

What does CLP mean for retailers?

Introduction

Any retailer who sells paint, nail varnish remover, bleach or washing powder will have seen the orange and black warning symbols which adorn the packaging of these chemically based products. The main responsibility for deciding what label goes on these products is the job of the manufacturer or importer who first places the chemical on the market. The good news is that under the Classification, Labelling and Packaging (CLP) Regulation – which introduced a new style of labels – the main responsibility is still with the manufacturer or importer. The bad news is that the changes are complex: retailers are affected by and drawn into the decision-making process as the changes may have consumer purchasing consequences – something that just can't be ignored. This guidance aims to explore the impact of CLP on retailers so that you can manage the changes.

Transition to CLP

The CLP Regulation (which is described in more detail in our “A brief guide to CLP”) was intended to be a major step towards a globally harmonised system of classification and labelling of chemicals (GHS for short). One potential advantage of more globalised hazard communication is better movement of goods in the EU and beyond. However, making the changes requires time and money and the costs are often passed onto retailers and ultimately to the consumer.

When the CLP Regulation was agreed the burden on companies, particularly SMEs, was recognised. Several measures were taken to lessen the cost, and one of the most important provisions was separate deadlines for chemical substances (such as unfragranced calcium chloride moisture-absorbing flakes) and mixtures (such as proprietary bathroom cleaners). Under the transitional provisions, classification and, where required, labelling of substances was mandatory from 1 December 2010; for mixtures, these obligations began on 1 June 2015.

So, since 1 June 2015, the basic requirements for substances and mixtures have been the same. However, the Regulation includes a two-year derogation, a period of grace which allows the supply chain to consume stocks of mixtures which were already labelled in accordance with the Dangerous Preparations Directive (DPD) and placed on the market by 1 June 2015. Such mixtures do not need to be re-labelled until 1 June 2017. (There was a similar derogation for substances already placed on the market by 1 December 2010 which expired on 1 December 2012). This means that from 1 June 2017 all mixtures that are placed on the market must be classified under the CLP regulation.

CLP Pictograms and what they mean



Contains gas under pressure; may explode if heated.
Contains refrigerated gas; may cause cryogenic burns or injury.



Unstable explosive; Explosive - mass explosion hazard; Explosive- severe projection hazard; Explosive- fire, blast or projection hazard; May mass explode in fire.



May cause or intensify fire; oxidiser.
May cause fire or explosion; strong oxidiser.



Extremely flammable gas; Flammable gas; Extremely flammable aerosol; Flammable aerosol; Highly flammable liquid and vapour; Flammable liquid and vapour; Flammable solid



May be corrosive to metals
Causes severe skin burns and eye damage



May cause respiratory irritation; May cause drowsiness or dizziness; May cause an allergic skin reaction; Causes serious eye irritation; Causes skin irritation; Harmful if swallowed; Harmful in contact with skin; Harmful if inhaled; Harms public health and the environment by destroying ozone in the upper atmosphere



Fatal if swallowed; Fatal in contact with skin; Fatal if inhaled; Toxic: if swallowed; Toxic in contact with skin; Toxic if inhaled



Very toxic to aquatic life with long lasting effects
Toxic to aquatic life with long lasting effects



May be fatal if swallowed and enters airways; Causes damage to organs; May cause damage to organs; May damage fertility or the unborn child; Suspected of damaging fertility or the unborn child; May cause cancer; Suspected of causing cancer; May cause genetic defects; Suspected of causing genetic defects; May cause allergy or asthma symptoms or breathing difficulties if inhaled

Need further help?

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

If you need 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 events, 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.