**Health and Safety**

**Guidance Note**

**New International COSHH symbols**

**What is a hazardous substance?**

Any substance which is listed in Part 1 of the Approved Supply List as dangerous for supply because it is very toxic, toxic, harmful, corrosive or irritant.


- **Corrosive**

- **Harmful**

- **Irritant**

- **Toxic**
• Very toxic

• Any preparation (mixture) that is dangerous for supply, as above.
• Any substance which has a Workplace Exposure Limit (WEL).
• Any biological agents used at work.
• Any dust other than one with a WEL at a concentration in air above 10 mg/m³ averaged over 8 hours, or any such respirable dust above 4 mg/m³ over 8 hours.
• Any other substance that creates a risk to health because of its properties and the way it is used or is present in the workplace.

New International symbols

International symbols will replace the European symbols in 2009. Some of them are similar to the current symbols but there is no single word describing the hazard. Information on these is available on the Globally Harmonised System webpages.
Link URLs in this page

1. Approved Supply List
   http://www.hse.gov.uk/chip/information.htm#supply
   http://ecb.jrc.it/classification-labelling/search-classlab/
3. Corrosive
   http://www.hse.gov.uk/coshh/assets/images/corrosive-l.gif
4. Harmful
   http://www.hse.gov.uk/coshh/assets/images/harmful-l.gif
5. Irritant
   http://www.hse.gov.uk/coshh/assets/images/irritant-l.gif
6. Toxic
   http://www.hse.gov.uk/coshh/assets/images/toxic-l.gif
7. Very toxic
   http://www.hse.gov.uk/coshh/assets/images/verytoxic-l.gif
8. Globally Harmonised System webpages
   http://www.hse.gov.uk/ghs/index.htm

Glossary of abbreviations/acronyms on this page

United Nations Globally Harmonised System of Classification and Labelling of Chemicals (GHS)

**Aim:** One chemical, one label - worldwide.

All over the world there are different laws on how to identify the hazardous properties of chemicals (called 'classification') and how information about these hazards is then passed to users (through labels, and safety data sheets for workers).

This can be confusing because the same chemical can have different hazard descriptions in different countries. For example, a chemical could be labelled as ‘toxic’ in one country, but not in another.

The UN brought together experts from different countries to create the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).
The aim of the GHS is to have, worldwide, the same:

- criteria for classifying chemicals according to their health, environmental and physical hazards; and
- hazard communication requirements for labelling and safety data sheets.

The UN GHS is not a formal treaty, but instead is a non-legally binding international agreement. Therefore countries (or trading blocks) must create local or national legislation to implement the GHS.

**What does the new CLP Regulation mean for UK chemical suppliers and users?**

New **scientific criteria** to assess hazardous properties of chemicals.

For example, the diagram below demonstrates there are differences between the definitions for ‘acute toxicity - oral’ under the existing system compared to the new GHS criteria.

For a detailed comparison of the criteria used to define the classifications, please see the EC report:

- **Comparison between EU and GHS criteria - human health and the environment**\(^1\)

A new design for the existing hazard symbols

For example:
More examples of the UN GHS pictograms\textsuperscript{[2]}

For further details of how to allocate pictograms according to the UN GHS please see Annex I of the UN GHS\textsuperscript{[3]} and three new harmonised hazard warning symbols for labels (known as ‘pictograms’),

This pictogram refers to less serious health hazards such as skin irritancy/sensitisation and applies to many circumstances where the CHIP symbol is applied.

CHIP symbol

This pictogram reflects serious longer term health hazards such as carcinogenicity and respiratory sensitisation

This pictogram means ‘Contains gas under pressure’

New harmonised \textbf{warning} and \textbf{precautionary statements} for labels, which will replace the existing risk and safety phrases

\textit{New hazard statements for labels, for example:}
H240 - Heating may cause an explosion
H320 - Causes eye irritation
H401 - Toxic to aquatic life

New precautionary statements for labels, for example:

- P102 - Keep out of reach of children
- P271 - Use only outdoors or in well-ventilated area
- P410 - Protect from sunlight

What will happen to CHIP and the HSE approved supply list?

Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 (known as CHIP or CHIP 4)

The CLP Regulation applies directly in all member states. This means, firstly, member states do not need to implement the Regulation in national legislation. Secondly, member states will need to repeal national legislation that implements the existing classification and labelling system.

In Great Britain, the implementing legislation is the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009, and in Northern Ireland (NI) the Chemicals (Hazard Information and Packaging for Supply) (Northern Ireland) Regulations 2009.

Although the CHIP Regulations will be repealed in full in the UK when the new Regulation is fully in force (1 June 2015), it is also necessary to amend CHIP and its supporting guidance as the transitional period progresses and the new Regulation begins to apply the new GHS regime.

Discontinuation of the HSE Approved Supply List

Chemical suppliers will be familiar with the Approved Supply List (ASL) as an integral part of the CHIP Regulations.

The ASL published Annex I of the Dangerous Substances Directive (67/548/EEC) which lists the harmonised classifications and labelling requirements for some 8000 substances, agreed by experts at European level. The classifications were legally binding and had to be used by suppliers.

The entry into force of the CLP Regulation has meant there is no longer a need for the ASL.

Annex VI of the CLP Regulation

On its entry into force on 20 January 2009, the CLP Regulation repealed in full Annex I of the Dangerous Substances Directive. However, as the agreed harmonised classifications and accompanying labelling requirements are still needed throughout the transitional period of the CLP Regulation to allow suppliers to classify preparations (mixtures), the list was immediately re-enacted in Table 3.2 of Part 3 of Annex VI to the CLP Regulation.
As the CLP Regulation is direct acting on all Member States, there is no longer a need for a separate national publication and the Approved Supply List has therefore been discontinued with immediate effect.

All the agreed harmonised classifications can be found at the web site for the European Commission’s Joint Research Centre at:

- European Commission’s Joint Research Centre[5]

Table 3.2 includes all the harmonised classifications that appeared in the Approved Supply List up to and including the 30th and 31st Adaptations to Technical Progress (ATP) of the Dangerous Substances Directive.

The same harmonised classifications, but reflected using the criteria set out in the CLP Regulation (Table 3.1), can be found at the same link.

1st ATP to the CLP Regulation

The 30th and 31st ATPs were incorporated into the 1st ATP to the CLP Regulation, published on 5 September 2009 as Commission Regulation (EC) No 790/2009. Details can be found at:

- European Commission’s Joint Research Centre[6]

As with the current classification and labelling system, substances will continue to be added to the list of harmonised classifications and entered into the CLP Regulation’s Classification and Labelling Inventory.

Resources of member states’ authorities will continue to be focused on substances of the highest concern, mainly substances classified for carcinogenicity, germ cell mutagenicity or reproductive toxicity (categories 1A or 1B according to GHS), respiratory sensitisation or for other effects on a case-by-case basis. Such classifications will be continued to be harmonised and entered into Annex VI.

Under Article 37(4) of the CLP Regulation, proposals for new harmonised classifications will be considered by the Risk Assessment Committee set up under the REACH Regulation.

Classification and Labelling Inventory

The new CLP Regulation creates a Classification and Labelling Inventory. The Inventory will be populated by classifications determined by industry. Much of the information provided on these classifications will be submitted as part of the suppliers’ REACH registration for those substances that are placed on the market.
CLP Regulation - guidance and compliance ‘tools’ (‘translation table’)

**Guidance on CLP Regulation - European level**

The European Chemicals Agency (ECHA) oversees the CLP Regulation at European level and is responsible for providing suitable guidance for chemical suppliers and others who may have an interest in how the Regulation is intended to be applied.

ECHA has produced two levels of guidance. The first provides an overview of the Regulation and an introduction to its provisions and what they mean. The second is a much more technical document and provided detailed guidance on the application of the CLP classification criteria.

- **ECHA Guidance on the CLP Regulation**[7]

**Guidance on CLP Regulation - UK level**

As the CLP Regulation is directly acting on all EU Member States it is important that guidance and advice to chemical suppliers across the EU market is consistent.

Therefore, **there are no plans to provide any guidance on CLP at UK level.** Chemical suppliers should use the ECHA guidance indicated above. HSE is keen to play its part, but as with the REACH Regulation, all stakeholders must take responsibility when developing tools and guidance for understanding the new CLP Regulation.

**‘Translation’ Table: harmonised classifications (CLP Regulation - Annex VII)**

Annex VII of the CLP Regulation presents a ‘translation’ table which can be used to ‘convert’ classifications made under the current Dangerous Substances Directive to the new classifications made by applying the CLP criteria. **Where there is no direct one-to-one equivalent, the Annex has assigned the least severe classification and places a duty on the supplier to decide if a more severe classification is needed.** This annex is intended to be used by those substances and mixtures that have already been self-classified under the existing European legislation, and where the hazard categories identified are equivalent.

The European Commission intends the table to help suppliers/importers of substances and mixtures fulfil their obligations under the new Regulation without having to reclassify, as long as the chemical has already been classified under the existing system. If a supplier/importer chooses not to use the table they must fully re-evaluate the substance or mixture using the criteria in the Regulation.

At this stage, how the translation table will work and its appropriate use is still being developed.
CLP Regulation - UK national Helpdesk

While the UK will not provide any specific guidance on the CLP Regulation, the Regulation requires member states to establish a national Helpdesk to assist chemical suppliers. This obligation is fulfilled through a joint REACH/CLP Helpdesk. Contact details are:

REACH and CLP UK Competent Authority Helpdesk, 
Health and Safety Executive
2.3 Redgrave Court, 
Merton Road 
L20 7HS Bootle 
Merseyside

- E-mail: UKREACHCA@hse.gsi.gov.uk
- REACH website[8]
- CLP website[9]

Other guidance/tools

The European Commission is also considering the development of an on-line tool to help industry comply with the GHS-based Regulation. Further details will be provided as the project develops.

UK Government will also work with the European Commission, trade associations, industry and other stakeholders to develop guidance and help educate those affected.