

CLP Regulation will become obligatory 1st June 2015

Changes in the labelling and effects to the user of coolants

General

Effective 1st June 2015, the European Regulation (EC) No. 1272/2008 will become obligatory as the new directive for the handling of hazardous substances. It is known by its abbreviated form CLP for classification, labelling and packaging. This regulation defines how the hazards of substances and mixtures are determined in order to label and package them according to their hazardous potential.

The CLP Regulation adopts the globally applicable GHS (Globally Harmonised System) on EU level. It repeals the former Dangerous Preparations Directive 1999/45/EC, which remains valid until 31 May 2015. Already on 1 December 2012, the CLP Regulation has bindingly replaced the Directive 67/548/EEC.

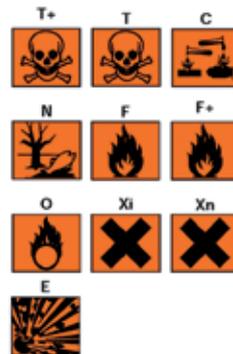
Changes

The most significant change is, that in most cases the classification criteria of the new regulation have become much more stricter. Usually, mixtures are classified based on the hazards of their ingredients. Regarding water-miscible cooling lubricants, for example, emulsifiers, solubilising agents or biocides are often irritating. According to the former Dangerous Preparations Directive, a mixture consisting of 20% skin irritating ingredients had to be classified itself as

skin irritating, now, according to the CLP Regulation, the limit is lowered to 10%.

As a consequence, many cooling lubricant concentrates being hazard-free according to the former directive, might now be classified otherwise, e.g. as skin or eye irritating, but without any changes regarding the real danger.

Especially noticeable is the new appearance of the hazard pictograms: Before, an orange box with a black border standing on the edge, now, a square with a red border standing on one tip (see below). Most of the symbols remain, but the St. Andrew's cross is replaced by an exclamation mark. There are two completely new pictograms: The gas cylinder and the human silhouette signalling particular health hazards.



Many coolants will get new hazard symbols.

By implementing the CLP Regulation, new hazard classes are introduced as well, among them eight new physical hazards such as corrosive to metals and a new health hazard called specific target organ toxicity (STOT).

For hazard classes such as “skin irritation” applies, that it can occur in different states of intensity. This intensity is divided into various categories. The lower the number, the more severe the hazard. In this example, category 1 represents severe skin corrosion (Skin corrosion 1) and category 2 represents skin irritation (Skin irritation 2).

Furthermore, H- and P-statements replace the R- and S-phrases as verbal descriptions of hazards and hazard minimization. Here, there are principally many overlaps, for example:

Before: R38 – Irritating to skin. S24 – Avoid contact with skin.

Now: H315 – Causes skin irritation. P262 – Do not get in eyes, on skin, or on clothing.

In addition, there are two new signal words “Warning” and “Danger”, which represent less severe respectively more severe hazards.

Effects

For the moment being, most Oemeta products require no labelling according to the Preparations Directive. Upon switching to the CLP Regulation, the major part of these products will be labelled. This is due to the changes in the classification criteria and not due to changes in the composition of the products. In most cases, however, the products will be labelled with light labels such as skin or eye irritation (H315 respectively H319 and pictogram with exclamation mark) or harmful to aquatic life (H412 with no specific hazard symbol).

Starting in April 2015 and thus, just in time before the CLP Regulation becomes effective, Oemeta will provide the safety data sheets with the classification according to the CLP Regulation. Later on, the new classifications will also be found on the adapted container labels. As defined in the DGUV 109-003 “Activities with cooling lubricants”, if necessary, the user has to consider the new information in hazard assessment or when creating operating instructions. As well, the user has to check effects on internal labelling according to TRGS 201.

If you have any questions regarding the new labelling, please send an e-mail to products@oemeta.com or directly to your responsible salesperson. In case you have difficulties in using the new product labels, of course, we support you in selecting product alternatives wherever this is technically possible.

The most relevant labelling for our cooling lubricant products (pictograms; hazard statements; hazard class):



H314: Skin corrosion 1
H318: Eye damage 1



H 315: Skin irritation 2
H319: Eye irritation 2
H302/H312/H332: Acute toxicity 4 (oral/dermal/inhalative)
H317: Skin sensitisation 1
H335: STOT SE 3 (respiratory irritation)



H304: Aspiration toxicity 1 (mineral oils, kinematic viscosity 40°C ≤ 20.5 mm²/s)
H373: STOT RE 2 (may cause damage to kidneys)



H400: Aquatic acute 1
H410: Aquatic chronic 1
H411: Aquatic chronic 2

no specific symbol

H412: Aquatic chronic 3