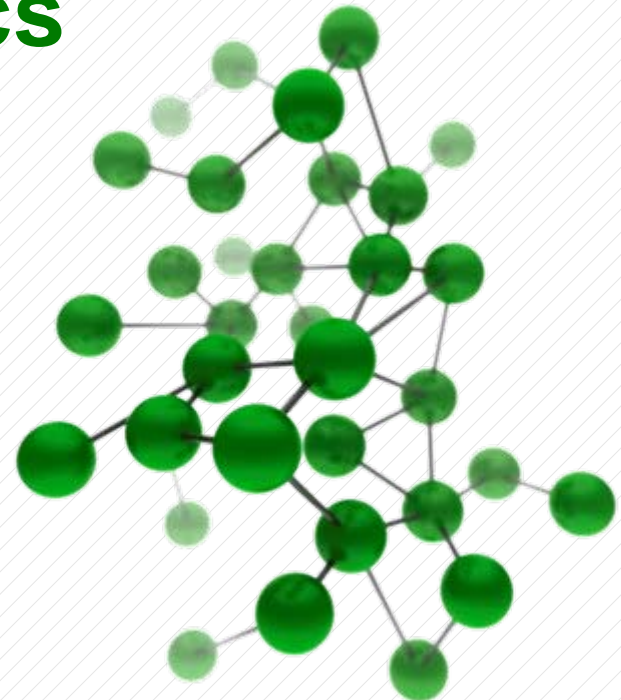


# REACH & CLP Some Basics

**K&L GmbH**



**Please note:**

**This presentation offers an outline of the REACH regulation for producers, importers and so called downstream**

**For more detailed information, legal and business consulting, please contact:**

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## **Substances:**

1. Overview
2. Registration
3. Authorization / Restriction
4. Downstream User
5. CLP regulation - Basics

## **Articles:**

1. Definition and Overview
2. Information requirements Article 33

**REACH** : **R**egistration, **E**valuation & **A**uthorisation of **C**hemicals

The REACH Regulation covers:

- **Substances and preparations**
- **Articles**

**CLP**: **C**lassification, **L**abelling and **P**ackaging of chemicals

## Substances

**> 1 ton/year**

**Registration**

**Evaluation by manufacturer/importer**  
Information requirements differ with quantities

- > 1 t/a
- > 10 t/a
- > 100 t/a
- > 1.000 t/a

**Dangerous Substances**

**Authorisation/ Restrictions**

**Substances classified as**

- carcinogenic
- mutagenic
- toxic for reproduction
- persistent, bio-accumulative, toxic

**may be subject to authorization and restrictions**

**Information Requirements**

- Classification and Labelling
- Down Stream User
- Safety Data Sheet

## **Substance:**

a chemical element and its compounds, natural state, including necessary additives and impurities but excluding solvents.

## **Registration:**

necessary proceeding for any substance put on the European market > 1 ton per year at the European Chemicals Agency (ECHA).

## **Authorization:**

Substances of very high concern will be listed in Annex XIV and are not allowed to be used without an authorization granted by ECHA.

## **Restriction:**

A substance, for which Annex XVII contains a restriction shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction.

1. EU-Manufacturer of substances

2. EU-Importer of substances and preparations

3. Non-EU manufacturer of sub-stances may overtake the registration duty instead of importers by using an Only Representative (OR)

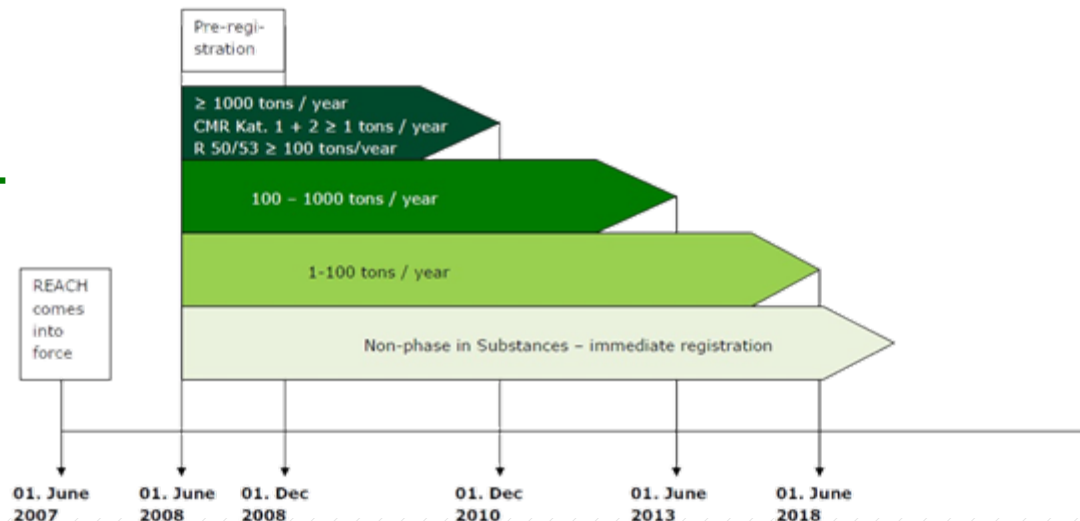
4. User of substances: must contribute to registration as downstream user

**No registration – no market:** the registration must be submitted to ECHA, the European Chemicals Agency, before market entry.

**So called phase-in substances (“known substances”)** do have an extended registration deadlines depending on the annual volume put on the market if they have been pre-registered in 2008 or late-pre-registered afterwards.

**New substances** have to be registered immediate

## Registration of phase-in substances:



Substances of very high concern (svhc) to be put on **Annex XIV** are:

- **Carcinogenic, mutagenic, toxic for reproduction (CMR)**
- **(very) persistent and (very) bio accumulative (PBT, vBvB)**

After a substance is put on Annex XIV, companies have a grace period for applying for an authorization or for substitution of the substance.

**In Annex XVII**, substances are restricted for special uses. Substances are put on Annex XVII after an evaluation process and have to be implemented after a transition period.

## **Rights:**

Can ask the registrant to include their uses (of a substance) in the registration dossier and Chemical Safety Report..

## **Duties:**

- Shall make sure that substances bought are REACH compliant.
- Must take the necessary safety measures for protecting health and environment as described in the Chemical Safety Report / Extended Safety Data Sheet.

## CLP Regulation

Classification, Labelling and Packaging

EU implementation of the **GHS** (Globally Harmonized System) of the United Nations.

### Changes:

- Notification of substances into the Classification and Labelling Inventory
- Based on a new classification of substances
- New Hazard statements and pictograms



## Article

...means an object with a shape, surface or design which determines its function to a greater degree than does its chemical composition.

Examples for articles:



## If an article

- contains a so called candidate substance according to Artt. 57 and 59 REACH and
- the concentration of the candidate substance in the article exceeds 0,1 mass %.

**The supplier of the article must inform**

- **Recipients and**
  - **Consumers within 45 days upon request.**
- NGOs prepared template letters to request such information already**

## What is a Candidate Substance?

If there are good reasons to believe that the substance must be classified as **CMR, PBT und vPvB**, it will be put on the list for substances in Annex XIV.

**Thank you!**

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