



# State of play on the Revision of CLP

Caracal Meeting on PBT, vPvB, PMT, vPvM  
*30 September 2021*



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# Chemicals Strategy for Sustainability

In the framework of the European Union Green Deal, the [Chemicals Strategy for Sustainability](#) was adopted in October 2020. It aims to:

- better protect citizens and the environment
- boost innovation for safe and sustainable chemicals



# Strategy implementation: main actions

- Revision of core Chemicals Legislation: CLP (Mid 2022), REACH (end 2022)
- Revision of consumer products framework - Cosmetics (2022), Toys (2022) , Detergents (2022) , Food contact material etc.
- Establish safe and sustainable by design chemicals criteria
- Identify EU chemicals dependencies and EU chemicals foresight
- EU global role by promoting high standards and not exporting chemicals banned.



# Chemicals Strategy and CLP revision

Main actions related to CLP:

- Introducing and, where relevant, strengthen existing criteria on Endocrine disruptors, Persistent, Bioaccumulative and Toxic substances (PBTs) and Persistent, Mobile and Toxic substances (PMTs).
- Assessing the need for specific criteria for Immunotoxicity, Neurotoxicity and Toxicity for terrestrial organisms;



# Potential new hazard classes in CLP (I)

Based on societal demand, ensure higher protection against most harmful chemicals. This can be achieved ensuring that CLP is the central piece for hazard classification in EU by adding new hazard classes:

1. Endocrine disruptors (based on WHO definition both for Human health and Environment).
2. Persistency, Bioaccumulation and Toxicity (PBTs + vPvB based on the already existing REACH Regulation Annex XIII criteria).



# Potential New hazard classes in CLP (II)

Ensure that the CLP is the central piece for hazard classification by adding new hazard classes:

3. Persistency, Mobility and Toxicity (PMTs + vPvM);
4. Assessing the need for specific criteria for Immunotoxicity and Neurotoxic currently under STOT and Toxic for Reproduction;
5. Terrestrial toxicity.



# CLP and GHS interaction

Assess the need for new hazard classes:

- Substances toxic to the immune system
- Substances toxic to the nervous system
- Substances toxic for terrestrial organisms
  
- Endocrine disruptors (human health, environment)
- Persistent, mobile and toxic substances (PMTs/vPvMs)
- Persistent, bioaccumulable and toxic (PBTs/vPvBs)



# Main topics CLP revision

1. Introduction new hazard classes (EDs, PBTs, etc.)
2. Improving Classification (both CLH and self classification)
3. Labelling (fold out labels, small packaging etc.)
4. Online sales (hazard communication and enforcement)
5. Scope of CLP Regulation (assessing exemptions)
6. Annex VIII (improvements)
7. Applicability and transitional periods





# IA evidence base and data collection

The Impact assessment will be based on the findings of:

- **Fitness check on the chemical regulations other than REACH (2019)**
- **Fitness check on endocrine disruptors (2020)**
- **Ongoing ad-hoc study on CLP (April 2022)**
- **Ongoing study on Digital labelling initiative (mid 2022)**

In addition, the European Chemical Agency provides technical and scientific support to the CLP revision. A supporting study on CLP is expanding the evidence base.

# Supporting study/actions for Impact Assessment

- Public consultation on the *Inception Impact Assessment* May –June 2021: 182 comments
- ***CLP open public consultation*** online questionnaire (ongoing until 15 Nov 2021). 123 Comments received (up to 28/09)
- ***Supporting study***: launched in August 2021
- ***Stakeholder consultations***: existing relevant EU fora (CARACAL, and its subgroup on EDs, ECHA)
- ***Impact assessment***

# Indicative timing Caracal meetings

- ED Subgroup: 13<sup>th</sup> September => focus on Cat. 2 criteria
- PMT/vPvM and PBT/vPvB : 30 September 2021
- New ATP and reevaluation of CLP scope: 19 October 2021
- Annex VIII and On line sales : 27 October 2021
- CARACAL 41: 17/18 November 2021
- *Classification improvements (CLH, Harmonised PNEC/DNEL): tbc*
- *Labelling simplification : tbc*

# Indicative timing of actions

- Impact Assessment finalization – by end of March 2022
- COM CLP revision draft proposal – Mid of 2022
- Caracal consultation on CLP draft proposal – as of Q3 2022
- Proposal adoption (according to the procedure to be followed)
- EU Commission proposal to GHS – 2023-2024 working biennium



# Thank you

## EU Chemicals Strategy for Sustainability

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