



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES
ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

UEAPME position on GHS amendments, 1st Reading, 2nd April 2008

*Draft Report on Proposal for a regulation on classification, labelling and packaging,
Envi Committee, (Rapporteur: Amalia Sartori)*

Amendments n.	Issue	UEAPME position	Justification
6	Other forms of communication to consumers	No	Risk of complicating means of communication.
7	Additional information to label	Yes	Any additional and non compulsory form of information may be useful
12	Labelling and classification criteria	Yes	A global harmonization of criteria would facilitate exchange of goods
19	Information on composition and classification of existing mixtures	No	There is a risk of revealing industrial secret
26	Levels of fees for confidentiality	Yes	This measure is particularly helpful for SMEs
27	Disclosure of previously confidential data for newly found CMR	Yes	Appropriate measure to deal with very dangerous substances
28	Exemption from obligation of labelling	Yes	Giving a role to the member states would make implementation easier
29	additional information to labels	Yes	To facilitate alternative forms of access to information
31	Update of old labels	No	6 months are not sufficient for companies
32	Combination packaging	Yes	If the outer packaging is in accordance with regulation for

			transport, then the GHS label can be omitted (as it is on the inner packaging anyway).
41	Coordination of controls and sanctions by the Commission	Yes	The Commission would guarantee a correct implementation and harmonization
56	Safeguard of chemical identity	No	If all the dangerous are excluded, it is impossible to protect chemical safety
62	Availability of list of substances to the public	Yes	It is important to make the complete list of substances available to the public
68	Incorporation of new hazard classes	Yes	Important to incorporate new hazard classes recognised at international level
82	Classification of mixtures	No	Points a) and b) cannot be excluded from this article, as they represent cases of reactions that do not affect the classification
90	Hazard pictograms in Annex I	No	Using pictograms for all hazard classes would draw less attention to the most hazardous classes
91	“	“	As amend. 90
92	“	“	As amend. 90
94	Hazard pictograms on Annex I, part 5	No	As Amend. 90 If these principles are introduced, the harmonisation with non EU countries would be affected
95	Hazard pictograms on Annex I, part 5	No	As amend. 94 If these principles are introduced, the harmonisation with non EU countries would be affected
96	“	“	AS amend. 94
98	Confidentiality on	No	Confidentiality

	labels		should not only confined to non dangerous substances
100	Reply of Agency to request of authorization within specified time	No	To maintain a specific time frame for reports helps preventing the disruption of productive activities
101	Information of non-acceptance by the Agency	Si	Important for companies to be informed about negative decisions by the Agency
102	"	"	As amend. 101
105	Labelling for single portions or single dose	No	Simplification of labelling for single portions is fundamental to prevent confusion and difficulties in reading
106	Labelling for single portions or single dose	No	It does not make sense to exclude from application volumes above 100 ml (for instance 125 ml) that are the most common ones
107	Danger for environment in labels for small packaging	Yes	It further simplifies the label
108	"	"	As amend. 107
109	"	"	As amend. 107
110	"	"	As amend. 107
111	"	No	As amend. 105
112	"	No	As amend. 105
114	"	No	As amend. 106
117	Further exemptions for small volume labels	Yes	If there are any further extensions of exemptions due to reduced environmental impact, it is useful to exempt from obligation of labelling
118	Update of labels	Yes	It is reasonable to foresee a time frame of 12 months to change labels

126	Notification of label in accordance to REACH	Yes	Important to specify volumes to comply with notification according to REACH
127	“	“	As amend. 126
133	Harmonization of GHS regulation	Yes	Important to harmonize with EU member states, but also with other states applying GHS
134	Conservation of documents	No	10 years are more than sufficient
135	“	“	As amend. 134
136	Controversies between supplier and member state	Yes	It facilitates the communication between states and Agency
139	Update of Annexes	Yes	It is appropriate that they are constantly updated with new classifications
141	Adaptation of labels of mixtures to GHS	No	To change the deadline to 1° dic 2013 to change all labels of mixtures is risky as companies will not have sufficient time to clear the stockpiles.
142	Revision	Yes	It is of fundamental importance to analyse the implementation and harmonization of the Regulation
143	Adaptation of labelling for mixtures to GHS	No	As amend. 141 It is not feasible to reduce the deadline by two years
145	Tables with toxicity categories	No	Adding a fifth category would represent a departure from the UN GHS and would thus be against the principle of harmonization
146	“	“	As amend. 145
147	“	“	As amend. 145
148	“	“	As amend. 145

149	“	“	As amend. 145
150	“	“	As amend. 145
151	“	“	A amend. 145
152	“	“	As amend. 145
153	Substances dangerous to the ozone layer	No	Adding the pictogram to this category would go counter the principle of harmonization and represent a departure from GHS
154	PBT and vPvB substances	No	Adding new classifications would go counter the principle of harmonization and represent a departure from GHS
155	“	“	As amend. 154
156	“	“	As amend. 154
157	“	“	As amend. 154
158	“	“	As amend. 154
159	“	“	As amend. 154
160	“	“	As amend. 154