



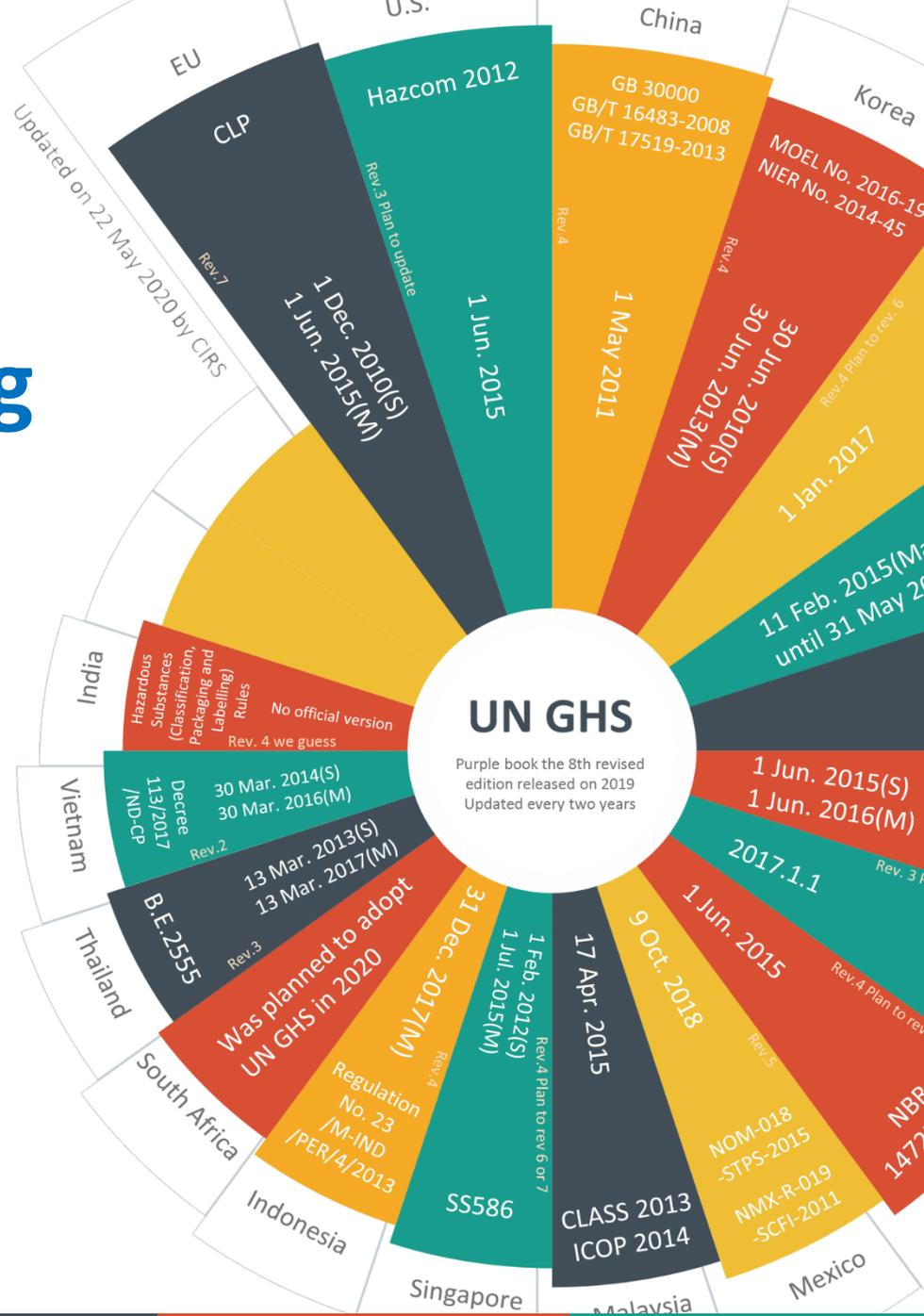
Global GHS Training Course

No.6 - CLP and the SCIP Database



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Contents



EU REACH



EU CLP



Substances of Very High Concern (SVHC)

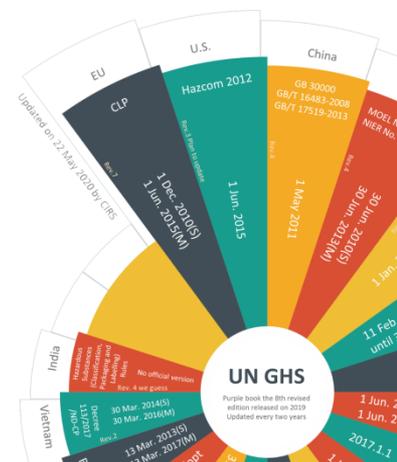


SCIP Database



Q&A

EU REACH

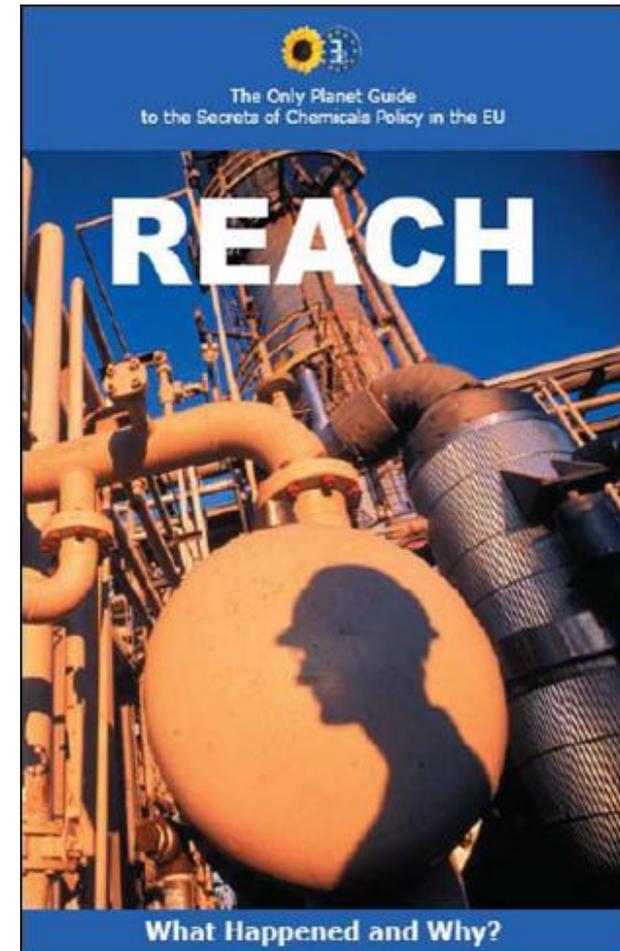


EU REACH

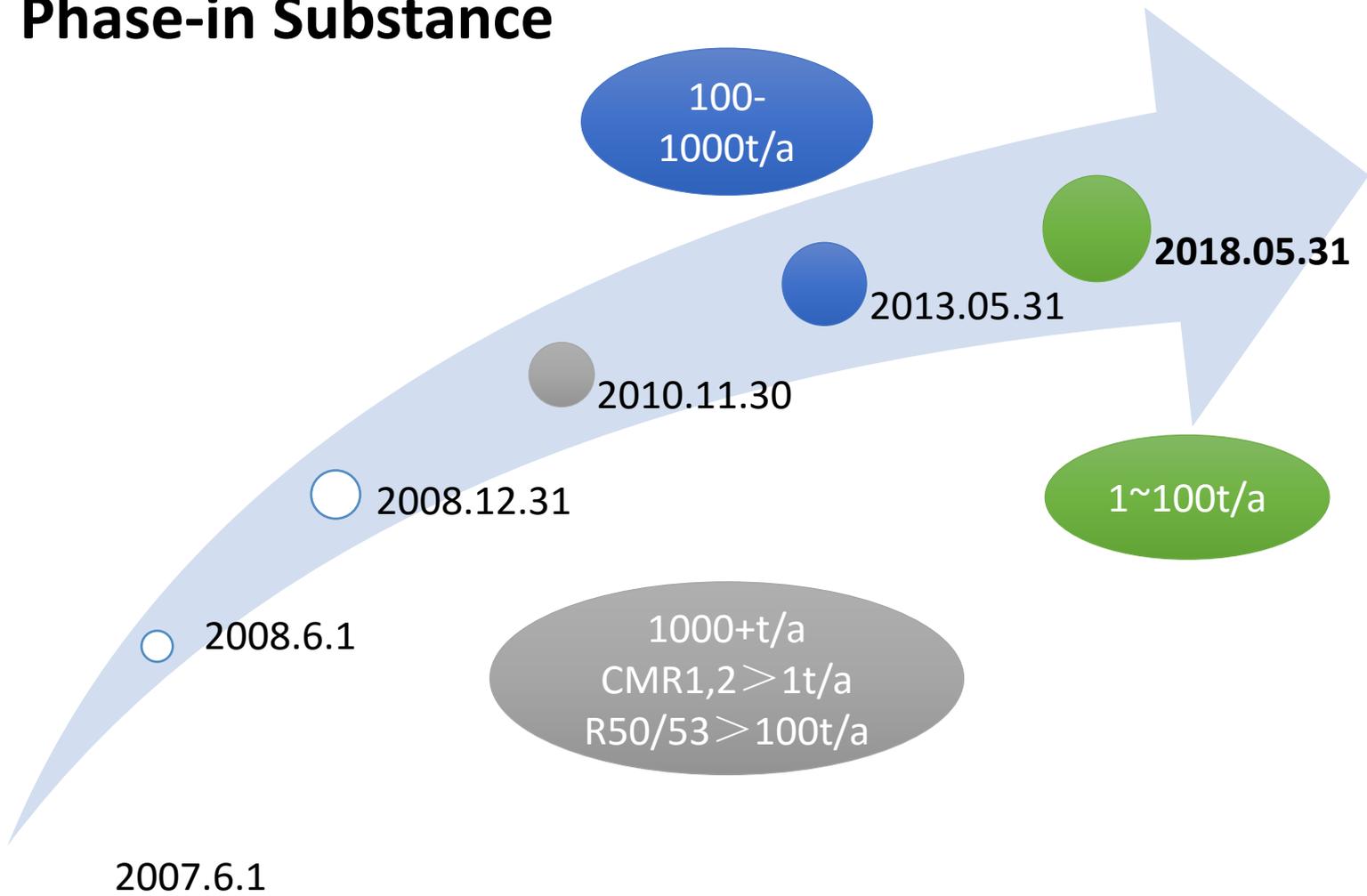
- **R**egistration,
- **E**valuation,
- **A**uthorisation and Restriction of
- **C**hemicals



**Managed by ECHA
(European Chemicals Agency)**



Phase-in Substance



There is no timeline of Non Phase-in Substance.

Substance



Mixture



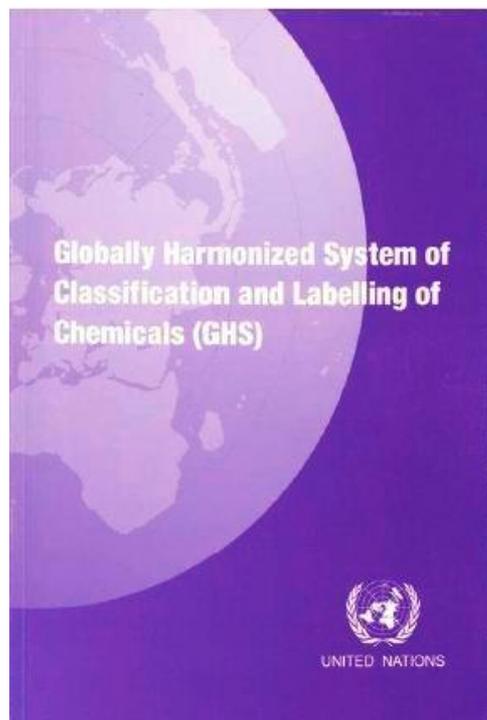
Article



-Substance imported or manufactured > 1 ton per year.

Introduction of GHS

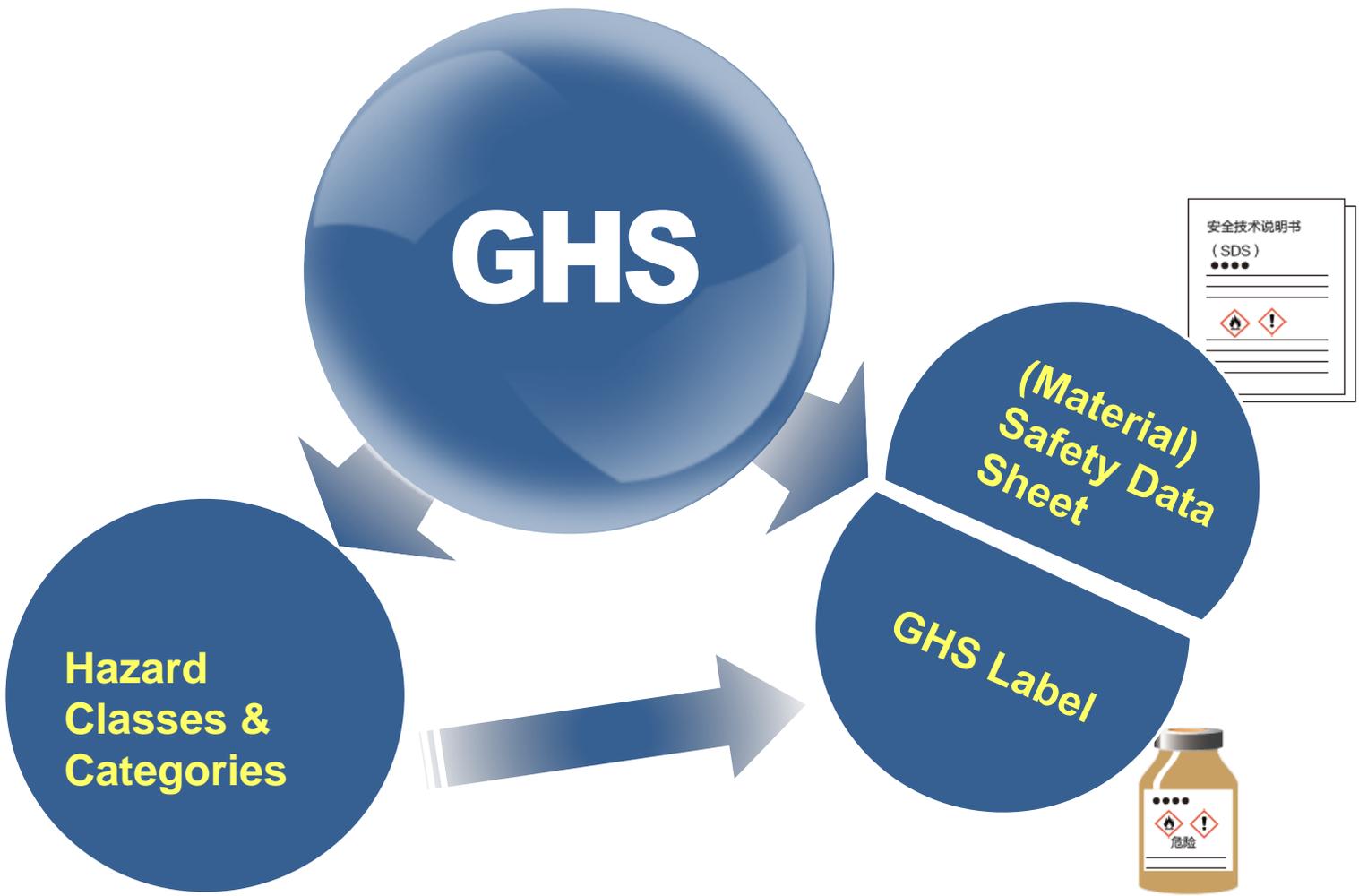
Globally Harmonized System of Classification and Labelling of Chemicals



8th Revised Edition

http://www.unece.org/trans/danger/publi/ghs/ghs_rev08/08files_e.html

Introduction of GHS



GHS: hazard classifications



Physical Hazards

- Explosives; Flammable Gases; Chemically Unstable Gas; Aerosols; Oxidizing Gases; Gases Under Pressure; Flammable Liquids; Flammable Solids; Self-reactive Substances; Pyrophoric Liquids; Pyrophoric Solids; Self-heating Substances; Substances, Which In Contact With Water, Emit Flammable Gases; Oxidizing Liquids; Oxidizing Solids; Organic Peroxides; Corrosive To Metals; Desensitized Explosives

Health Hazards

- Acute Toxicity; Skin Corrosion / Irritation; Serious Eye Damage / Eye Irritation; Respiratory Sensitization; Skin Sensitization; Germ Cell Mutagenicity; Carcinogenicity; Toxic To Reproduction; Effects On Or Via Lactation; Specific Target Organ Systemic Toxicity (Single Exposure); Specific Target Organ Systemic Toxicity (Repeated Exposure); Aspiration Hazard

Environmental Hazards

- Aquatic Toxicity (Acute, Chronic); Hazardous For The Ozone Layer

1. Experimental data

Table 2.6.1: Criteria for flammable liquids

Category	Criteria
1	Flash point < 23 °C and initial boiling point ≤ 35 °C
2	Flash point < 23 °C and initial boiling point > 35 °C
3	Flash point ≥ 23 °C and ≤ 60 °C
4	Flash point > 60 °C and ≤ 93 °C

• 2. Calculation

Table 3.3.3: Concentration of ingredients of a mixture classified as skin Category 1 and/or eye Category 1 or 2 that would trigger classification of the mixtures as hazardous to the eye (Category 1 or 2)

Sum of ingredients classified as	Concentration triggering classification of a mixture as	
	Irreversible eye effects	Reversible eye effects
	Category 1	Category 2
Eye or skin Category 1	≥ 3%	≥ 1% but < 3%
Eye Category 2/2A		≥ 10%

1. Identification of the substance/mixture and of the company/undertaking

2. Hazard identification

3. Composition/information on ingredients

4. First-aid measures

5. Fire-fighting measures

6. Accidental release measures

7. Handling and storage

8. Exposure controls/personal protection

9. Physical and chemical properties

10. Stability and reactivity

11. Toxicological information

12. Ecological information

13. Disposal consideration

14. Transport information

15. Regulatory information

16. Other information

GHS: label element

- 1. Pictograms



- 2. Signal words

Danger or Warning

- 3. Hazard statements

May damage fertility or the unborn child; Very toxic to aquatic life with long lasting effects.

- 4. Precautionary statements

Wear protective gloves/protective clothing/eye protection/face protection; Avoid release to the environment;
If exposed or concerned: Get medical advise/attention;

The 9 Standard Pictograms



Oxidizers



Flammables, Self Reactives,
Pyrophorics, Self-Heating,
Emits Flammable Gas,
Organic Peroxides



Explosives, Self
Reactives, Organic
Peroxides



Acutely Toxic
(severe)



Burns Skin, Damages
Eyes, Corrosive to Metals



Gases Under Pressure



Carcinogen, Respiratory
Sensitizer, Reproductive
Toxicity, Target Organ
Toxicity, Mutagenicity
Aspiration Toxicity



Toxic to aquatic
environment



Acutely toxic(harmful),
Irritant to skin, eyes or
respiratory tract, Skin
sensitizer, Hazardous to
the Ozone layer.

GHS in different countries/areas



EU	Regulation EC 1272/2008 (CLP)
USA	HCS 2012 / HazCom 2012
China	GB 30000, GB/T 16483-2008, GB/T 17519-2013
Japan	JIS Z 7253, JIS Z 7254
Korea	MOEL 2016-19
Thailand	B.E.2555
Malaysia	CLASS 2013, ICOP 2014
Taiwan	CNS 15030
Brazil	NBR 14725:2012
Singapore	SS 586:2014

.....

Note: each country/area updates the local requirements (regularly or irregularly).

- **REGULATION (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures**
 - 1. Classification
 - 2. Labelling
 - 3. SDS
 - 4. C&L notification

- * Guidance available on ECHA
- ** <https://echa.europa.eu/regulations/clp/understanding-clp>

CLP Annex VI



- Annex VI of CLP gives a list of harmonized classification and labelling for hazardous substances.
- For listed substances, the Annex VI classifications are mandatory.

Summary of Classification and Labelling						
Harmonised classification - Annex VI of Regulation (EC) No 1272/2008 (CLP Regulation)						
General Information						
Index Number	EC / List no.	CAS Number	International Chemical Identification			
603-002-00-5	200-578-6	64-17-5	ethanol ethyl alcohol			
ATP Inserted / Updated: CLP00 CLP Classification (Table 3)						
Classification		Labelling			Specific Concentration limits, M-Factors, Acute Toxicity Estimates (ATE)	Notes
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)		
Flam. Liq. 2	H225	H225		GHS02 Dgr		

<https://echa.europa.eu/brief-profile/-/briefprofile/100.000.526>

<https://echa.europa.eu/information-on-chemicals/cl-inventory-database/-/discli/details/49769>

Precautionary Statement Guidance

- The P-statements should be selected based on the rules in CLP Article 28 and Part 1 of Annex IV to CLP
- The selection of P-statements should take into account the underlying hazards and identified or foreseen uses of the substance
- If the content of two P-statements are the same, choose the most relevant statement
- The P-statements assignment follows a “traffic light” system. They are “highly recommended”, “recommended”, “optional” and “not to be used” for the hazard label
- A particular recommendation should be seen in the light of the original CLP conditions for use specified under the relevant precautionary statement in the selection tables
- Two target groups under the CLP Regulations. Where there is no explicit mention of the target group, the conditions for use apply to both the general public and industrial/professional users
- Where the use of a particular precautionary statement is (highly) recommended but some exemptions are indicated (“unless” condition), it should not be used where the conditions specified in the “unless” clause apply:

How to Find Signal Words, Pictogram, H and P Phrases for Flammable Liquids in Various Categories

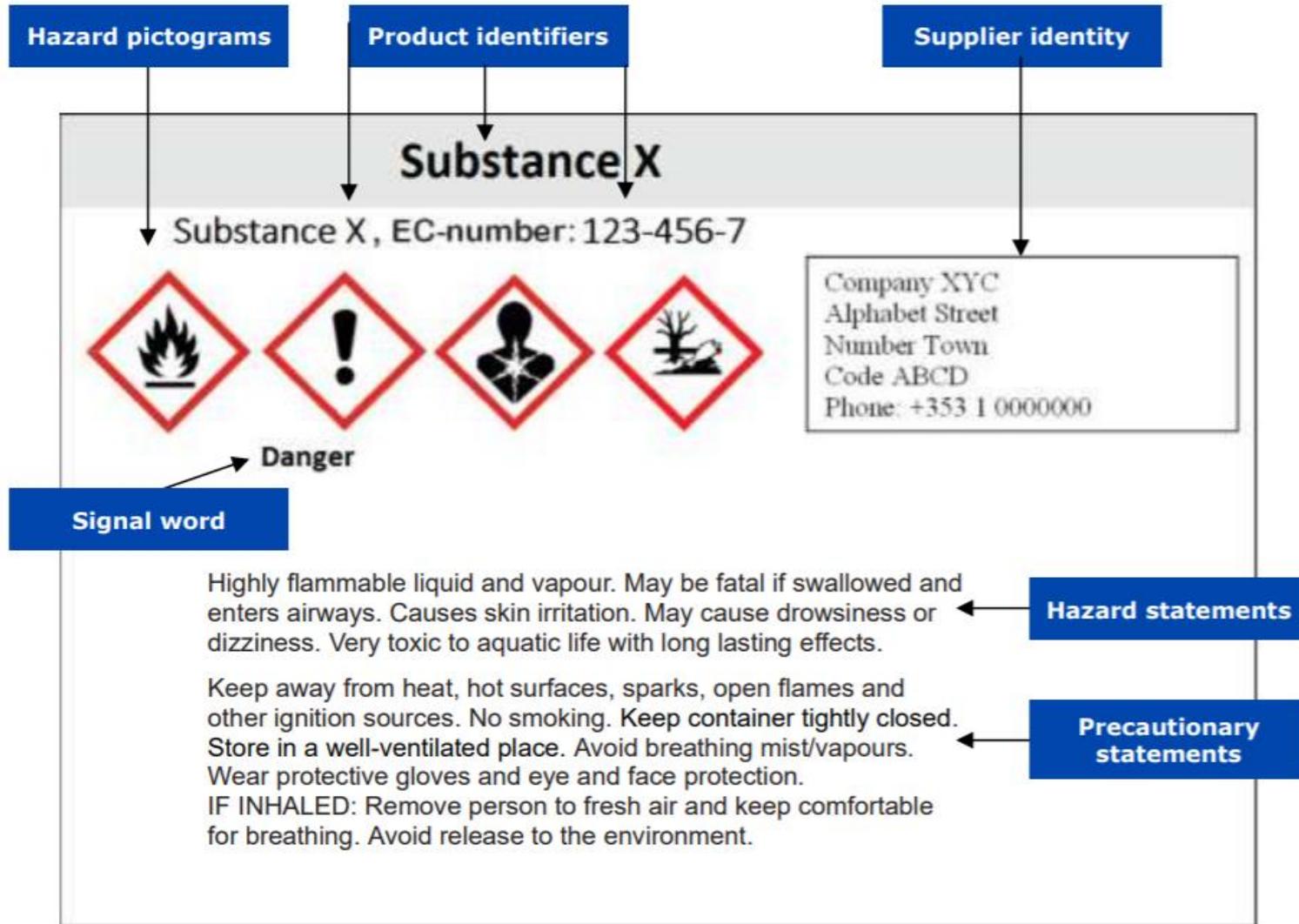
7.3.2.6 Flammable Liquids

Hazard category	Signal word	Hazard statement
1	Danger	H224 Extremely flammable liquid and vapour.
2	Danger	H225 Highly flammable liquid and vapour.
3	Warning	H226 Flammable liquid and vapour.



Precautionary Statements			
Prevention	Response	Storage	Disposal
<p>P210 Keep away from heat/sparks/open flames/hot surfaces. – No smoking. Manufacturer/supplier to specify applicable ignition source(s). ★ Highly recommended</p> <p>P233 Keep container tightly closed. ★ Highly recommended for category 1, unless P404 has already been assigned ★ Recommended for category 2, unless P404 has already been assigned ★ Optional for category 3 ★ Recommended if product is volatile so as to generate a potentially explosive atmosphere, unless P404 has already been assigned</p>	<p>P303 + P361 + P353 IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower. ★ Optional unless deemed necessary, e.g. due to the risk of generating a potentially explosive atmosphere</p> <p>P370 + P378 In case of fire: Use ... for extinction. ... Manufacturer/supplier to specify appropriate media. - if water increases risk. ★ Highly recommended if specific extinction media are required or appropriate, e.g. if water is ineffective or if water increases risk</p>	<p>P403 + P235 Store in a well-ventilated place. Keep cool. ★ Highly recommended for flammable liquids category 1 and other liquids that are volatile so as to generate a potentially explosive atmosphere</p>	<p>P501 Dispose of contents/container to in accordance with local/regional/national/international regulations (to be specified). ★ Highly recommended for the general public if the substance / mixture is subject to legislation on hazardous waste. It is recommended to specify the site of disposal while a reference to the applicable legislation is not necessary. ★ Recommended for industrial / professional users if there are specific disposal requirements above the normal expectation for the disposal of chemicals. . It is recommended to specify the site of disposal while a reference to the applicable legislation is not necessary.</p>

Label Example



Language requirements



Languages required for labels and safety data sheets

Country	Language 1	Language 2	Language 3
Austria	German		
Belgium ¹⁾	French	Dutch	German
Bulgaria	Bulgarian		
Croatia	Croatian		
Cyprus	Greek		
Czech Republic	Czech		
Denmark	Danish		
Estonia	Estonian		
Finland	Finnish	Swedish	
France	French		
Germany	German		
Greece	Greek		

Information required for SDS authoring

- Company Info – name, address, contact, emergency contact.
- Destination (standard, language); For CLP SDS, indicate if CIRS is the OR of the substance or any substance in the product.
- Product info – product name, usage, component (CAS number and concentration/concentration range)
- Physical info – physical state, color, odor, etc.
- Transportation information (if available) – UN number, proper shipping name
- Any other implementation – SDS, registration number, toxic/eco-toxic data, etc.

CLP Update

Noteworthy Points

The update to the REACH annex II will apply from the next year.

- Nanoforms information must be included in the SDS.
- If available, the specific concentration limits, the multiplying factors and acute toxicity estimates set in accordance with CLP should be provided in the SDS.
- the unique formulation identifier (UFI) is indicated in the SDS only with regard to the dangerous mixtures

The 12th ATP will apply from October this year

- Annex II: Deleted phrase EUH001; renumbering of sections.
- Annex III: Added hazard statements H206, H207, H208 and H232.
- Annex IV: Corrected and revised P phrases.
- Annex IV: Added a new hazard category, i.e., desensitised explosives.
- Annex VI: Added a new hazard category for flammable gases and new hazard class desensitised explosives in table 1.1.

The 13th ATP applies from May this year.

- The preservatives MIT, CMIT/MIT and the bleaching agent Sodium hypochlorite, had their classifications either added to Annex VI or updated.
- MIT has been assigned a 15 ppm specific concentration limit which is significantly lower than the 0.1% concentration limit used for general category 1A skin sensitisers.
- The addition of oral and inhalation Acute Toxicity Estimates (ATEs) for Pinoxaden (CAS number 243973-20-8).

The 14th ATP will apply from October 1st 2021.

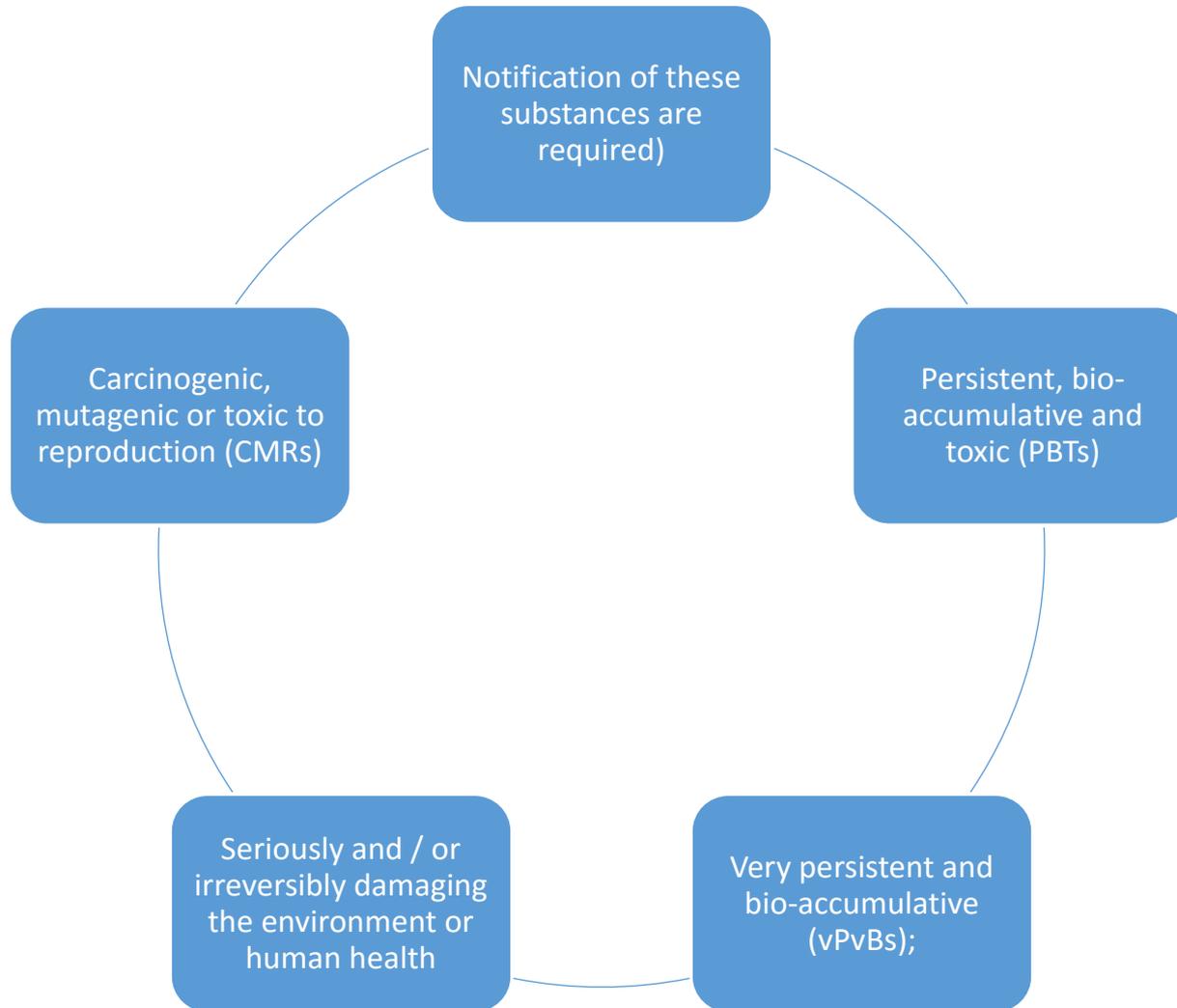
- The label of liquid mixtures containing 1% or more of titanium dioxide particles with aerodynamic diameter equal to or below 10 µm will bear the EUH211 statement: "Warning! Hazardous respirable droplets may be formed when sprayed. Do not breathe spray or mist."
- The label of solid mixtures containing 1 % or more of titanium dioxide will bear the EUH212 statement: "Warning! Hazardous respirable dust may be formed when used. Do not breathe dust."
- Note V: If the substance is to be placed on the market as fibres (with diameter < 3 µm, length > 5 µm and aspect ratio ≥ 3:1) or particles of the substance fulfilling the WHO fibre criteria or as particles with modified surface chemistry, their hazardous properties must be evaluated in accordance with Title II of this Regulation, to assess whether a higher category (Carc. 1B or 1A) and/or additional routes of exposure (oral or dermal) should be applied."
- "Note W: It has been observed that the carcinogenic hazard of this substance arises when respirable dust is inhaled in quantities leading to significant impairment of particle clearance mechanisms in the lung."
- "Note 10: The classification as a carcinogen by inhalation applies only to mixtures in powder form containing 1 % or more of titanium dioxide which is in the form of or incorporated in particles with aerodynamic diameter ≤ 10 µm."

Introduction

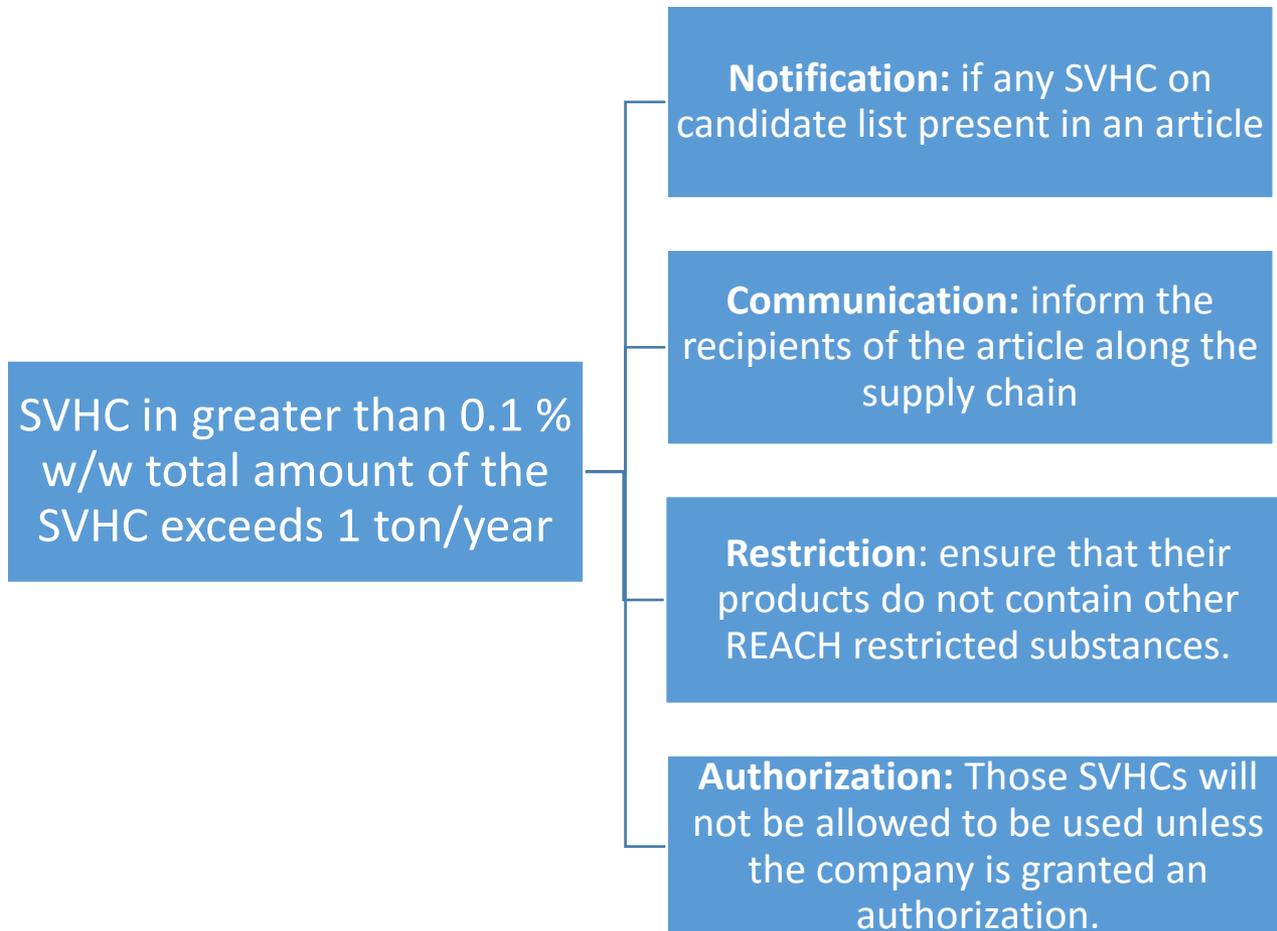


Obligations	Notification of Substances in Articles	Communication of information on substances in Articles	Notification of Articles to SCIP Database
Legal Basis	Article 7(2) REACH	Article 33 of REACH	Article 9(1)(i) WFD
Concerned parties	Article producers and Supplier	Article Suppliers	
Substances Concerned	Substances included in the candidate list of SVHCs for Authorisation		
Possible Exemptions	If the substance is already registered for that use or if exposure can be excluded	No	For suppliers that are retailers only selling to consumers
Tonnage Threshold	1 tonne per year		
Concentration threshold in the Article	0.1% (w/w)		
Information to be Provided	ECHA	Article recipient and consumers upon request	ECHA

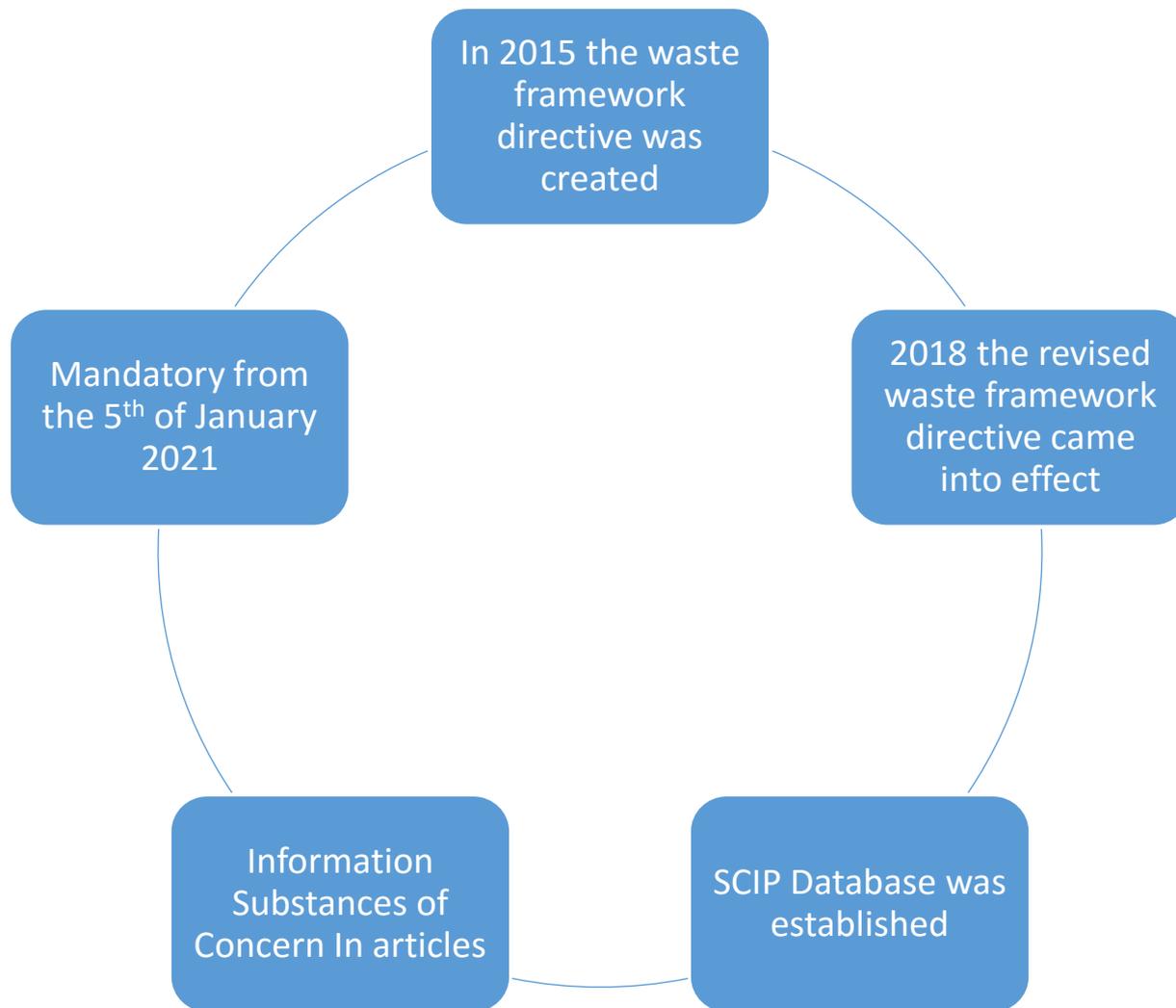
What is an SVHC?



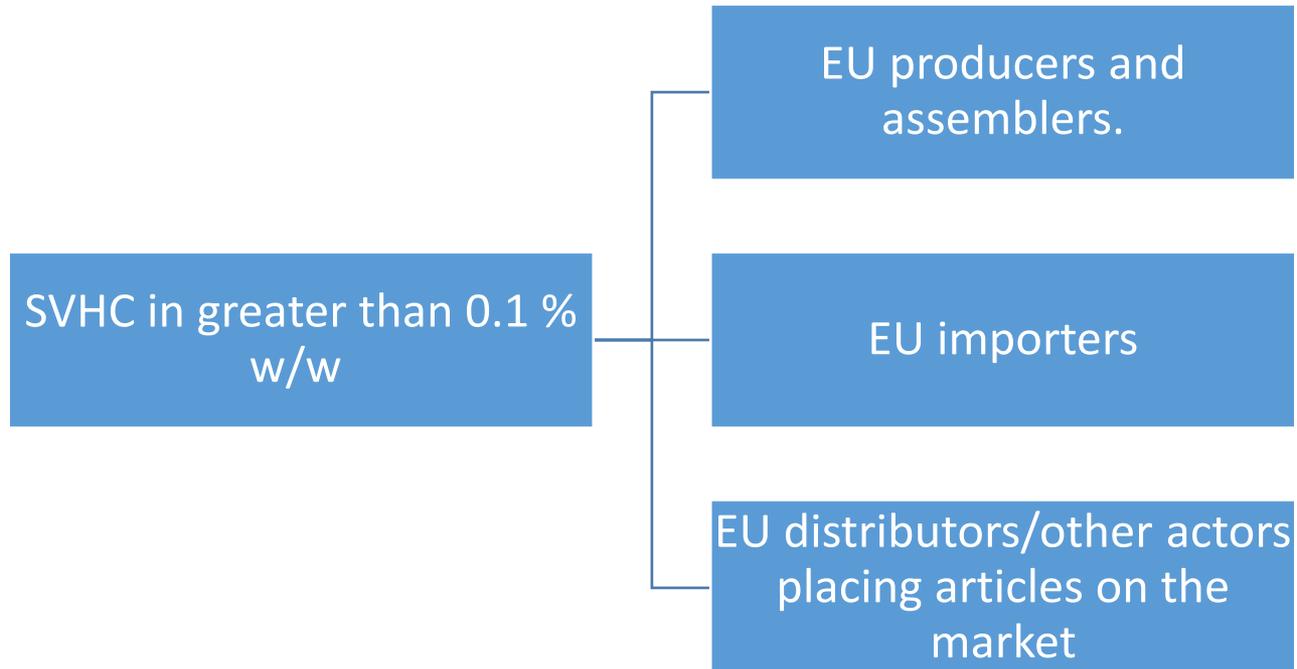
How can I achieve SVHC compliance?



Background



Who Needs to Submit a Notification?



How to identify the SVHCs in your articles?

Testing
is the
most
direct
method
but...

Collecting hazardous data from other members in your supply chain, this would include the testing reports. Some companies employ the use of various software in order to streamline this process including IMDS, Bomcheck, chemSHERPA and ECBOSS[®] GPM.

Searching the hazardous material database, which contains data on many hazardous substances, the assessment report will provide you with a risk profile of your allowing you to more accurately determine what SVHCs could be present.

Carrying out preliminary laboratory screening to rule out any unnecessary testing would therefore lower the cost of testing for the presence of SVHCs in your article.

The Database

Submit information on articles to the SCIP database

Data preparation in IUCLID.

Data submission in the ECHA Submission portal.

Material for system-to-system submission of data

A prototype of this database has been launched on the ECHA website

This test data will be considered as such and deleted prior to the end of October 2020

Information to be submitted

Component information							
*Component name	*Amount	*Article category	*Primary article identifier type	*Primary article identifier value	*Production in European Union	Other article identifier type	Other article identifier value
Unit Weight (g)	Picture	Height (m)	Length (m)	Width (m)	Diameter (m)	Density (kg/m ³)	Volume (m ³)

*Material information				
*Material name	*Material/ Mixture category	Description	Unit Weight (g)	Other characteristic

SVHC Substances		
*Substance name	*CAS	*% (w/w)

CIRS Advantages

Experienced REACH Regulation Team



- One of the largest Only Representative in the world (EU REACH, China REACH, K-REACH)
- Act as Only Representative for over 3,000 non-EU companies
- Registered over 2,000 substances
- Served clients in more than 25 countries
- Partner of BCF (British Coating Federation)

Globally Available Network of Consultants



- We have office in Europe, China, South Korea, USA
- We are going to set office in Germany, Japan, Singapore...



Reliable IT Software Developed and maintained for Over 10+ Years

- Designated Hazardous substance control and chemical compliance management platform
- Abundant Big Data and database of different chemical products properties for preliminary analysis
- Customized software service
- Used by international companies



Accredited laboratory with 10+ years experience

- Focus on hazardous substance testing especially for **SVHC** since 2008
- Qualified lab with global accreditation
- Internationally accepted testing reports
- Served more than 10,000 global clients

Q&A Session

Following our event, please always click

<http://www.cirs-reach.com/news-and-articles/2020-CIRS-Training-Courses-Global-GHS.html>

to find further updates

Contact Email: service@cirs-reach.com

For our Consultation

Next Webinar: Does article need to comply with GHS

Time & Date: (GMT+1) 15:00, August 12th

Registration still Available

Global GHS Training Courses 2020 CIRS

