

# Classification and Labelling Inventory - Overview

**Eighth Stakeholders' Day**

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Palmi Atlason

Junior Scientific Officer

European Chemicals Agency



## Overview

- Background
- The C&L Inventory database
- The public C&L Inventory portal
- Convergence of classifications
- Conclusions



## Background

### **Manufacturers/Importers are obliged to notify: (Art. 39)**

- All hazardous substances (under CLP), and
- All substances subject to REACH registration...

*...which are placed on the market*

### **Notifications should contain: (Art. 40)**

- Identity of the notifier
- Substance identity, including composition and impurities/additives
- Classification and labelling (including SCLs/M-factors and reason for no classification)

### **We have received so far (March 2013):**

- **5.8 million notifications** for
- **122 000 substances**

## The public C&L Inventory portal

ECHA shall “establish and maintain a classification and labelling inventory in the form of a database” parts of which will be public (Art. 42(1))

### REACH Article 119(1):

- Classification and labelling
- If applicable, EC name and no, CAS no
- IUPAC name (for certain hazard classes)

### Not included:

- Identity of notifiers
- Composition/impurities/additives
- Confidential information

### Additional information:

- Table 3.1 to Annex VI of CLP
- Joint REACH registration entry



## Content of the public C&L Inventory

- **All** notifications for substances for which there is a hazardous notification (according to Article 119(1))
- **All** notifications for EC substances
  - Including non-classified substances
- **~ 90% of notified substances (110 000)**
- **~ 98% of received notifications**

|                   | Substances | Notifications |
|-------------------|------------|---------------|
| EC substances     | 33 %       | 70 %          |
| Non-EC substances | 67 %       | 30 %          |



# Search options

## Search Classification and Labelling Inventory

### Search Criteria

Substance Name

Other Identifier

i  
 Starts with...  Contains  Matches exactly with...

i  
 Only Harmonised C&L i

### Classification Details

|                       | Hazard Class and Category Code(s)  | Hazard Statement Code(s)       |
|-----------------------|--|--------------------------------|
| Physical hazards      | Diss. Gas<br>Expl. 1.1<br>Expl. 1.2<br>Expl. 1.3                           | H203<br>H204<br>H205<br>H220   |
| Health Hazards        | Acute Tox. 1<br>Acute Tox. 2<br>Acute Tox. 3<br>Acute Tox. 4               | H300<br>H301<br>H302<br>H303   |
| Environmental Hazards | Aquatic Acute 1<br>Aquatic Acute 2<br>Aquatic Acute 3<br>Aquatic Chronic 1 | EUH059<br>H400<br>H401<br>H402 |

You may select one or more of the above values by using the Control (CTRL) key.

In order to perform a search you need to read through and agree to this [legal disclaimer](#).

# Harmonised classification

Harmonised classification - Annex VI of Regulation (EC) No 1272/2008 (CLP Regulation) ▲

## General Information

| EC Number | CAS Number | Index Number | International Chemical Identification |
|-----------|------------|--------------|---------------------------------------|
| 407-870-4 | 97384-48-0 | 608-031-00-7 | 2-benzyl-2-methyl-3-butenitrile       |

ATP Inserted / Updated: CLP00 i

CLP Classification (Table 3.1)

| Classification                    |                          | Labelling                |  |                                 | Specific Concentration limits, M-Factors | 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) |  |       |
| Acute Tox. 4 *                    | H302                     | H302                     |  | GHS07<br>Wng                    |  |       |
| Aquatic Chronic 3                 | H412                     | H412                     |  |                                 |  |       |

| Signal Words | Pictograms  |
|--------------|---|
| Warning      | <br>Exclamation mark |

# Substance summary page

Notified classification and labelling

## General Information

| EC Number | CAS Number | IUPAC Name  |
|-----------|------------|--|
| 215-185-5 | 1310-73-2  | sodium hydroxide   |

[Discuss](#)

## Notified classification and labelling according to CLP criteria

| Classification                    |                          | Labelling                |  |                                 | Specific Concentration limits, M-Factors   | Notes | Number of Notifiers  | Joint Entries  | View  |
|-----------------------------------|--------------------------|--------------------------|--|---------------------------------|--|-------|---|---|---|
| Hazard Class and Category Code(s) | Hazard Statement Code(s) | Hazard Statement Code(s) | Supplementary Hazard Statement Code(s) | Pictograms, Signal Word Code(s) |  |       |   |   |   |
| Skin Corr. 1A                     | H314                     | H314                     |  | GHS05<br>Dgr                    | Skin Irrit. 2: 0,5% ≤ C < 2%<br>Eye Irrit. 2: 0,5% ≤ C < 2%<br>Skin Corr. 1A: C ≥ 5%<br>Skin Corr. 1B: 2% ≤ C < 5% |       | 1577  |   |    |
| Skin Corr. 1A                     | H314                     | H314                     |  | GHS05<br>Dgr                    |  |       | 888   |   |    |
| Met. Corr. 1                      | H290                     | H290                     |  | GHS07<br>GHS05<br>Dgr           |  |       | 292   |   |   |
| Acute Tox. 4                      | H312                     | H312                     |  |                                 |  |       |   |   |   |
| Skin Corr. 1A                     | H314                     | H314                     |  |                                 |  |       |   |   |   |
| Eye Dam. 1                        | H318                     | H318                     |  |                                 |  |       |   |   |   |
|                                   |                          | H319                     |  | GHS05<br>Dgr                    | Skin Irrit. 2: 0,5% ≤ C < 2%<br>Eye Irrit. 2: 0,5% ≤ C < 2%<br>Skin Corr. 1B: 2% ≤ C < 5%<br>Skin Corr. 1A: C ≥ 5% |       | 143   |              |  |
|                                   |                          | H315                     |  |                                 |  |       |   |   |   |
| Met. Corr. 1                      | H290                     | H290                     |  |                                 |  |       |   |   |   |
| Skin Corr. 1A                     | H314                     | H314                     |  |                                 |  |       |   |   |   |
| Eye Dam. 1                        | H318                     |                          |  |                                 |  |       |   |   |   |

# Convergence of classifications

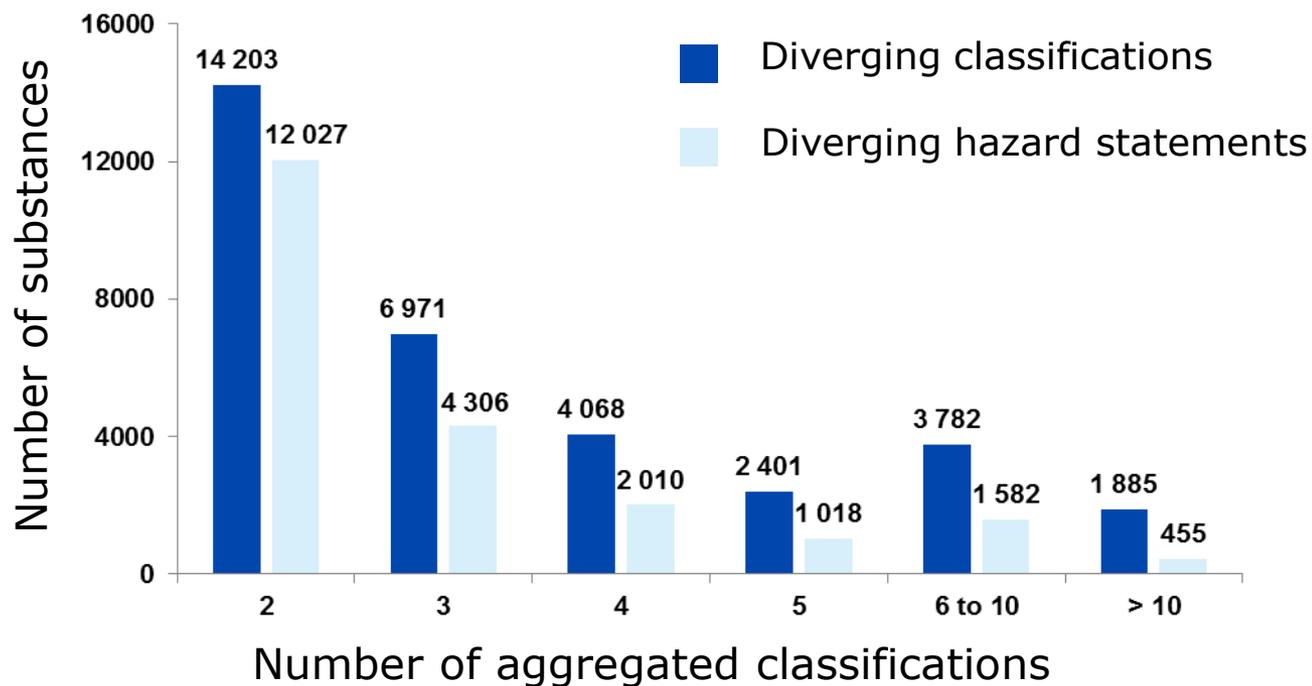
C&L Platform and regulatory  
use of the Inventory database



## Divergence of classifications

- Notifiers of the same substance are obliged to *"...make every effort to come to an agreed entry to be included in the inventory. The notifiers shall inform the agency accordingly"* (Art. 41)
- ~ 25% of substances have different notified classifications
- Differences can be legitimate (e.g. impurities/physical form), but different access to data or disagreements on data can also have effect
- Errors (e.g. missing labelling, incorrect hazard statement) also common

# Level of divergence in the Inventory



## Convergence and regulatory actions

- In time, classifications should converge on one or few entries for each substance
- The Inventory database can be used to identify and prioritise substances for regulatory processes
  - Harmonised classification and labelling (CLH)
  - Substances of very high concern (SVHC)
- Level of divergence used in priority setting
- Any self-prioritisation by industry is welcomed

## The C&L Platform

- ECHA launched the C&L Platform in January 2013 to assist notifiers in agreeing on classifications of substances
- Platform is a series of web-based discussion rooms, each connected to one substance on the C&L Inventory
- Each room accessible only to registrants and notifiers of that substance
- Use is free, easy and anonymous and users are already discussing their substances

# Access to the C&L Platform

## General Information

| EC Number | CAS Number | IUPAC Name  |
|-----------|------------|--|
| 215-185-5 | 1310-73-2  | sodium hydroxide   |

Access to the  
C&L Platform



Discuss

- Access to each discussion room is restricted to registrants and notifiers of that substance

### Entry to the C&L Platform

The C&L Platform has been established to allow notifiers and registrants to come into contact with each other, exchange information and agree on the appropriate classification for a particular substance. The C&L Platform is divided into discussion rooms based on particular substances and is only accessible to those who have either notified or registered the substance through REACH-IT.

By clicking on "**Proceed**" below, you will be guided to the login page for the discussion room dedicated to the substance you navigated from. No other substance discussion rooms will be accessible from below. These need to be accessed through their respective summary page on the C&L Inventory.

**Before continuing, please verify the following:**

- Do you have a valid REACH-IT account?
- Did you submit a notification for the substance in question through REACH-IT?

If the answer to either of these questions is no, the system will not permit you to access the discussion room.

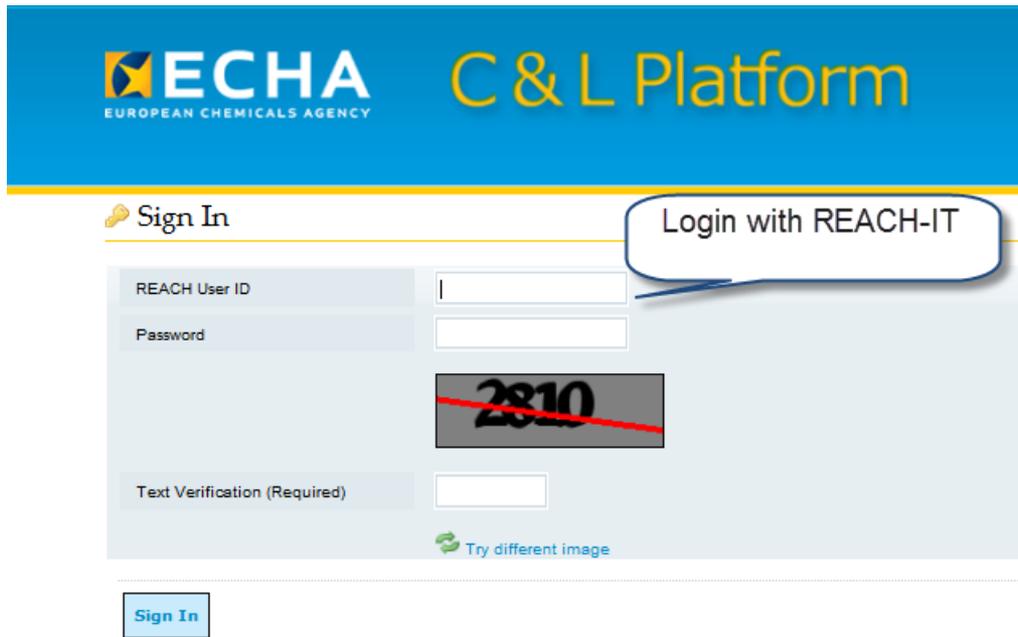
The number displayed in the "DISCUSS" button indicates the number of participants who have entered the discussion room in question. If the number displayed is "0", the discussion room has not been created and you will be asked to post the first post.

Do you wish to proceed?

Proceed

Cancel

# Log in using REACH-IT credentials



 **C & L Platform**

 Sign In

REACH User ID

Password



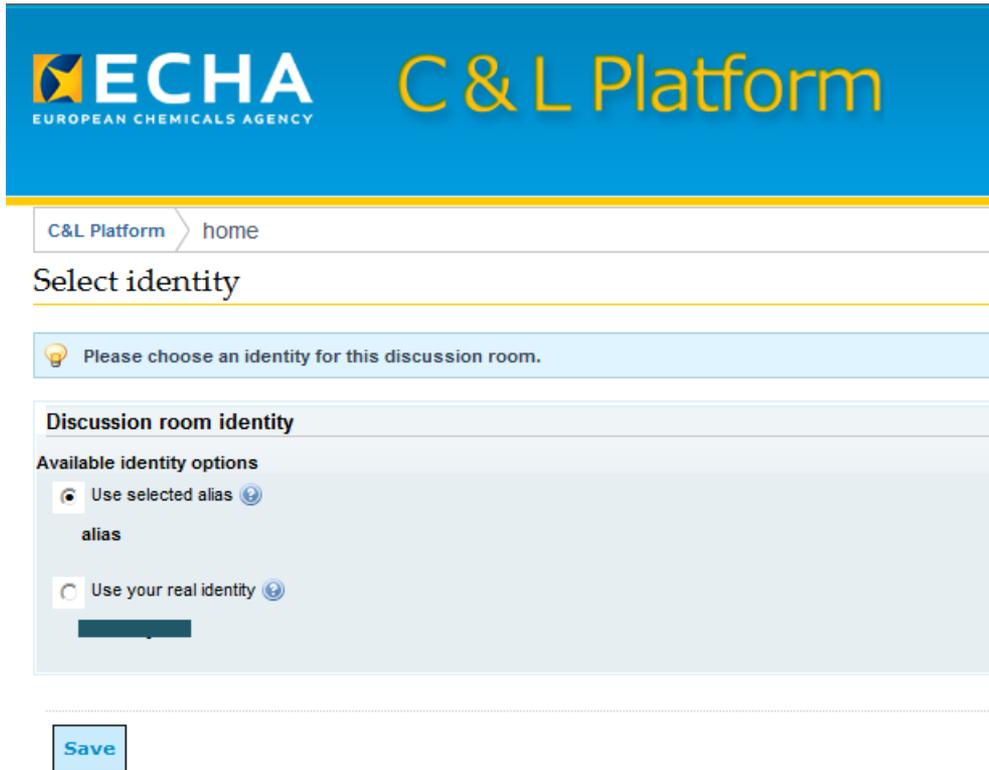
Text Verification (Required)

 [Try different image](#)

[Sign In](#)

Login with REACH-IT

# Choosing an alias



C&L Platform > home

## Select identity

 Please choose an identity for this discussion room.

### Discussion room identity

Available identity options

Use selected alias 

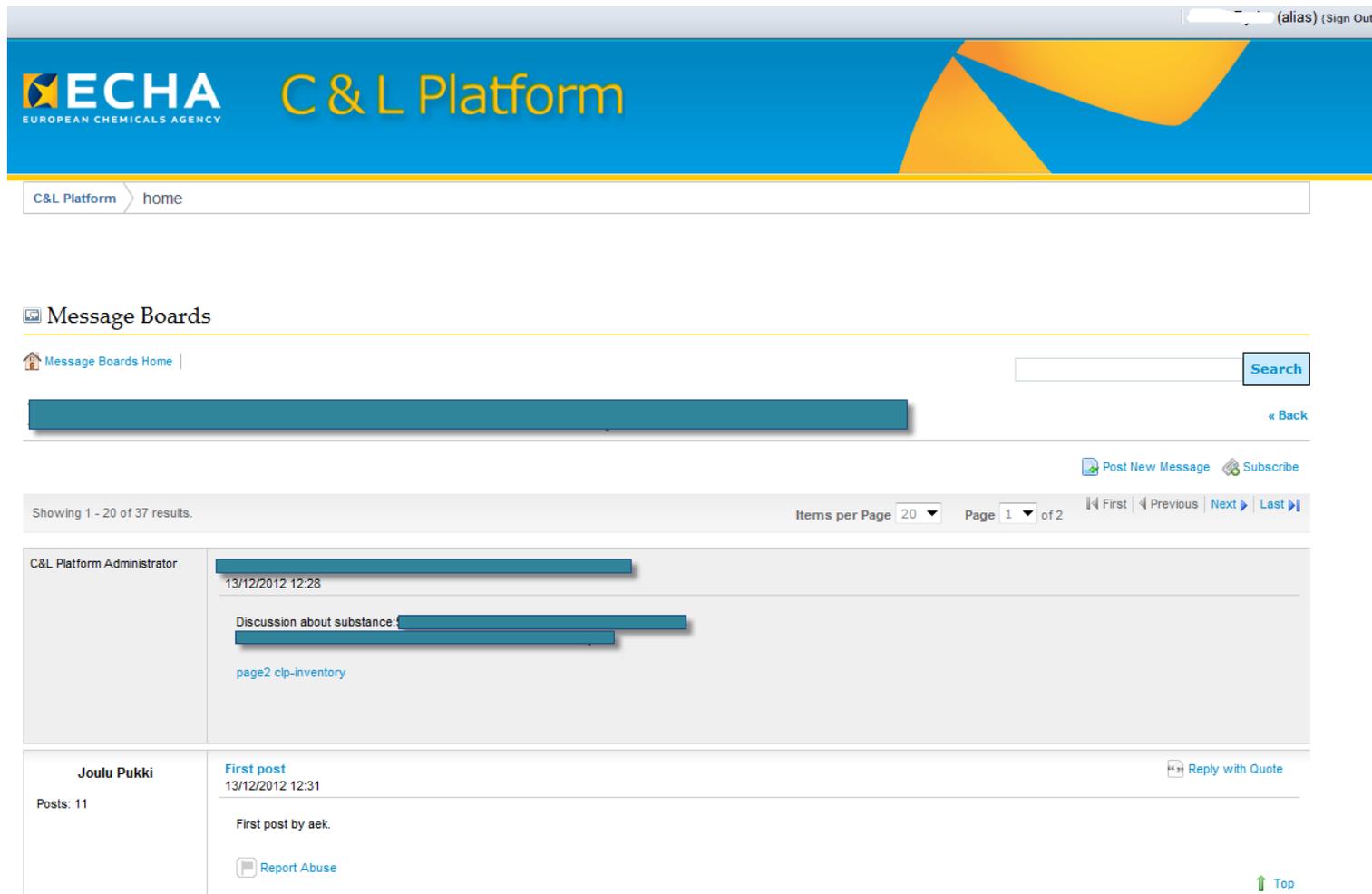
alias

Use your real identity 

██████████

[Save](#)

# Inside the room



The screenshot shows the ECHA C&L Platform website. At the top, there is a blue header with the ECHA logo and the text "C & L Platform". Below the header, a breadcrumb trail shows "C&L Platform" and "home". The main content area is titled "Message Boards" and includes a "Message Boards Home" link and a search box. A large teal redaction bar covers the top part of the message content. Below this, there are links for "Post New Message" and "Subscribe". The interface shows "Showing 1 - 20 of 37 results." and navigation controls for "Items per Page" (set to 20), "Page 1 of 2", and "First", "Previous", "Next", "Last" buttons. The first message is from "C&L Platform Administrator" dated "13/12/2012 12:28" with a subject "Discussion about substance:" followed by a redacted line and a link "page2 clp-inventory". The second message is from "Joulu Pukki" dated "13/12/2012 12:31" with a subject "First post by aek." and a "Report Abuse" link. A "Top" button is visible at the bottom right of the message area.

## Conclusions

- The C&L Inventory represents the largest database of self-classified substances in the world
- Opportunity to examine and analyse hazardous chemicals on the EU market
  - Can serve as a valuable tool in assisting MSCAs in their work
  - Industry can prioritise substances of concern for discussion
- The public portal increases transparency in the market
- The C&L Platform is easy to use and anonymous
- Over time and with the joint effort of all parties, the inventory should converge on a single or few entries for each substance, resulting in a reliable database on hazardous substances

**Thank you**

