

Tips for users of Chemicals in the work place

A short guide for users of chemicals in the workplace on how to get the most from the classification and labelling information you receive



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Tips for users of Chemicals in the work place

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1. Classification

Chemicals are classified according to their hazardous properties so that people can easily recognise the hazards associated with them.

The classification shows, for example, if the chemicals have the potential to cause cancer, irritate the eyes, damage the environment, explode and so on.

If you use chemicals in the workplace, you need to know the classification of a chemical when you are assessing the risks and identifying control measures. The classification often helps you to decide if other legislation to control chemicals also applies at your site.

- » Who classifies chemicals?
- » Why is the same chemical classified differently by different suppliers?
- » What should I do when I get different classifications from different suppliers?
- » How do I find classification information on ECHA's website?
- » How do I determine whether the classification information from my supplier is reliable?

Click and find out!



In the European Union, the CLP Regulation ((EC) 1272/2008) is the core legislation that deals with the classification, labelling and packaging of chemicals.

It is based on the United Nations Globally Harmonised System on the classification and labelling of chemicals (UN GHS).

This has been adopted by many countries worldwide, so there is now greater uniformity in classification criteria globally.

Classification

1.1 WHO CLASSIFIES CHEMICALS?

Chemical suppliers are responsible for classifying the substances and mixtures they supply. This is usually the manufacturer, formulator or distributor.

Suppliers classify according to the rules provided in the CLP Regulation. This is called self-classification.

Sometimes, the classification is agreed by independent experts at European level. This is called harmonised classification. When a substance has a harmonised classification, you must use it.

You can find the classification on the package label and in Section 2 of the safety data sheet (SDS) of the substance and/or the mixture supplied. You can also find the classification of all manufactured and imported substances on ECHA's website.



Explosive
Explosiv
Explosif



Hazardous to the environment
Umweltgefährlich
Dangereux pour l'environnement



Gas under pressure
Gas unter Druck
Gaz sous pression



Acute toxicity
Akute Toxizität
Toxicité aiguë



Serious health hazard
Ernste Gesundheitsgefahr
Grave danger pour la santé



Oxidizing
Oxidierend
Oxydant



Flammable
Entzündbar
Inflammable

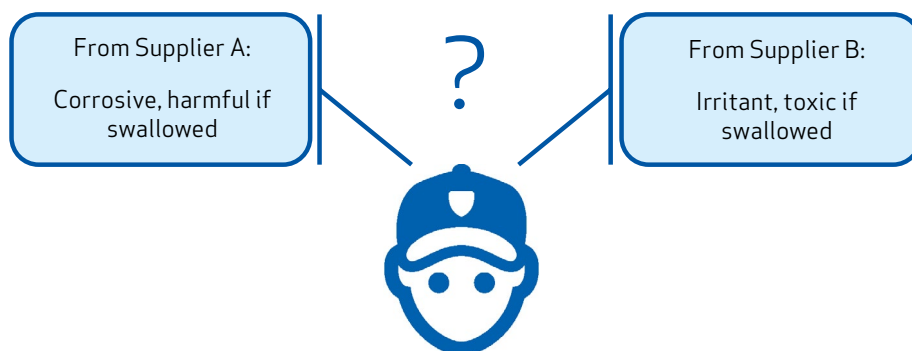


Corrosive
Korrosiv
Corrosif



Health hazard
Gesundheitsgefahr
Danger pour la santé

1.2 WHY IS THE SAME CHEMICAL CLASSIFIED DIFFERENTLY BY DIFFERENT SUPPLIERS?



You sometimes see different classifications for the same chemical, and it helps to understand why this happens.

The reasons include:

- Different hazardous impurities, additives or ingredients might be present,
- Properties such as the physical form, the pH, the flash point might be different,
- Suppliers need to interpret scientific studies when they classify a chemical, and different suppliers might reach a different conclusion. Sometimes this is justifiable, but sometimes the suppliers may be mistaken,
- Formulators often derive the mixture classification using the classification of the ingredient substances. If the substance classification differs, the mixture classification may also differ.

1.3 WHAT SHOULD I DO WHEN I GET DIFFERENT CLASSIFICATIONS FROM DIFFERENT SUPPLIERS?

If you get different classification information from different suppliers for the same substance or mixture, you need to check that they are actually the same chemical. Perhaps they have different impurities or ingredients, or are in a different physical form and this explains the difference in classification. If the chemical is the same, contact your suppliers and encourage them to adopt a common classification.

If your suppliers do not agree on the classification you can:

- Take a precautionary approach and adopt the most stringent classification,
- or
- Adopt the classification you are most confident of. For example, this could be the classification that is most consistent with the toxicological information in the safety data sheet. You can also look at the classification information on ECHA's website. You need to have sufficient competence to make this decision and document it,

or

Classification

- Ask for advice. The CLP Helpdesk of your national competent authority, your national enforcement agency or your trade association may be able to help, But don't expect them to classify the chemical for you!

or

- Classify the chemical yourself. This option is seldom taken by users of chemicals in the workplace. It must be done by a competent person and based on reliable evidence. If the classification is different to that of all your suppliers, you have to report your classification to ECHA.



Remember, if there is a harmonised classification, you must use it.

1.4 HOW DO I FIND CLASSIFICATION INFORMATION ON ECHA'S WEBSITE?

ECHA's website gives information on over 120 000 substances, more than 13 000 of which are REACH registered. Take these steps to find information on classification:

1. Search for the substance on ECHA's main page (<http://echa.europa.eu>)

2. On the Search Result page, click on the substance name to go to the Infocard. Click on the BP icon to go to the brief profile¹. You can go to the C&L Inventory from both pages

Search for Chemicals

Advanced search

201-245-8

Search

Search by name, EC number or CAS Registry number

Name

EC / List no.

CAS no.

4,4'-isopropylidenediphenol

201-245-8

80-05-7

BP

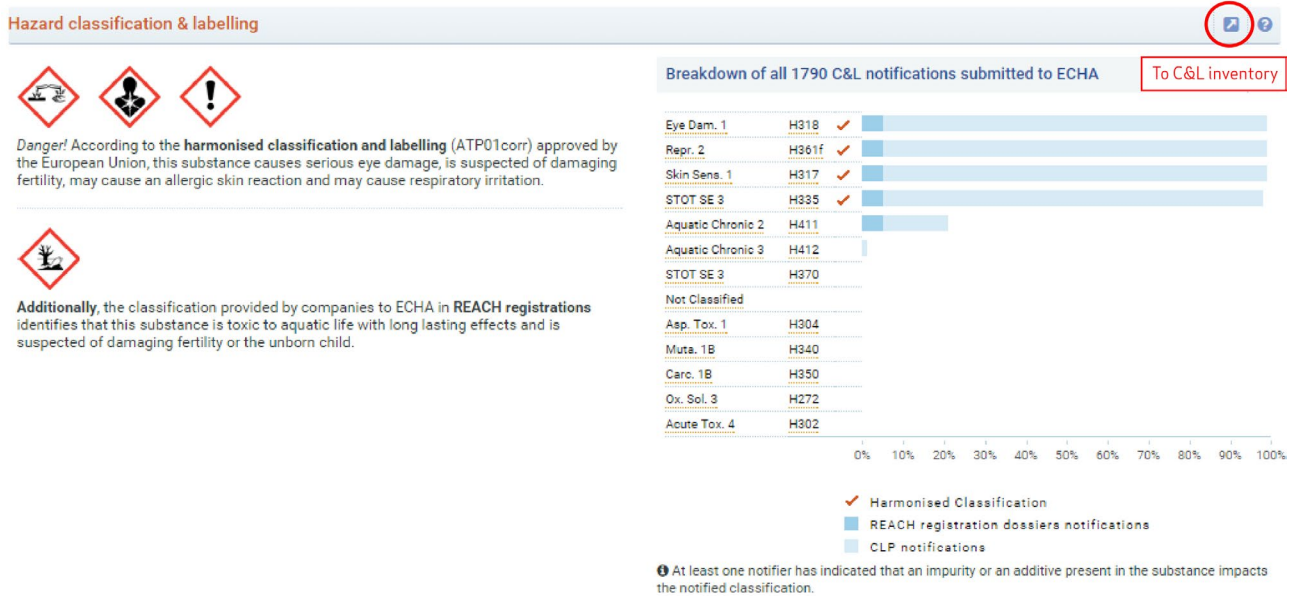
To infocard

To brief profile

¹ The Infocard and Brief Profile provide substance information in a format that is easy to read. They are collated from the information accessed on the "Information on chemicals" web page, that is provided by companies. ECHA does not verify the accuracy of the information.

3. The Brief Profile gives a graphic overview of available C&L Inventory data. It shows if the classification is harmonised, whether the data is from REACH registrations or C&L notifications, and the percentage of suppliers reporting each classification. If impurities and/or additives affect the classification reported, this is indicated below the graph. Click on the arrow on the right hand side to go the C&L Inventory.

Classification



In the C&L Inventory, the header and colour indicates if the classification is harmonised or notified - blue and yellow respectively. The harmonised classification is always shown first. The Seveso categorisation is also provided for substances covered by the Seveso Directive.

Classification

1.5 HOW DO I DETERMINE WHETHER THE CLASSIFICATION INFORMATION FROM MY SUPPLIER IS RELIABLE?

Tips on how to assess the reliability of your supplier's classification include:

- The classification is consistent with the harmonised classification,
- The classification is consistent with REACH registration classification. These classifications are likely to be based on more test data than substances that are not registered,
- In the C&L Inventory, the classification is marked as a "joint entry". This means the source is a lead dossier of a REACH registration joint submission. Consequently, the substance classification probably underwent more extensive discussion and review than individual registrations and notifications,
- In the "Brief Profile", the graph distribution shows that a substantial proportion of notifiers assign a given classification (although there is not always safety in numbers).



The classification information in the ECHA database is based on notifications by companies and information provided in REACH registration dossiers. ECHA does not verify the accuracy of the information.

The C&L Inventory aims to be up-to-date but it is not the primary legal record of harmonised classification. That can be found in Table 3.1 in Annex VI to CLP.

Mixture classifications are **not** notified and are not included in the C&L Inventory.

Labels

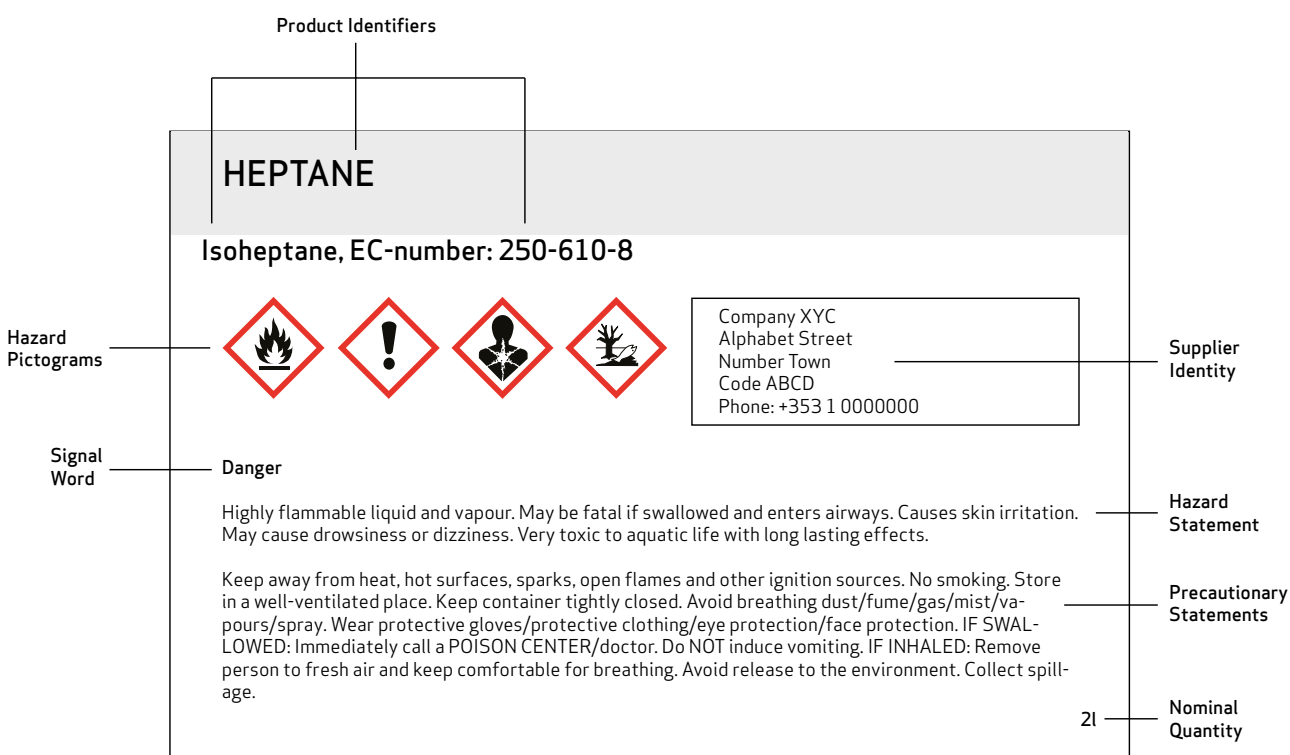
2. Labels

When a substance or mixture is classified as hazardous, there must be a label on the packaging.

The label provides information on the product, the supplier, the hazard and precautions that should be taken. An example is shown here. The detailed requirements are specified in the CLP Regulation (<http://echa.europa.eu/regulations/clp/legislation>) and ECHA Guidance (<http://echa.europa.eu/guidance-documents/guidance-on-clp>).

You should check that the information on the label is consistent with the information in the safety data sheet. If it's not, contact your supplier.

With mixtures, you may still see labels that comply with the previous Dangerous Preparations Directive (DPD) (with orange symbols). These are still acceptable until June 2017 if the mixtures were placed on the market before 1 June 2015.



Packaging

3. Packaging

The packaging of hazardous chemicals should keep workers and the environment safe from unintended contact. If you aren't satisfied with how the chemicals you receive are packaged, contact your supplier.

The packaging requirements for hazardous chemicals are specified in the CLP Regulation and those most relevant for the workplace are:

- The packaging should be designed so the hazardous contents cannot escape. Packaging should not be susceptible to being damaged by its contents and should be strong enough to meet the normal stresses and strains of handling.
- Packaging with replaceable fastenings should be designed so that they can be repeatedly refastened without the contents escaping.



Packaging that fulfils the transport of dangerous goods requirements also meets many of the provisions of the CLP Regulation.



4. Checking information

4.1 THINGS TO CHECK IN LABELS AND SAFETY DATA SHEETS

Your supplier is responsible for providing correct information to you. However, you need to check the label and the safety data sheets for the chemicals you handle on site.

You are not expected to do the work of an inspector, but you should be able to judge whether the information is reliable. Here are some indicators that the information you receive is reliable:

The label

- The product identity on the chemical label is the same as on the SDS,
- The chemical label information is the same as in Section 2.2 of the SDS,
- The label is prepared in accordance with CLP. (It is okay to have a label for mixtures according to previous legislation until June 2017, if the mixtures were placed on the market before 1 June 2015),
- The label contains all the necessary information, and is clearly readable.

The safety data sheet (SDS)

- The SDS is up-to-date:
 - the update interval is not specified in the regulation but the SDS must be updated without delay if there is relevant new information, or if the substance is subject to authorisation or restriction. If the supplier has not sent a revised SDS for a few years, you could ask that supplier if the current version is still up-to-date,
- The quality of the information provided is good,
- The label or SDS is in a national language of the country,
- The SDS is complete, with all 16 sections and the relevant subsections completed as appropriate.
- The SDS contains the relevant information necessary for a risk assessment at the workplace. This information would include:
 - Classification and labelling information,
 - Occupational exposure limits,
 - Exposure controls (e.g. local exhaust ventilation),
 - How to handle and store safely,
 - Emergency number and first aid measures.

Checking information

- Exposure scenarios are provided with the SDS for a REACH-registered substance (although these are not required if the registered quantity is less than 10 tonnes per year),
- The information in the SDS is consistent with the information in exposure scenarios annexed to the SDS.

You should contact your supplier if the information you get is inadequate, or you receive different information from different suppliers.

If your supplier is unhelpful, the REACH/CLP Helpdesk of your national competent authority and/or your national enforcement agency can advise you.



- Use the checklist developed by the national enforcement authorities to help you check the SDS: <http://echa.europa.eu/regulations/reach/safety-data-sheets/checklist>
- Consult the eGuide for safety data sheets and exposure scenarios for section-by-section information on what should be in an SDS, when to expect an exposure scenario, how to check them and much more: <http://echa.europa.eu/regulations/reach/safety-data-sheets>

4.2 HOW DO I COMMUNICATE WITH MY SUPPLIER?

Checking information

Here's what your email/letter could look like:

Your name and address

Supplier name and address (or competent person listed on SDS)

Name of chemical:
Date of receipt of chemical/SDS:
Date of SDS:

Dear _____,

We wish to request an updated SDS/label for the chemical referred to above to address the following issues:

- In the SDS:
 - Section 1: Emergency number for national poison centre is missing
 - Section 2: Classification inconsistent with Annex VI (harmonised classification)
 - Section 3: Issue with ranges used
 - Section 8: EN standards for PPE missing and national OEL missing
 - Section 9: List of physical hazard testing inadequate
 - Section 11: Toxicology tests missing
 - Section 15: List of regulatory requirements
 - Difference in label v SDS noted
 - Label elements missing from label or SDS
 - Exposure scenarios not supplied with registered substances
 - Use not covered in exposure scenario
- On the label
 - Product identifier v SDS inconsistent
 - Blank pictograms
 - Label elements missing
 - Readability

Can you please respond as soon as possible with an updated SDS and labels as appropriate?

Regards,

Name and address



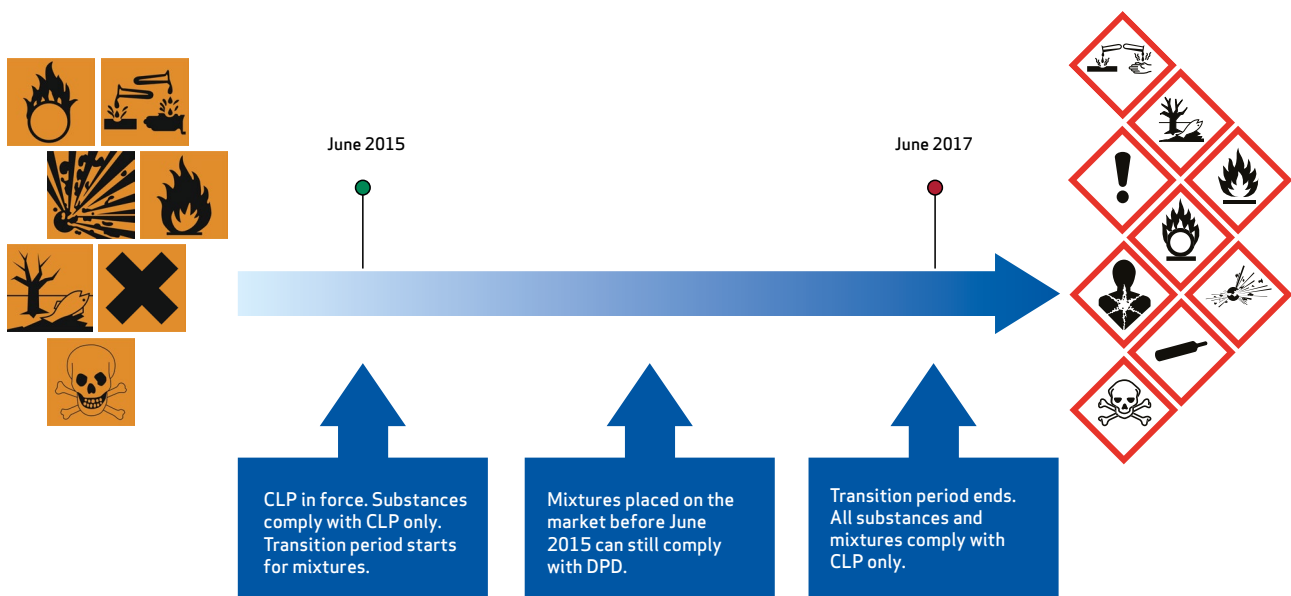
If you have new information regarding the hazardous properties of the substance, or other information that calls into question the appropriateness of the risk management measures in the safety data sheet, you must communicate this information to your supplier.

Legislation

5. Legislation

5.1 CHANGES IN CLASSIFICATION LABELLING AND PACKAGING LEGISLATION

- From 1st June 2015, the Dangerous Preparations Directive (DPD) 1999/45/EC has been fully replaced by Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (the CLP Regulation).
- Mixtures (preparations) which were already placed on the market and classified, labelled and packaged in accordance with DPD before 1st June 2015 do not have to be relabelled and repackaged in accordance with the CLP Regulation until 1 June 2017.
- This means that all substances you receive should now be classified, labelled and packaged in accordance with CLP Regulation but you may still receive mixtures classified, labelled and packaged in accordance with DPD until June 2017.

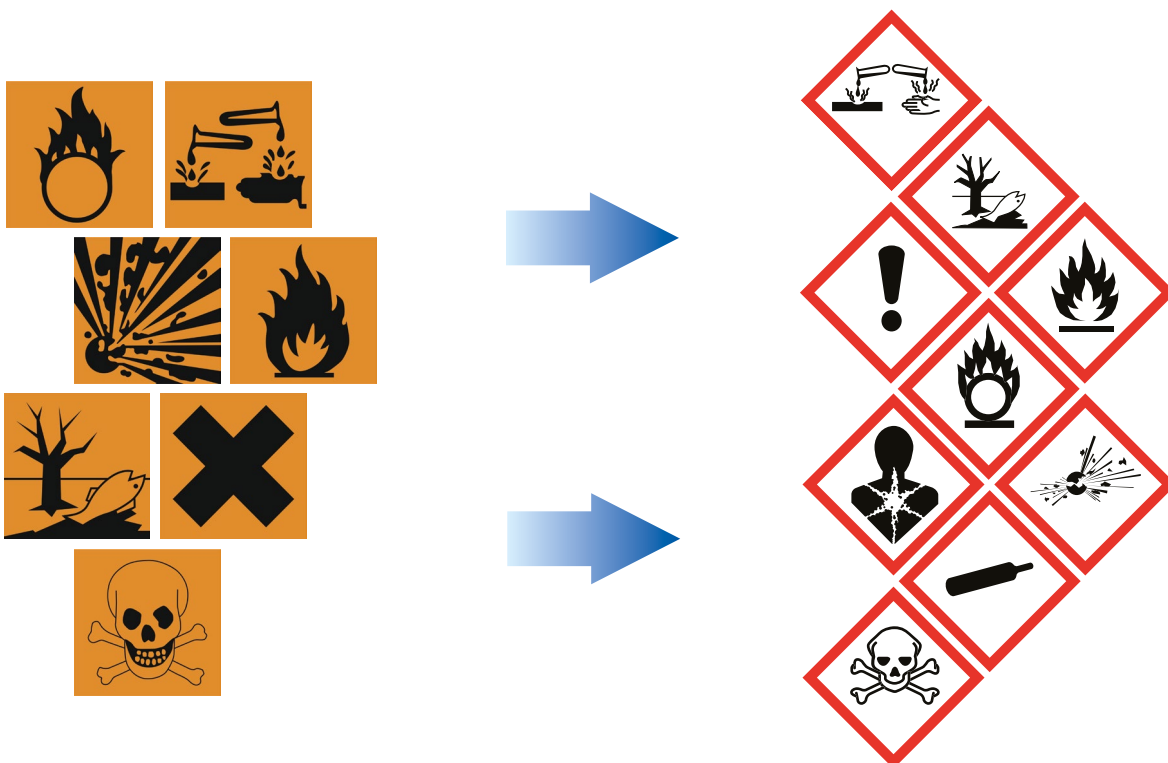


5.2 MANAGING THE TRANSITION TO CLP AT YOUR SITE

Legislation

The transition to CLP can be confusing. Here are some tips to help your company manage the changes:

- Make sure that all employees handling chemicals recognise and understand the new CLP labels, including the pictograms and the hazard and precautionary statements. Test yourselves on the CLP quiz (<http://www.echa.europa.eu/chemicals-in-our-life/clp-pictograms>).
- If your supplier has not provided you with the classification according to CLP yet, be assured you can still use the old classification at your site. It is not wrong.
- Check whether the classification of chemicals you handle has changed, perhaps because of new hazard categories and classification thresholds or new information from REACH registration. This could affect your risk management on site and other compliance obligations under other legislation.
- If you supply mixtures look at the formulator web page for more details on your obligations and use the step-by-step guide to help you classify them. Make sure you update the label and safety data sheet as necessary (<http://echa.europa.eu/regulations/reach/downstream-users/who-is-a-downstream-user/formulators>).



Legislation

5.3 MANAGING HAZARDOUS CHEMICALS ON SITE

If your company handles chemicals, you need to have an effective chemicals management system in place to ensure that they are managed, handled and used safely in compliance with legislation.

Steps you can take include:

- Know which legislation related to chemicals applies to your business. The main legislation is detailed in the next section,
- Have an up-to-date inventory of the chemicals you store or use at the workplace,
- Be aware of the classification of substances and mixtures you handle, and how it affects your other legislative obligations,
- Take reasonable steps to ensure that the classification and labelling is reliable. If not, risk assessments and other compliance actions based on it may be inadequate and human health and the environment may not be protected as required,
- Monitor changes in classification regularly and evaluate the impact of any changes on compliance with other legislation.

5.4 OVERVIEW OF THE MAIN LEGISLATION

There is a wide range of legislation which aims to make sure that the hazards and risks presented by chemicals are properly managed – in the workplace, the home or the environment. These legislative requirements often depend on the classification of the chemical. Here is an overview of the main legislation

Regulations and directives promoting the safe use of chemicals

- The CLP Regulation ((EC) No 1272/2008) on classification, labelling and packaging of substances and mixtures. It amended and repealed the Dangerous Substances Directive (67/548/EEC) and Dangerous Preparations Directive (1999/45/EC).
- The REACH Regulation ((EC) No 1907/2006) concerning the registration, evaluation, authorisation and restriction of chemicals.
- The PIC Regulation (EU) No 649/2012 concerning prior informed consent for the export and import of hazardous chemicals.
- Council Directive 1998/24/EC of 7 April 1998 on the protection of the health and safety of workers from the risks related to chemical agents at work (CAD).
- Directive 2004/37/EC of the European Parliament and of the Council of 29 April 2004 on the protection of workers from the risks related to exposure to carcinogens or mutagens at work (CMD).
- Council Directive 1992/58/EEC of 24 June 1992 on the minimum requirements for the provisions of safety and/or health signs at work.
- Directive 2010/75/EU of the European Parliament and of the Council of 24

November 2010 on industrial emissions (integrated pollution prevention and control) (IED).

- Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (SEVESO III).
- Directive 2008/68/EC on inland transport of dangerous goods.

Regulations and directives for specific situations

- Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products.
- Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC.
- Regulation (EC) No 648/2004 of the European Parliament and of the Council of 31 March 2004 on detergents.
- Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel.
- Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products.
- Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys.
- Directive 2014/40/EU on manufacture, presentation and sale of tobacco products.
- Directive 2014/68/EU on pressure equipment.
- Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC.
- Council Directive 93/42/EEC of 14 June 1993 concerning medical devices.
- Directive 98/79/EC of the European Parliament and of the Council of 27 October 1998 on in vitro diagnostic medical devices.
- Council Directive 75/324/EEC of 20 May 1975 on the approximation of the laws of the Member States relating to aerosol dispensers.
- Council Directive 1994/33/EC of 22 June 1994 on the protection of young people at work.
- Council Directive 1992/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding.
- Decision 2000/532/EC establishing list of wastes.

Legislation

- Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of-life vehicles.
- Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS).
- Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE).

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