

Air Liquide Welding, REACH and CLP

Position at the end of April 2009



Reminder about REACH

Objective: to improve the protection of human health and the environment.

The European Union (EU) has issued a new regulation relating to chemical substances. It came into force on 1 June 2007.

With this regulation, named REACH, the European Union has put in place a single European system for the Registration, Evaluation and Authorisation of Chemicals.

Under the regulation, all chemicals produced or imported in quantities above one tonne per year and per manufacturer or importer, including those that are already in circulation, shall be the subject of a risk analysis and shall be tested by their manufacturers or importers.

Phase I: registration

Manufacturers and importers are required to register their chemicals with the European Chemicals Agency (ECHA) in Helsinki. If the product is a preparation (such as a welding consumable product), the requirement is for the registration of each chemical that goes into the composition of the preparation, whenever the quantity of one tonne per year is exceeded.

The registration calendar is as follows:

- 1 December 2010:
 - for all the chemicals produced or imported in quantities greater than or equal to 1000 tonnes per year,
 - for all the chemicals that are classified as highly toxic for aquatic organisms and which could have long-term harmful effects on the aquatic environment (risk phrase R50/53), the quantity selected is 100 tonnes or more,
 - for chemicals that are carcinogenic, mutagenic or toxic to reproduction (CMR) belonging to categories 1 or 2, the limit is 1 tonne or more.
- 1 June 2013:
 - for all chemicals produced or imported in quantities greater than or equal to 100 tonnes per year.
- 1 June 2018:
 - for all chemicals produced or imported in quantities greater than or equal to 1 tonne per year.

Pre-registration or preliminary registration

In order to benefit from the above registration schedule, companies must have reported the chemicals during the pre-registration phase scheduled from 1 June 2008 to 1 December 2008 as regards all phase-in chemicals, that is chemicals marketed in the EU before 19 September 1981. A company that omitted to pre-register a chemical can no longer import or manufacture the chemical before it is fully registered with ECHA.

Preliminary registration is aimed at facilitating the sharing of data between reporting companies, reducing unnecessary testing (particularly on vertebrates) and reducing the costs borne by industry.

The roles of Air Liquide Welding

According to REACH, Air Liquide Welding acts as “importer”, “distributor” and “downstream user” (producer of welding filler materials).

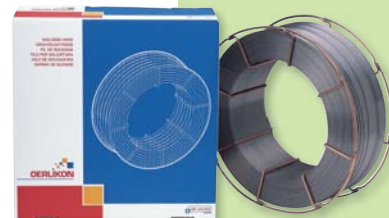
For these different roles, Air Liquide Welding has obtained from its suppliers the commitment of completing pre-registration by 1 December 2008 or has done it as an importer.

Air Liquide Welding: anticipating marketing restrictions

However, Air Liquide Welding has not waited for REACH regulations to comply with restrictions relating to the marketing and use of chemicals.

For example:

- Air Liquide Welding consumables do not contain substances identified as extremely concerning, and particularly the 15 substances in the candidate list,
- Air Liquide Welding has created a new range of cadmium-free silver solder,
- Similarly, the PCBs of our arc welding machines no longer contain lead (for RoHS compliance) etc.



The “new” Safety Data Sheets (SDSs)

The systematic assessment of substances will lead to the updating of Safety Data Sheets (SDSs). The harmfulness of a large number of chemicals is known in part at the present time. To encourage user information, the future generation of SDSs will be accompanied by a Globally Harmonised System (GHS) in the area of labelling, defined internationally and its European application, called CLP (see below), which will be much more explicit. Each user will thus be able to easily identify the elements of concern for health or the environment and shall be required to strictly follow the supplied safety instructions.

Air Liquide Welding and SDSs

The list of chemicals and the Health, Safety and Environment information known are included in sections 2 and 3 of the Safety Data Sheets of Air Liquide Welding.

The customers of Air Liquide Welding can download the Safety Data Sheets from the special website at <http://www.safety-welding.com>

As required, the revision of the downloaded Safety Data Sheets will be supplied free of charge and every update that follows registration will contain the final registration number. The preliminary registration number remains the property of the manufacturer or importer and is not the subject of any disclosure obligation.

CLP (Classification, Labelling and Packaging)

The CLP European regulation organises the application in Europe of the global harmonised system for the classification and labelling of chemicals (GHS) for workers and consumers.

In 2009, operators will see the appearance of new labels, **particularly with new pictograms** and hazard indications that will replace the current risk phrases and symbols. In addition to the definition of new classification, labelling and packaging rules, this regulation provides for the establishment of a list of chemicals with harmonised European classification and labelling and an inventory of classifications and labelling.

It also sets out the new obligations in the area of communication of information for manufacturers and importers of chemicals. The old and new systems will coexist for a transition period. The new system will be fully implemented by 2015.

CHEMICAL PRODUCTS



LABELLING IS EVOLVING

To answer all your queries about REACH and CLP in respect of its products, Air Liquide Welding has appointed a REACH coordinator and specialist for its customers, Patrick COUDERC (patrick.couderc@airliquide.com)

Useful links:

- European Commission - folder providing access to the full text of REACH: http://ec.europa.eu/enterprise/reach/index_en.htm
- European Chemicals Agency: <http://echa.europa.eu>
- Regulation relating to the classification, labelling and packaging of chemicals: http://eurlex.europa.eu/JOIndex.do?year=2008&serie=L&textfield2=353&%20Submit+=Rechercher&_%20submit=Rechercher&ihmlang=en