

2. juni 2021

Høringssvar til revision af CLP-forordningen

Green Transition Denmark (GTD) welcomes the opportunity to provide feedback on the Commission's discussions of the revision of EU's CLP Regulation. GTD is a Danish NGO working to promote a green and sustainable transition of society.

CLP is an essential tool to regulate hazardous chemicals. However, it needs to be updated to sufficiently support the implementation of the new Chemicals Strategy of Sustainability. For many years GTD have been urging for criteria for endocrine disrupting chemicals (EDCs). To provide enough protection to people and environment it is necessary to identify and restrict EDCs across EU law. There is a need to introduce a hazard class for EDCs. Also, PBTs, vPvBs, PMTs and vPvMs should be included and we urge that these chemical groups are included in future discussions. Furthermore, sub categories for suspected EDCs and endocrine active substances will make it possible to reflect the current state of scientific knowledge with transparency and a precautionary approach which is highly needed.

We highly welcome the European Commission's intent to address the lack of global harmonized standards (GHS). It is especially needed for terrestrial toxicity through the development of specific criteria for non-aquatic organisms. This very needed action should be coupled with the development of criteria for terrestrial persistence. Also there is a need to lower the level of evidence required to classify hazardous chemicals per category, in particular for the most concerning endpoints such as PBTs. One specific example of a problematic hazardous and highly used chemical that are not covered by the PBT criteria is 6PPD (used in e.g., tires) and its break down product. It is very harmful to the aquatic environment but falls under the threshold criteria for bioaccumulation. This is also shown in scientific literature.

Ensure that CLP remains purely hazard based and focused on the substance's intrinsic properties. No risk or socio-economic considerations are valid in the CLP process of identification, classification labelling and packaging of hazards.

We furthermore highly support the consultation responses from EEB and BEUC, where extended comments and arguments can be found.