



## GHS/CLP Directive Questionnaire

### What does GHS mean?

GHS is the abbreviation for Global Harmonised System for the classification and marking of chemical products. It is a set of rules passed at a UN conference in 1992 with the objective of regulating the handling of chemicals in a standard way world-wide, thus improving both human and environmental safety.

### What does CLP mean?

CLP is the abbreviation for Classification, Labelling and Packaging and represents the implementation of GHS within the European Union. It was introduced in 2008 by (EC) Directive No. 1272/2008 (CLP Directive) and has been gradually implemented since then. Its implementation will be completed on **01.06.2015**, after which the current system of classification and marking chemical products currently described in the Hazardous Substances Directive will be replaced completely by CLP.

### What is going to change through the CLP Directive?

The main changes are:

- New hazard symbols (white rhombus with a red rim in place of the orange-and-black square used up to now)
- New hazard statements and warning notes (previous "R-statements" are now called "H-statements" "H" stands for hazardous, previous "S-statements" are now "P-statements", "P" stands for precautionary), most of which have new wording
- More stringent classification criteria, leading in many cases to "stricter" marking (e.g. "corrosive" rather than "irritant", or "irritant" rather than "no marking obligation").

### What is going to change for Buzil products apart from the new symbols, hazard statements and warning notes?

A whole series of products will be given "stricter" marking due to the more stringent classification criteria. This results in the following pattern for the 103 products (incl. detergents) in the current price list:

- 43 products remain without marking obligation
- 18 products are to be given a new marking equivalent to the old hazard symbol
- 23 products previously without marking obligation are to be given the new hazard symbol "irritant" (exclamation mark).
- 5 products previously without marking obligation are to be given the new hazard symbol "corrosive"
- 14 products previously marked "irritant" are to be given the new hazard symbol "corrosive"

(See also document "Labelling\_old\_new\_incl\_colour code.pdf" for more details)



**Do the new markings have any influence on product transport?**

Yes, since some of the new hazard statements automatically include classification as hazardous goods some goods not classified as hazardous goods before will have to be transported as hazardous goods in future.

The legal regulations applicable for transport will not change following the introduction of CLP. Transport regulations are still regulated by international requirements for land and sea transport, despite CLP. The same applies to handling and storage.

**Is it possible that the new regulations require a change in storage conditions for some products?**

Yes, since storage class depends on hazardous goods classification the storage class (8b - Non-combustible, corrosive substances and 12 - Not fire-hazardous liquids) for products newly classified as hazardous products will change accordingly.

**Are the products now “more strictly” marked according to the CLP Directive more hazardous than before?**

No, the CLP Directive simply applies different evaluation standards than the hazardous goods laws previously in force. Whether or not this new marking really results in improved user safety is a subject under controversial discussion among experts.

**Once CLP is implemented, must additional personal protective equipment be worn?**

The CLP classification can make it necessary for additional personal protective equipment to be worn for handling products which did not have this requirement before.

**Will the CLP Directive affect the composition of Buzil products?**

Generally speaking – no. In a few borderline cases the formulae will be adapted to avoid inappropriate over-marking. This adaptation will take place within the context of our continual improvement process and will not influence the quality of our products.

**What is the timeline for implementation at Buzil?**

Buzil is marking its products CLP-compliant using new labels and safety data sheets. The significantly larger amount of information on the labels has led to the integration of basic changes e.g. new language combinations. For our customers this means that all relevant product information will have been changed and made available by May 31, 2015.

**How long will the “old” safety data sheets be available?**

The previous safety data sheets will be available for downloading from our website until 31.05.2017.

**By what date should customers ideally have used up products with the “old” labels, since they will no longer be valid from this date on?**

By 31.05.2017.



**Further information on CLP also under:**

Comparison Old labelling – New labelling (Labelling\_old\_new\_incl\_colour code.pdf)

Comparison GHS - material and preparation directive (comparision\_GHS+MaPD.pdf)