Study on the regulatory fitness of the legislative framework governing the risk management of chemicals (excluding REACH), in particular CLP and related legislation

Industry Associations

1. Do you have examples which demonstrate that implementation of the CLP has been effective in achieving its objectives with regard to the protection of human health and the environment, as well as the free movement of chemicals? Is there one particular aspect of CLP implementation that has been important to its success? Are there any aspects where effectiveness could be improved?

2. What are the three main benefits / cost savings achieved from the CLP implementation for your sector and / or the environment and society?

3. To what extent are the classifications under the CLP understood by downstream users? Are there examples where they are not understood?

4. To what extent are the symbols under the CLP understood by downstream users? Are there examples where they are not understood? Are there more effective communication approaches?

5. Where other legislation is linked to the CLP, does this help achieve a high level of protection? Or could more appropriate risk management have been achieved at the sectoral level, using sector specific legislation?

6. Do you have examples of any aspects of the CLP where you believe the costs of complying are disproportionate to the associated benefits? Could efficiencies be realised if CLP were implemented differently? What aspects of the current framework are the most efficient? What aspects are the least inefficient? (*Note this could include procedural aspects as well as administrative, technical and other aspects.)*

7. Are there any inconsistencies (e.g. different criteria for classification) between sectoral legislation and the CLP? In other words, are the legal requirements under the different legislation consistent in how they attempt to reach their stated objectives?

8. Do you have examples of legislative overlaps between the CLP and sectoral legislation? Are any of the legal obligations to identify and communicate chemical hazards unnecessarily duplicated? If so, what are the overlaps?

9. Do the original needs for the CLP and its component parts still exist or are parts of the CLP no longer needed? Are there any gaps that the CLP should address?

10. Does the manner in which the CLP has been implemented restrict the ability of linked legislation to keep pace with scientific and technical advances or to successfully market their products inside or outside the EU? If so, which were the most restrictive aspects?

11. Could harmonisation of classification, labelling and packaging be achieved across Europe without the CLP?