

17 June 2015

HelpNet CLP Workshop: summary of discussions

Time Wednesday 18 March 2015, 14:00 – 17:00
Place ECHA Conference Centre, Annankatu 18, Helsinki, Finland

1. Opening of the workshop

The moderator of the workshop, Outi Tunnela (ECHA), welcomed the participants and asked for their active participation.

2. Improving support to industry

Andreas Herdina (ECHA) explained the reasons of his concern on the level of support the industry is getting. Outi Tunnela then opened the floor asking if the helpdesks were indeed providing the correct level of support and if it helped.

Several HelpNet correspondents mentioned the high expectations from customers who expect either authoritative replies or consultant work. The discussion moved to more specific topics, such as the request from a customer on how to reduce their costs when complying with the Regulations and to what extent national helpdesks (NHD) should provide advice on this topic.

An observer raised the issue of multilingual labels. There was a general understanding that NHD could provide good examples on how companies are tackling labelling difficulties to the relevant Partner Expert Group (PEG). They also pointed out that the main challenge companies, especially importers face when labelling mixtures, is the lack of information on the composition. When considering overall CLP and REACH compliance, IT tools or the lack of experience in compiling safety data sheets (SDS) are perceived as problematic but those topics were not in the scope of the CLP workshop.

3. Consumer awareness activities

Tiiu Brautigam (ECHA) introduced the map of member states' communications material, requesting the correspondents to amend and add information as necessary.

The following discussion highlighted some activities which have been perceived as having positive impact. One of these was the use of national TV channels with broad audience, which had reached the consumer audience. A correspondent highlighted the differentiation per activity the USA-OSHA (United States of America Occupational Safety and Health Organisation) on their communication campaigns: gardening, in the kitchen, etc.

Another idea discussed was targeting audiences that could influence the real audience intended to be reached, for example pre-schoolers and school children who can pass on the information to their parents, potentially the responsible staff in a company for workplace safety.

A HelpNet correspondent highlighted the need to insist on the benefits of using an international system towards easier commerce, being CLP the EU interpretation of GHS, which is starting to be implemented in other countries too

ECHA agreed to circulate the list to the participants in order to gather further input.

4. Update on “Training-the-trainers” event of 2015

The moderator informed the participants about the training session organised by the Enforcement Forum. She promised to inform the HelpNet about the possibilities for the correspondents to attend the training.

5. Discussions on specific topics

5.1. Issues presented at the Forum “Train-the-trainers” 2014

A quick overview.

5.2. Update on controversial HelpEx questions: labelling of outer packaging (Caracal discussion); transitional period for DPD classified and labelled mixtures

- Labelling of outer packaging

A correspondent proposed the use of marking similar to the limited quantity mark (LQ) as a practical approach. Also the concept of hierarchy of hazards, already used in the transport of dangerous goods, was discussed as well as the possible benefits of differentiating supply from transport. The issue would in any case be brought to the Caracal subgroup on labelling and packaging (a meeting to take place on 25 March).

- Transitional period for mixtures already classified and labelled under DPD

The concept of placing on the market in the context of the transitional period in CLP Article 61(5) remained controversial. It was agreed that the COM should still be (at least informally) consulted.

5.3. Questions not agreed during the FAQ update 6.0: extreme pH; mixtures containing UVCBs

- Extreme pH

The discussion started by discussing the Danish proposal on the FAQ. A correspondent suggested a stepwise approach including a scheme or visual explanation. The correspondents agreed on re-launching the FAQ process with the Danish text as a starting point.

- Classification of enzymes

An Industry correspondent presented the strategy for the classification of enzymes where enzyme activity is the main determinant of the hazard profile. For enzymes, respiratory sensitisation and sometimes skin irritation (in humid conditions) are the main hazards. There was a general agreement on the approach proposed by Industry. The industry association has prepared guidelines but is asking for ‘official endorsement’ as inspectors do not always agree with their justification. The correspondents discussed the suitability of a Question and Answer pair or a factsheet. ECHA will look into this.

6. Closing of the meeting

The moderator thanked all correspondents, observers and presenters for their participation. The correspondents were encouraged to provide their comments on the documents that would be made available to them (see Action Points list – Annex II) and come up with ideas and topics for future workshops.

FINAL DRAFT

Annex I List of participants

Members of HelpNet

Belgium	CLAES	Kristof
Bulgaria	ZIDAROVA	Elena
Croatia	LOVRIC	Zdravko
Cyprus	ORPHANOU	Maria
Denmark	ANDERSEN	Trine Thorup
Estonia	LAHE	Aigi
Finland	TOLSA	Leni
France	DUFFORT	Gaëlle
France	PIGANIOL	Nathalie
Germany	FLEISCHER	Andreas
Germany	WIANDT	Suzanne
Greece	SKAFIDA	Panagiota
Hungary	BURAI	Erika
Ireland	WALSH	Caroline
Italy	IZZO	Paolo
Latvia	LAZDEKALNE	Elina
Latvia	RUBENE	Liga
Lithuania	GRINCEVICIUTE	Otilija
Lithuania	JANONYTE	Agne
Luxembourg	CHOCHOIS	Laurene
Malta	ANASTASI	Audrey Anne
Netherlands	WOUTERS	Margaretha
Norway	LARSEN	Ann Kristin
Poland	DOMANSKI	Krzysztof
Portugal	LAGINHA	Isabel
Romania	CAROLE	Nicoleta
Slovakia	PORUBIAK	Michal
Slovenia	HUMAR-JURIC	Tatjana
Spain	SANCHEZ DIAZ	Maria Elena
Spain	ZAMORA NAVAS	Laura
Sweden	FALCK	Jonas

Representatives of the European Commission

DG ENV: Absent

DG GROW: Absent

Candidate country observers

Serbia: RASOVIC Aleksandra

Observers :

EUPC: TILLIEUX Geoffroy

CEPE: TURKENBURG Luc

CEFIC: JÀNOSI Amaya

AMFEP: TSUCHIYA Rie

ECHA staff

Representing the Units: A2, B2, D2

Annex II Action points

N.	Action	Actor	Due date
1	Circulate map of member states' communications material	HelpNet Secretariat	30 April
2	Inform about possibility to participate in "Training for trainers" event by Enforcement Forum	HelpNet Secretariat	30 April

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