

## **CHEM Trust's response to the public consultation on the CLP revision proposal**

### **Proposal for amending Regulation (EC) No 1272/2008 of the European Parliament and of the Council on classification, labelling and packaging of substances and mixtures (COM2022 748 final)**

CHEM Trust welcomes the Commission proposal for a revision of the CLP legislation, and the associated delegated act amending the CLP Annexes. CHEM Trust supports the goals of the Chemicals Strategy for Sustainability and the European Commission's efforts to improve the chemicals legislation to make it more protective, efficient, and coherent. The revision of CLP is an important step forward in this work.

#### **General comments**

Many of the new provisions ensuring better protection by better identification of hazardous properties, increased transparency and predictability, better information to consumers, and more global harmonisation are supported. In particular, we welcome:

- The inclusion of new hazard classes for EDCs, PBTs and vPvBs, and PMTs and vPvMs, as this will greatly improve the identification of these harmful substances which is a prerequisite for regulatory control.
- That groups of chemicals can be covered by harmonised classification, and that the classification of mixtures and multi-constituents have been further improved and clarified.
- The clarification of the Weight of Evidence definition in Annex 1, including which sort of information should be taken into account for classification, and in addition, the focus on using alternative test methods, wherever possible, as well as NAMs in the future.
- The possibility for the Commission to make classification proposals as well as the increased transparency, including requirements for notification.
- The decision to revise the CLP and subsequently promote the introduction of new hazard classes for EDCs, PBTs, PMTs for classification and labelling, as well as the use of alternative test methods at the UN level as part of the GHS.

However, despite these important improvements, we are surprised that future initiatives to include neurotoxicity and immunotoxicity, as committed by the CSS, have not been addressed by the proposal.

Furthermore, we are very concerned that European citizens and the environment will not be protected against endocrine disruptors for many years to come. This is not due to the transition

times in the CLP revision itself, but due to the very long transition times set out by the new delegated act amending Annex I to the CLP Regulation.

We therefore urge the swift adoption of the CLP revision, and also to set a deadline of 6 month from a RAC opinion to a final Commission decision on hazard classification in order to minimize exposure to Category 1 and Category 2 endocrine disruptors as soon as possible.

Finally, we assume that it is an oversight that the new hazard classes have not been added to Art.18.3(b).

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