Setting the Scene

MARK HAILWOOD
CLP into Seveso III

- The application of the CLP-Regulation to major accident hazards was one of the major changes in adopting the Seveso III Directive
- This has highlighted a number of issues, some of which are not new, in the practical application.
Issues (not exhaustive)

- Classification of substances for which there are no harmonized criteria, or for which the harmonized criteria do not cover all hazard categories;
- Managing the classification of mixtures, in particular where the component substances have different hazard;
- Acceptability of the information given in Safety Data Sheets;
- Classification of wastes;
- Definition of “alternative fuels”;
- Dynamics of the CLP-Regulation and its impact on the scope of the Seveso III Directive;
- Identifying establishments potentially covered by national major hazard regulation or policies;
- Managing substances which, in the form that they are available on-site, cannot lead to a major accident.
Toxicity - Seveso III alignment

- Oral mg/kg
  - T+ 1 2 3 4
  - T
  - Xn

- Dermal mg/kg
  - T+ 1 2 3 4
  - T
  - Xn

- Inhalation vapour mg/l
  - T+ 1 2 3 4
  - T
  - Xn

- Inhalation aerosol mg/l
  - T+ 1 2 3 4
  - T
  - Xn

- Inhalation gas ppmV
  - T+ 1 2 3 4
  - T
  - Xn
Classification Issues

- The CLP Regulation Annex VI contains the harmonized classifications for the substances listed.

- This means:
  - For the acute tox. classifications with a *, that this is a minimum classification.
  - Classifications which are not listed in the harmonized list may be relevant, but are not harmonized
  - Substances which are not listed must be dealt with through “self-classification”.
  - Mixtures must be treated through self-classification / rules on mixtures according to CLP Regulation Annex I
Dynamics in CLP

- The CLP Regulation is the EU implementation of the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS).
  - There is a bi-annual amendment of GHS
  - Amendments will eventually be integrated into CLP through ATP Regulations.
- REACH is the registry of chemical substances within the EU.
  - This gathers data and information on hazardous properties
  - Improved data may lead to changes in the classification
- There will therefore be **changes to the scope** of the Seveso III Directive **without any amendments in Annex I** of Seveso III.
Identifying Establishments / Facilities

- It is necessary to have a substance classification system in place.

- Operators must provide information on:
  - Safety Data Sheets (up to date, all relevant hazards for the substances, in the local language)
  - The maximum quantities of the substances on site, their form and location. This includes wastes, intermediates, unintended products due to loss of control.

- Examples of typical Establishments:
  - Oil refining, chemical manufacturing, blending and mixing
  - Oil, gas and petroleum storage, bulk tank storage of chemicals, warehouses, packaging and commissioning, explosives storage.
  - End users of chemicals: e.g. plastics, surface treatment, food industry
  - Hazardous waste collection and treatment
Thank you for your attention!