

Technical consultation on the Danish EPAs updated advisory list for self-classification of hazardous substances

The Danish EPA are undertaking a technical update and republication of the advisory list for self-classification of dangerous substances. All comments received will be considered for the final version of the report and the list which is planned for publication in September.

Background

Manufacturers and importers are obliged to assess whether the substances they place on the market and not listed on the EU list of hazardous substances (Annex VI to the CLP regulation) are hazardous in light of available information. Experience shows that lack of data on chemicals makes it difficult to meet this requirement in a qualified manner. To help manufacturers and importers to meet their obligation to self-classify, the Danish EPA issued in 2001 the advisory list (AL2001) for self-classification of dangerous substances. As a basis for establishing this list various combinations of (Q)SAR methods were used to predict relevant properties for making advisory classifications of chemical substances with respect to a number of hazardous properties. At the website of the Danish Environmental Protection Agency, different search facilities are available¹.

This advisory list has now been updated (in a list as hereinafter referred to as AL2009), which means that 49,292 agents (chemical substances) have been investigated and new recommended classifications have been given for 23,922 substances on the following properties:

- Carcinogenic properties (Classification: Carc3; R40)
- Mutagenic substances (Classification: Mut3; R68)
- Reproductive toxicity (Classification: Repr; R63)
- Danger to the aquatic environment (Classifications: N; R50 – N; R53/53 – N; R51/53 – N; R52/53).

The new list has been updated from the old list in the following areas:

¹ Link:

http://www.mst.dk/English/Chemicals/Substances_and_materials/Lists+of+substances/The-advisory-list-for-selfclassification.htm

- New and improved technical methods have been used, and thus more reliable advisory classifications are obtained.
- Reproductive toxicity is now included on list

More details on the update are described in the background report which is also included as a part of this consultation.

Two classification endpoints from the previous list (AL2001) have not yet been updated. They are:

- Acute lethal effects if swallowed
- Allergenic effect on the skin

These advisory classifications are included in AL 2009 where relevant with the comment that they have not been updated. Further updates of the Advisory Self-classification List are planned in the near future. For consideration are updates on the last two endpoints and a revision of all advisory classifications in accordance with the new CLP regulation (GHS).

Practical issues in relation to the consultation

A database with search facilities regarding the updated list for self classification of chemicals is for the purpose of this consultation available via the following link: <http://www2.mst.dk/databaser/Vejlliste2009/default.htm>

The draft background report and the updated list are attached.

All responses should be delivered electronically to the following address: fling@mst.dk.

The deadline for responses is 1/9-2009.

This letter is sent to the parties as shown in the attached consultation list.

Questions may be directed to:
Flemming Ingerslev, Civil Engineering (Ph.D.), ,
Phone +45 72544520
Email: fling@mst.dk

Yours sincerely

Per Nylykke - Head, Chemical Unit