

## CLP revision 2021

In the 38<sup>th</sup> Meeting of Competent Authorities for REACH and CLP held on 4<sup>th</sup> of March 2021 some developments have been discussed during the CLP open session which are very important for the industry.

On Agenda point 3. “Chemicals Strategy for Sustainability (CLP related actions)”, proposals and timeline for a CLP revision have been made. These proposed changes will have far-reaching consequences, both for the testing of substances according to REACH and CLP and for classification and labelling. This will affect the acceptance of a substance by the customer.

What are the main adaptations in this proposal?

- **Harmonised Classification**
  - Commission should be enabled to charge ECHA for CLH proposals.
  - Harmonisation of human health and environment-based safety values (e.g. PNEC, DNEL).
  - Development of mechanisms for enhanced prioritisation and comments by concerned parties.
- **New Hazard Classes**
  - Endocrine Disrupter (ED) properties should be included for both, human health and environment.
  - PBT (vPvB) properties should be included and have a new hazard class.
  - PMT (vPvM) hazard class should be added.
- **New Criteria**
  - Toxicity data derived from terrestrial organisms testing.
  - Specific criteria for immunotoxicity and neurotoxicity to specify current STOT and reproductive toxicity.
- **Other Actions**
  - Limiting of labelling derogations for sensitive products (e.g. cosmetics).
  - Obligation for distributors to notify hazardous mixtures to poison centres.
  - Obligation for duty holders to notify hazardous substances to poison centres.
  - Obligation of periodically update of CLP notifications.

There are some more proposals to enhance the safety data sheets and legally required notifications. The timeframe for the proposed measures is very ambitious. Starting in April 2021 with consultations, the commission adoption is scheduled for end of 2021!

Chemservice will follow these developments very closely and inform customers as appropriate. We assume that the implementation of the proposed measures will have comprehensive consequences not only for new or additional studies under REACH / CLP but also that the bureaucratic efforts for SDS revisions and various notifications will increase.