

Session 1

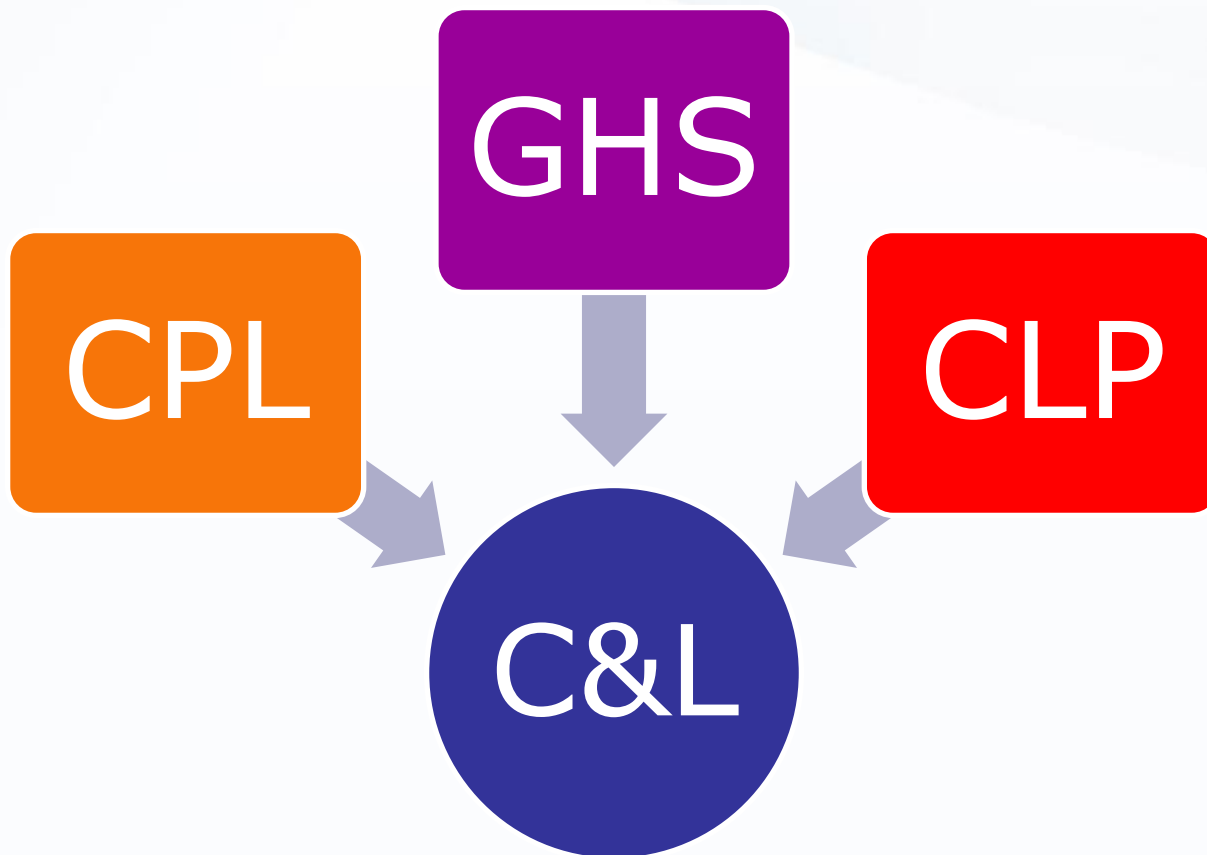
Reclassification

Caroline Walsh





Acroynms



Key Topics



- CLP Regulation- a brief overview (WHY?)
- Reclassification WHAT? WHO? HOW?WHEN?
- Guidance and Help



WHY CLP is needed?

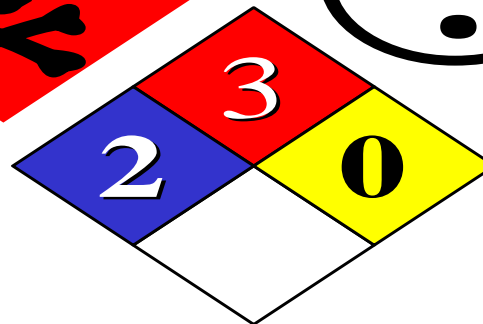
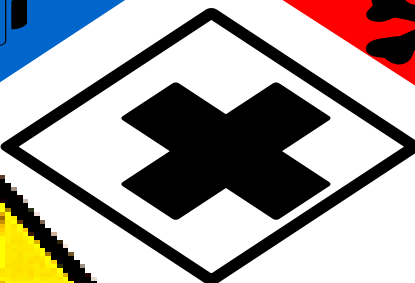
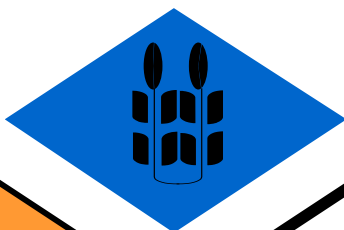


HARMFUL IF SWALLOWED



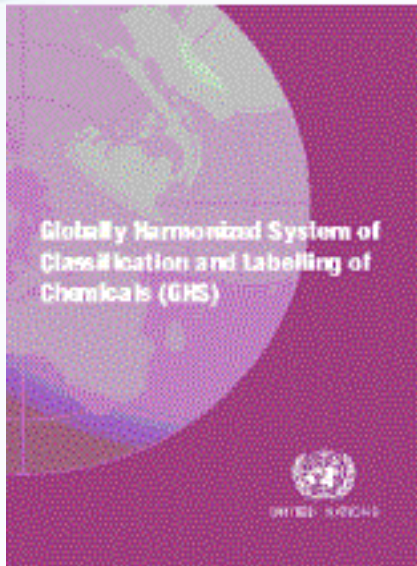
警告

WARNING!





The Solution: GHS



HARMFUL IF SWALLOWED



Warning

International
Convention



C&L: 'legal' aspects



UN	EU	IE
<u>UN GHS</u> Initiated 1993 Published 2003 1 st edition 2005	CPL Directive <u>67/548/EEC (DSD)</u>	CPL Regulation <u>S.I No 116 of 2003</u>
	CPL Directive <u>1999/45/EC (DPD)</u>	CPL Regulations <u>S.I No 62 of 2004</u> <u>S.I No 624 of 2001</u>
2 nd edition <u>2007</u>	CLP (EC) No <u>1272/2008</u> CLP 1 st ATP (EC) No <u>790/2008</u>	Chemicals Act, No 13 of <u>2008</u>
3 rd edition <u>2009</u>	CLP 2 nd ATP (EC) No <u>XXX/2011(pending)</u>	Chemicals (Amendment), Bill No 47 of 2010 (<u>pending</u>)



CLP in Ireland



- CLP is a Direct Acting Regulation

However

- Chemicals Act, 2008 amendment required to bring administrative and enforcement provisions for CLP into Ireland
- Competent Authorities are:
 - HSA for industrial chemicals
 - DAFF (PCS) for pesticides (PPP & biocides)
- Beaumont Hospital responsible for Article 45



CLP Regulation



- CLP Regulation (EC) No. 1272/2008: EIF 20th Jan 2009
- Amends CPL EU Directives /IE Regulations
- Replaces CPL (DSD/DPD) from 2015
- Applies general principles of GHS
- Uses a “Building Block Approach”
- Consistency with TRANSPORT & REACH
- Target audience both worker & consumer



Terminology



Existing CPL	New CLP
Dangerous	Hazardous
Preparations	Mixtures
Symbols	Pictograms
Indication of Danger: Irritant Xi 	Signal Word: Warning 
Risk Phrases: R38	Hazard Statements: H315
Safety Phrases: S2	Precautionary Statements: P102



CLP Exemptions



- Radioactive substances
- Subject to customs supervision
- Non-isolated intermediates
- R&D not placed on market
- Waste
- Substance/Mixture used in defence
- Substance/Mixture in finished state for final user:
 - Medicinal/Veterinary products
 - Cosmetics
 - Medical devices
 - Food/Feeding stuffs



CLP Titles



- I:** General Issues
- II:** Hazard Identification, Hazard Evaluation & Classification
- III:** Hazard Communication in form of labelling
- IV:** Packaging
- V:** Harmonisation of Classification and Labelling
- VI:** Competent Authorities & Enforcement
- VII:** Common and Final Provisions



CLP Technical Annexes



- **I:** C&L for hazardous substances & mixtures
- **II:** Special Rules for Labelling & Packaging of certain substances & mixtures
- **III - V:** List of Hazard Statements, Supplemental Hazard Information, Precautionary statements & Hazard Pictograms
- **VI:** Harmonised C & L for certain hazardous substances
- **VII:** Translation Tables



WHAT to reclassify



- **Substances** currently classified according to the existing CPL have to reclassified according to the new CLP from **1st December 2010**
- **Substances** currently not classified according to existing CPL rules have to be reassessed to determine if they are **NOW** classified according to CLP



WHAT to reclassify



- There are 4 main criteria to consider when reclassifying a substance:

- Physical:



- Human Health:



- Environment:



- Additional hazard information: e.g. EUH066



WHO has to reclassify



	Reclassify	Label	Package	Notify	Keep info 10 yrs
Manufacturer	✓	✓	✓	✓	✓
Importer	✓	✓	✓	✓	✓



WHO has to reclassify



Manufacturer: *“any natural or legal person established within the Community who **manufactures** a substance within the Community”*

*** Same as REACH**



WHO has to reclassify



Importer: *“any natural or legal person established within the Community who is **responsible for import**”*

*** Same as REACH**



WHO has to reclassify



Placing on the Market: *“supplying or making available, whether in return for payment or free of charge, to a third party. **Import** shall be deemed to be placing on the market”*

*** Same as REACH**



HOW to reclassify



- Annex VI: **Harmonised classification**:
 - 8000 substances in Table 3.1
- Annex I: **Self-classification**:
 - Apply in absence of harmonised C&L or where harmonised C&L available for some endpoints only or
- Annex VII: **Translation Table**



HOW to reclassify



● Annex VI: **Harmonised Classification**

- Table 3.1: CLP criteria
- Table 3.2: CPL criteria (old Annex I of DSD)

- Use mandatory for substances
- Applied by all suppliers of same substance
- Under DSD all endpoints harmonised
- Under CLP only CMRs, respiratory sensitisers, others case-by-case



HOW to reclassify



Regulation (EC) No 1272/2008 Annex VI Table 3.1

Classification		Labelling		
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Pictogram Signal Word Code(s)	Hazard Statement Code(s)	Suppl. Hazard statement code(s)
Flam. Liq. 2	H225	GHS02	H225	
Acute Tox. 3 *	H331	GHS06	H331	
Acute Tox. 3 *	H311	GHS08	H311	
Acute Tox. 3 *	H301	Dar	H301	
STOT SE 1	H370 **		H370 **	

Pictogram(s)



Flame Skull and crossbones Health hazard

Regulation (EC) No 1272/2008 Annex VI Table 3.2

Classification	Risk phrases	Safety phrases	Indication(s) of danger
F; R11 T; R23/24/25-39/23/24/25	11 23/24/25 39/23/24/25	1/2 7 16 36/37 45	F T

Symbol(s)



Highly flammable Toxic



HOW to reclassify



● Annex I: **Self Classification**

1. Gather available information

Test data, non-test data, human data, other

2. Examine data

Expert judgement; adequate, reliable data

3. Evaluate & review the information

Apply criteria; Weight of evidence

4. Decide on Classification

- If substance/mixture meets criteria assign classification
- Hazard class and category



HOW to reclassify



31.12.2008

EN

Official Journal of the European Union

L 353/91

Table 3.2.5

Label elements for skin corrosion/irritation

Classification	Category 1 A/1 B/1 C	Category 2
GHS Pictograms		
Signal Word	Danger	Warning
Hazard Statement	H314: Causes severe skin burns and eye damage	H315: Causes skin irritation
Precautionary Statement Prevention	P260 P264 P280	P264 P280
Precautionary Statement Response	P301 + P330 + P331 P303 + P361 + P353 P363 P304 + P340 P310 P321 P305 + P351 + P338	P302 + P352 P321 P332 + P313 P362
Precautionary Statement Storage	P405	
Precautionary Statement Disposal	P501	



HOW to reclassify



• Annex VII: **Translation table**

- Use only **before** 1st December 2010 for substances and **before** the 1st June 2015 for mixtures
- Use only **to translate** existing classification if substance already DSD classified
- If No data available for hazard class
- If data available, **DO NOT USE** Annex VII
- Translation tool available **online**

Translation between classification in accordance with Directive 67/548/EEC and this Regulation

Classification under Directive 67/548/EEC	Physical state of the substance when relevant	Classification under this Regulation		Note
		Hazard Class-and-Category	Hazard statement	
E; R2		No direct translation possible.		
E; R3		No direct translation possible.		
O; R7		Org. Perox. CD	H242	
		Org. Perox. EF	H242	
O; R8	gas	Ox. Gas 1	H270	
O; R8	liquid, solid	No direct translation possible.		
O; R9	liquid	Ox. Liq. 1	H271	
O; R9	solid	Ox. Sol. 1	H271	
R10	liquid	No direct translation possible. Correct translation of R10, liquid is: <ul style="list-style-type: none"> — Flam. Liq. 1, H224 if flashpoint < 23 °C and initial boiling point ≤ 35 °C — Flam. Liq. 2, H225 if flashpoint < 23 °C and initial boiling point > 35 °C — Flam. Liq. 3, H226 if flashpoint ≥ 23 °C 		
F; R11	liquid	No direct translation possible. Correct translation of F; R11, liquid is: <ul style="list-style-type: none"> — Flam. Liq. 1, H224 if initial boiling point ≤ 35 °C — Flam. Liq. 2, H225 if initial boiling point > 35 °C 		
F; R11	solid	No direct translation possible.		
F+; R12	gas	No direct translation possible.		



WHEN to reclassify



- Substances **manufactured** and placed on the market from 1st December 2010
- Substances **imported** and placed on the market from 1st December 2010
- **Derogation for substances** 'already' placed on the market to 1st Dec 2012



WHEN to reclassify



- Mixtures **formulated** and placed on the market from 1st June 2015
- Mixtures **imported** and placed on the market from 1st June 2015
- **Derogation for Mixtures** 'already' 'on the shelf' to 1st June 2017



Preparation tips



- **Identify your role(s)** and obligations
- Create an inventory of all chemicals
- Ensure expertise
- Check all substances identities
- Gather all information
- Examine, evaluate,
- Classify **via** Annex VI, Annex I or Annex VII



HSA Guidance & Help



- CLP & REACH Helpdesk Ph. 1890 289 389
- CLP Helpdesk: email clp@hsa.ie
- CLP Webpage: www.hsa.ie/clp
- CLP [Posters](#) A1 & A4 formats
- CLP [Brochure](#)
- REACH Helpdesk email: reachright@hsa.ie
- REACH webpage www.reachright.ie
- REACH & CLP [E- Bulletin](#)



ECHA Guidance & Help



- ECHA : Guidance Documents/FAQ's
 - CLP FAQ [Version 1.2](#) (24/11/10)
 - Introduction to CLP [1](#)
 - Application on Classification criteria [2](#)
 - Labelling & Packaging [3](#) (draft)
(18/11/10)
 - Downstream Users [guidance](#)

Session 2

Notification of substances

Marco Valentini





Key topics

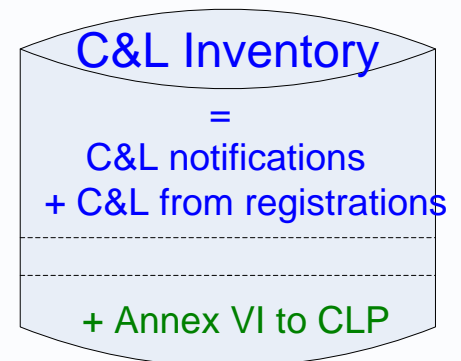


1. C&L Notification: What? Who? When?
2. The challenges of C&L notifications
3. IT tools available
4. Guidance and Help

What is the Inventory?



- Database with:
 - C&L information on notified & registered substances received from manufacturers & importers
 - list of harmonised classifications (Table 3.1 of Annex VI to CLP)
- Established and maintained by ECHA
- Made public in 2011



WHAT to notify?



Substances:

- Subject to **registration under REACH**
 - Also non classified substances!
 - Regardless of REACH deadline (2010, 2013, 2018)
- **Classified as hazardous under CLP**
 - No tonnage threshold!
- Classified as hazardous **in mixtures** above specific concentration limits

...AND PLACED ON THE MARKET!

WHO shall notify?



- Notification must be performed by:
 - EU Manufacturer, or
 - EU Importer, or
 - EU Group of manufacturers/importers



- Downstream users, distributors and producers of articles do not need to notify.
- Only Representative cannot normally notify under CLP. However, see ECHA website for exception to this rule ([Who has to notify?](#)).



WHEN to notify?



- General rule: within one month from placing on the market
- Substances on the market on 1st December 2010 must be notified by **3rd January 2011**
- Notification is independent from the REACH registration deadlines
 - **2010**: include in REACH registration dossier
 - **2013/2018**: use any notification tool



Information to be notified



Article 40 of CLP:

- Identity and contact details of the notifier
- **Identity** of the substance
- Classification of the substance **according to CLP**
- The reason for “**no classification**” for endpoints
- SCLs or M-factors and justification
- Label elements (hazard pictograms signal words, hazard statements, any supplemental statements)



Challenges



- First deadline : 3 January 2011!
- Huge number of C&L notifications expected
- Amount of data requested per notification
- Quality of data
- Various profiles of notifiers with different needs



How to notify?



Four steps:

1. Create a REACH-IT account
2. Prepare your C&L Notification
3. Create a Notification Group*
4. Submit your C&L Notification

*if applicable



How to notify?



- IT Tools:
 - ❖ IUCLID 5.2
 - ❖ Bulk file creation
 - XML format
 - Excel sheet
 - ❖ Online C&L
- Excel tool for creation of a group of manufacturers/importers
- Submission tool:
 - REACH-IT 2.0

IUCLID 5.2



- Notification created in IUCLID 5.2
 - Template = "CLP notification"
 - IUCLID 5 notification then submitted via REACH-IT

Dossier templates available for a substance:


- Complete
- Biocides - Active ingredients
- Biocides - Biocidal products
- Biocides - Substances of concern
- CLP notification**
- CLP Regulation - CLH dossier

Labelling

Signal word

Hazard pictogram

GH501: exploding bomb

Hazard Pictogram  Code: GH501: exploding bomb

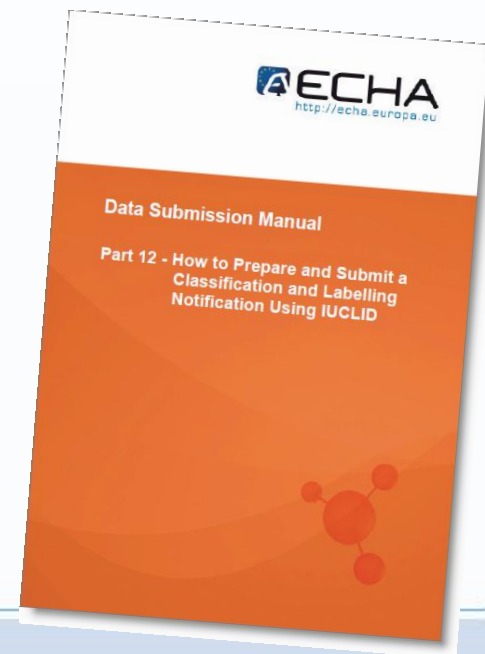
Hazard statements

H201: Explosive; mass explosion hazard.

Hazard statement: H201: Explosive; mass explosion hazard.

Additional text

Precautionary statements





Section 1.1 – Substance ID



Reference substance:

- with EC number;
OR

- with CAS number;
OR

- with IUPAC name + Molecular formula + Molecular weight range + Structural formula;
OR

- with IUPAC name + Remarks;
OR

- with IUPAC name + SMILES notation.

Reference substance

atropine / 8-methyl-8-azabicyclo[3.2.1]oct-3-yl tropate / 51-55-8

EC number	EC name
200-104-8	atropine
CAS number	CAS name
51-55-8	
IUPAC name	
8-methyl-8-azabicyclo[3.2.1]oct-3-yl tropate	

Type of substance:

Type of substance

Composition

Origin

Trade names

Trade names flag

Name

Pick list

Select a composition

mono constituent substance

multi constituent substance

UVCB

OK Cancel



Section 1.2 - Composition



- Degree of purity
- For each constituent / Impurity / Additive :
 - EC number OR CAS number OR IUPAC name;
AND
 - Typical concentration OR Concentration range.

Substance composition

Composition 1

Name: Composition 1

Brief description

Composition ID: L-f3de03fc-72fa-4ad2-a50c-6460a09f7d08

Degree of purity

> 88 < 92 % (w/w)

Constituents

- ca. 45 % (w/w) methanamine / methanamine / 74-89-5
- < 50 % (w/w) flubendazole / methyl [5-(4-fluorobenzoyl)-1H-benzimidazol-2-yl]carbamate / 31430-15-6

Impurities

- 2 % (w/w) benzene / benzene / 71-43-2

If impurity or additive essential to C&L of the substance:

this impurity is considered relevant for the classification and labelling of the substance



Section 2.1 - Classification



• Non hazardous substance:

Tick

Not classified

• Hazardous substance:

- Hazard category and class
- Hazard statement
- Reason for no classification
- If Specific concentration limit: Concentration range + Hazard statement





Section 2.1 - Labelling



- Hazardous substance:
 - Signal word
 - At least one Hazard statement
 - Supplemental hazard statement, if applicable
 - Hazard pictogram, if applicable



Section 2.1 - Labelling



Labelling

Signal word

Hazard pictogram

GHS02: flame

Hazard Pictogram



Code

Hazard statements

Hazard statement

Additional text

Pick list

H200: Unstable explosives.
H201: Explosive; mass explosion hazard.
H202: Explosive, severe projection hazard.
H203: Explosive; fire, blast or projection hazard.
H204: Fire or projection hazard.
H205: May mass explode in fire.
H220: Extremely flammable gas.

OK Cancel

Precautionary statements

Additional labelling requirements

EUH001: Explosive when dry.

CLP supplemental hazard statement

Additional text



Multiple composition "tip"



- To improve the quality of the C&L notification:
 - If more than one composition or C&L:

Classification and Labelling according to GHS

General information

Name

Not classified

Implementation

State / form of the substance

Remarks

Related composition

Select a related item

composition 1 / L-feb4b137-416b-4c9c-af56-b3d83f52arfb4

composition 2 / L-1ef9eb50-d94b-4fd6-9fd5-0ac75a241115

OK Cancel



Most frequent mistakes!



- IUCLID 5.1 !
- Wrong template
- Inconsistency between section 1.1 and 1.2
- Missing information (section 2.1)
- Missing EC number in case of update
- Update vs initial
- C&L notification for a substance already registered! (NONS)



IUCLID 5.2 Tips



- Read the [manual](#)
- Check if substance already registered or notified by you
- Use TCC plug-in (also for C&L Business Rules!)





Bulk file creation



- Objective: submit in one shot many notifications
- XML file** submitted via REACH-IT
- Excel tool** for data creation and transfer to XML

Classification: C&L4		Substance:	
Classification name	Is the substance classified as hazardous?	Internal Id	Classification selection
Not classified	No	1	Not classified
C&L1	Yes	2	C&L1
C&L2	Yes	3	C&L2
C&L3	Yes	4	C&L3
C&L4	Yes	5	C&L4

```
<?xml version="1.0" encoding="UTF-8" />
<BulkCLNotification schemaVersion="1.0" creationDate="2010-04-19T00:00:00Z" creationApplication="ECHA Bulk XML Creator v1.0" xmlns="http://echa.europa.eu/schemas/ciNotification" xmlns:ci="http://echa.europa.eu/schemas/contactInfo" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="http://echa.europa.eu/schemas/ciNotification C:\BOULOT-1VC&amp;L03-TechFUP\01-C&amp;L-1\02-Bulk\02-ProposaM100212-Bulk\0\CLNotification.xsd">
  <ContactPersons>
  </ContactPersons>
  <Substances>
    <Substance substanceInternalID="1">
      <MonoConstituentSubstance>
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          <CASNumber>121-20-0</CASNumber>
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            <HighValue precision="equalOrLessThan">57</HighValue>
          </DegreeOfPurity>
        </Identification>
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      </MonoConstituentSubstance>
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                <Classification category="7005" hazardStatement="7269"/>
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              <OxidizingGases>
                <Classification category="7011" hazardStatement="7287"/>
              </OxidizingGases>
              <GasesUnderPressure>
                <Classification category="7014" hazardStatement="7291"/>
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            </PhysicalHazards>
          </Classification>
        </Classified>
      </ClassificationAndLabelling>
    </Substance>
  </Substances>
</BulkCLNotification>
```

message.



Bulk file creation



- For the **SMEs**:
- Translated version of the bulk excel tool

Bienvenue dans l'outil Bulk XML Creator! Langue:

Notez que vous devez activer les macros pour pouvoir utiliser cet outil!

Cet outil peut être utilisé par les notifiants pour générer des fichiers XML en vue de notifications C&E globales. Le fichier XML généré par cet outil peut alors être envoyé à l'ECHA via REACH-IT.

Utilisation de cet outil:

Cet outil Excel fonctionne comme un assistant en 4 étapes: vous devez d'abord effectuer les étapes 1 (Contacts), 2 (Classifications) et 3 (Substances) avant de pouvoir générer un fichier XML valide à l'étape 4.

Utilisez la feuille «1- Contacts» pour:

- définir les personnes de contact de votre entreprise pour la substance notifiée
- Vous devez d'abord indiquer le nom de votre contact!

Utilisez la feuille «2- Classifications» pour:

- définir la classification et l'étiquetage de la substance notifiée
- Vous devez d'abord indiquer le nom de votre C&E!
- Cette feuille permet de spécifier les informations requises en vertu de l'article 40, paragraphe 1, points c, d, e et f, du règlement CLP, sur la classification et l'étiquetage

Utilisez la feuille «3- Substances» pour:

- définir l'identité et la composition chimique de chaque substance

La substance est-elle classifiée comme dangereuse?		State	Classification Dangers physiques			
dangereuse?	Forme	Forme	Explosibles	Mention de danger	Motif de l'absence de données	Gaz inflammables
		Forme	Catégorie de danger	Mention de danger	Motif de l'absence de données	Catégorie de danger
Non					manque de données	
Oui	gazeux		Expl. Div. 1.1	H201: Explosif, danger		Flam. Gas 1
						H220: Gaz extrêmement



Bulk submission



- Most frequent mistakes/questions:
 - Forget to enable the macros
 - "Save as" instead of clicking "Validate data and create XML"
- Limitations of the bulk tool:
 - Only for substance with CAS or EC number
 - Only for substance with one composition and one C&L
 - Cannot specify new SCL or M-factor (Art. 10) as you cannot attach the relevant scientific justification.

Online notification



- SMEs... but not only
- C&L notification prepared directly in REACH-IT
- Pragmatic approach :
 - Reduced fields / default values
 - Compulsory fields
 - Link with the C&L inventory (incl. Annex VI)
 - "I agree" button
 - On-line help and guide



Online notification



ECHA

Reach-IT

You are connected as SandL001 on behalf of LEFEVRE-ECHA-SAT - Preferences - Logg

Home > Online dossier creation > C&L notification > Inventory Entry selection

- Company
- Pre-registration
- Pre-SIEF
- Online dossiers
- Phase-in Information
- Registration / notification
- Joint submission
- Classification and Labelling
- Message box
- User account
- Inventories
- Legal entity change
- Invoices
- Search

Substance identity | Optical information | **C&L** | MI Group | Contact | Validation

Please find below the existing entries in the C&L inventory related to the substance you want to notify.

Check if you agree with one of the proposed C&L or if you want to notify a different C&L.

Please note that harmonised classification has to be respected and you should not modify any of those hazard classes/differentiations. If the substance has a harmonised classification for some hazard classes/differentiations you should classify for other hazards according to available and reliable data.

General information

Dossier name: Update for [02-2114091963-38-0000] on [10/05/2010 10:49:13]
 C&L notification type: C&L notification for a substance not listed in Annex VI to CLP.
 Substance type: Mono-constituent substance

Substance identity

EC number	CAS number	IUPAC name
231-132-9	7440-23-5	sodium

C&L already present in the inventory

Harmonised C&L ?

Select	Hazard category	Classification Hazard statement code	Pictogram	Signal word	Labelling Hazard statement code	Suppl. Hazard statement codes	SCL	M-factors	Notes
<input checked="" type="checkbox"/>	Water-react. 1 Skin Corr. 1B	H260 H314		Dgr	H260 H314	EUH014			Expand

Registered C&L ?

Select	Hazard category	Classification Hazard statement code	Pictogram	Signal word	Labelling Hazard statement code	Suppl. Hazard statement codes	SCL	M-factors
No Records Found								

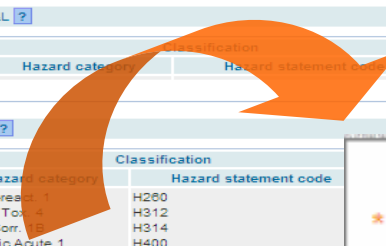
Notified C&L ?

Select	Hazard category	Classification Hazard statement code
<input type="radio"/>	Water-react. 1 Acute Tox. 3 Skin Corr. 1B Aquatic Acute 1	H260 H312 H314 H400

- I selected one of the proposed C&L and I agree with it
- I want to notify a different C&L
- I want to update and provide further information to the C&L I already submitted

<< Previous Save and close

Next >>



I selected one of the proposed C&L and I agree with it

I want to notify a different C&L

Online notification



- Most frequent mistakes:
 - Not enough preparation
 - Online C&L notification for a substance already registered! (NONS)
 - Initial vs Update

Online tool tips

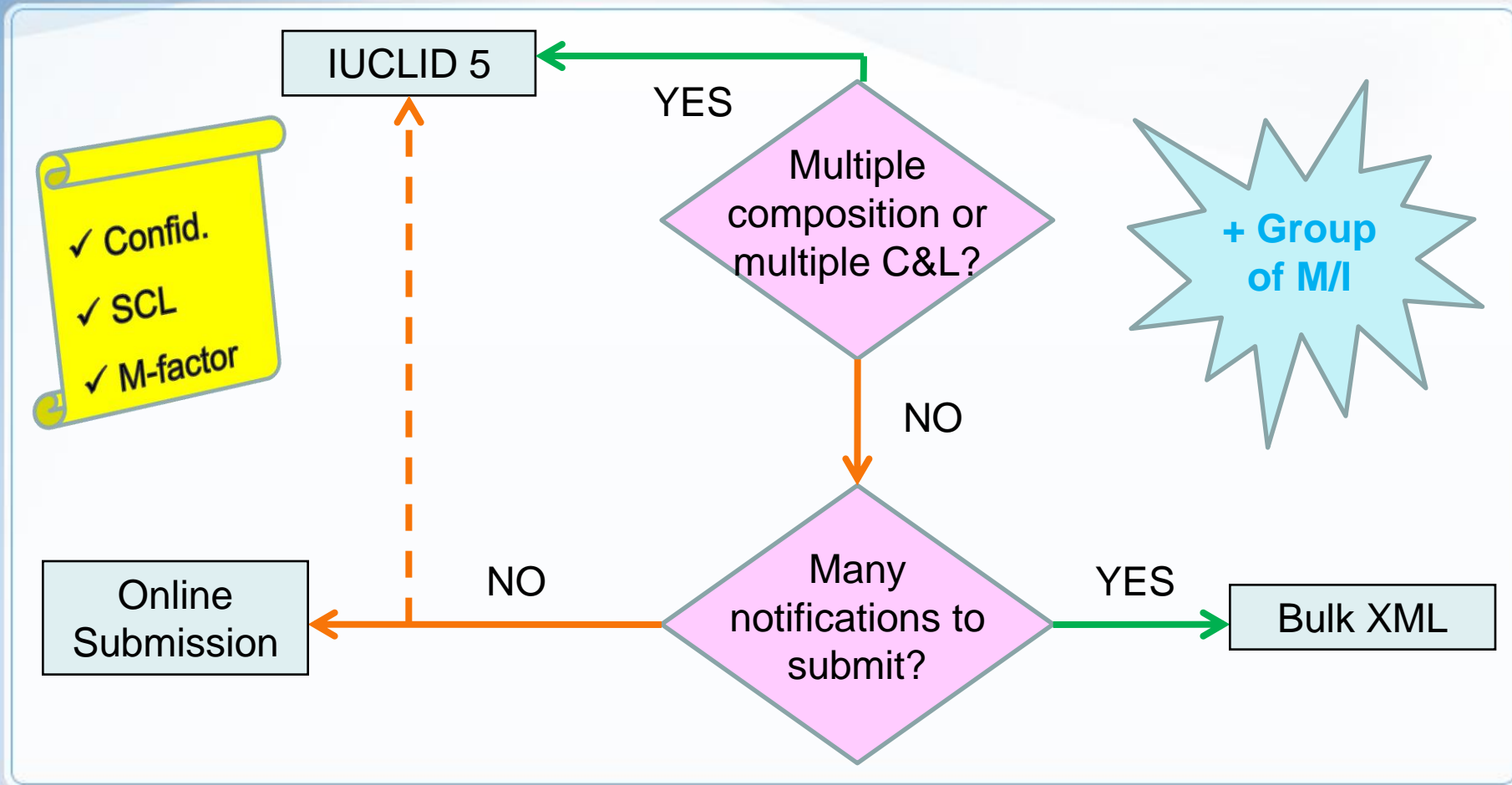


- Gather all necessary information before starting
- Check Annex VI to CLP
- Check if substance already registered or notified by you
- Read the [manual](#)





A tool for each need...





Group of Manuf./Imp.



"A group of manufacturers or importers can be one of the following:

- a Corporate company with different legal entities*
- several companies that have no specific links between each other*
- a SIEF*
- a Joint Submission ...*

...that agree on a common C&L for the same substance."

In REACH-IT:

- Creation/Update and manage your group(s)
- Submit as a group

ECHA Reach-IT

You are connected as [Sandrine.001](#) on behalf of LEFEVRE-ECHA-SAT - Preferences -

Home > Manage the Groups of Manufacturer(s)/Importer(s)

Company
Under the CLP regulation, a group of Manufacturer(s)/Importer(s) can notify C&L notification to ECHA.
A group of Manufacturer(s)/Importer(s) can be for example:

- a Corporate company with different legal entities, or
- several companies that have no specific links between each other, or
- a SIEF,

that agrees on a common C&L for the same substances.

You will find below the list of group Manufacturer(s)/Importer(s) that you have already created in REACH-IT and who can notify to ECHA the C&L under the CLP regulation.

If you want to view and/or update the information related to a group (member of the group, member details, etc), select a group and click on "View/Update the group". ?

If you want to view the C&L that have been notified by a group, click on "View notified C&L".

You can also [create a new group of Manufacturer\(s\)/Importer\(s\)](#) ? if needed.

Select	Group name	Last update	C&L Notified using this group
<input type="radio"/>	Sandrine and Co	28/04/2010	View Notified C&L
<input type="radio"/>	group1	07/04/2010	View Notified C&L
<input type="radio"/>	group 2	06/05/2010	View Notified C&L

[View/Update group](#) ? [Delete group](#)

Tips for Group of M/I



- A Group contains always by default the company that creates the Group in REACH-IT
- When the Group leader submits a registration for the same substance, the Group notification is not valid anymore
- All changes in the Group definition in REACH-IT are recorded and tracked → no need to update notification.



Notification submission



ECHA

Home

Welcome Sandrine L.

You have 0 [unread message\(s\) in your message box.](#)

Company	
Pre-registration	
Pre-SIEF	
Online dossiers	
Phase-in Information	
Registration / notification	
Joint submission	
Classification and Labelling	Notify a C&L using IUCLID
Message box	Notify a Bulk C&L
User account	Manage the Groups of Manufacturer(s) / Importer(s)
Inventories	
Legal entity change	Consult the public C&L inventory
Invoices	
Search	



Notification submission



You are connected as [PierreDupont1](#) on behalf of Chemicals and co. - [Preferences](#) - [Log](#)

[Home](#) > [Submit Dossier Intro](#) > [Select group of Manufacturer\(s\)/Importer\(s\)](#)

- Company
- Pre-registration
- Pre-SIEF
- Online dossiers
- Phase-in Information
- Registration / notification
- Joint submission
- Classification and Labelling
- Message box
- User account
- Inventories
- Legal entity change
- Invoices
- Search

Group of Manufacturer(s)/Importer(s)

If the notifier of this C&L notification is a group of Manufacturer(s)/Importer(s), you shall select it from the list below and click on next. If you do not notify this C&L as a group of Manufacturer(s)/Importer(s), click on next.

Please find below the list of group of Manufacturer(s)/Importer(s) that you have already created in REACH-IT and who can notify to ECHA the C&L under the CLP regulation.

If you want to view and/or update the information related to a group (member of the group, member details...), click on the group's name.

You can also [create a new group of Manufacturer\(s\)/Importer\(s\)](#) [?](#) if needed.

Select	Group name	Last update
<input type="radio"/>	Group of MI 01	02/03/2010
<input type="radio"/>	Group of MI 02	02/03/2010
<input type="radio"/>	Group of MI 03	02/03/2010
<input type="radio"/>	Group of MI 04	02/03/2010

[Click here to deselect the currently selected group.](#)

Cancel

Next >





Notification submission



You are connected as [PierreDupont1](#) on behalf of Chemicals and co. - [Preferences](#) - [Logout](#)

[Home](#) > [Submit Dossier Intro](#) > Select group of Manufacturer(s)/Importer(s) > Submit External Dossier

- Company
- Pre-registration
- Pre-SIEF
- Online dossiers
- Phase-in Information
- Registration / notification
- Joint submission
- Classification and Labelling
- Message box
- User account
- Inventories
- Legal entity change
- Invoices
- Search

Here you can submit a C&L notification dossier.

Classification and Labelling (C&L) notification

Please pick here using the "Browse" button the file which contains your dossier (your file should have been created using IUCLID 5 and have the extension "i5z")

* File name:

* Enter the text shown: ?

Can't read the text below? [Try another](#)



Access code for large files

For the submission of a file larger than 20 MB, please [request a large file access code](#) before submission.

If you have an access code for a large dossier, please, enter it here

Large file access code:





Notification submission



Successful submission

- Dossier report: Notification number



Submission failure

- Dossier report: reasons for failure





View and export...



ECHA

Reach-IT

You are connected as SandL001 on behalf of LEFEVRE-ECHA-SAT - Preferences -

Home > Classification And Labelling > View My Submitted C&L

- Company
- Pre-registration
- Pre-SIEF
- Online dossiers
- Phase-in Information
- Registration / notification
- Joint submission
- Classification and Labelling
- Message box
- User account
- Inventories
- Legal entity change
- Invoices
- Search

Search

You can search for the C&L notifications you have notified using one or several of the following search criteria:

- reference number
- substance identifier
- notifier type

You can also export in a CSV or PDF file all the C&L you have notified/registered to ECHA.

Please note that there might be a delay between the moment you submit your C&L notification and the moment you can export it. If you do not find a C&L you have successfully submitted recently, please try again later.

Search criteria

Reference Number ?

Reference Number:

Substance ?

Substance:

EC Number:

CAS Number:

Notifier Type ?

Notifier Type:

Name of Group MI:

Search as a single notification

Search Results

Last submission	EC No	CAS No	Classification		
			Hazard Category	Hazard statement code	Pictogram
DC120382-70	270-986-7	68512-65-2			
DC120382-70	270-692-9	68476-53-9	Pyr. Sol. 1 Aquatic Acute 1 Ozone	H250 H410 H420	GHS02 GHS04
DC120382-70	270-563-7	68443-89-0	Aquatic Acute 1 Ozone	H410 H420	GHS02 GHS04
DC120382-70	400-640-4				

CL Inventory Report

Export Information

Export date: 10/05/2010

Search Criteria

Name of Group MI: group1

Group of MI Information

Group name: group1

Last Update: 07/04/2010

Group member name	Group identifier	Contact name
LEFEVRE-ECHA-SAT company 1	IUC5-e4fd6d9-7a7d-4f9c-8f07-03b60b26f334 (UUID) 123456789(DUNS)	Benoit 1 Dupont 1

group1 entries

Last Submission	EC No	CAS No	Hazard Category	Hazard statement code	Pictogram	Signal Word	Hazard statement code (Labelling)	Suppl. Hazard statement code	Spec. Conc. Limits	M-Factor	Reference No
DC120382-70	270-986-7	68512-65-2									02-2114082233-56-0000
DC120382-70	270-692-9	68476-53-9	Pyr. Sol. 1 Aquatic Acute 1 Ozone	H250 H410 H420	GHS02 GHS04	Wng	H200		Expl. 1.1 22.0%>C<=98.0%		02-2114082232-56-0000
DC120382-70	270-563-7	68443-89-0	Aquatic Acute 1 Ozone	H410 H420	GHS02 GHS04	Dgr	H200		Expl. 1.1 22.0%>C<=98.0%		02-2114082231-60-0000
DC120382-70	400-640-4										02-2114082230-62-0000
DC120382-70	400-810-8										02-2114082229-45-0000
VB127613-48	232-268-5	8002-05-9	Flam. Gas 1 Flam. Liq. 1 Cor. 1B STOT SE 1	H220 H229 H350 H371	GHS08	Dgr	H350		Press. Gas (Dis. gas) 2.0%>C<=3.0%		02-2114080845-39-0000
YJ127278-19	285-116-8	64742-16-1	Expl. 1.1 Repr. 1A Lact. Aquatic Chronic 1 Muta. 1A STOT SE 1	H200 H360 H362 H410 H340 H370	GHS06	Wng		EUH208		02-2114080567-39-0000	





Tips for NONS notifiers



- If under NONS > 1 tonne
 - Claim registration number for NONS
 - Check previous Tonnage Band in REACH-IT
 - Send update registration dossier

Home > Reference Number History Search

Search criteria

Reference number: 01-7777001001-00-0000 1

Reference date: From: [dd/mm/yyyy] To: [dd/mm/yyyy]

Dossier type: All

Substance related criteria

EC Number: []

CAS number: []

Chemical Name: []

Company related criteria

Company name: []

Company UUID: []

[Search]

Search results

Select	Reference number	Reference date	Dossier type	EC Number	CAS Number	Chemical Name
<input type="radio"/>	01-7777001001-00-0000	02/04/2008	Registration	420-040-6		1-octylazepin-

[Next] 2

Home > Reference Number History Search > Reference Number History Details

Reference Number Details

Reference number: 01-7777001001-00-0000

Reference date: 02/04/2008

Current reference status: Active

Last known information about the submission

Dossier type: Registration

Tonnage band: Between 100 and 1000 tonnes/year

Maximum tonnage band: Between 100 and 1000 tonnes/year

OSII tonnage band: []

Maximum OSII tonnage band: []

TOSII tonnage band: []

Maximum TOSII tonnage band: []

Submission has been updated?: No

Part of a Joint Submission?: No

Joint submission name: []

Is Joint Submission leader?: No

Fee Waiver: -

Last known information about confidentiality claims

Degree of purity: []



Tips for NONS notifiers



- If under NONS < 1 tonne and:
 - Still < 1 tonne now: notify within 1 month from placing on the market using any of the IT tools
 - When you hit 1 tonne threshold, update registration dossier
 - Already reached or exceeds the 1 tonne threshold, update in form of registration dossier including C&L according to CLP!

Preparation tips



- List substances/substances in mixtures manufactured or imported
- Any exempted from CLP?
- Any subject to REACH registration?
- Collect information on substance identity and composition
- Name all substances in line with the guidance on Substance Identity
- Check if substances are listed in Annex VI to CLP

ECHA Guidance & Help



- ECHA : Guidance Documents/FAQ's
 - CLP FAQ [Version 1.2](#) (24/11/10)
 - [REACH-IT Sign up](#) and essential Industry User Manuals [Part 1](#) & [Part 2](#)
 - [IT Tools](#) download
 - [Practical guide 7](#): How to Notify Substances to the Classification & Labelling Inventory
 - [Data Submission Manual part 12](#): How to prepare and submit a C&L notification using IUCLID?

ECHA Guidance & Help



- ECHA : Guidance Documents/FAQ's contd.
 - [Industry User Manual part 15](#): Manage your group of Manufacturers or Importers
 - [Industry User Manual part 16](#): How to create and submit a C&L notification using the REACH-IT online tool
 - [Questions & Answers](#) for NONS Notifiers

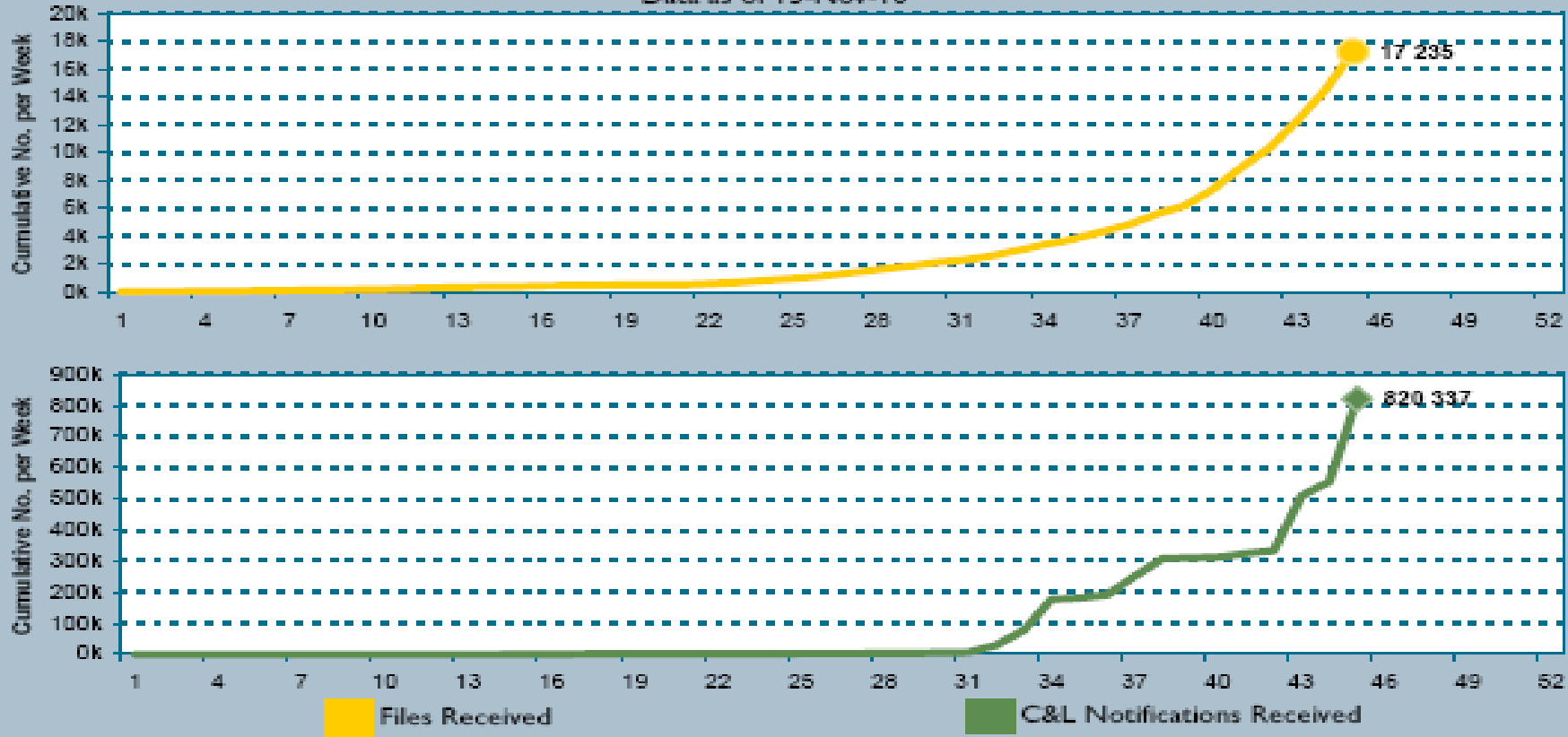


Trends in C&L Notifications



Trends in C&L Files & Notifications Received in 2010 by Week

Data as of 15-Nov-10





Don't wait 'til last minute....



...notify your substances now!