

CLP Briefing Note: CLP resources

Where do I start?

The law? Probably not...

It's tempting to find a copy of the Regulation and to plunge in. **Our advice is STOP!** Only do this if you are competent at classification under the previous system (DSD/DPD), you understand the background to CLP, and are comfortable working with legal texts. If so, then the full text of CLP can be obtained via http://echa.europa.eu/legislation/classification_legislation_en.asp. This page also has a link to the Adaptations to Technical Progress (ATP) to CLP which altered some of the Annexes to the Regulation. Unfortunately, currently there is no single legal document which consolidates these texts and so if you want to be formally sure of the accuracy of an entry in Annex VI you need to search both documents. However, there is a link to a consolidated database on the above page and this can be assumed to be accurate.

The guidance?

There are several ECHA Guides to CLP running into hundreds of pages. They can all be accessed via the ECHA site at: <https://echa.europa.eu/guidance-documents/guidance-on-clp> Where you start depends on your baseline knowledge and your specific needs. Decide what you need from the list below.

I know nothing about CLP and need a quick starter overview.

Allow about an hour to read the ECHA Questions and Answers on CLP. It will enable you to identify your role in CLP and begin to map out the work you need to do.

I am familiar with the basics, but I now need to get into more detail.

You are now ready for the ECHA Introduction to CLP. This document is substantial and you need to set aside several hours to read and digest it. You may want (but you don't need) to access the Regulatory text as well. When you have read this document you should be able to scope your CLP tasks and identify the resources required.

I have the background and now need to understand the detail of the classification criteria, either generally or in relation to a specific effect...

You need to use both Annex I of the Regulation and the ECHA Guide to the CLP Criteria. But take care! The latter is a long (winded) document with a good deal of scientific discussion, some of it highly specialised. It certainly can't be read at one sitting! Apart from the introduction we see it as a resource manual for the expert or for use to progressively expand your knowledge on a need to know basis. Surprisingly Annex I of CLP is a relatively easy read once you find your way around.

I need to understand the detail of the notification system.

Then read the helpful Guide from ECHA on how to submit and update your classification and labelling notification. <https://echa.europa.eu/support/dossier-submission-tools/reach-it/notification-to-the-cl-inventory>. This guide is straightforward and well written, and you should be able to work through it in a couple of hours. You may want to be able to access REACH-IT as you go through the document.

I have questions on issues which I am sure others have asked.



Then go to the ECHA Frequently Asked Questions.

I would like to know what the opinion of a national Competent Authority is on a particular issue.

Then ask them by using the list of National Helpdesks from ECHA see <https://echa.europa.eu/support/helpdesks> But don't expect a prompt reply – some of the help desks take weeks to respond. Most CAs also have websites and some (e.g. France and UK) have helpful newsletters to which you can subscribe.

Need further help?

If you need more help understanding the CLP Regulation and how it may affect your business, why not register on one of our CLP training courses? For details about our workshops, including the next available dates, please see our events webpage at <http://www.reachready.co.uk/events>, or contact us on events@reachready.co.uk or +44 (0) 207 901 1443. Remember, all our training can be provided in house either as a standard or tailored package, or via our advice and mentoring service.

As one of our Gold subscribers one of our experts will answer your questions – simply call us on +44 (0)207 901 1444 or email enquiries@reachready.co.uk.