C&L Notification Service and CLP Compliance Advice

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 20th January 2009.

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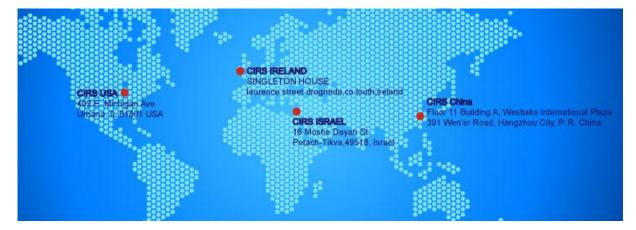
Note: There is no fee for making C&L notifications.

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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