

EFCC's Feedback on the Inception Impact Assessment on the Revision of EU legislation on hazard classification, labelling and packaging of chemicals (CLP)

The European Federation for Construction Chemicals (EFCC) represents European construction chemicals companies and national member associations, representing raw materials producers and formulators of finished products, including SMEs, across the European Union. EFCC welcomes the opportunity to participate in the public consultation on the Inception Impact Assessment for CLP.

The construction chemicals industry in Europe continues to be fully supportive of the CLP Regulation in ensuring both a well-functioning single market for chemicals and a high level of protection of human health and of the environment.

Incomplete information about hazards to human health and the environment.

Where CLP has so far missed the identification of critical hazards to human health and the environment this should be investigated.

However, we fail to understand why new hazard classes for Endocrine Disruption would be necessary. Our understanding is that CLP already captures disruptive effects through different existing and UN GHS harmonised classes such as CMR, STOT, chronic effects, etc. Whether these effects were mediated through the endocrine system or not does not change the outcome. And typically there is a threshold level under which safe use can be demonstrated.

Introducing a new hazard class will result in a significant deviation from the UN GHS with negative impacts on hazard communication globally, which is acknowledged by the COM. .

Hindrance of the free circulation of chemicals in the internal market

EFCC welcomes the initiative to allow a impossibility for companies to use multilingual fold-out labels for normally sized packaging. We also welcome the initiative to introduce tailored labelling rules where there is not enough space on packaging.

Insufficient public resources and/or risk of inefficient use of them

due to the absence of a mandate to the Commission or ECHA to initiate classification dossiers and of a prioritisation mechanism on the need to classify certain chemicals

Opportunities of new digital tools

We welcome this initiative but wonder why digital labelling is not included. Smart CE marking of construction products could be an opportunity to introduce such a digital tool.

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