnings change?

Both warnings change, those concerning Risk (former R-warnings), which become H warnings (Hazard – danger), but above all the safety warnings (S-warnings) that become mandatory, and much more specific as P warnings (Prevention).

**8. Also SDS are changing?**

Yes, because they will also contain the new classification, in addition to the one currently in use until 6/1/2015. From 6/1/2017 the present classification will be completely eliminated.

**9. Does this apply to all coating products I use?**

Yes, it applies to all products sold by IVM Chemicals.

**10. What does this change for a user of coating products?**

After the changes in the classification of chemicals, they must review their risk assessment, in particular the chemical risk, based on the requirements from D.lgs 81/2008. They will also need to review their waste classification.

**11. Can I use previously purchased products, labelled with the old system?**

Yes, until 6/1/2017. After that date the products will have to be re-labelled according to CLP or disposed of.

**12. Is anything changing in the prevention rules that I should adopt when using the products?**

Yes, as a result of the re-evaluation of risks, see question and answer 9.

**13. Is anything changing in the annual declarations on emissions?**

No; the classification of substances with an impact on emissions remains unchanged

**14. Why has one of the products that I regularly purchase changed the symbols on the label or on the safety data sheet?**

Because with the new CLP regulation the classification criteria have changed, so it is possible, though with the same formulation, to have products classified and labelled differently.

Example: products having a flash point between 21° and 55° C had no symbol except the word "flammable"; now those products and those with a flash-point up to 60° C will also have the flame symbol.

**15. What about the symbols on the SDS label/ for products with a low environmental impact, such as water-borne products? Do they also change?**

They may change, depending on the new classification of substances.

**16. Where can I find more information?**

On the website: <http://echa.europa.eu/it/>