

ECPA Thoughts on the implementation of CLP for plant protection product labels

The Classification, Labelling and Packaging Regulation 1272/2008 requires that all mixtures on sale from 2015 should adhere to the new classification and labelling proposals contained therein.

This Regulation therefore applies to PPPs and as such replaces the current hazard labelling developed under the Dangerous Preparations Directive 1999/45/EC, with new labelling defined by CLP. Whilst seemingly a substantial exercise it is estimated that no more than 10% of current labels will change their hazard classification and then only marginally, with all others shifting to the new language, warnings and pictograms used in CLP without a change in hazard classification.

ECPA believes Member State Competent Authorities should work with industry to ensure an effective and efficient move to CLP labelling, minimising resources and work load that are at a premium.

To this extent ECPA advocates that there is no need for a formal re-authorisation of each product, but an adaption of the existing authorisation supported by suitable justification. Where a classification is changed than a Member States may deem it necessary to re-issue a new authorisation for the product and the new classification.

ECPA believes that it is an industry responsibility to define and implement the requirements of the CLP regulation (ECPA document 20642, January 2012), however we recognise that this interpretation is not shared by some national competent authorities.

In the absence of a definitive legal interpretation, when pesticide registration authorities request submission of CLP classifications, ECPA recommends that companies provide these national competent authorities with a justification for the new classification and labelling using the ECPA CLP Justification Template supported by a new SDS, thus offering a pragmatic solution to ensure a smooth implementation to CLP. In doing so industry can ensure a rapid and smooth transfer of labelling and hazard communication with the new labels through 2015, thus minimising confusion in the eyes of customers, namely farmers, growers and specialist companies applying PPPs.

All risk management statements on the label will remain the same unless there has been a change in hazard classification, when suitable modification will need to be made and approved by the competent authority.