



Scope and main requirements of the relevant EU legislation in the area of chemicals management (CLP Regulation) and linkages with GHS and the Industrial Accidents Convention

*TAIEX Multi-Beneficiary Workshop on Industrial Accidents Prevention
Zagreb, Croatia, 21-23 February 2017*



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- Seveso III in the broader EU chemicals management framework
- CLP Regulation and UN GHS
- Scope and main requirements of CLP
- Changes introduced under Seveso III and TEIA Convention relating to GHS



Seveso III Directive in the broader EU chemicals management framework

- aims to prevent major accidents in industrial establishments where chemical substances are handled and to limit the consequences of such accidents
- it provides a set of measures for assessing the risks from major accidents in the establishment and surrounding area at local/regional level
- Annex I of Seveso III contains specific hazards (part I) and named substances (part II)
- classification of handled substances in combination with the handled amount defines whether an establishment comes in the scope of Seveso



Seveso III Directive in the EU chemicals management framework (2)

- the common links with the chemicals legislation are defined by the hazardous properties of the chemicals that are present in establishments
- EU chemicals legislation (REACH, Biocidal Products and Plant Protection Products Regulations) trigger data collection on the hazardous properties of the relevant substances and require chemical safety assessments
- assessment perspective under Seveso is broader and covers interactions between the establishment and surrounding environment and coordination with the external emergency reaction organisation (including local authorities, police, fire brigade, etc.)

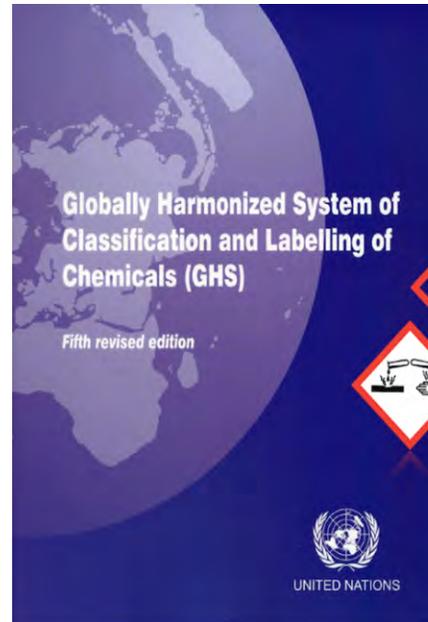


Seveso III Directive in the EU chemicals management framework (3)

- risk management measures established under the REACH, BPR and PPPR, as well as worker protection legislation or Industrial Emissions Directive (IED) can contribute to the Seveso assessment process
- CLP Regulation implements a system to categorise the hazardous properties of substances and mixtures and provides a standardised communication system on hazards

CLP Regulation and UN GHS

- It implements the provisions of the UN GHS within the EU.
- CLP took from GHS:
 - All hazard classes (16P, 10H, 2E)
 - Almost all hazard categories



Scope of the CLP Regulation

The following fall under the scope of CLP:

- Chemical substances and mixtures;
- Explosive articles referred to in Section 2.1 of Annex I.

Outside the scope:

- Radioactive substances and mixtures;
- Substances and mixtures subject to customs supervision;
- Non-isolated intermediates;
- Substances and mixtures for scientific research and development;
- Waste;
- Exemptions in the interests of defence;
- Substances and mixtures in medicinal and veterinary medicinal products, cosmetic products, medical devices, food or feeding stuffs, additives flavouring in food or feeding stuff and in animal nutrition, which are in the finished state, intended for the final user.
- Transport of dangerous goods by air, sea, road, rail or inland waterways.

CLP- main requirements

- **'CLP Regulation'** contributes to the GHS aim that the **same hazards will be described and labelled in the same way all around the world.**
- By using **internationally agreed classification criteria and labelling elements**, it is expected to **facilitate trade** and to **contribute towards global efforts to protect humans and the environment** from hazardous effects of chemicals.
- CLP Regulation replaced the former rules in the EU on classification, labelling and packaging of substances (**Directive 67/548/EEC, DSD**) and preparations (**Directive 1999/45/EC, DPD**).
- CLP applies for substances from **December 2010** and for **mixtures 1 June 2015.**

CLP- main requirements (2)

- Classification of substances and mixtures;
- Application of the harmonised classification in Annex VI;
- Appropriate Labelling and Packaging before placing hazardous substances and mixtures on the market;
- Cooperation between the actors in the supply chain for meeting requirements;
- Notification to the C&L Inventory;
- Notification to the body to be responsible for receiving information relating to emergency health response.

CLP- main requirements (3)

- in line with the GHS standards, CLP allows for the identification of hazardous chemicals and communication of these hazards to users through labelling.
- categorises hazards by hazard class and includes standard phrases for their communication (**H-statements**).
- includes standard communication with regard to the safe handling of substances and mixtures via the precautionary statements (**P-statements**).
- provides basis for **safety data sheets (SDS)** under the REACH Regulation and sets requirements for **packaging** of the hazardous chemicals.
- provides generic information on risk management measures for safe use, storage and disposal of substances and mixtures but also in case of accidental exposure of humans or accidents at sites where chemicals are used.



Linkages between CLP and Industrial Accidents Convention

- In 2014 Annex I of the Convention was amended to update the categories of substances and mixtures and the named substances and their threshold quantities.
- Purposes:
 1. To introduce the GHS criteria
 2. To update the list of named substances, and
 3. To maintain consistency with the corresponding European Union legislation (Seveso III).

Amendment of Annex I of the Convention – categories (2)

New categories in Annex I of the Convention:

- STOT SE (specific target organ toxicity-single exposure);
- Aerosols;
- Self-reactive substances and mixtures and organic peroxides;
- Pyrophoric liquids and solids;
- Substances and mixtures which react violently with water;
- Substances and mixtures which in contact with water emit flammable gases;
- Substances and mixtures which in contact with water liberate toxic gas.

Amendments in Annex I of the Convention – categories (3)

New criteria for:

- Flammable liquids (different flash points)

Old criteria	New criteria
Extremely flammable Flash point < 0 °C and boiling point ≤ 35 °C	Category 1 Flash point < 23 °C and boiling point ≤ 35 °C
Highly flammable Flash point < 21 °C but not extremely flammable	Category 2 Flash point < 23 °C and boiling point > 35 °C
Flammable 21 °C ≤ flash point ≤ 55 °C	Category 3 23 ≤ flash point ≤ 60 °C



Amendments in Annex I of the Convention – categories (4)

The classification of substances as T+, T and Xn (very toxic, toxic and harmful) under the DSD does not map directly to the hazard categories acute toxic 1, 2 and 3 in CLP.

Therefore, some of the substances concerned fall into different categories of acute toxicity, with a different qualifying quantity that may lead to some establishments now falling within the scope, whilst others fall out of the scope or change from upper- to lower-tier and vice versa

Amendments in Annex I of the Convention – categories (5)

New criteria for:

- Hazardous to the aquatic environment
 - Use of chronic toxicity data for classification in categories Chronic I and 2;
 - Higher cut-off values for logKow (i.e. 4 in CLP compared to 3 in DSD) and BCF (i.e. 500 in CLP);
 - M-factors need to be established for Acute I and Chronic I.

Amendments in Annex I of the Convention – named substances

Additional substances are included in the list of named substances (lower or higher thresholds apply) such as

- Petroleum products and alternative fuels:
 - Heavy fuel oils;
 - Alternative fuels serving the same purposes and with similar properties as regards flammability and environmental hazards as the other petroleum products;
- Anhydrous ammonia;
- Boron trifluoride;
- Hydrogen sulphide, etc.



Thank you!

Parvoleta Luleva
Hazardous Chemicals Department
Ministry of Environment and Water, Bulgaria
e-mail: pluleva@moew.government.bg
tel: + 359 2 940 6021