



Birmingham Health, Safety & Environment Association

721 Hagley Road West
Quinton, Birmingham B32 1DJ
Email: secretary@bhsea.org.uk
Website: www.bhsea.org.uk
Tel. No. 07802 973795

Registered Charity No.: 255523

Secretary: Andrew Chappell C.Eng., MIET., Dip.E.E., CMIOSH, MCMI

Newsletter

September 2010

Presentation: "The New CHIP Regulations".

Andrew Siveter, Consultant, CMS Team, Sypol Ltd.

Andrew explained that he works in the COSHH Management System (CMS) Team at Sypol Ltd, providing an on-line service to clients for COSHH Assessments and Control Measures. He added that the system was outlined, together with other Sypol services, in the information pack on the seats.



Andrew Siveter, CMS Team, Sypol Ltd.

He then went on to deal with some of the jargon surrounding today's topic by explaining some of the terms he would use: -

- **GHS** is Globally Harmonised System of Classification and Labelling of Chemicals.
- **CLP** is Classification, Labelling and Packaging of Substances and Mixtures and is the European version of GHS.
- **CHIP** is the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 and is the legislation we currently use to classify hazardous substances.

Andrew explained that the new Regulation will apply directly in all EU member states, so that they will not have to implement it in national legislation. They will, however, need to repeal any existing legislation that implements their current classification and labelling system. Because there is a lead-in period to the new legislation, the CHIP Regulations will still be amended until the the CLP Regulation is fully implemented. Hence the creation of CHIP4 to set the framework to allow CLP and CHIP to run side-by-side.

There are some crucial dates to remember: -

1st December 2010

- Substances
 - Must be classified under CLP on Safety Data Sheets and package labelling
 - May also carry a CHIP classification
 - There is a 2 years' grace for packaging
- Mixtures
 - Must be classified under CHIP
 - May also carry a CLP classification

1st June 2015

- Substances and mixtures must be classified under CLP only
- There is a further two year grace period for existing packaging for mixtures

Andrew said that a substance or mixture classified as hazardous and contained in packaging will bear a label including the following elements: -

- The name, address and telephone number of the supplier(s).
- The nominal quantity of the substance or mixture in the package, unless this quantity is specified elsewhere on the package.
- Product identifiers
- Hazard pictograms
- Signal words
- Hazard Statements appropriate precautionary statements
- Where applicable, supplementary information.

One of the more marked differences was that CLP introduces Hazard Statements, which are phrases applied to a hazard class and category that describes the nature of the hazards of a hazardous substance or mixture, including the degree of hazard. Any hazard statement must be included on the label. They are associated with Hazard Codes, in the format of **Hxxx**, which are used for reference and are not to be intended to interchangeable with hazard statements. Examples are: -

- H225 Highly flammable liquid and vapour
- H311 Toxic in contact with skin
- H402 Harmful to aquatic life

Andrew continued by saying that the CLP Regulations contain a new range of pictograms, some of which are different from the CHIP versions, as follows: -



- Unstable explosive
- Explosive: mass explosion hazard
- Explosive: severe projection hazard
- Explosive: fire, blast or projection hazard
- Fire or projection hazard
- Heating may cause explosion



- Extremely flammable gas
 - Flammable aerosols
 - Flammable liquid and vapours
 - Catches fire spontaneously if exposed to air
 - Flammable solid
 - Heating may cause fire
 - Self-heating; may catch fire
 - In contact with water releases flammable gas
- In contact with water releases flammable gases which may ignite spontaneously
 - Self-heating in large quantities; may catch fire



- May cause or intensify fire; oxidiser
- May cause fire or explosion; strong oxidiser
- May intensify fire; oxidiser



- Contains gas under pressure; may explode if heated
- Contains refrigerated gas; may cause cryogenic burns or injury



- May be corrosive to metals
- Causes serious eye damage
- Causes severe skin burns and eye damage



- Fatal if swallowed
- Toxic if swallowed
- Fatal in contact with skin
- Toxic in contact with skin
- Fatal if inhaled
- Toxic if inhaled



- Harmful if swallowed
- Harmful in contact with skin
- Causes skin irritation
- May cause an allergic skin reaction
- Causes serious skin irritation
- Harmful if inhaled
- May cause respiratory irritation



- Very toxic to aquatic life
- Very toxic to aquatic life with long lasting effects
- Toxic to aquatic life with long lasting effects



- May cause genetic defects
 - May cause allergy or asthma symptoms or breathing difficulties if inhaled
 - Suspected of causing genetic defects
 - May cause cancer
 - Suspected of causing cancer
 - May cause damage to organs
 - Causes damage to organs
- Causes damage to organs through prolonged or repeated exposure
 - May cause damage to organs through prolonged or repeated exposure
 - Suspected of damaging fertility or the unborn child
 - May damage fertility or the unborn child
 - May be fatal if swallowed or enters airways

Another significant piece of information is the Product Identifier, which details the identification of the substance or mixture and contains the following: -

- The name and identification number, as given in Annex VI of the Regulations
- If the substance is not included in Annex VI, the name and identification number, as it appears in the classification and labelling inventory
- If the substance is not included in either of the above two documents, the CAS number together with an international chemical name(s)
- If the CAS number is not available, an international chemical name(s)

For a mixture, the Product Identifier shall consist of: -

- Trade Name or designation of the mixture
- The identity of all substances in the mixture that contribute to the classification of the mixture as regards acute toxicity, skin corrosion or serious eye damage,

germ cell mutagenicity, carcinogenicity, reproductive toxicity, respiratory or skin sensitisation, specific target organ toxicity or aspiration hazard.

- a maximum of four chemical names on one label shall suffice (unless more than four names are needed to reflect the nature and the severity of the hazards)

Signal words indicate the relative level of severity of hazards to alert the reader to a potential hazard. There are two levels: -

1. Danger – indicating the more severe hazard categories
2. Warning – indicating the less severe hazard categories.

Significantly, the Signal word Warning will not appear on a label, but will appear on the safety data sheet

Andrew then mentioned the Precautionary Statement that is a phrase describing recommended measure(s) to minimise or prevent adverse effects resulting from exposure to a hazardous substance or mixture due to its use or disposal. These must be included on the label and, as with the hazard statements, are given Precaution Codes in the form **Pxxx**. Not more than six Precautionary Statements shall appear on the label, unless necessary to reflect the nature and severity of the hazards. Examples of precautionary statements are: -

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

Andrew concluded by mentioning that the existing Approved Supply List (ASL) with classifications and labelling requirements for about 7,000 substances will be repealed at the end of the transitional period. The European Chemicals Bureau has 'translated' the ASL into the GHS criteria and, once completed, it will be transferred to Annex VI of the new CLP Regulation.

Members' Questions

Tim Prestage of Tim Prestage Ltd. asked about problems with Product Safety Data Sheets for substances such as hardwood dust or fumes from welding rods. Andrew agreed that this type of problem had no solution and that there were no phrases that were applicable to welding rods

Warwick Adams, of Interserve Project Services, enquired if there was any clear classification of substances and Andrew replied that it was a complicated situation with, unfortunately, no simple answer.

(Secretary's Notes:

1. Annex VI is accessible on <http://ecb.jrc.ec.europa.eu/esis/>
2. The CLP Regulations are accessible on <http://echa.europa.eu> . BE WARNED, however, there are 1355 pages in this document! Before downloading, take a look at the Annexes that can be downloaded separately, which are listed on the home page for these Regulations. Also note that Annex VII on page 1352, contains a conversion table to take you from Risk Phrases to Hazard Statements.
3. Most statements and classifications on CLP are compatible with CHIP4 but you will have to review your COSHH assessments to make the translation as soon as possible after the legislation starts to take effect.)