

Classification and Labelling (C&L) Inventory Requirement to Notify Information to ECHA



As an EU manufacturer of chemical substances, or an importer of chemical substances on their own or in mixtures into the European Union (EU), you are likely to have a duty to notify information to the European Chemicals Agency (ECHA) on the classification and labelling of those substances; this information will be entered into the 'C&L Inventory'. This duty comes from the recently implemented EU Regulation for the Classification, Labelling and Packaging (CLP) of substances and mixtures (EC No. 1272/2008).

The duty to notify to the C&L Inventory applies if a substance you import or manufacture:

- is subject to Registration under REACH or;
- meets the criteria for classification as hazardous or;
- is in a mixture above certain concentration limits leading to the mixture meeting the criteria for classification as dangerous.

If one of these conditions applies to you and you place the substance on the market (import counts as placing on the market) on 1 December 2010, you will have to make a notification to ECHA by 3 January 2011 (in practice, since the REACH IT portal of ECHA is closed for the Christmas and New Year holidays, this means before 24 December 2010).

Compliance with the requirements for the C&L Inventory can be onerous and challenging: a notification may require you to submit information in up to 200 fields per substance. Note also that certain substances that are exempt from registration under REACH, may well be subject to C&L notification! This includes active substances in biocidal and plant protection products, polymers (if hazardous), and small tonnages (< 1 tpa) of hazardous substances, for example.

It is important to act **now** to see whether these duties apply to you - and if they do, to prepare for them.

The REACH Centre is able to offer efficient and cost effective support to help ensure that you are fully compliant with these complex requirements.

For more information email enquiries@thereachcentre.com, phone +44(0)1524 510278, or visit our website.