



## REACH & CLP Checklist ~~July~~ September 2011

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Voor afkortingen: zie TF Afkortingen (<http://extranet.essenscia.be/Contents/Document.asp?ID=7160>)

***This document is updated on a quarterly basis. Revisions are highlighted in red.***

**This checklist gives you an overview of several elements to evaluate if you are on schedule with the REACH and CLP requirements. If something is unclear to you or you want help, don't hesitate to contact essenscia. Essenscia does not only support her members but has also projects to help downstream users and consultants with REACH en CLP.**

**For more information, please contact Tine Cattoor, tel. 0496/59 36 15, [tc@essenscia.be](mailto:tc@essenscia.be).**

### **REACH basics start**

- The first registration deadline for phase-in substances has passed:
  - Check supplier safety data sheets (SDS) for the registration status of their substances. For registered substances the registration number shall be mentioned on the next revision.  
Please note that registration numbers starts with "01" (eg. 01-2119444314-46-0001) and that in some cases the last four digits (which refers to the registrant) may be omitted.
  - The list of registered substances can be consulted on the ECHA website. ([echa.europa.eu/registered/registered-sub.aspx](http://echa.europa.eu/registered/registered-sub.aspx)). Please note that substances
    - may be exempt from registration;
    - may not need to be registered yet; or
    - may have been registered but the information of the dossier is not yet disseminated.When checking the list of registered substances, you can also verify if a substance is registered as a full dossier and/or as a on site/transported isolated intermediate, which can be relevant for upcoming registrations.
- Review your REACH inventory. Are you manufacturing/importing new substances since your last update ? Did you stop manufacturing/importing ? Did volumes increase/decrease ? It is recommended to update your inventory on a quarterly basis to assure that you remain compliant with the registration obligations.
 

Note that:

  - Phase-in substances that you produce or import for the first time can still be preregistered until 1 year prior to their registration deadline.
  - However, if you produce/import a substance with a 2010 deadline for the first time, you must register before starting the production or import.
- Prepare for the next registration deadline of 31 May 2013:
  - Register as soon as possible the substances already registered by other SIEF members during the first 2010 registration wave.
  - Start the SIEF discussion now.
  - Start preparing the substance sameness check now.

### extended safety data sheets (ext-SDS)

- When you receive an ext-SDS with exposure scenarios for registered substances, carefully review the document:
  - o Is your use described in section 1.2 of the safety data sheet and in the exposure scenarios?
  - o Correspond your conditions of use with the conditions of safe use as described in the exposure scenarios (do you have the same operational conditions as described in the exposure scenarios? are all described risk management measures in place?)?

Note that you have 12 months to comply to a safe use as described in the exposure scenario's.

- Depending on the result of the review, additional action may be required (e.g. making your own chemical safety assessment and notify ECHA within 6 months about your use).
- Document your assessment!
- Communicate relevant information contained in the exposure scenario's to your customers without any delay.
- In case you are a formulator, update the safety data sheets for mixtures you supply further downstream.

More information about what to do when you receive an extended SDS can be found in 'themafiche extended SDS' on the intranet.

### Authorisation

- The annex XIV includes at this moment six substances which are subject to authorization. In case you are using one of these substances, check carefully with your supplier whether he will apply for an authorization for your use or whether you will have to prepare an authorization dossier.
- In case you are using one of the annex XIV substances, consider evaluating alternatives and developing a substitution plan.
- Check regularly the ECHA-website on draft recommendations for inclusion of new substances in annex XIV ([http://echa.europa.eu/consultations/authorisation/draft\\_recommendations\\_en.asp](http://echa.europa.eu/consultations/authorisation/draft_recommendations_en.asp)).

### General

- Include the REACH process in your standard business processes (R&D, purchasing, marketing, training, ...). Product Safety Management should be part of your existing management system.
- Do you check the presence of candidate list substances in imported and manufactured articles and do you communicate concentrations above 0,1% (w/w) to your customers? Don't forget that Belgium considers it to apply to parts of an article if the part can be sold separately.
- Producers and importers of articles must notify ECHA of candidate list substances present in their articles over 0,1% (w/w) and the total volume of the substance exceeding 1 ton/year.  
This notification has to be submitted no later than 6 months after the inclusion in the candidate list (except for those substances that were already on the candidate list before 1/12/2010, in this case the notification had to be done before 1/6/2011).  
Exemptions apply for substances already registered for that use in the article or exposure to humans and environment is excluded during the use and disposal of the article.
- Current candidate list contains 53 substances. Check the ECHA website for the latest list.  
[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)
- Do you check compliance with the restrictions of annex XVII?
- Are you ready for an inspection by the Authorities? Inspections have started!  
*Essenscia developed a self assessment tool to check compliance with the REACH regulation. All articles for which you can be penalized in Belgium including the level of the penalization are listed in the tool. The tool is available for members on the essenscia extranet.*

### Implement CLP

- Are your SDSs compliant with the new format of Regulation 453/2010 (revised Annex II of REACH) ? A transition period of 2 years (until 1/12/2012) may be applicable. For substances both DSD and CLP classification must be included on the SDS.  
*Essenscia developed an overview document when a new SDS format is applicable. The document is available for members on the essenscia extranet.*
- Do you have a transition plan in place for the mixtures that you are putting on the market ? For mixtures the deadline for CLP classification and labeling is 1 June 2015.
- For substances requiring registration the classification and labeling should have been agreed in the SIEF before 1/12/2010 independent of the volume.
- Have you notified the CLP classification and labeling of your substances that you manufacture or import to the ECHA (starting 1 December 2010 within 1 month of manufacturing/importing). This obligation applies for all substances placed on the market that must be registered and also for hazardous substances on their own or leading to the classification of the mixture as hazardous. Do you have a system in place to assure that you notify new substances within a month of their first manufacturing or import?
- In case you are a manufacturer or importer of substances as such, have you switched to the CLP classification and labeling (obligation since 1 December 2010) ?
- In case you are a formulator, check the new classifications of your ingredients. Due to additional data available since the registration, the classification of substances might have changed. This might have an impact on the classification on your mixtures. Carefully check the SDS for more information.
- Are your employees trained on the new CLP classification and labelling ?
- Are you monitoring the new harmonized C&L proposals ? (see Registry of Intention on the ECHA website)
- Due to the classification according to CLP, the classification of the substances that you purchase, might have changed. This may have an impact on e.g. the PPE for your employees and storage conditions. Carefully check the SDS for more information.
- Some CLP classification rules and harmonized classification & labeling have been changed with the 2<sup>nd</sup> ATP (Verordening 286/2011). Check potential impact on your products.

*Essenscia developed a manual to define classification and labeling of your substances and mixtures. The tool provides a summary of all the applicable rules in a condense spreadsheet and is available for members on the essenscia extranet.*