C&L Notification Service and CLP Compliance Advice


According to CLP, EU manufacturers and importers (or groups of manufacturers or importers) who place a hazardous substance on the market, shall notify certain information, in particular the substance identity and the classification and labeling of that substance to ECHA (C&L notification).

The deadline of C&L notification for substances placed on the market before 1 December 2010 is 3 Jan 2011. Substances placed on the market after 1 December 2010 shall be notified within one month from the first time they are placed on the market.

Note: Non-EU companies and REACH only representatives do not have direct obligations under CLP regulation. However, if you are a non-EU company and your importers have requested you to submit C&L notifications; you may fill in one application form and send it to CIRS. CIRS will submit C&L notifications in the name of your EU importers and acquire C&L notification number for them.

The application form can be downloaded from here:
http://www.cirs-reach.com/EU_GHS_CLP_ Regulation/Application_Form_CLP_Notification_Substance.doc

Which substances are subject to C&L notifications (CLP notification)?

- Substances subject to registration under REACH (>=1 tonne/year) and placed on the market, unless a supplier has already registered the substance with a classification and labeling according to CLP;
- Substances classified as hazardous under CLP and placed on the market irrespective of the tonnage; and
- Substances classified as hazardous under CLP and present in a mixture above the concentration limits specified in Annex I of CLP or as specified in Directive 1999/45/EC, where relevant, which results in classification of the mixture as hazardous, and where the mixture is placed on the market.

Do I have to submit C&L notification (CLP notification)?

- We have pre-registered several substances under REACH and we are not going to register them until 2018. Do we have to notify to the C&L Inventory before 3 Jan 2011? Yes.
• We place a hazardous substance on the EU market and we didn't pre-register/register them because our tonnage is lower than 1 ton per year. Do we have to notify to the C&L Inventory before 3 Jan 2010? Yes.

• We bought products from non-EU suppliers and the products will be registered by the Only Representatives before Dec 2010. Do we have to submit our own notifications before 3 Jan 2010? No.

• We bought products from non-EU suppliers and the products will not be registered by the Only Representatives until 2013. Do we have to submit our own notifications before 3 Jan 2010? Yes. Because only representatives and non-EU manufacturers cannot submit CLP notifications. Someone in the supply chain has to do the job.

• We are a chemical company based outside EU. Do we have to submit C&L notifications? No. Non-EU companies and REACH only representative do not have direct obligations under CLP regulation. However, if you are a non-EU company and your importers have requested you to submit C&L notifications; you may fill in the application form above and send it to CIRS. CIRS will submit C&L notifications in the name of your EU importers and acquire C&L notification number for them.

How to submit a C&L notification to the C&L Inventory?

C&L notifications will be submitted electronically via the REACH-IT system. The following information is required for C&L notification:

• your identity and the identity of substance;
• the classification of the substance;
• indication of why if the substance has been classified in some but not all CLP hazard classes;
• if applicable, specific concentration limits, or M-factors related to the classification as hazardous for the aquatic environment together with a justification for the use; and
• the labeling elements for the substance, including the supplemental hazard statements referred to in Article 25(1).

Companies will ultimately have three options for submission of CLP notifications:

• via IUCLID 5.2 (notification dossier is prepared in IUCLID 5.2 and submitted to ECHA in REACH-IT). You can specify all the requested information in IUCLID 5, and create a classification and labelling notification dossier in IUCLID.

• directly to REACH-IT using an XML form for bulk submissions. You can create a bulk XML file containing more than one classification and labelling notification.
ONLINE. If you need to notify only a few substances and you are not currently using IUCLID 5, an online notification via REACH-IT could be your preferred option.

After C&L notification dossier is submitted, a CLP notification number will be issued starting with 02-xxx.

Note: There is no fee for making C&L notifications.

**How can we assist you in complying with CLP?**

We provide end-to-end solutions to CLP compliance. We can help you classify your substances and mixtures according to CLP, notify the classification and labeling of your products to the C&L Inventory, print GHS labels and prepare the latest Safety Data Sheets.

- Regulatory advice on the implications of CLP and REACH for your company;
- Re-classification and re-labeling of your substances or mixtures;
- CLP compliant labels (GHS Label);
- Notification to the Classification & Labeling Inventory (C&L notification) (IUCLID 5 or XML bulk submission or online submission);
- New Safety Data Sheets in accordance with CLP & REACH;

For more information about your roles and obligations under CLP, please go to:
http://www.cirs-reach.com/EU_GHS_CLP_Regulation/EU_GHS_CLP_Regulation_Obligations.html

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