



CIRS

CLP Compliance in retail supply chain



*Global Chemical
Regulatory Compliance*



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Who is CIRS?



- CIRS is an individual consulting firm founded in 2007 and headquartered in China;
- 350+ employees in 8 branches;
- Branches in Dublin(Ireland), London (UK), Arlington(US), Seoul (Korea), Nanjing(China), Beijing(China), Hangzhou(China);
- CIRS provides regulatory compliance consulting, testing and training services.
- CIRS shares more than 70% Chinese consulting markets;
- 4000+ Clients across the world

CIRS China (HQ)

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CIRS Europe

Add: CIRS, Regus Harcourt Centre D02 HW77, Dublin, Ireland

CIRS US

Add: #200-092, 3100 Clarendon Blvd., Arlington, VA 22201

CIRS Korea

Add: B-2310, 583, Yangcheon-ro, Gangseo-gu, Seoul, Republic of Korea

CIRS UK

Studio 310, Pill Box, 115 Coventry Road, London, E2 6GG



Background of CLP



REGULATION (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures

1. Classification
2. Labelling
3. SDS (Safety Data Sheet)
4. C&L notification
5. Poison Centre 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>



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. 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



Label Elements

- **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;



Label Size

Capacity of the package	Dimensions of label (in millimetres)	Dimension of each pictogram (in millimetres)
≤ 3 litres	If possible at least 52 x 74	Not smaller than 10 x 10 If possible, at least 16 x 16
> 3 litres but ≤ 50 litres	At least 74 x 105	At least 23 x 23
> 50 litres but ≤ 500 litres	At least 105 x 148	At least 32 x 32
> 500 litres	At least 148 x 210	At least 46 x 46



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		

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Products categories under CLP scope



CLP Scope

Article 1 - REGULATION (EC) No 1272/2008

Article 1

Purpose and scope

1. The purpose of this Regulation is to ensure a high level of protection of human health and the environment as well as the free movement of substances, mixtures and articles as referred to in Article 4(8) by:

- (a) harmonising the criteria for classification of substances and mixtures, and the rules on labelling and packaging for hazardous substances and mixtures;
- (b) providing an obligation for:
 - (i) manufacturers, importers and downstream users to classify substances and mixtures placed on the market;
 - (ii) suppliers to label and package substances and mixtures placed on the market;
 - (iii) manufacturers, producers of articles and importers to classify those substances not placed on the market that are subject to registration or notification under Regulation (EC) No 1907/2006;
- (c) providing an obligation for manufacturers and importers of substances to notify the Agency of such classifications and label elements if these have not been submitted to the Agency as part of a registration under Regulation (EC) No 1907/2006;
- (d) establishing a list of substances with their harmonised classifications and labelling elements at Community level in Part 3 of Annex VI;
- (e) establishing a classification and labelling inventory of substances, which is made up of all notifications, submissions and harmonised classifications and labelling elements referred to in points (c) and (d).



CLP Scope

Item	Definition	CLP Required?	Examples
Substance	A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.	Yes	Chemical substance: Methanol, Ethyl alcohol, etc.
Mixture	A mixture or solution composed of two or more substances.	Yes	Lubricating oil, Paint, Detergent, Glue, etc.
Article	An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.	No	Toy, Electronic, Sports equipment, etc.

CLP Scope

What is a Chemical Product?



Paints



Lubricating oil



Glues



Inks



Detergents

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CLP Scope

Exemption



Medicinal products



Veterinary medicinal products



Cosmetic products



Medical Device



Food or Feeding stuffs

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CLP Scope

Product Category	Product Type	CLP required?	Comments
DIY Stuff	- Paint: Wall paint, Floor & Concrete paint, Chalk paint, Magnetic paint, etc. - Wood protection: Lacquer, Wood stain, Wood oil, Wood wax, etc. - Preparation: Pretreatment (Primer, Wall filler, etc.)	Yes	These products meet definition of Mixture under CLP.
	Tools, Electricity, Doors, etc.	No	These products shall be considered as Article.
Household	Detergent, Fabric softeners, Stain removers, Washing machine cleaners, Dishwashing Liquid, etc.	Yes	These products meet definition of Mixture under CLP.
	Dish brushes, Trash cans, Food containers, Wipers, Tools, etc.	No	These products shall be considered as Article.
Car Engine	Car Maintenance: Paint, Oils & Fluids, Car Wax, Cleaning agents, etc.	Yes	These products meet definition of Mixture under CLP.
	Accessories, Styling, Tools, Electronics, etc.	No	These products shall be considered as Article.
Beauty	Make-up, Perfume, Facial care, Facial cleansing.	No	These products shall be considered as Cosmetic Products.
Personal Care	Hair, Body Care, Hand & Foot Care, Dental Care, Sun protection, etc.	No	These products shall be considered as Cosmetic Products or Article.
Beverages & Delicacies	Tea, Coffee, Candy, Chocolate, cake, etc.	No.	These products shall be considered as Food products.

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Key terms of CLP compliance review



Before Start

- Determine your role in the supply chain:
 - Manufacturer
 - Importer
 - Downstream user (Formulator/ Re-importer)
 - Distributor (Retailer)

- Understand CLP and its implication for your business
 - Develop inventories of substances and mixtures
 - Identify your suppliers & customers

- Assess the need for necessary training of the staff in your organization

- Monitor the updates of regulations and relative guidance, website of competent authorities and the Agency (ECHA)

- Seek advice and support from your consulting firm or trade association



Classification

- Search in house by yourself
- Communicate with Supplier and request SDS
- Check EU REACH registration
- Search C&L Inventory
- Process testing if necessary

ECHA databases: <https://echa.europa.eu/information-on-chemicals>

EFSA (European Food Safety Authority, for active substances of plant protection

products): <http://www.efsa.europa.eu/>



Information required for SDS authoring

- Company Info – name, **address**, contact, emergency contact, **UFI code**.
- 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



Label

- Official language(s) of the member states(s)
- Relative information is consistent with SDS, e.g. Chemical name, CAS No., EC No., etc.
- **One** signal word shall be chosen
- Hazard statements shall match the classifications
- The most appropriate precautionary statements shall be indicated (normally ≤ 6)
- The code of Hazard & Precautionary statements shall be used

Hazard Statements: H	Precautionary Statements: P
200 – 299 Physical hazard	100 General
300 – 399 Health hazard	200 Prevention
400 – 499 Environmental hazard	300 Response
	400 Storage
	500 Disposal



Pictograms

9 Standard Pictograms

- Diamond Shape
- Black Symbol
- White Background
- Red Frame
- >1cm²



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.



Pictograms

Wrong Cases





CLP labelling

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.

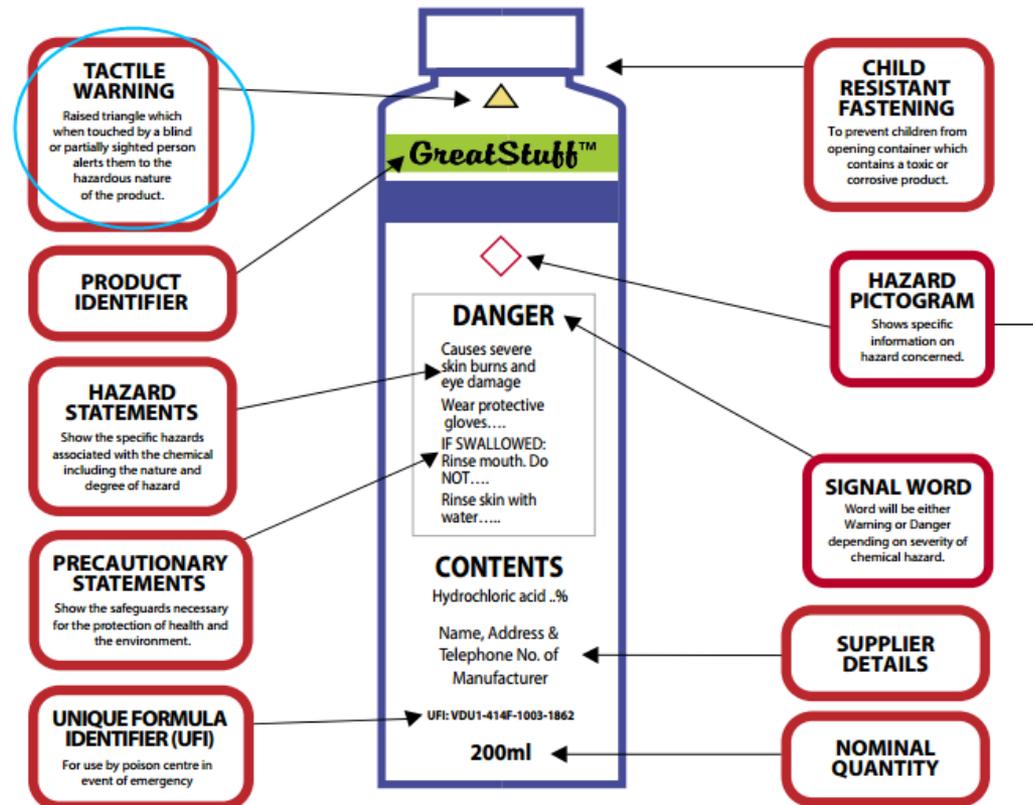


Precautionary Statements			
Prevention	Response	Storage	Disposal
<p>P210 Keep away from heat/sparks/open flames/hot surfaces. – No smoking. Manufacturer/supplier to specify applicable ignition source(s). ★ Highly recommended</p> <p>P233 Keep container tightly closed. ★ Highly recommended for category 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>



Packaging

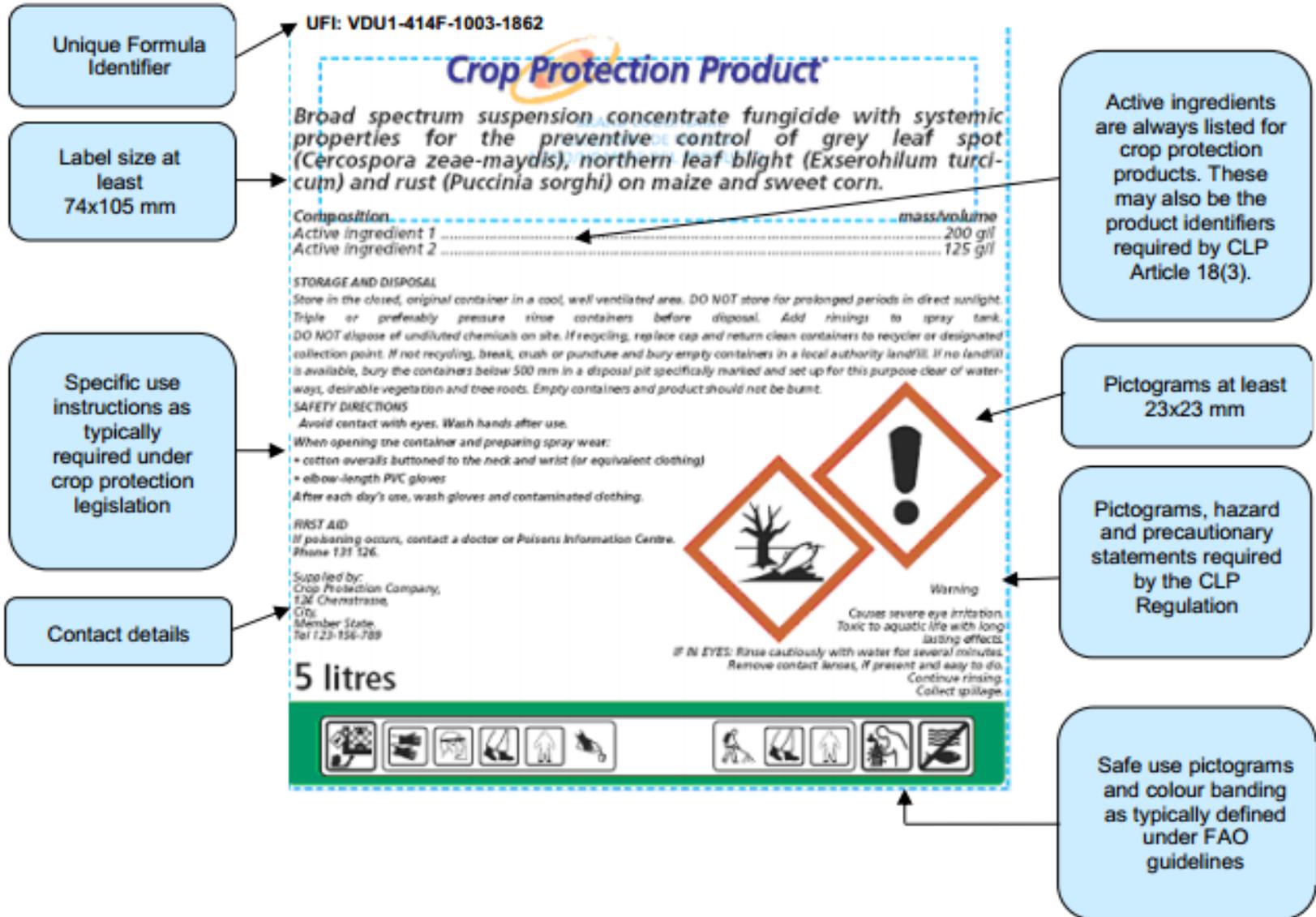
- Labelling exemptions for small or difficult to label packaging
- Packaging rules for the provision of child-resistant fastenings and tactile warnings
- Specific rules for labelling of various layers of packaging



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Case analysis and advice from CIRS

Example



Advice from CIRS

- Build an inventory of your chemical products and relative substances
- Have essential knowledge of CLP regulations
- Communicate with your suppliers and clients for CLP compliance
- Monitor regulation updates tightly
- Update SDS and label in time

“As a distributor, you are obliged to ensure that your substances and mixtures are labelled and packaged in accordance with CLP Titles III and IV, before placing them on the market. To comply with this obligation, you may use the information supplied to you, for example, in the SDSs that accompany substances and mixtures (CLP Article 4 (5)).”



Our CLP Service

- **SDS and Label preparation**
- **SDS and Label review**
- **Poison Centre Notification**
- **C&L Notification**
- **Training & Consulting**
- **Others**



The 2nd Season Global GHS Course (2021)



Introduction of Turkey GHS and KKDIK Updates

14:00 Jul 7th (GMT+1)

<http://www.cirs-reach.com/news-and-articles/Global-GHS-Course-2021.html>



CIRS

Thank You!

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