

**Chemical Regulations Self Help Group Autumn meeting 14th September 2021, Halifax
Bradley Hall Golf Club and via Zoom**

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Attendees

Attendees in person

First name	Surname	Company
Janet	Greenwood	TT Environmental
Mick	Goodwin	WSP
Mark	Vallely	Union Colours
Anthea	McAllister	Gulf Oil
Richard	Lee	European OGD
Carl	Turner	Colour Synthesis Solutions
Helen	Morris	Lambsons
Caroline	Simpson	Coloursapes
Tracey	Ferry	Boud Minerals

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Attendees via Zoom

First name	Surname	Company
Alison	Hill	Lomon Billions
Aaron	Turrall	FSi Ltd
Clive	Foster	Dominion Colour/ Gemini Dispersions
Colin	Pratt	Colin Pratt Consultant
Ihuoma	Arthur-Bennett	Star Brands Ltd
James	Watson	Town End (Leeds) PLC*
Claire	Walker	Stephenson Group
John	Rawson	Sholkem Chemie Associates
Clara	Ritch	3M
Karen	McAvoy	Amox Chemicals
Lee	Walker	Ralken Colours
Dominique	Dugue	Baker Hughes
Nicola	Kaye	REACH Law
Gina	Dungworth	Thornton & Ross
Neil	Hollis	BASF
Peter	Godfrey	CEA Research Associates
Vikki	Binns	Meridian Biotechnologies
Sarah	Handford	Prime Surfactants
Steve	Marks	Airedale Chemicals
Thomas	Bamford	Vickers Laboratories Ltd*
Zuzana	Hovorka*	Bartoline
Graham	Butterworth	Reckitts
Jenny	Hodges	Tata Steel
John	Parkes	Agrochemex
Jono	Dale	Exponent
Joss	North	John Hogg
Julie	Woolin	Dixon Chew
Kerry	Knowles	CPG
Krupti	Desai	Energizer
Lisa	Hutton	Nufarm
Matt	Ray	Nufarm
Martin	Critchley	Axchem
Paul	Thomas	Kreatis
Rachel	Griffiths	Solenis
Vidyut	Mehta	Roha Group
Louise	King	Baytouch

* and colleagues

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We had at least 46 attendees, 9 in the room and 37 via Zoom, many thanks to everyone who attended.

Apologies

First name	Surname	Company
Binny	Todd	Whitesea & Baltic
Julian	Sarkar	Zanos
Lydia	Moi	DIT
Louise	Copeman	Brenntag

1. Welcome and group rules reminder

Mick Goodwin

Thank you everybody for coming. I'll run through a bit of housekeeping in the usual roles, as you know this is a bit of a hybrid meeting with 10 of us in the room and everyone on zoom so I will apologize in advance for the technical hitches and, and I'll try and get the continuity of everything right but it may be a little more challenging than normal.

As usual, it's being recorded, and you will receive a copy. And we can we can pause the recording, between speakers.

As always, please, please be aware about competition law and you don't say anything that could compromise that, that we're all here from different backgrounds, different positions and points of view, we're all here to share information. Please stay on mute unless you wish to speak.

Clive Foster

Hi, the sound was perfectly good and then something happened, and it's not so good. I don't know if that's the same for all of us?

Janet Greenwood

I think it's because we have people in the room and on Zoom.

Neil Hollis

Do you have multiple microphones and speakers in the room?

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2. DUINS

Mick Goodwin

Okay. How's that for everybody now. Is that it on the housekeeping rules I think so? Without further ado, we will carry on. The first item on the agenda is DUINS state of play. Has anyone, well I presume people have done lots of DUINS by now. How is it going. Is there any feedback, has anyone got any feedback from the HSE on DUINS.

2.1. Unknowns and DUINS

Anthea McAllister

I have a query on it. Okay, then. Can everybody hear me okay.

When you're doing DUINS for a product that's coming in and you don't know all of the constituents that that's fine, so you can put them all in. Maybe you've got 100 products which have got similar constituents, so you wouldn't be putting the product name at the supplier because if you did, you just end up with lots and lots of pages of the same thing.

But then, so I did that on the 27th, and then on the 28th, one of those chemicals becomes classified and is now disclosed. How is my chemical covered? Does that makes sense?

Mick Goodwin

So DUINS are by substance.

Anthea McAllister

So disclosed in section 3.1 (of the SDS)

Mick Goodwin

Yes.

Anthea McAllister

So it's not hazardous today...

Mick Goodwin

... if you've got unknown substances in your formulation.

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Anthea McAllister

I've got unknown substances today they're non-hazardous then on the 28th they're hazardous and disclosed on section 3.

Then I've got something coming in that essentially doesn't have a DUIN, but I'm not importing anything new.

Mick Goodwin

My understanding is that you have to do everything you can to disclose to the HSE, your DUINs, what the substances is.

If you have unknowns, you can say that on the DUINS list on unknown constituents in this formulation, and as long as you've tried, and done everything you can't to get that information from your supplier you are covered, to the best of my knowledge .

Does, do the other consultants in the room agree with that? Yeah, I'm getting thumbs up from a couple of people.

Anthea McAllister

So you need to list everything that's coming in.

Mick Goodwin

Yeah, if you've got Formulation A with 20% unknowns, Formulation B 10% unknowns, it could be the same substances in both formulations, but you don't know that as long as you've made every effort to find out what's in there.

Obviously you've got the 1 tonne threshold to consider as well and you will need

Anthea McAllister

Can't you consider the 1 tonne threshold, because if you're talking about two formulation unknowns, that could be it could all be the same.

Mick Goodwin

Yeah, exactly. But at the point of when the registration is due, you're going to need to know what's in there anyway, to do the registrations. But you've got six years to work that out.

Anthea McAllister

So just list the raw material name and put unknown for every single one.

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Mick Goodwin

Yeah, I would do and that's what we've done for a client of ours.

Janet Greenwood

And Helen Morris has something to say.

2.2.DUINs and polymers

Helen Morris

I asked a similar question about polymers because we don't know (the monomers).

I asked the question direct to the HSE and they just said "*do what you can put the polymer on the list, send us the SDS from the supplier if you have it, and just give us what you've got*", and that was the email, it was quite long. And "*have you asked them?*" Well obviously, yes, and all the usual questions but in the end they just said, "*well just give us what you've got and it's fine*".

Yeah, and they seem to be quite happy with that when we submitted them all and come and they've not come back.

Document: DUINs for Monomers in Polymer HSE reply to Helen Morris, download here:

https://5917e482-af83-4b43-81e8-c10ef2e4a665.filesusr.com/ugd/fdd46c_c6e994912b2a4fb68206eaa2632415f0.pdf

Mick Goodwin

As I understand enforcement on DUINs will be on audit. So, if the HSE come and audit and want to know, have you done DUINs for all of everything you've imported, every time you can show them, taking every effort we can, you can just substitute these with the unknowns, that we've listed, and we know there are unknowns and we're going to try and find them out before the registration deadline.

Anthea McAllister

So we don't think they'll start checking these things of customers at all?

Mick Goodwin

To the best of my knowledge, they're not going to, these spreadsheets get filed by company, and they will get pulled out if the HSE come and look at your company. That's how I understand it.

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Tracey Ferry

I just got an automatic reply saying I've completed ours. We don't know the composition, and we just received an automatic reply.

Mick Goodwin

Does that help? Anyone else, any comments on DUINs.

2.3. John Rawson queries on DUINs

John Rawson

Three observations, the first one we supply a polymer into the UK from EEC the supplier tells me it doesn't need registration. There's no DUIN available, says the consultant, because it's a polymer, so not registered on the REACH. I'm a little uneasy about it but we've already brought it in, on that basis and we can only rely on the manufacturer.

The second thing is we've got the same DUIN number for several intermediates, that's the way that it was arranged by our consultant. I thought you needed a separate DUIN number for every intermediate but obviously not.

So they're just two queries that I do have about this situation. Obviously if you've not registered a product on the REACH you cannot obtain a DUINs number without actually getting full registration, is that how it appears in Europe or in UK?

Mick Goodwin

My understanding on the first two issues is that the DUINs number is given to the company, submitting the DUINs. So you've got a number per organization. per legal entity rather than per substance or submission.

On the polymers, the monomers within that polymer will need to be DUINs.

And, again, relating to what was just mentioned in the room and what we've seen, we've seen exactly what you have that a supplier of one of our clients has said or it doesn't need to be registered it's a polymer, we can't disclose the monomers.

You can take unknown monomers within whatever the polymer is or you make a stab at it, well you don't make a stab at it, you do everything you can to make sure you've got that done. On whether you, Neil do you want to come in and add to that.

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2.4. One DUIN number per legal entity

Neil Hollis

Yeah, I can just say Mick, I agree totally with your points and certainly each legal entity will only have one DUINS reference.

So for BASF PLC, in the UK our list is currently just short of 3000 substances and they all refer to a single DUINS number, which is the same for all 3000 of those substances so you don't get a one off DUINS number per substance John, it's per legal entity.

John Rawson

Is that irrespective of the number of times you apply Neil.

Neil Hollis

Indeed, yes. And I think there is guidance that if you do then make a second submission or a third submission you clearly identify the DUIN number, you clearly identify your company name as it appears in Companies House. And also you clearly identify that it is an amendment or a supplementary submission.

John Rawson

Now that's useful. Thank you.

2.5. Polymer and Monomer DUINS

Neil Hollis

Yeah, And what was the other point, polymers. Yeah, so as Mick said, you know, the principles of REACH still apply.

Therefore you should notify the monomers and you know if, and I have actually seen guidance from the HSE and they recommend you take what they call a best guess.

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So, you know, I've actually seen this this this written down in an email, and I suppose that if you are importing acrylates you know it's an acrylic acid or a methacrylic acid. If you are importing ethoxylates you know that there's ethylene oxide. So you can do some kind of investigations I suppose.

John Rawson

Well first of all we can ask our friendly supplier to explain about the monomers in this polymer. I worry that he will not disclose anything that's not seen in the MSDS, for instance, as intellectual property.

Neil Hollis

Yeah, it's quite possible, but then again, let's say you're buying a polyacrylamide you'll know it's a polyacrylamide, because that's what you intend to buy you know I need a polyacrylamide so

John Rawson

It's a poly acrylic acid so all your points are relevant.

Neil Hollis

Yeah, so that when you can say I import a polymer, it's based on acrylic acid, therefore I know acrylic acid is at least one of the monomers and that's probably the only information you can give.

2.6.DUINs and non-REACH registered material

John Rawson

Yeah that's useful. Thank you.

The final point that I made was to get a DUIN number for an intermediate that you've not pre-registered or registered under REACH. Can you do that?

As a new development product and get a DUIN number for it.

Neil Hollis

If it's a brand new substance, then I suggest, that's never been registered before under REACH, then you have to go through the registration process.

The DUIN is a provisional measure to allow existing business to continue. And I don't think that that falls within the boundaries of this provisional measure.

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John Rawson

Sorry I wasn't clear what I said Neil, undoubtedly one or two products that we're looking at for development purpose for the UK and for Europe. We will not have REACH registration, but there may be one or two or three previous registrations in the ECHA system.

On that basis, if we've not dealt with it before, but apply for a DUIN number, is that the simple procedure that we can follow, or will they insist we register it. Well, we can't register it fully under UK REACH at the moment.

Neil Hollis

Yeah, one of the criteria for DUIN is that you have to have been a downstream user of the substance during 2019 or 2020.

John Rawson

What does that mean exactly, we got a sample, we evaluated it?

Neil Hollis

I guess, I would say so, if you say got a sample of it in 2019 then I would say that you were a downstream user of that substance in 2019.

John Rawson

That's useful thank you.

Neil Hollis

I think you have to take quite a pragmatic approach. I gave the example, and this does happen, you know, I said to the authorities, what happens if you import 10 tonnes in 2010, and then use one tonne per year. And then the final tonne you use in 2019.

And they said, yep, that's fine, that qualifies for a DUINS even though you haven't imported it for 10 years, or 11 years now.

The fact that you used it two years ago, means you fit the criteria.

Mick Goodwin

You've put it into the supply chain somehow within that period.

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Neil Hollis

Yeah, or you've used it and converted it . Supply chain under ECHA terms.

2.7.DUINs are for REACH-registered material

Janet Greenwood

Could I just remind everybody at this point that this is for substances that have come from the EU. So if something is new from outside the EU, you can't do a DUIN for that supply chain

Mick Goodwin

It has to be in the in the supply chain either through import, or through an OR mechanism.

Neil Hollis

It has to be REACH compliant.

Mick Goodwin

Peter, do you want to come in.

3. Disclosure of components comment

Peter Godfrey

I agree with what Neil was saying I was going to come back and reply to John, exactly the same way.

One thing that concerns me about what Anthea was saying about importing products , where you don't know the full formulation.

I've had previous experience with HSE, and they have said if you don't know the full formulation, you should not be importing it because some companies in the past claim that things are not hazardous and not declared them in a safety datasheet when in fact they were.

Mick Goodwin

Yeah, it's a good point you have, I think it comes down to doing everything possible to find out, doesn't it, and we went through this. In the early days of REACH.

Peter Godfrey

Yes, they're quite strict on it, apparently.

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Janet Greenwood

I think things have changed as well, haven't they?

Think about what's happened, what they said under EU REACH when we were part of the EU was one thing. And now they are absolutely desperate to keep British business going.

So I think that we are going to have a certain amount of leeway, but sooner or later it will go back to the no data, no market, probably quicker than we'd like in industry.

4. UK (GB) REACH

4.1.UK (GB)REACH Inquiries are being accepted at HSE

Peter Godfrey

And the other thing is inquiry dossiers are being accepted because I've already submitted quite a number, where my clients have gotten the data, but wanted to make sure they were into the communication with the other registrants.

Nicola Kaye

I was just going to come back to the point about not being able to do registrations, currently.

We've got a couple of clients who aren't eligible for DUINS, They are new registrants for the UK market.

So we have gone down the inquiry route, and we're actually getting the advice from the HSE of being able to submit a registration dossier with waivers for the required data where we don't have the data available, but committing to being part of the substance group and updating the dossier once a lead registrant dossier is available.

So you can get a UK REACH registration number in the short term to allow new entries onto the market, as long as you then update in the future.

4.2.Return to disclosure of components in formulation issue

Jonathan Dale

Just to come back on the formulation issue.

I've got an email from the HSE, we were having the same situation.

We've got these non hazardous components which are claimed to be REACH compliant.

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I emailed the agency I said I wanted it in writing please and they said basically *call them unknown one, unknown two, unknown three*. So we've got that.

4.3.UK (GB) REACH Registrations with waivers

Jonathan Dale

And again we've also got several registrations with the waivers in them, literally put it in the statement in Section 13.2 of your dossier saying, help, we can't register because we've got no data.

It's not far off that, we are committed to having this and so while we will get involved with the lead registrant as Nicola was saying.

And it all sailed through very very smoothly.

4.4.Lead Registrant assigned by mistake in one UK (GB) REACH registration

Jonathan Dale

There were a couple of snags in the comply with UK REACH system, when they are automatically assigned as the role of lead registrant which we didn't want to be.

It was first past the post we'd agreed to let another company be the lead we'd signed up. Yeah, absolutely, we'll do this we'll get involved and we'll negotiate and we'll have bilateral access. Okay so we're sending our dossier.

And then we've got a very surprised email saying, *oh, did you mean to take the lead. No. Did you mean to take the lead. Oh, we've given it to you by accident.*

So, you know, there was a there was an issue with the system, we've sorted it now, but I think personally, the HSE is back to the highest level of pragmatism I've ever seen them at. Even prior to REACH.

I think they've been brilliant with us so far.

So I think DUINS, do what you can call it unknown 123 call it monomers in polymer one, unknown monomers in unknown polymer one whatever you want to do it, and I think they'll just let you sort of adapt the system, as we need to as we go along.

And that's a parallel to the way in which EU REACH people were changing substance identity.

We pre-registered this, it's actually that, and I think we'll see, you know people tend to forget that sort of level of IT dodging pragmatism, we had to have 15 years ago, I think we'll see that again, up till the time people actually really start registering in bulk.

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Neil Hollis

Just to confirm Jonathan, we won't be taking you to court for stealing our lead status. (laughter)

Mick Goodwin

Thank you, Peter, do you want to come back on that.

Peter Godfrey

Anthea actually had her hand up before me.

4.5. When are UK (GB) REACH registration fees payable to the HSE?

Anthea McAllister

I was just wondering, when you put the registration through, so you're not buying any data, we still paying the charge to HSE for the registration or is that all at the end as well.

Mick Goodwin

Fees aren't due until point of registration.

Anthea McAllister

So you can do a registration now with no data and say I promise I will get the data when it's available. So, we then pay the registration please but then the letter of access fees or the data fees are getting paid at the end, when everybody else is that?

Jonathan Dale

Can I jump in there? we've done this and you get your invoice now, if you do what we call a "waiver dossier", the agency refer to it as an N-RES, a new registrant of an existing substance.

- You submit your dossier with the waivers, like you would do any other waiver for EU REACH, at that point you get an invoice.
- You pay your invoice and then you get the UK registration number, and then you'll sort out your letter of access in two, four or six years time.
- You can't get an N-RES for a new substance.

So if it would be a new proprietary substance that you developed, you are literally the same as REACH you do your inquiry dossier, and you do your data set, and you submit that and that will, you know you're delayed by the time the labs take.

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But if it was, I won't name the client but I'll name the substance because it was ethylene oxide, we had an issue where there was a change in the supply chain.

We had ethylene oxide, it's a rather common substance. As you can imagine, and our client was like, Oh my gosh, we've not got the supply chain we thought we have we need to register this now because we're bringing in polymer, so we had to register and we agree with Neil, you know, absolutely, BSF, they know a thing or two about ethylene oxide so I hear.

They can be the lead we wanted that. But that was how it worked.

So, yeah, we've got the invoice, we paid the invoice we've got the registration and then all of a sudden we're the lead registrant, so I think they've solved that one now.

4.6.UK (GB) REACH Grandfathering window to re-open briefly

Peter Godfrey

I was just gonna add a bit extra on here because I've heard and had the confirmation email from HMRC that there will be a short window for late grandfathering opening up shortly.

Janet Greenwood

Is that a second one?

Peter Godfrey

Yes, it's after April end, because of requests from industry they're actually going to open up a short window probably towards the end of October.

People can do late grandfathering it will be a short window from what I can gather, but I questioned HSE on behalf of a Japanese client of mine, and they said they will be opening up that window.

Janet Greenwood

Because we had one, if you remember, at the end of July didn't we?

Peter Godfrey

Not a general one that was a specific request, this will be a general one open to everyone.

Jonathan Dale W

Can I jump in there, I need that clarifying. When we say it's still a grandfathering so that is literally, if you had a UK REACH registration we're still the strict terms of grandfathering apply.

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Is that right, Peter when you say it's a general one, it's still you've got to have had an EU REACH registration?

Peter Godfrey

That's correct. The same conditions apply but they are opening up a short window for people that missed it, and mainly for people with no ORs, non-EU companies that had a registration in the UK from March 2017 to end of December 2020.

Mick Goodwin

Is that because they've not seen as many as expected?

Peter Godfrey

Possibly, our client is actually a lead registrant for the product so he has all the data. So, that might help.

4.7. Another N-RES dossier issue

Neil Hollis

I just want to go back to the N-RES process that we were just talking about a couple of minutes ago.

I've also spoken to the authority on this and I asked them the question, you know what happens if you submit an N-RES dossier today and then you begin importing, several tonnes a year, you then have a registration deadline in 2027.

But in the meantime, your business changes, and you decide to stop importing this substance, and I was informed that there is obviously the obligation for article 22 to keep your dossier up to date.

And therefore, if you submit an N-RES now or in the future with the waiver saying that you will join the joint submission, at some point, what happens if you then do decide to cease manufacturer or cease import.

There are no further information requirements, so your waiver that you state in your dossier says hey, I will look to join the joint submission, but there is actually not a loophole as such, but there is then a possibility if your business changes you don't have to join the submission for it.

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Helen Morris

They told me that once we've done this new substance registration. If we bring the first instance manufactured ten tonne and then for the rest of the years right up until the deadline didn't do anything, we'd still be obligated to register.

Mick Goodwin

Okay, that's conflicting.

Neil Hollis

I have it in black and white, that says no further info, I can quote it on screen, no further information will be requested about that substance unless manufacturer or import starts again.

Mick Goodwin

We've got conflicting info from the HSE.

(JG note – we will discuss this via email and report back via email or at the next meeting).

5. Would it be helpful to collate HSE emails?

Janet Greenwood

Can I just come in, actually. I'm speaking of things from the HSE. I was speaking to Stephen Bounds, the other day, who's ex WSP. And he said, wouldn't it be handy to have a point where we've got all of the information from the HSE made central

And while I am beyond reluctant to do that for the wider clients it's something that we could do, but we probably have to stick it on the back of the GHS classification courses.com website, because the chem selfhelp websites, really, really difficult to manage these days.

So is that something people would be interested in to see it by topic, searchable, you know like we can with the newsletters, would that help? (general agreement)

Yeah. Okay, I'll have a look at it I can't promise anything sort of immediately, but I'll see what I can do because I've got everything going back for years. But it's the post Brexit stuff that's really vital isn't it.

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Mick Goodwin

Has anyone got anything else you'd like to raise on DUINs, I think we've covered a lot there. If not, we'll move on to the status of polymers from Graham Oh Clive sorry, before we go on to Graham, Clive, you've got your hand up.

6. UK (GB) REACH strategy around data under the 12-year rule

Clive Foster

Yeah, and a question on strategy in REACH when you put in a registration, you will get given some data because it was older than 10 years old. And so you didn't have to fill those data points.

In the case of UK REACH if you adopted a strategy of waiting until 2027 then is there a chance that you'll get a lot of your data given to you rather than actually going out and spending any money on letters of access.

Mick Goodwin

Yes, there will be data available under the 12 year rule, will there not?

Clive Foster

So if it was registered in 2013, there really is not a lot of point of doing anything until after 2025

Jonathan Dale

No. Don't look so disconsolate, Neil, it's not your money it's BASF's.

Neil Hollis

There's still, I feel, a lot of confusion around the 12 year rule and the UK REACH law dictates that it will take the EU's 12 year rule into account and it will take this submission into the EU system into account, but I'm not entirely sure how the UK will track this, how will they know when each endpoint was submitted in a dossier under REACH. So, there's still, I think, some confusion about this one.

Mick Goodwin

Yes, there'll be some lawyers arguing the toss over when data was available and what it's worth, and is it suitable and, yeah, maybe some of the legal pounds to be had somewhere.

Thanks Clive. Graham. Graham do you want to come in and talk about polymers?

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7. Polymer registrations under UK(GB) REACH

Graham Butterworth

Yes, morning everyone, it was just firstly you've covered the one of my first concerns as UK REACH's regards monomer registrations cause I've been hearing all sorts of rumors that polymers on the current market are illegal, because nobody's registered the monomers for UK REACH. You've covered those points.

What I'm tracking at the moment are the amendments to EU REACH as regards polymer registrations, and I was just wondering if everybody's seen any discussions as regards UK, or is that too early at the moment, they're still concentrating on getting to grips with UK REACH.

Mick Goodwin

I haven't seen anything UK specific on polymer registrations, has anyone else?

Neil Hollis

I saw a comment this week from Rebecca Powell, so she's the junior Minister working for George Eustice at DEFRA, and she stated that work is underway regarding a UK chemical strategy.

So it would be my anticipation that any adaptations to REACH will come through this strategy. I'm led to believe that the consultation on this was due to begin this year, but it has been put back until next year.

Peter Godfrey

On that, there has been discussions on the UK chemical strategy. Last year, through professional bodies DEFRA contacted them.

As members we were able to feed into it, but it's still saying for discussion, they still will produce a white paper consultation.

As regards registration of polymers there still isn't an EU amendment yet complete with EU REACH, so until something happens and DEFRA then decide what to do, they'll have to go through the UK process so it's likely to be several years away before anything happens.

Mick Goodwin

Yeah. Thank you, everyone. Thanks Graham. Next item I think we've covered some of this already but Neil on data sharing, under UK REACH, and guidance and where the situation is at.

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8. Data sharing under UK-REACH

Neil Hollis

I wasn't entirely sure what this point was anyway I don't remember actually raising it, but yeah, obviously I think we're all following the guidance situation at the moment from HSE.

And like I say, I think that is still quite a bit of uncertainty regarding the 12 year rule, how it will be used by the registrants in UK REACH and how it will be legislated in the processes by the HSE so I think that's just one that we keep our eye on.

Mick Goodwin

Has anyone got any any experience or come across lead registrants I know BASF said what their strategy is going to be but anyone else on cost sharing, data sharing agreements for UK REACH?

Vidyhut Mehta

Yes, it's started, like we have registered more than 40 substances. But you can reach the lead registrants in Germany, particularly, they have started this process in UK and Turkey as well.

So, in the last three months I noticed several emails from Italy, some companies manage on behalf of German manufacturers. So, they have also sent several emails, informing all other registrants in EU that they plan to take the role of lead registrants.

Yes, it is in the pipeline for not all substances, so there may be last minute follow up from different manufacturers.

Jonathan Dale

We've got a couple of anecdotal observational ones that we've seen.

One of our clients has been approached or offered by Reach Centrum free letters of access for UK based on having purchased an EU level of access and they're quite a big inorganic consortium that have done this.

And then, a leading German consultancy has suggested they are putting forward the idea of 15% of European costs or EU costs for access to, or resalable, access to the UK data set.

So, the lead registrant from the UK, if they're not part of the Europe, of the EU side of things will purchase a transferable letter of access to the EU data set for use in the UK for a one off fee of 15%, and then they can resell that letter of access to other UK registrants for an equal share of that 15% of the of the whole thing.

So we've literally seen both 0% and 15% sort of be bandied about as now the standard practice.

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Mick Goodwin

I think this is something that will take a good few years to settle down again, isn't it. Does anyone else want to come in on on cost sharing or data sharing.

Lisa Hutton

We're going take the same approach really is that if you are an existing EU registrant then we will provide you with a letter of access for UK REACH, free of charge, if you've already bought the data for EU REACH.

We're a bit unclear I think at the minute how we're going to deal with any new registrants for UK REACH if we are the lead registrant just for the costs, because I don't think actually, we may not be in that situation so it's not something that we've had to consider yet.

And for substances where we are the, the EU lead registrant, we've just nominated ourselves, you know put feelers out to say, well, we'll do the same in the UK. If everybody's happy with that, we will still be the lead.

We had an email from some consortiums saying we want to be the lead registrant for a substance that we're joint registering for and we've just everybody in all the pre registrants in the UK have all gone, *"no you're not. You're not a manufacturer, forget it"*.

So I think we might end up taking the lead for that because we are a manufacturer, even though we're not currently the lead but we will probably do that in the UK. So it's starting to move a little bit things moving around.

Mick Goodwin

Thank you. I saw a throwaway comment from, I can't remember where I saw it, earlier in the week or last week saying that there's some companies are already preparing to challenge data sharing costs.

I thought that's a bit presumptive given that most data sharing costs haven't been decided yet, but nice to see that the lawyers are getting ready in advance. (laughter)

Janet Greenwood

Should we take an early break?

Mick Goodwin

Yeah should we have 10 minutes. It's quite hard focusing on the room and the screens like this, we'll have 10 minutes, or 15. We'll be back at 11 o'clock. Does that sound okay to everybody.

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BREAK

9. Single Use Plastics labelling

9.1. Discussion on Single Use Plastics labelling

Mick Goodwin

Thank you, everyone, welcome back the next item on the agenda is EU single plastics labeling. single use plastics labeling in Northern Ireland status, has anyone come across this issue, got any experiences with it, managed to print off the weird symbols that you have to now put on. Deadly silence everywhere, Colin.

Colin Pratt

Firstly I must apologize for digging this up and breaking everybody's hearts over it!

It was something that I found, I've also pushed on the CHCS website, unfortunately, I found it kind of nine months late, given that it was written in the middle of December.

But yeah, sorry for that chaps, and I had a bit of a word with Janet just to check my own sanity.

And then told everybody about it and it's quite a few people have admitted to also missing it.

I think the biggest thing, certainly from my side is things like hand wipes, which I think will be affected, maybe less so the, the female sanitary bits and pieces because that tends to be done by bigger guys and the Procter and Gamble's of the world and things like that. But certainly, handwipe manufacturers there's a fair number of those around.

So that was my take on it, and I'm certainly involved in advising my previous employer who put hand wipes into Europe, so it will certainly affect them.

Gina Dungworth

Sorry I got dragged away by other people, are we talking treated articles here.

Mick Goodwin

No, single use plastic labeling.

Gina Dungworth

Oh right, I think Kath's on the case with that bit. It's just the treated article malarkey that she might not be, but she's here if we need to yell at her at all.

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Mick Goodwin

Does anyone have any requirements for single use plastic labeling, we have no hands, no show of hands, we can park that then as long as you are all aware of it.

Gina Dungworth

Well, on the labeling side of things, I think that might be affecting the medicines peeps more than my side of things, because obviously they will see the requirement for things to stay legible for the entire life, ultimately like put it back in the cupboard for yonks.

Colin Pratt

Just to reiterate what it was, it was actually an additional label that needs to be put on items in the global sense, that might be put down the loo.

So sanitary products, when they're talking about hand wipes it's more cosmetic hand wipes, but the definition is hand wipes.

So the idea is that if there's plastics in hand wipes, maybe for the structure of the wipe, you don't flush it down the loo when you've wiped your makeup off, because then it breaks down or bits come off it and it ends up causing microplastics.

So it's additional labeling that's required. I can't remember the exact date but it was July, wasn't it, the law from July of this year on sanitary products and on hand wipes. They found plastics in the filters on cigarettes. So again it's to advise people don't dispose of your cigarette butts by putting them down the toilet. And there's an extra bit and I can't remember what the other one was now, there was tobacco product, hand wipes and there was a fourth one, nappies.

Yeah and there's things like that that you don't dispose of it down the toilet, obviously, the sewage treatment works, we've got big filters but by the time it gets to the sewage treatment works it's had some molecules knocked off it and they get into the rivers and into the sea, etc, etc.

So that was a new labeling requirement that I dug out from somewhere I think I saw it in LinkedIn anyway originally. Yeah, but it was news to me so I kind of posted it around everywhere just to be annoying.

Gina Dungworth

Can you post that somewhere because I think we're on top of that, with our disinfectant wipes, but I'll just make sure that we're always

Colin Pratt

It was on Janet's email, I think it was yesterday you published it wasn't it Janet?

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Janet Greenwood

Yes it was. Yes, we've got the link in yesterday's email, and we also have the link to the EPS, the Adobe Illustrator files, if you are caught out by this because they've been very naughty and they didn't have the information all in one place. I know that's been difficult for people, but I can put that information back in meeting notes again.

Gina Dungworth

In the meeting notes and more likely to remember to forward it. Sorry.

Colin Pratt

The directive is only about 11 pages, and of that there's a sort of page on each product and then an annex which is about two pages on each product, so it's a bit repetitive but it is only 11 pages so it's not a 400 page document to read, and as I say kind of one page is then expanded and repeated in two so you know once you've picked out the bit you need it's probably only three pages you need to read.

9.2.Extract from TT Env email newsletter on Single Use Plastics

Single Use Plastics labelling in the UK

Colin Pratt emailed me about this issue last week, and you may have seen it as a discussion topic on the CHCS forum, so apologies for being a bit late with this information. If you are not on the CHCS forum, you can sign up here: <https://chcs.org.uk/chemical-hazards-forum> .

Briefly, there was an EU directive requiring specific labelling on single-use plastics which was published on 17th December 2020, coming into force 20 days later, and therefore outside the scope of Brexit, see <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF...>

As a directive, this does not automatically apply to member states, who are required to put it into their own local laws in order for it to be implemented. I am unsure as to whether this has happened for Northern Ireland yet.

These new labelling requirements cover nappies, feminine hygiene products, some types of tobacco products, and single use plastic glasses (the full list is in the Directive, only 10 pages long). There is a requirement for a new symbol comprising two boxes, side-by-side, showing "don't put this down the toilet" and "may harm aquatic creatures" (I'm sure there's a better description!).

Zuzana Horovka of Bartoline commented via email: *Luckily we have been able to action on this quite quickly, but I noticed that although the legislation have fair bit of requirements on the logo appearance, it's very hard to find it in decent format/resolution for download. I had our design agency to create one for us, and thought I share it with you and anyone who might need it.* . [EU Plastic in Product logo – 25-03-2021.pdf](#) . Many thanks to Zuzana for her generosity.

The EU have also provided eps format files here: <https://ec.europa.eu/environment/topics/plastics/s...>

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Via the CHCS forum, Mel Cooke of Alchemy Compliance highlighted that there is an earlier Directive, 2019/904, covering single use plastics, which came into force on 5th June 2019, and Nicola Kaye of REACH Law confirmed that this has been adopted as part of the Pollution Prevention and Control Act, see <https://www.legislation.gov.uk/uksi/2019/1417#text%25253D2019%25252F904>, but Nicola has searched the UK legislation.gov.uk website and has not been able to find any reference to the new Directive.

Even if there is no information about Northern Ireland yet, it would be prudent to assume that this Directive will have to be implemented under the terms of the Withdrawal Act and the Northern Ireland Protocol, and ensure that any Single Use Plastics you are selling there are compliant with this new label information.

Extract ends

10.Divergence between GB and EU

Mick Goodwin

Moving on, divergence queries. Aaron your name was next to this on the agenda.

10.1. Nano materials and microplastics divergence

Aaron Turrall

Hello. Yeah, it was about nanomaterials. I know the EU are looking, ECHA's looking at nano material at the moment. In terms of the definition, and also for microplastics as well. I'm just wondering whether the UK, if anyone's heard whether the UK are looking at anything similar at the moment.

Mick Goodwin

Anyone got any experiences the UK is take on Nano and microplastics. No, I thought that was the case, I couldn't find anything online there was no information from the HSE on it so maybe it's something they'll look at in the chemical strategy. But yeah, I thought I'd ask anyway just to see if anyone's heard anything.

That's great. No problem.

Mick Goodwin

Just generally on divergences, I know that this is some smaller small areas of divergence big if you're in the middle of it, but has anyone, come across areas of divergence, that caused conflict or issues or got any experiences they want to share. Janet.

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10.2. Tracking divergence – TT Environmental

Janet Greenwood

We're tracking divergence on things like the harmonised classifications, the restrictions, and authorised substances.

You're probably already aware that since the 31st of December, we've had something like:

- 12 New SVHCs from ECHA (there are another 4 going through the process at the moment).
- Authorizations are the same
- there's, I think, three restrictions, one of which is amending an existing restriction,
- and the harmonized classifications remains the same, up until the 17th ATP.

10.3. d-limonene divergence issues

Interestingly we had, it was Paul Thomas, (hello Paul, you're with us today), who was the technical expert on d limonene, (which) is being declassified or reduced classification on chronic aquatic environment from H410 down to H 412, which you can imagine for the fragrance guys, it's like, yeah.

And what the HSE are doing , they're being prats, because they're ignoring what the UK rapporteur agreed at ECHA.

And if you've been following that in the newsletter then I can sort of repeat that because it's, it's a big deal in the fragrance industry, which of course fragrances go into so many consumer products, not even the things that are specific consumer products, it's going to matter, hugely to a lot of people.

And on the back of that I went into all 99 MCL proposals, and 15 of them are diverging or showing difference from the EU. From the RAC opinions, now some of that may be coming in the 17th ATP but literally there are not enough hours in the day for me to check that yet.

So I am kind of working on it.

And for anybody who's got a login for GHS classification courses.com , as in they are a trainee, past or present. I am putting together a new knowledge base, following the EU and the GB guidelines, and we've got tracking spreadsheets so you will have access to that in the next week or so, because it affects everybody.

Absolutely everybody that's trying to keep on track of it, whether or not I open that up to self help group members, I don't know, but you it seems silly to go to all this effort to track it and then not share it with people. So, yeah, watch this space.

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Mick Goodwin

I'll come to you in a minute Colin, Anthea did you want to come in.

11. Labelling address issues

11.1. GB label requirements

Anthea McAllister

From what you've just talked about all we would do is put the most significant or the highest, we'd have to put ? hazards because we don't have separate SKUs coming in, and what I was wondering is, for all our labeling for anything new.

We're putting the EU address on it, but basically all those in the supply chain and in the supply chain here or in Europe that comes over, it still doesn't have a UK address on it, and we have not been pulled up for that now. Yet, when I asked the HSE about it they said it will become a requirement, at some point, I was wondering if anybody has reached that point?

Janet Greenwood

Yeah, we are beyond it because the point was the first of January this year. What we've got, we've got the difference between policy and pragmatism, the policy people.

And that's Francis McGuigan and his female sidekick want us to have the GB address on the label now, and they want it to be on the main bit, with the address of the label and the EU label should be in the supplementary, you can have the EU address on, but it should be in the supplementary bit of the label.

The key point that they've said is there mustn't be any issue over whether it's an EU or a GB address, which you solve by putting EU colon; GB colon; and you have them together on a label.

If we can do it for cornflakes and the consumer is not confused by it, why can't we do it for chemicals. And it's simply that the policy people, and they keep going on and on about it, if you're if you're in touch with them, which unfortunately I am, they keep going on about it but yes it needs to have an address label on now with a GB address.

EU different. EU have said, you're bringing in something with a GB address just over label it, put a sticker on with the EU (address), which is a lot more sensible.

Anthea McAllister

I think both will end up being fine but I'm not going back and repackaging.

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Janet Greenwood

No you can't, you can't it's stupid, isn't it.

Anthea McAllister

Has anybody been fined for it, or been told off for it?

Mick Goodwin

Has there been any audit or enforcement on address labelling? No Is anyone aware

Karen McAvoy

They're still recruiting loads of people. Think about the feasibility of this, they can't be out policing it at the moment because they haven't got the people on the ground, that they're busy trying to, you know, can you imagine we've had a pandemic which has obviously them, they're all been working at home, they're only just getting back in the offices, they're recruiting all these people, another 48 this week I saw that they were looking for.

Training inspectors, they've already taken 60 on who are still in training and knowing a little bit about the training you're talking a couple of years, two to three years that they're in training anyway.

Mick Goodwin

I know, when they publish their annual report or their three year plan or whatever it was, 25% of the allocated time for this financial year was for training, wasn't it, in the HSE.

Karen McAvoy

That backs up that. You take all these new people in there they're going to spend all the time showing them around the building! (laughter)

Mick Goodwin

Hopefully they're doing a little more, training than just that.

Karen McAvoy

I'm being facetious, but yeah, you get it, it's going to be a long time before they're really out there in enforcing and think about the different industries that they're now going to have to. Not practical at the minute

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11.2. Will stock get stuck in customs if it doesn't have a GB or EU label on it?

Anthea McAllister

I have the same question (unable to hear) in France for all (unable to hear) My only concern is that it's a very easy thing, maybe I don't know where to check, they don't need any training, they just need a list of why do't you always spot check that. And then, you know, we've got things going through customs that, some of it's old stock, it doesn't have the address on them.

Colin Pratt

The problem with that, and again it's my previous point is that, in theory it's the importer who needs to get everything legally compliant, and until they see it, ie get it in their warehouse, they don't know how non compliant, it is.

So if the customs stop stuff then I'm not sure that that's overly helpful.

I can see that if something's going to Paris, then when the guys in Paris, get it, they have an obligation to re label it put on European address labels do due diligence on the labels and the H&S places, but until they say they don't know what's wrong.

So for the customs to stop it, which is, we agree is the obvious thing to happen is almost wrong because at that point, the importer hasn't seen it so they can't correct it.

You know what's supposed to happen the guy from Paris gets in his car drives to Calais with a load of sticky labels and stick stuff all over it.

At the end of the day, how can how can the importer check it, until they get it into their warehouse?

Anthea McAllister

(Unclear) is different now in different countries, though. So if you go into some countries, the line of when it needs to be combined, it's when it's in your warehouse, and then sometimes you do get a time period where you can do that, I think New Zealand's like that, it doesn't matter if it comes over the border "label non complian"t, as long as before you put it on the market it's compliant, that's fine.

But China is not like that it's supposed to have all those details on before it even gets there, and we know what the UK it's minor things now but ...

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Janet Greenwood

The line is placing on the market in the UK is that, so technically it was always that under CLP anyway, so technically you could import stuff, use it in your own operations and not have to label it for CLP for example, because you weren't placing it on the market.

Mick Goodwin

Zuzana.

11.3. Irish Competent Authority picking up on non-EU addresses on label

Zuzana Hovorka

Yes, sorry, I just wanted to say we've done a massive project of updating our labels with both EU and UK addresses, and we've got picked up like five times already, by the Irish outer asking us howcomethis label doesn't have the EU address on. Luckily we've talked to the person, I don't remember her name but it's a woman. And it's been proved that these labels came in the market, in Ireland, last year before Brexit, so luckily we kind of get out of it. But if we couldn't have proved that we would probably get fined.

Mick Goodwin

Okay, so that's in Ireland that their enforcing strictly.

Zuzana Hovorka

Yeah, yeah, several times.

Karen McAvoy

Yeah I can back up that the PRCD in Ireland. They've woken up the last four months and I've got that reliably from consultants in Dublin, as well confirmed it, that suddenly the last four months are starting to be, and you're getting fast responses like I've sent some information to them yesterday.

Normally it would be three weeks, four weeks before you to even get in that lodgement email I got a response from everything said that the clients I'm acting for a compliant. And so it's gone away.

But yeah, Ireland. I don't know if they've taken a lot more stuff on, what's going on, or new system but definitely they're acting very differently to how they've acted before, so I'd agree with that.

Mick Goodwin

Richard did you want to comment

12.Are we UK or GB?

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Richard Lee

On the terminology are we UK or GB now?

Mick Goodwin

Depends on what you're talking about.

Janet Greenwood

GB – CLP; UK-REACH

Mick Goodwin

But UK REACH applies to GB only!

Janet Greenwood

Basically they did everything as if we were going to have no deal.

So they had a lot of stuff to do a lot of published things and they set up the IT system as UK REACH, and it would cost too much money to go back and re label it GB REACH.

So, what we do is we call it “UK brackets GB REACH”, (UK (GB) REACH) just to be absolutely persnickety.

Mick Goodwin

They didn't want to change it back from UK REACH to GB REACH to avoid confusion, okay, but they didn't want to call CLP, UK CLP, they called it GB CLP to avoid confusion!

Janet Greenwood

And of course, if the deal fails, Northern Ireland automatically reverts back and everything becomes UK everything anyway. We need a link for that GB UK car sticker, by the way.

13. Knock-on effects of proposed d-limonene classification change

Colin Pratt

Going back a quick topic if I might, unfortunately I can't find the putting hand up button.

A while back, Janet briefly mentioned d-limonene Now I don't have a d-limonene SDS to hand. But in my new job as a self employed DGSA, it's worth noting that if it drops from aquatic chronic one , to aquatic chronic three, it no longer has just transport.

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Because at the moment, it would be under an environmentally hazardous liquid 3082 or 3077 or whatever whichever one it is ones liquid ones, a solid, and if it does go down to aquatic chronic three, and that is the only hazard, I can't confirm maybe it's flammable maybe it's toxic as well.

But if it's only an environmental hazard, then it drops out of that.

So that could be interesting because that means it's covered by ADR in Europe, so that would cease but it would still be covered by Transport of dangerous goods in the UK.

So it would be hazardous transport in the UK but would be completely safe to route all in Europe. So, something else that we got heading towards us, perhaps with my new hat on,

Mick Goodwin

And then you'd need to run down to Dover with the stickers to (put on).

Colin Pratt

Well, technically yes. If anybody wants we can put some stickers on in Dover, then I can, do that for a small admin fee.

Nicola Kaye

I think it also impacts on COMAH as well within change of environmental hazard.

Colin Pratt

Yeah, and obviously on labeling it could well change mixtures if the percentage is high enough, you're going to end up with different CLP labels in Europe to UK, depending on what the percentage in the formulation is, there's going to make a bit of stupidity there for the HSE will change to Europe, I'm sure in the end but it might take them a few years to do it.

Mick Goodwin

Good example of what seemingly is a small divergence can have a big knock on effect and transport and COMAH and labeling and everything else.

Nicola Kaye

Big on cost, I mean it's, yeah, the impact is directly costs, you know, everybody's already picked up huge amounts of costs so any divergence will just add to that particular people are exporting

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14. Titanium dioxide update from Alison Hill

Janet Greenwood

Can I come in here. Just on, it's not labels, well it is really, titanium dioxide labeling I take everybody's picked up on yesterday's newsletter about the guidance that's come out of ECHA, Allison Hill has very kindly sent through, now on email, I'll direct link to that paper on the ECHA website, and I'll put that in the notes as well.

And she's also saying that the guidance, or this labeling guidance from ECHA does not include any guidance on the aerodynamic part particle business, but that the TDMA have got guidance on that. So I will put that link in, because it's the aerodynamic properties of TIO₂ that give rise to the alleged carcinogenicity so thanks very much Allison that's really handy. Thank you.

If people sign up for the updates from TDMA website, there will be an update in the next few days with links to information on the aerodynamic diameter measurement papers, sign up under the "contact us" heading.

15. Transport classification query for environmental hazard

Clive Foster

On Colin's point ,if you wish to go on transport classifications and what happens if you drop out of transport classification in the UK?

Apparently, we recently got done for a un9005, on the grounds that the Transport classification apparently you have to consider quantity Q2 and 3.

And so, even though it's within the EU it's not transport classified there are places in the world where it is, and that difference between CLP and UN GHS classifications, meant that we were supposed to put on a un9005 for environmental classification, despite the fact that it had, as I say that acute aquatic two I think.

Janet Greenwood

Yeah that's H 401, which doesn't exist (in GB and the EU)

Nicola Kaye

It could have potentially been under ADN as opposed to ADR, and are some of the inland waterways.

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Clive Foster

Waterways yes.

Nicola Kaye

I know they've got some additional stuff that they don't have in other transport modes.

Mick Goodwin

Good another good point. Thank you. Any other divergence issues questions queries comments. Okay. Graham had a transport question. Graham.

16. Aerosols Transport Classification query

Graham Butterworth

Yeah, thanks Mick, the situation is aerosols pack of say four or six, shrink wrapped limited goods, they then put onto a pallet, that in turn is then shrink wrapped again with the LQ diamond on the back, even though it's transparent.

It then goes to what we'll call a wholesaler, you know, the likes of Costco, and the question that's come through to my desk was when they take the outer shrink wrap off which has got the LQ lettering on.

Should the packs underneath, be limited quantity or not?

My initial feeling was that, because the likes of Costco, can also be supplying professional users, then it should be, because in normal supermarkets, I see them filling the shelves, they'll take that shrink wrap off that's got the LQ diamond on, and they're then selling individually aerosols to consumers, not technically professional users.

However, we know that Costco can admit professional users, as well as consumers that have joined their club, and it was one of those.

Mick Goodwin

Presumably they sell in bulk packs as well.

Graham Butterworth

Yeah, they're not, they're not breaking the packs down let's just say a four pack to a consumer or a professional user.

Colin Pratt

Is this in the UK or in Europe?

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Graham Butterworth

UK Colin

Colin Pratt

UK, there's a couple of things they can make use of.

There's a derogation in CT in CDG 2009 for last mile distribution, where you can break cartons without having to re label, and also in the UK, of course, if you're a user, then you don't have to label it so if you're buying one aerosol from Tesco's, it doesn't have to be labeled to ADR or the same for professional users.

But if Costco are distributing, then there's a derogation specific to the UK, where they can break a carton effectively at their distribution warehouse and ship half a carton to a shop, without having to re label it, but that's only a GB derogation because it's in 2009 transport dangerous goods.

So there's a couple of things that they might be able to do. But if they're distributing it internally warehouse to warehouse, then it'll have to be properly marked, but then the individual cartons should be, you know your tray of 12 or whatever that should be marked anyway.

Mick Goodwin

Does that answer your question Graham.

Graham Butterworth

Yeah, thanks very much, Colin. Thank you. Thank you all.

Colin Pratt

Send me email if you get stuck, get my email via Janet or whatever, or find me on the website and we can chat.

Graham Butterworth

Thanks very much Colin, much appreciated.

17.Trade issues

Mick Goodwin

Thank you. Last, almost last item on the agenda trade issues.

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Janet Greenwood

That was just how is everybody getting on after the trade issues meeting that we had and is supply still horrific and are you managing basically.

Mick Goodwin

Are we all applying to be lorry drivers?

unknown

Would the roads want us?

Janet Greenwood

I wanted to get my class one HGV because then I would have everything ticked on the back (of my driving licence), but given my reversing skills I think I wouldn't pass.

John Rawson

Basically from our point of view, we're sharing the extra volatile costs with our customers.

So, our margins are down but the customer is also participating because of the force majeure situation that's been placed on the global trade business. If that makes any sense to anybody else.

Basically the blockage of the Suez Canal and the fact that all the containers that are empty in Europe. The export from Europe to Asia has been non existent, for the last, well not non existent but being down for the last 18 months.

Consequently, at one stage, Felixstowe was blocked with empty containers as I've been mentioning before, so vessels were being diverted to Rotterdam and other places because of lack of space available.

Things are easing bit, but certainly the transport costs are so volatile at the moment, maybe two or three times or four times more than they were before the pandemic.

China of course are taking advantage of this situation it's a nightmare there, India particularly are a bit more pragmatic but it's very very expensive. So we're managing to cope but taking the pain as well.

Janet Greenwood

Sort of following on from that, does anybody want Mark Rowbotham back for some training, or are you all coping? Everybody coping, I think, yeah, if anybody really wants some training, then we can arrange it but email me.

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Mick Goodwin

Any other items on trade and transport, or anything else anyone wishes to raise, comments, questions, I'm looking around the room I'm looking around the zoom.

Anthea McAllister

I was just wondering if anybody's heard anything about India REACH, not that it should be called REACH. And because we keep doing webinars on it we can't the, fifth last, final final final draft.

But I can't get anybody over there to say whether it's really, real.

Mick Goodwin

I haven't heard anything in a while. But while being six months or so. Anyone else have any input on India.

Graham Butterworth

I'm in contact with our local right guys in India. The Sixth Amendment draft is due out but as far as I can see they've got more pressing issues in India, and we don't anticipate anything coming out now till perhaps early next year.

I'll keep an update and when I get information through I'll pop it through to everybody.

Mick Goodwin

Okay, brilliant thanks Graham. Anything else anyone wishes to raise. Brilliant. Yeah, go on, Janet.

18. "Parish Notices"

Janet Greenwood

Just to remind everybody, we're just about to run the Accountability Programme for CLP mastery starting in a fortnight's time, well fortnight tomorrow's time. No a week tomorrow's time sorry 22nd, I must get out more.

So if you have anybody who wants to come on our training course then remember there is the self help group discount.

So that's my sales pitch and we've already had the Colin Pratt Dangerous Goods consultancy sales pitch too 😊, other DGSA's are available, but Colin's live with us as it were. Yeah, so that's it for me. Thanks.

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Mick Goodwin

Is anyone going to ChemUK tomorrow birthday. Hands up. Yeah, I'll be there Thursday. If anyone wants to have a coffee, give us a shout ,come UK, in NEC. Neil and Jono are, , I've got a list of questions for Neil and Jono, and I will be heckling from the front row.

I'm, to be honest, I'm looking forward to I'm looking forward to seeing people in real life. See lots of friendly faces again. If people are going, Yeah, I'll be there Thursday. I'll look forward to seeing you. Any other housekeeping issues or parish notices or anything.

Mick Goodwin

Anyone got anything else you wish to say raise shout about before we disappear for our packed lunch. Okay, those, in Birmingham on Thursday I'll see you then everyone else I'll see you in December, hopefully. Thank you very much everyone.

19.Date of next meeting – 7th December 2021

We are hoping to have the Christmas Lunch meeting on 7th December 2021 at Halifax Bradley Hall Golf Club, which has been booked. Tina, our usual caterer, should be able to do our usual 2 course meal.

Meeting notes produced by Janet Greenwood, TT Environmental Ltd and Megan Chapman, The Savvy VA.

23rd September 2021

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