

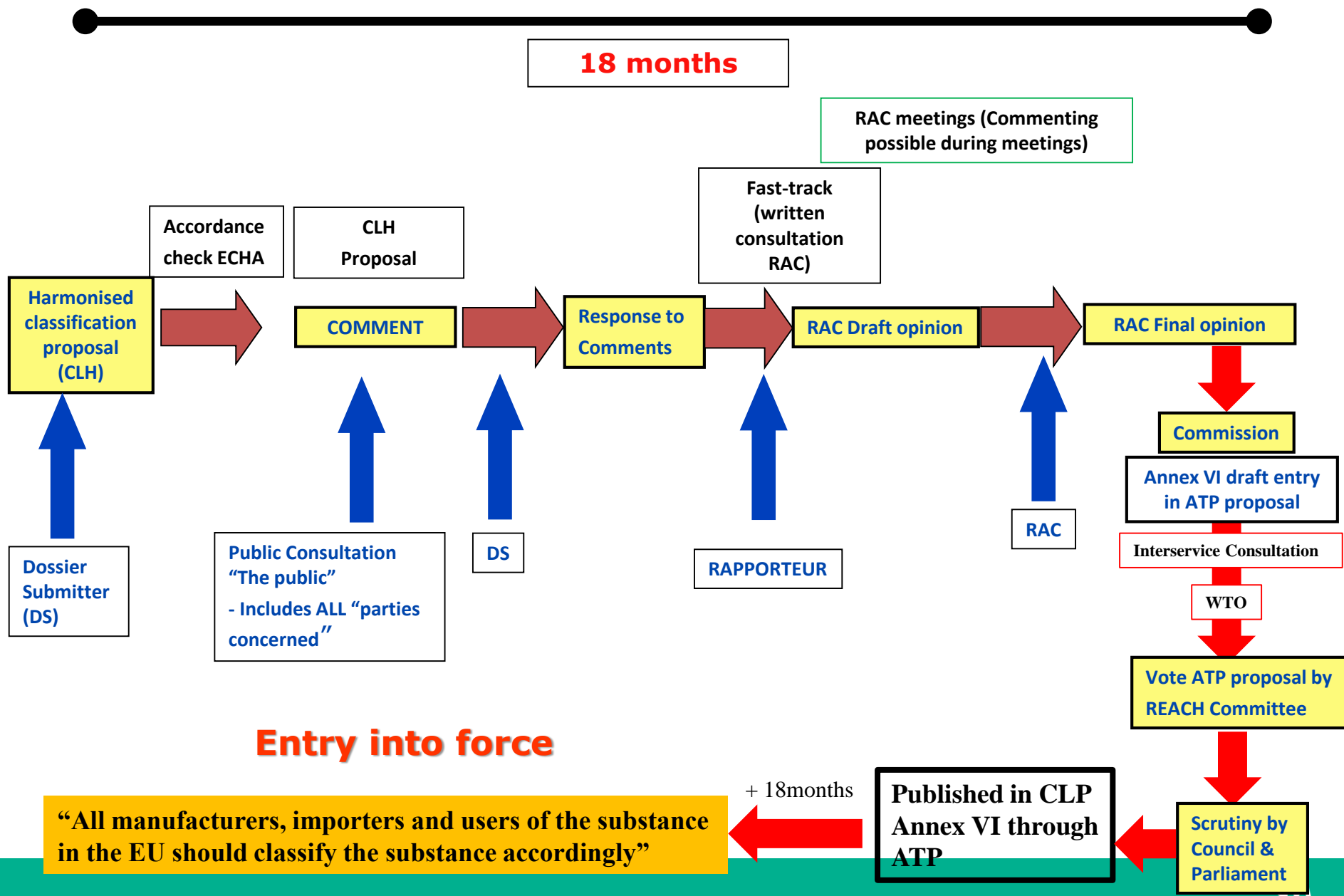
6. Classification



Se Al Cu Ni Pb Sn Zn Au Ag Pt Sb W Be Si Cr Co Mo Ge V Mn Ir Ru Rh Ta

6.1 Brief reminder on the CLH process

SUMMARY- CLH Process



Key rules

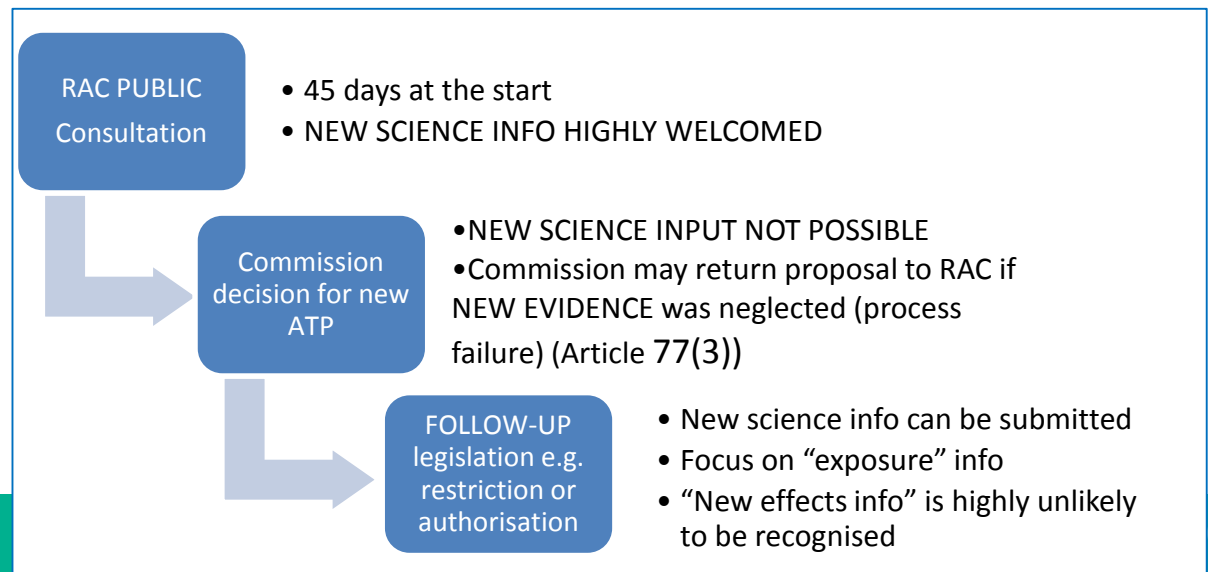
- Understanding the **process**: when to provide input and how? Who to mobilise?
- Have an up to date **registration dossier**
- Ensure **communication** with impacted « industries »
- **Strong** but **appropriate** expertise present during the RAC discussions:
 - Prepare: need to have 'agreement' to attend and be announced
 - Limited time for interventions at the meeting but possibilities for networking
 - Use your STO for 'principles' issues
 - Only technical and scientific interventions
 - Follow-up
 - « RAC rules are RAC rules »
- **Commission** may help, but does not 'save'

What about the **SCIENTIFIC** information that will be used?

The Dossier Submitter's "Information base" is summarized in the Annex XV proposal.

New information of relevance for *the hazard properties* under review for harmonised classification may be **HIGHLY IMPORTANT** BUT:

- **CAN ONLY** be submitted under the Public Consultation (45 days)
- **SHOULD** be included in the Registration file when submitted by a manufacturer
- the last day of the Public Consultation acts as a formal deadline beyond which new information is not recognised for RACs activities.
 - What if a response on RAC Rapporteurs' opinion is required? Sometimes information provided to the chair of RAC by a formal STO can still be recognised (but often not)



What about SOCIO-ECONOMIC information?

SEA information is in principle **NOT CONSIDERED** under the harmonised Cl&L process. However:

- Generic impact information (what sectors, workplace or consumer, ...) may be useful in case a **fast track procedure** is applied by the RAC Rapporteur (triggering a discussion in plenary rather than written procedure)
- Costs related to the implementation can be useful at the level of **the Commission discussion**
- Precise and focussed cost benefit information is highly relevant for **restriction cases** including the semi-automated triggering of marketing and use restrictions on Consumer use for new CMRs

