

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

**Sub-Committee of Experts on the Globally Harmonized  
System of Classification and Labelling of Chemicals**

12 April 2012

**Twenty-third session**

Geneva, 4 (p.m) – 6 July 2012

Item 4 (b) of the provisional agenda

**Implementation issues: Reports on the status  
of implementation**

**The classification and labelling inventory of chemicals on the  
European Union market**

**Transmitted by the European Union**

**Introduction**

1. Regulation (EC) No 1272/2008 (the CLP Regulation) introduces the criteria of the Globally Harmonised System (GHS) of Classification and Labelling of chemicals in the European Union (EU). The European Chemicals Agency (ECHA) manages the CLP related tasks, such as harmonised classification and labelling and maintaining the Classification and Labelling (C&L) Inventory, to ensure consistent implementation in the EU.

2. The CLP Regulation requires all manufacturers and importers of hazardous substances placed on the EU market (irrespective of production volume) and all substances subject to registration under Regulation (EC) No 1907/2006 (the REACH Regulation) to notify the classification and labelling of their substances – based on the criteria contained in the CLP Regulation which are in line with those of the GHS - to the Agency within one month of placing on the EU market. The Agency in turn maintains a classification and labelling Inventory holding all the notified information and makes certain elements of the database publicly accessible via its website. The first release of this database was launched on 13 February 2012, containing information on around 80% of the notified substances.

3. The publication of the inventory is a key milestone of the CLP Regulation and represents a significant step forward towards transparency on the physical, health or environmental hazards of chemical substances. The inventory lists the classification of chemical substances used in the EU which allows identifying those that are potentially hazardous and may damage health and the environment.

**Background**

4. The public C&L inventory is a database containing classification and labelling information according to the criteria in the CLP Regulation of notified substances available on the EU market irrespective of their production volume. It also provides the list of substances having a harmonised classification and labelling according to Annex VI of the CLP Regulation.

5. It provides a wealth of information from industry on how companies self-classify chemicals and also shows how some companies have classified the same substance

differently. The aim is to provide companies with easy access to information on the hazardousness of a given substance, facilitating the task of correctly classifying and labelling substances and mixtures.

6. It is a tool for hazard communication and a source of basic information on substances placed on the market, for suppliers of substances, EU Member State Competent Authorities and the general public.

## **The public C&L inventory – Information and structure of the database**

7. The content of the C&L inventory is defined by the CLP Regulation. The first version of the inventory contains the IUPAC name (and the EC name where available) as well as all classification and labelling elements from all notifications that apply one or more specific hazard classes or categories mentioned in Article 119(1)(a) of the REACH Regulation, including most of the hazard classes for physical and health hazards and all substances classified as hazardous to the aquatic environment and to the ozone layer. Information from notifications from further substances not already present will be added at a later stage, regardless of classification. The harmonised classification and labelling for substances present on Annex VI to CLP is also included.

8. The C&L inventory compiles information from over 3.5 million notifications for more than 115,000 substances submitted by manufacturers and importers. The substance identity and classification and labelling elements of most of these notifications will be publicly accessible. It is the responsibility of the notifier to self-classify and label the substance(s) based on available hazard information. The inventory does not provide information on the background of the differences in classification notified for the same substance – ECHA is also not in a position to make such information available on request. However, the notified classification should be based on information and data available to the notifier. Should a harmonised classification exist for a substance, the notifiers are obliged to follow this classification but are nevertheless responsible for considering the hazard classes not included in the harmonised entry.

9. ECHA has not filtered or checked the quality of the information provided, and displays the classifications as notified by industry. Therefore a classification contained in the inventory cannot be used as a legally valid justification for the classification of a substance; nor can the absence of a classification be used to claim absence of hazardous properties.

10. A number of options are available for searching the inventory, based on both the substance identity (e.g. EC or CAS number or substance name) and its classification. Combining the substance identity and classification elements will further refine the search results.

## **Outlook**

11. The public C&L inventory represents the largest database of self- and harmonised (within the EU) classified substances today and is unique in the world in terms of its scope. Its publication constitutes an important step in hazard communication and may, in the long term, help to improve the safe use of hazardous substances by consumers, professional users and industrial workers.

12. Industry is encouraged to use the information included in the inventory as a common ground for discussions between companies to reach agreement on the self-classification and

labelling of hazardous substances. To provide support for the hazard communication process, ECHA is currently looking to develop an IT based platform to facilitate contacts among notifiers of chemicals to give them the opportunity to discuss reasons for differences and, where appropriate, agree on a uniform classification.

13. The inventory is maintained by ECHA and the information will be refreshed on a regular basis with incoming and updated C&L information<sup>1</sup>. Improvement of the quality of the content of the C&L inventory is only possible with the joint effort of the concerned parties.

## **Further information**

### **The public C&L inventory**

<http://echa.europa.eu/web/guest/information-on-chemicals/cl-inventory>

### **C&L inventory Q&A**

<http://echa.europa.eu/web/guest/support/faqs/q-a-on-the-public-cl-inventory>

### **C&L inventory factsheet**

[http://echa.europa.eu/documents/10162/17242/factsheet\\_public\\_classification\\_labeling\\_en.pdf](http://echa.europa.eu/documents/10162/17242/factsheet_public_classification_labeling_en.pdf)

---

---

<sup>1</sup> A first refresh has already been published on 29 March 2012