CLP Frequently Asked Questions

This document contains answers to questions about the application of the CLP regulation by the Crop Protection industry. For general questions relating to the CLP regulation, please see the Questions and Answers section of the ECHA website.

Contents

1: Questions relating to safety data sheets

Q1.1: Are exposure scenarios required to be attached to the safety data sheet of a plant protection product?

A: The concept of Exposure Scenarios applies only to substances and not to mixtures. The common practical approach is to integrate information from the Exposure Scenario and Risk Management Measures from the substances in the plant protection product into the main body of the safety data sheet of the Plant Protection Product. Additionally, a simple reference to the conditions for safe use contained in the product label could be made. Further information can be found in the ECHA guidance on compilation of Safety Data Sheets, section 3.22

Q1.2: Is an exposure scenario required to be annexed to the safety data sheet of an active ingredient?

A: Active substances that are either registered under regulation 1107/2009 or have met other criteria (see article 15 of REACH) are regarded as registered under REACH and a separate REACH registration is not required. This means that a chemical safety report is not required and hence an exposure scenario does not exist

Q1.3: Where a national pesticide registration authority requires a pesticide product to be labelled in a way that differs from the company's view of the CLP labelling, how should the safety data sheet for the product be adapted?

A. The classification and labelling information required by the pesticide registration authority must appear in sections 2.1 and 2.2 of the safety data sheet for the product in that country only. All other sections of the safety data sheet remain unchanged.

Q1.4: Does the additional, plant protection specific labelling defined in regulation 547/2011 need to be included in section 2.2 of the safety data sheet?

A. Section 2.2 of the Safety data sheet must contain the hazard pictogram(s), signal word, hazard statement(s) and precautionary statement(s). Other additional labelling information is considered as supplemental information by CLP. There is no requirement to include supplemental information in this section of the safety data sheet but the compiler may choose to do so.

2: Questions relating to labelling

Q2.1: When must the label refer to the safety data sheet?

A. The labelling phrase EUH210 "Safety data sheet available on request" is part of the label when the product is not classified as hazardous under CLP but contains at least one hazardous component exceeding the generic or specific concentration limit. See CLP, annex II, paragraph 2.10 for the full requirement

Q2.2: How should the risk management measures from a product label be addressed in the Safety Data Sheet?

A. The safety data sheet provides advice on risk management measures in sections 4 (first aid advice), 5, 6, 7, 8, 10 and 13. The contents of these sections should be consistent with the product label.