



## Q&A

### **What is CLP?**

Classification, Labelling and Packaging Regulation, or CLP, is a new European Union system for classifying, labelling and packaging chemical substances and mixtures. It aims to provide a consistent and comprehensive way for defining, classifying and communicating the health, physical and environmental hazards of chemicals. CLP is based on the United Nations' Globally Harmonised System (UN GHS).

### **Why did the U.N. develop the Globally Harmonized System (GHS)?**

The goal of GHS is to achieve greater consistency worldwide in the labelling of physical, health and environmental hazards associated with chemicals. GHS was also developed to lower barriers to trade created by the variety of labelling requirements found around the world. In Europe, GHS is called CLP.

### **What is the difference between GHS and CLP?**

GHS is the global recommendation for classifying and labelling chemicals. CLP is the European legislation that enables us to implement CLP in our markets.

### **Why is CLP Regulation important?**

It is important that customers know how to safely handle chemical substances and mixtures. Clear, consistent classification of chemicals and labeling of products, required under CLP, is one way to protect customers and the environment from potential harm from hazardous chemicals.

### **When does the new CLP regulation take effect in Europe?**

CLP came into effect in January 2009. All products that were considered substances (contained only one ingredient) had to be fully transitioned by 1<sup>st</sup> December 2010. Products that were mixtures (contained more than one ingredient) have until 31<sup>st</sup> May 2015 to be fully transitioned. This means that for mixtures old-style safety data sheets are still compliant. Owing to this transition phase, if a SDS is in CLP format both the old and the new classifications for substances must be shown in Section 3 and the old and new labelling information must be shown in section 2 of the Safety Data Sheet.

### **What does Ecolab need to do to comply with CLP regulation?**

Manufacturers, importers of substances and mixtures as well as formulators, distributors and retailers, must classify, label and package substances and mixtures in accordance with the new CLP Regulation. We need to author our SDS to CLP criteria and label our products to CLP criteria.

## Which countries are implementing CLP (GHS)?

In the European Union, CLP was implemented in January 2009. This means that the countries following European Union regulations -- the EU member-states plus Norway, Lichtenstein, Switzerland and Iceland -- will follow the CLP regulation. Outside the EU, many countries are implementing or have plans to implement GHS. Among them are the U.S., Canada, Brazil, New Zealand, Japan, Korea and South Africa.

## Can you share an example of the new pictograms?



## Are all Ecolab products affected by CLP?

Ecolab's policy is to author safety data sheets for all products, even those that are not hazardous or there is no legal requirement to do so – therefore all Ecolab products are touched by CLP.

## How are articles different to chemicals?

An article is defined in REACH as '*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*'.

In a general sense, an article can usually be considered to be a finished product. Some examples of articles are clear cut, for example a telephone, a chair and a car (a car is an article made up of other articles, wheels, seats, etc).

CLP applies to specific types of articles

- explosive articles (those containing one or more explosive substances or mixtures); or
- pyrotechnic articles (articles containing one or more pyrotechnic substances or mixtures);

Ecolab does not produce these types of articles.

### **What are the key dates I need to know?**

GHS implementation varies by region of the world. Implementation is underway in Asia Pacific already, with Canada, Europe and the US in progress. In Europe, effective December 1, 2010, substances will have to be classified and labelled according to CLP. Formulations or mixtures will need to be classified according to CLP by June 1, 2015. As a formulator of products (mixtures) Ecolab's products need to be classified and labelled according to CLP no later than June 1, 2015.

### **What is the classification and labelling inventory?**

The classification and labelling inventory (also referred to as C&L) is a database which will contain basic classification and labelling information. All substances that are manufactured or imported into Europe must be notified regardless of quantity and within one month of being placed on the market. This includes those substances that are below the thresholds for notification under REACH. This includes research samples that may be sent to test houses. It will also contain the list of harmonized classifications and will be managed by ECHA.

### **Is animal testing needed for the CLP classifications?**

No. There is no requirement to perform additional animal testing for the purpose of classification. New animal testing can only be initiated if all other means of generating reliable data have been exhausted.

Classifications can be derived using existing data, read-across data, literature data and by calculation.

### **Will the warning statements on our labels significantly change?**

It depends. CLP classification criteria are different, which may result in some Ecolab products requiring different warning statements.

CLP has different endpoints which mean some products may be classified differently to how they were before. This could result in different warning statements.

The important thing to understand is that our Ecolab products have not changed. It is the classification that has changed.

### **Is Ecolab differentiating between the implementation schedules across the European region?**

Because our products are labelled for sale in multiple countries we will implement the CLP classifications at the same time even if CLP is yet to be introduced in your country. However, the safety data sheets will reflect both CLP and the existing DPD hazard warnings.