



# Cross-sector solutions for companies using interchangeable components

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#SAFERCHEMICALS



# Today's topics

- Challenge: complying with Annex VIII to Classification, Labelling and Packaging Regulation obligations with unpredictable variable compositions
- Grouping of components as a practical cross-sector solution
- Principles and demonstration
- Practical info sheet available

# Poison Centre notifications

## ***Challenging situations:***

- Unpredictable presence and concentration of certain components used interchangeably
- Exact mixture composition cannot be established at any given point

**But** no changes with regard to classification, hazard or emergency health response

→ unnecessary high number of notifications and updates

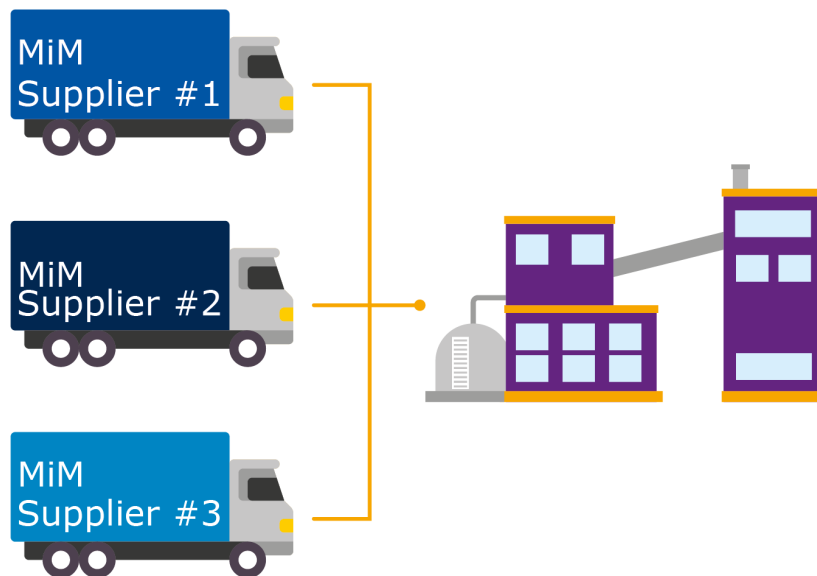


# Interchangeable component group (ICG) solution

- Possibility to apply less strict requirements in terms of compositional information – more flexibility
- Balances the information required by poison centres and administrative burden/difficulty to comply
- Reduces the number of notifications and updates
- Requires companies to meet specific criteria

**Example 1:** Use of multiple suppliers of similar Mixture in Mixture (MiM) component:

- same function but varying composition
- no changes in final mixture classification and toxicological profile



## **Example 2:** Use of different raw materials

- but technically equivalent
- same hazard classification
- no impact on emergency health response

! Different components used according to availability lead to different final mixtures

**Final mixture**



Component A 50% ●

Component B 30% ●

Component C ? %

Component D ? %

Component E ? %

20% ●

# ICG solution: application

- Possibility to group individual components (substances and MiMs) under one “umbrella” *component* without the need to indicate their individual concentration
- Grouped components may be used:
  - one *instead of* another; or
  - in unpredictable/highly variable combination

# ICG solution: Criteria

## **Criteria set 1**



*Checked*

- Same classification
- Same technical function
- Same toxicological properties (target organs and toxicological effects)

## **Criteria set 2**

- Same classification AND specific hazard classes only
- Similar pH
- Max 5 components



*Checked*



*Checked*

Hazard identification and additional information (Part B, section 2 of Annex VIII) on the final mixture does not change



## How it all works!

- Interchangeable component group (ICG) is technically treated as a MiM containing interchangeable components (*it is not a MiM!*)
- An ICG must be given a meaningful named
- Interchangeable components can be substances or mixtures
- Specific information requirements and validation rules apply
- Alert the submission system and use the ICG check box when building the mixture composition

# Practical steps

## Step 1

Add a new MiM component and name accordingly (free text field)

## Step 2

Check box for the ICG

## Step 3

Add ICG components – substances or mixtures

## Step 4

Provide concentration (and classification) for the group

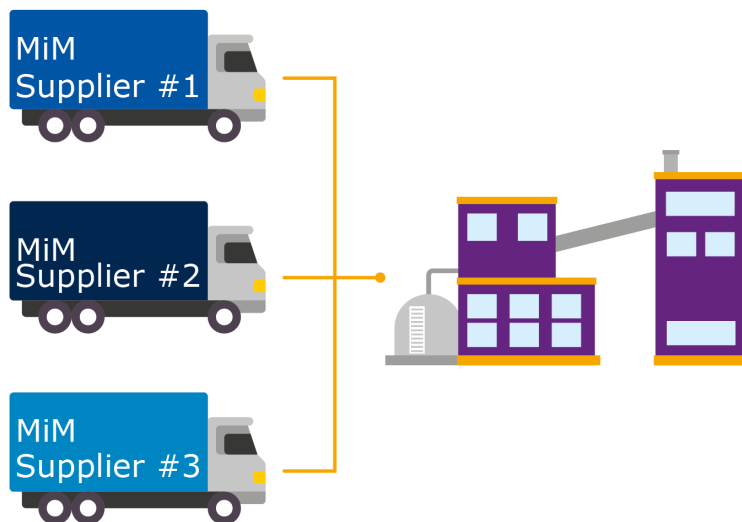


# Summary

- Annex VIII requires full and precise composition.
- When composition is highly and unpredictably variable a specific solution exists, which allows for less detailed information.
- Solution applicable to any sector and mixture.
- Main principle is that impact on emergency response is minimised.

# What our demo covers

- Hard surface cleaner ABC contains:
  - Solvent (80-84 %)
  - Detergent base (9-11 %)
  - Solubiliser (0.2-0.4 %)
  - Surfactant (1-2 %)
  - **Emulsifier (MiM) ???** (1-2 %)



Each batch can contain any % of each MiM

No impact on the final product

In total, the emulsifier represents 1-2 % of the final composition

# Interchangeable emulsifier components

## Emulsifier Blend Gold

Supplier: ABC Oy

SDS composition

Classification: Skin Corr. Cat. 2, Eye Irr. Cat. 2

## Emulsifier Blend Silver

Supplier: Smart srl

SDS composition

Classification: Skin Corr. Cat. 2, Eye Irr. Cat. 2

## Emulsifier ES-35

Supplier: Shining corp.

UFI

Classification: Skin Corr. Cat. 2, Eye Irr. Cat. 2



**Thank you!**

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