



# GHS

*Global Harmonized System*

The logo for B&B Asesores features a wireframe globe on the left. The letters 'B&B' are prominently displayed in a bold, green, sans-serif font. Below them, the word 'Asesores' is written in a smaller, white, sans-serif font with a black outline, following the curve of the globe.

**B&B**

Asesores

# Labels

## HAZARD COMMUNICATION

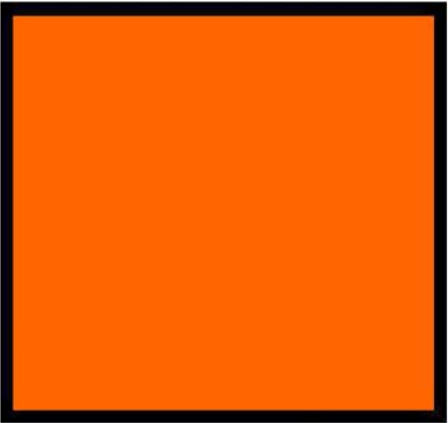
Accurate and easily understandable information for all audiences to which it is addressed

- ✦ Identification of the producer / supplier / distributor
- ✦ Identification of the substance / product
  
- ✦ Pictograms
- ✦ Signal word: "HAZARD" "ATTENTION"
- ✦ Hazard phrases: The set for each class and category that describes the nature of the hazard:
  - ✦ "Produces skin irritation"
  - ✦ "Toxic to aquatic organisms"
- ✦ Precautionary statement

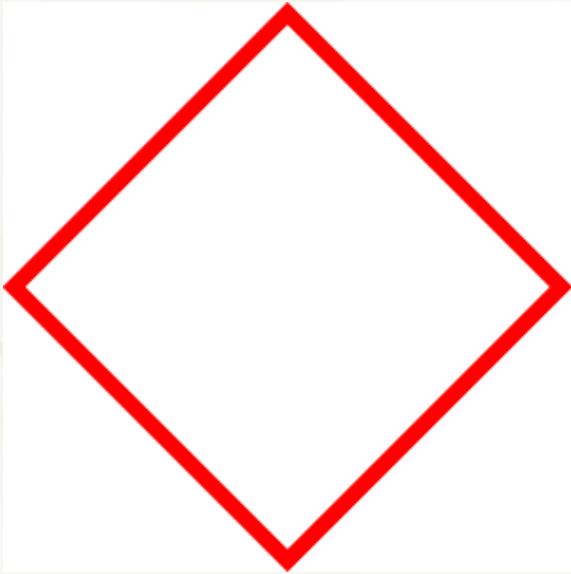


# *New pictograms*

**UE**



**GHS**



The logo for B&B Asesores is located in the top left corner. It features a stylized globe with a grid pattern. The letters 'B&B' are prominently displayed in a bold, green, sans-serif font. Below them, the word 'Asesores' is written in a smaller, white, sans-serif font with a black outline, following the curve of the globe.

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Asesores

## *Required information on a GHS label*

### *1.- Identification of the producer / supplier / distributor*

- ✦ By the name, address and telephone number. .

### *2.- Identification of the chemical product*

- ✦ The product identification must be the one provided by the FDS. If it is a mixture should include a description of all components that may cause adverse health effects and should be indicated on the label. The competent authority may obligate to include the name of all components. In products intended exclusively for the workplace the product identification can be included in the FDS, and not on the label. The identification of the chemical is protected by the norms on Confidential Business Information








## 3.- Pictograms

### PICTOGRAMAS EXCLUSIVOS DEL GHS

## 4.- Warning

They indicate the degree of seriousness of the hazard in a quick and easy form for the reader of the label. The GHS uses the words "Hazard" for more severe hazard categories or "Warning" for less serious ones.

SÍMBOLO/PALABRA OBLIGATORIO	SÍMBOLO/PALABRA FACULTATIVO	CASO EN EL QUE SE APLICA
		SIEMPRE
		PARA IRRITACIÓN CUTÁNEA U OCULAR
		PARA SENSIBILIZACIÓN DE LA PIEL O IRRITACIÓN CUTÁNEA U OCULAR
Peligro	Atención	SIEMPRE



**B&B**

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### *5.- Hazard statement*

- ★ They are phrases that identify and supplement certain risks by describing the type of hazard and are assigned to a class and category

### *6.- Precautionary statement*

- ★ They are recommendations for action to be taken, in order to reduce or prevent adverse effects caused by exposure to a hazardous product.



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- ★ The label must accompany the chemical since that is sent until it is on the workplace, and inside this all the containers must be labeled;







**Hazard**

**High category**





**Warning**

**Low category**








**ACUTE TOXICITY: INHALATION**

Category 1	Category 2	Category 3	Category 4	Category 5
				No pictogram
Danger	Danger	Danger	Warning	Warning
Cause death after inhalation	Cause death after inhalation	Toxic after inhalation	Harmful after inhalation	May be harmful following inhalation

## ACUTE TOXICITY: SKIN

Category 1	Category 2	Category 3	Category 4	Category 5
				No pictogram
Danger	Danger	Danger	Warning	Warning
Fatal in contact with skin	Fatal in contact with skin	Toxic in contact with skin	Harmful in contact with skin	Harmful in contact with skin

## Acute toxicity(ORAL)

Acute Toxicity (oral)	Symbol		Hazard statement	Precautionary statement	Signal Word
	Handling	Transp.			
category 1 < 5 mg/kg			Fatal if swallowed	Not harmonized yet	Danger
category 2 > 5 - < 50 mg/kg			Fatal if swallowed	Not harmonized yet	Danger
category 3 > 50 - < 300 mg/kg			Toxic if swallowed	Not harmonized yet	Warning
category 4 > 300 - < 2.000 mg/kg		No symbol	Harmful if swallowed	Not harmonized yet	Warning
category 5 > 2.000 - < 5.000 mg/kg	No symbol		Could be harmful if swallowed	Not harmonized yet	Warning

# B&B

## Asesores

# Current EU label

**BASF**  
The Chemical Company

UN 1263  
PAINT

### Corial® EM Finish FR-MS

(entità: PROPAN-2-OL)  
(entità: PROPAN-2-OL)

EG-Kennzeichnung  
EC-Labeling

Gilgig • Toxic • Toxique • Vergiftig • Tóxico •  
Tossico • Toxik • Myrkyllinen

Umweltgefährlich • Dangerous for the environ-  
ment • Dangereux pour l'environnement • Mi-  
lieu-gevaarlijk • Peligroso para el medio ambien-  
te • Pericoloso para o ambiente • Pericoloso per  
l'ambiente • Επικίνδυνο για το περιβάλλον •  
Miljøfarlig • Farlig for miljøet • Miljøfarlig •  
Ympäristölle vaarallinen



R: 10-60-61-38-51/53 S: 53-37-45-61

BASF Aktiengesellschaft  
67056 Ludwigshafen Germany  
Tel. +49 1802273 112

110 kg net  
® = Reg. Trademark BASF

ΣΥΝΘΕΤΙΚΟ ΑΣΕΤΟ, ΕΝ-Ν  
ΒΥΤΥΛΦΕΡΜΑΤΟ, ΣΟΛΒΕΝΤ ΝΑΦΤΑ  
[X] 2 ΕΤΥΛΦΕΡΜΑΤΟ, ΣΟΛΒΕΝΤ ΝΑΦΤΑ,  
ΒΥΤΥΛΦΕΡΜΑΤΟ, ΣΟΛΒΕΝΤ ΝΑΦΤΑ,  
Βασιλικό. Kan de Purgieringsoplossing  
af tekenen. Kan de Rijn en Maas  
verontreinigen. Meet de Rijn, OITG' for  
Wassergegevens, voor in tekenen be-  
rekening van de afvalstoffen.

(PG III)

Αξιοποιήστε το προϊόν σύμφωνα με τις  
επισημασμένες οδηγίες. Το προϊόν  
μπορεί να είναι επικίνδυνο για το περιβάλλον  
και να προκαλέσει βλάβες σε υδάτινα  
οργανισμούς. Μετρήστε την ποσότητα  
του προϊόντος που χρησιμοποιείται και  
προσθέστε την στην ετήσια δήλωση  
αποβλήτων.

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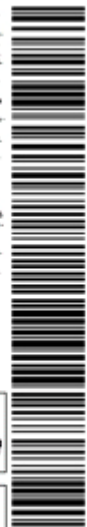
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V00003 + S0140719 + 3



(240)57005302(3101)001100(10)12345678W0



Kühl lagern!  
Kein Feuer!  
Gefahr in  
Lager freisetzen!

# Possible GHS label

**BASF**  
The Chemical Company

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UN 1263 (PG III)  
PAINT

**Corial® EM Finish FR-MS**

(enthält: PROPAN-2-OL)  
(enthält: PROPAN-2-OL)

EG-Kennzeichnung  
EC-Labeling




**Danger**

Keep out of the reach of children.  
Read label before use.

V00003 + S0140719 + 3



**FLAMMABLE LIQUID**

**3**

Art: 57005302  
Lot: 12345678W0

Fill date: 08/2006  
Expiration date: 08/2007

BASF Aktiengesellschaft  
67056 Ludwigshafen Germany  
Tel. +49 1802273 112

R: 10-60-61-30-51/53 S: 53-37-45-61





2-ETHYLHEXYL ACETATE; DI-N-BUTYLPHthalate; SOLVENT NAPHTHA  
 2-ETHYLHEXYLACETAT; DI-N-BUTYLPHthalat; SOLVENT NAPHTHA.  
 Entzündlich. Kann die Fortpflanzungsfähigkeit beeinträchtigen. Kann das Kind im Mutterleib schädigen. Reizt die Haut. Giftig für Wasserorganismen, kann in Gewässern längerfristig schädliche Wirkungen haben.  
 Exposition vermeiden - vor Gebrauch besondere Anweisungen einholen. Geeignete Schutzhandschuhe tragen. Bei Unfall oder Unwohlsein sofort Arzt zuziehen. Freisetzung in die Umwelt vermeiden. Besondere Anweisungen einholen/Sicherheitsdatenblatt zu Rate ziehen.  
 © BASF Schweiz AG, Appital, 8820 Wädenswil/Au, Tel. +41 (0)44 781 91 11

2-ETHYLHEXYL ACETATE; DI-N-BUTYLPHthalate; SOLVENT NAPHTHA.  
 Flammable. May impair fertility. May cause harm to the unborn child. Irritating to skin. Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.  
 Avoid exposure - obtain special instructions before use. Wear suitable gloves. In case of accident or if you feel unwell, seek medical advice immediately. Avoid release to the environment. Refer to special instructions/Safety data sheets.

Fill weight: 110 kg

Gross weight: 115,6 kg



(240)57005302(3101)001100(10)12345678W0



4 042865 207282

**B&B**

Asesores

## PICTOGRAMAS DEL TRANSPORTE



30

**B&B**

Asesores

## PICTOGRAMAS DEL SGA



# B&B

## Asesores

The screenshot shows a Windows Internet Explorer browser window displaying the ECHA website. The address bar shows the URL [http://echa.europa.eu/classification\\_en.asp](http://echa.europa.eu/classification_en.asp). The page title is "ECHA Website - Classification". The main content area features the ECHA logo and the text "European Chemicals Agency". A navigation menu on the left lists various sections: HOME, SIEF, REACH, CONSULTATIONS, ECHA CHEM, REACH-IT, CLASSIFICATION (with sub-items: CLP Regulation, Guidance, Harmonised C&L), HELP, PRESS AND EVENTS, ABOUT ECHA, PUBLICATIONS, WORKING WITH US, and APPEALS. The main content area is titled "New classification, labelling and packaging regulation" and contains the following text: "The new EU regulation (EC) No 1272/2008 on classification, labelling and packaging of chemical substances and mixtures, the so called CLP Regulation entered into force on 20 January 2009. The CLP Regulation will gradually replace the Dangerous Substances Directive (67/548/EEC) and the Dangerous Preparations Directive (1999/45/EC). Both Directives will be repealed on 1 June 2015." Below this text are links for "More" and "Guidance". The "Guidance" section states: "Guidance on the CLP Regulation will be published to support companies in fulfilling their obligations and in applying the new rules on classification, labelling and packaging. That guidance is currently being developed." Below this is another "More" link. The "Harmonised classification and labelling" section states: "Under the CLP Regulation Member States may send proposals for the harmonised classification of substances that are carcinogenic, mutagenic, toxic for reproduction or respiratory sensitisers. Industry can also in certain cases send proposals." Below this is a final "More" link. The browser's taskbar at the bottom shows several open applications, including "GPF-GHS-JUNIO09", "REACH - IT Home - ...", "ECHA Website - CL...", "Presentación 5 Ide...", and "Presentación1". The system tray shows the date and time as 17:33.





Reach-IT

You are connected as [bbasesores](#) on behalf of B&B Asesores Auditores Ambientales S.L. - [Preferences](#) - [Logout](#)

Home

Company

Welcome Rosa Beaus.

Pre-registration

You have 0 [unread message\(s\) in your message box.](#)

Pre-SIEF

Online dossiers

Phase-in Information

Registration /  
notificationView registration /  
notification

Joint submission

Submit  
registration /  
notification

Message box

User account

Claim Notified  
Substance

Invoices

Search

### REACH-IT News:

[The clock is ticking - Form your SIEF now](#)

16/06/2009

If you have pre-registered a substance with a 2010 registration deadline and you are not yet active in your SIEF, you need to act now. If you are a Lead Registrant please inform ECHA about your election. On the other hand, if you do not intend to register by 1 December 2010 you need to change your status in REACH-IT.

[REACH-IT closed for holiday and maintenance](#)

16/06/2009

REACH-IT will be closed on Thursday 18 June at 19:00 EET.

Normal service will resume on Monday 22 June at 10:00 EET.

ECHA apologizes for any inconvenience caused.

[Data Submission Manual 5 has been updated](#)

19/05/2009

Data Submission Manual 5: How to complete a technical dossier for registrations and PPORD notifications has been updated. This manual outlines the IUCLID 5 sections/fields to be filled in in order to prepare a complete dossier according to Article 20(2) of REACH. The changes made in this version 2.0 are listed on page 2 of this manual. The



You are connected as **bbasesores** on behalf of B&B Asesores Auditores Ambientales S.L. - [Preferences](#) - [Logout](#)

[Home](#) > [Submit Dossier Intro](#)

- Company
- Pre-registration
- Pre-SIEF
- Online dossiers
- Phase-in Information
- Registration / notification
- Joint submission
- Message box
- User account
- Invoices
- Search

### Registration / notification submission

Here you can initiate the submission process for registration / notification dossiers (or reports) or their updates. To submit an update you should use the same process as for the first submission of your dossier / report. The updated version should contain all previously submitted valid information and the updated one (please refer to relevant guidance documents).

*Fields marked with an asterisk (\*) are mandatory.*

\*Dossier type:

- Registration
- Registration of on-site isolated intermediate
- Registration of transported isolated intermediate
- Product and Process Orientated Research and Development (PPORD) notification
- Classification and Labelling (C&L) notification
- Inquiry notification



REACH - IT Submit External Dossier - Windows Internet Explorer

https://reach-it.echa.europa.eu/reach/secure/company/dossiers/submission/submit\_dossier\_intro.fac

Archivo Edición Ver Favoritos Herramientas Ayuda

Favoritos REACH - IT Submit External Dossier

Contact

# ECHA

## Reach-IT

You are connected as **basesores** on behalf of B&B Asesores Auditores Ambientales S.L. - [Preferences](#) - [Logout](#)

Home > [Submit Dossier Intro](#) > [Submit External Dossier](#)

Company  
Pre-registration  
Pre-SIEF  
Online dossiers  
Phase-in Information  
Registration / notification  
Joint submission  
Message box  
User account  
Invoices  
Search

Here you can submit a C&L notification dossier.

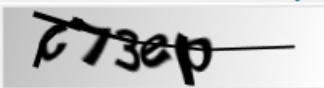
### Classification and labelling (C&L) notification submission

Please pick here using the "Browse" button the file which contains your dossier (your file should have been created using IUCLID 5 and have the extension ".i5z")

\* File name:

\* Enter the text shown:  

Can't read the text below? [Try another](#)



### Access code for large files

For the submission of a file larger than 20 MB, please [request a large file access code](#) before submission.

If you have an access code for a large dossier, please, enter it here

Large file access code:

Listo

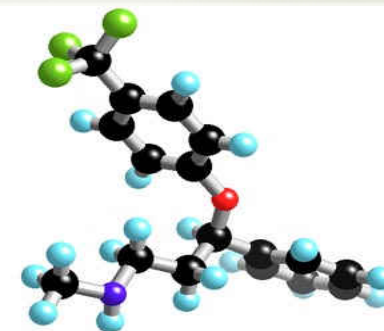
Internet 100%

Inicio GPF-GHS-JUNIO09 REACH - IT Submi... ECHA Website - Cla... Presentación 5 Ide... Presentación1 ES 17:35



**B&B**

Asesores



***MAIN MARKET ACCESS  
CONDITIONS IN THE EU UNDER  
REACH FOR NON-EU  
COMPANIES.***



**B&B**

Asesores

- REACH is a European*
- *regulation: Only registered substances under REACH could be marketed in the EU (if they are not exempted)*



The logo for B&B Asesores is located in the top left corner. It features a stylized globe with a grid pattern. The letters 'B&B' are prominently displayed in a bold, green, sans-serif font. Below them, the word 'Asesores' is written in a smaller, white, sans-serif font with a slight shadow effect.

**B&B**

Asesores

- *REACH* is in force, and affects directly all chemical manufacturers and importers within the EU and indirectly to downstream users.
- Manufacturers of substances or
- substances in mixtures outside the EU also have to follow *REACH* if they want to market their products in the EU, this means that the substance has to be registered.





Manufacturers from outside the EU have three possibilities of having their substances registered with the European Chemicals Agency (ECHA):

- ✦ by their own agent established in the EU,
- ✦ by importers
- ✦ by an Only Representative



*First possibility:*

*Registration by the non-EU company own  
agent established in the EU*

Not all the non-EU companies  
have a subsidiary or an  
agent in the EU !!!



## *Second possibility: Registration by an importer*

A customer develops the registration and imports the substance into the EU market. The customer becomes an importer and he is responsible to comply with REACH for the substance that enters the EU market.

Disadvantages for the non EU company:

- ✦ If a company sells to many clients or many substances in Europe **several importers** are needed: the coordination and communication with all of this importers could be difficult to manage.
- ✦ **All EU customers who purchase to the manufacturer outside the EU will have to become importers** (with the consequent efforts and expenses) or all customers would have to buy only from that importer (which would become a single distributor of the substance that is purchased from outside the EU. If the importer stops the relation to the company from outside the EU, the non-EU company couldn't sell in the EU. The importer may buy the substance of any other manufacturer outside the EU.
- ✦ **Market confidential data** is passed on within the manufacturer's own supply chain without control.
- ✦ This possibility is interesting when very few substances are sold in the EU and only few customers



**B&B**

Asesores

*Third possibility:*

*The REACH offers manufacturers outside the EU the possibility of appointing an Only Representative*

It is the best business possibility because the non EU company can sell freely to all European customers!



## *Only Representative (OR)*

- ✦ *“A natural or legal person established outside the Community who manufactures a substance on its own, in preparations or in articles, formulates a preparation or produces an article that is imported into the Community may by mutual agreement appoint a natural or legal person established in the Community to fulfil, as his only representative, the obligations on importers ”.*
- ✦ *“The representative shall also comply with all other obligations of importers under this Regulation. To this end, he shall have a sufficient background in the practical handling of substances and the information related to them and, shall keep available and up-to-date information on quantities imported and customers sold to, as well as information on the supply of the latest update of the safety data sheet.”*
- ✦ *“If an Only Representative is appointed, the non-Community manufacturer shall inform the importer(s) within the same supply chain of the appointment. These importers shall be regarded as downstream users for the purposes of this Regulation.”*



**B&B**

Asesores

## *The advantages for the non-EU manufacturer of appointing an Only Representative (OR) :*

- ✦ The manufacturer does not need to have its own company in the EU.
- ✦ None of the costumers are obliged to register: facilitating the purchase.
- ✦ Confidential data are communicated exclusively to a neutral partner.
- ✦ The manufacturer has direct control over the registration process of its substances.



**B&B**

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*Customers of the company outside the EU (the importers) will also benefit if the company register through an OR:*

- ✦ They buy registered substances without incurring in the costs of having to register themselves.
- ✦ Customers will also save the costs of time and training required to develop a registration.
- ✦ As “downstream users”, customers assume less obligations than if they were registrants.





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# *What does the OR do*

- ◆ Comply with the obligations of REACH on behalf of the company outside the EU
- ◆ Keep Client informed of REACH developments in EU.
- ◆ Understand Client's products manufacture outside the EU, client's customers and supply-chain .





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- ✦ Keep available and up-to-date information regarding the substance registered.
- ✦ Keep informed the supply chain of the updates on the safety data sheet.
- ✦ Meet the requirements of REACH as a manufacturer of chemicals:
  - ✦ Meet the Reach requirements for the registration of the substance (send the registration and pre-registration dossier)
  - ✦ Fulfill the obligation of share data for registration, request of authorization (if required) and notification of classification and labeling.
  - ✦ Ensures that risks from the use of the substance are identified, controlled and documented (safety data sheets)





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## Conclusion:

Non EU Companies needs always an importer or an European Only Representative to sell in the EU:

A company outside the EU who want to sells substances in Europe and wants to continue with business, from 01 June del 2008 requires someone who is:

- ✦ A subsidiary of the same company (which act as OR)
  - ✦ A European player of the same company (which act as OR)
  - ✦ A European customer (acting as importer)
  - ✦ A European OR hired by the company outside the EU
- ✦ Just in the case of a.), b) and d) the company outside the EU will be the owner of substance's registration and may sell in Europe.
- ✦ In the case of c.), the owner of registration will be the importer and the Non-EU company may only sell to them. This importer can buy the registered substance to any company outside the EU.





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# Thank you

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