

# CLP Regulation revision - Targeted Stakeholder Survey

## 2. PART I. About you

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### 1. Please provide the following details

Your Name : Oliver Hartmann

Organisation name: : Association of the European Self-Care Industry (AESGP)

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### Country of operation:

Belgium

### Comments:

**After completing this survey, are you willing to be contacted for any clarification, a follow-up interview and/or further updates on the impact assessment?**

Yes

### 2. I am providing my contribution as:

Business association

### 3. If you represent a company, please indicate its size.

### 4. If you represent a company or business association, please indicate the two-digit NACE code of the primary business sector.

### 5. If you represent a company or business association, please indicate what activities concerning chemical products (substances and/or mixtures) your company or the members of your business association are involved in. Multiple answers are possible.

Manufacture of chemical substances

Manufacture of mixtures

Import of chemical substances and mixtures

Use of chemical products in manufacturing goods/articles or delivering services

### Comments:

### 6. If you represent a national or regional/local authority, please indicate your role(s) in the implementation and/or enforcement of the CLP Regulation. Multiple answers are possible.

### Comments:

## 3. PART II. Hazard identification

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**7. Do you agree that the following issue:**

*'The CLP Regulation does not provide for an exhaustive set of hazard classes',*

identified by the different evaluation activities carried out for the review the Regulation, hinders the ability of CLP to reach the goals mentioned in the table below? Please rate your answer on the scale from 'strongly agree' to strongly disagree'.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health			X			
The issue hinders the ability of CLP to ensure a high level of protection of the environment			X			
The issue hinders the ability of CLP to ensure free movement of chemicals			X			

**Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:**

**8. How important is it to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from 'very important' to 'not important at all' and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Inclusion of a hazard class for endocrine disruptive (ED) properties						X
Inclusion of a hazard class for Persistent, bioaccumulative and toxic (PBT) properties						X
Inclusion of a hazard class for very persistent and very bioaccumulative (vPvB) properties						X
Inclusion of a hazard class for persistent, mobile and toxic (PMT) properties						X
Inclusion of a hazard class for very persistent, very mobile (vPvM) properties						X
Inclusion of a hazard class for immunotoxic properties						X
Inclusion of a hazard class for neurotoxic properties						X
Inclusion of a hazard class for toxic properties to terrestrial organisms						X

**9. What other measures do you consider important for addressing the problem indicated in question 7?**

**Please explain:**

10. Are the following groups affected by the measures listed in question 8? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'.

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers		X				
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances	X					
Manufacturers of mixtures	X					
Importers of chemical substances and mixtures	X					
Distributors of chemical substances and mixtures	X					
Downstream users of chemicals (e.g., manufacturers of articles)	X					

11. Please describe how the groups you indicated in answer to the previous question are affected.

It would entail the generation of new data, update current risk assessments and preventive measures /operational controls.

Hazard classifications drive SDS updates, labelling, notification and training of workers, storage and shipping requirements (e.g., WGK, DG).



**13. Please specify any other important positive or negative impact of the measures listed in question 8, including quantitative information.**

Generally, the introduction of new hazard classes, new criteria for hazard classification and new risk mitigation measures would result in significant resource investments for companies. The re-assessment of the chemical portfolio and implementation of the necessary risk mitigation measures is also a very lengthy process.

**4. PART III. Hazard quantification**

**14. Do you agree that the following issue:**

*‘Different conclusions are made in risk assessments for the same substance due to limited hazard quantification provisions under the CLP Regulation’*

identified by the different evaluation activities carried out for the review of the Regulation, hinders the ability of CLP to reach the goals mentioned in the table below? Please rate your answer on the scale from ‘strongly agree’ to strongly disagree’.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health			X			
The issue hinders the ability of CLP to ensure a high level of protection of the environment			X			
The issue hinders the ability of CLP to ensure free movement of chemicals			X			

Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:

**15. How important is to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from ‘very important’ to ‘not important at all’ and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Include toxicity reference values in harmonised classifications.						X
Create a central public repository of toxicity reference values.						X

**Comments:**

**16. What other measures do you consider important for addressing the problem indicated in question 14?**

17. Are the following groups affected by the measures listed in question 15? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Specify other groups if required.

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

18. Please describe how the groups you indicated above are affected.

**19a. How would the measures listed in question 15 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment				X
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X

**19b. How would the measures listed in question 15 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**20. Please specify any other important positive or negative impact of the measures listed in question 15, including quantitative information.**

## **5. PART IV. Harmonised classification and labelling**

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**21. Do you agree that the following issue:**

*'The current procedure for harmonisation of classification and labelling in the CLP Regulation does not allow a timely and efficient addition and update of CLH dossiers'*

identified by the different evaluation activities carried out for the review of the Regulation, hinders the ability of CLP to reach the goals mentioned in the table below? Please rate your answer on the scale from 'strongly agree' to strongly disagree'.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health						X
The issue hinders the ability of CLP to ensure a high level of protection of the environment						X
The issue hinders the ability of CLP to ensure free movement of chemicals						X

**Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:**

**22. How important is it to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from 'very important' to 'not important at all' and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Provide the Commission with the mandate to initiate and develop proposals for harmonised classification and labelling of substances.						X
Provide manufacturers, importers and downstream users with the right to propose modifications to existing harmonised classification and labelling subject to specific conditions, including priority assessment by the Commission.						X
Improve the current prioritisation system to ensure an effective use of the limited public resources.						X

**Comments:** CLP labelling obligations should be aligned with existing product-specific legislation to avoid redundancies and contradictions.

**23. What other measures do you consider important for addressing the problem indicated in question 21? Please specify.**



**24. Are the following groups affected by the measures listed in question 22? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'.**

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

**25. Please describe how the groups you indicated above are affected.**

**26a. How would the measures listed in question 22 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment				X
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X

**26b. How would the measures listed in question 22 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**27. Please specify any other important positive or negative impact of the measures listed in question 22, including quantitative information.**

## **6. PART V. Self-classification**

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28. Do you agree that the following issue:

*'Diverging and/or erroneous self-classifications and obsolete information in the Classification and Labelling Inventory'*

identified by the different evaluation activities carried out for the review of the Regulation, hinders the ability of CLP to reach the goals mentioned in the table below? Please rate your answer on the scale from 'strongly agree' to 'strongly disagree'.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health						X
The issue hinders the ability of CLP to ensure a high level of protection of the environment						X
The issue hinders the ability of CLP to ensure free movement of chemicals						X

Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:

29. How important is to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from 'very important' to 'not important at all' and explain your response in the textbox below.

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Introducing compulsory periodical updates of the CLP notifications of self-classification.						X
Publishing names of notifiers under the CLI while protecting confidentiality where appropriate.						X
Removing of incomplete, incorrect or obsolete notifications by the ECHA.						X
Improving the ECHA's digital tools for classification and labelling notification.						X

Comments:

30. What other measures do you consider important for addressing the problem indicated in question 28? Please specify.

**31. Are the following groups affected by the measures listed in question 29? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Please specify other groups if required.**

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

**32. Please describe how the groups you indicated above are affected.**

**33a. How would the measures listed in question 29 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment				X
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X

**33b. How would the measures listed in question 29 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**34. If applicable, please specify any other important positive or negative impact of the measures listed in question 29, including quantitative information.**

## **7. PART VI. Labelling**

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**35. Do you agree that the following issue:**

*‘Labelling requirements for certain substances and mixtures supplied in bulk or in small/complex packages are impractical or ambiguous’,*

identified by the different evaluation activities carried out for the review of the Regulation, hinders the ability of CLP to reach the following goals? Please rate your answer on the scale from ‘strongly agree’ to strongly disagree’.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health						X
The issue hinders the ability of CLP to ensure a high level of protection of the environment						X
The issue hinders the ability of CLP to ensure free movement of chemicals						X

**Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:**

**36. How important is to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from ‘very important’ to ‘not important at all’ and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Derogation from labelling requirements for substances and mixtures supplied in bulk (e.g., fuels, cement, detergents).						X
Derogation from labelling requirements for substances and mixtures contained in very small packaging (e.g., writing instruments).						X
The use of digital labels to complement and support hazard communication (e.g. provide information in multiple languages and/or small packages, provide on the physical label the most important elements and complementing with the digital option						X
The use of fold-out labels to provide information in the EU languages.						X
The use of symbols instead of multilingual text descriptions for conveying information.						X

**Comments:** CLP labelling obligations should be aligned with existing product-specific legislations to avoid redundancies and contradictions.

**37. What other measures do you consider important for addressing the problem indicated in question 35? Please specify.**

**38. Are the following groups affected by the measures listed in question 36? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Please specify other groups if required.**

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

**39. Please describe how the groups you indicated above are affected.**

**40a. How would the measures listed in question 36 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment				X
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X

**40b. How would the measures listed in question 36 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**41. Please specify any other important positive or negative impact of the measures listed in question 36, including quantitative information.**

## **8. PART VII. CLP scope exemptions**

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**42. Do you agree that the hazards borne by the following chemical products may not be covered by sectorial legislation to the extent provided by CLP? Please rate your answer on the scale from ‘strongly agree’ to strongly disagree’ and explain your response in the text-box below.**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
Medicinal products			X			
Veterinary medicinal products						X
Medical devices			X			
Cosmetics products						X
Food			X			
Feeding stuffs						X

**Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:**

While health hazards are extensively covered by the sectorial legislation, environmental hazards are not covered to the same extent.

Extending the obligation of environmental hazard classification and labelling to products not classified as chemicals should be carefully considered. It is important that the environmental hazard criteria and risk mitigation measures are commensurate with the risk evidence, factor in exposure and risk-benefit assessments and consider possible other specifics to a certain product classification.

Importantly, environmental hazards should be addressed in light of the specificities of each sector. The impact of widening the scope of the CLP Regulation on each sector impacted should be carefully assessed before proposing any legislative changes.

When considering label warnings/symbols, it is important to take into account the end-user understanding/knowledge/risk perception, packaging types & sizes. Of further relevance, healthcare are of essential need and inappropriate environmental hazards labelling of healthcare products could possibly impact treatment compliance.

**43. How important is it to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from ‘very important’ to ‘not important at all’ and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Improve the risk or conformity assessment in sectorial regulation to address all hazards covered by the CLP Regulation.			X			
Enhance cross-references between sectorial and CLP regulations when it comes to hazard assessments.			X			
Revoke the exclusion from CLP Regulation for those sectors where the exemptions are no longer fit for purpose.					X	

**Comments:**

**44. What other measures do you consider important for protection from hazards borne by the products that are currently exempted from the CLP Regulation? Please specify.**

All risks (health and environmental hazards) or conformity assessments should be covered through the sector-specific legislations and not through the CLP in order to avoid duplication and address specificities of each sector. In particular, risk assessments should be adapted to the specificities of each product type, consumer target group and usage.

45. Are the following groups affected by the measures listed in question 43? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Please specify other groups if required.

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers		X				
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances	X					
Manufacturers of mixtures	X					
Importers of chemical substances and mixtures		X				
Distributors of chemical substances and mixtures		X				
Downstream users of chemicals (e.g., manufacturers of articles)		X				

46. Please describe how the groups you indicated above are affected.

**47a. How would the measures listed in question 43 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment	X			
Classification and reclassification of substances	X			
Notification to the Classification and Labelling Inventory (CLI)	X			
Labelling and relabelling of substances and mixtures	X			
Update and distribution of revised safety data sheet (SDS)	X			
Packaging	X			
Reformulation of mixtures	X			
Update of IT systems	X			
Training of staff	X			

**47b. How would the measures listed in question 43 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**48. Please specify any other important positive or negative impact of the measures listed in question 43, including quantitative information.**

## **9. PART VIII. Online sales of chemicals**

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**49. Do you agree that the following issue:**

*'CLP does not specifically address online sales, and this results in a lower level of protection from hazards borne by substances, mixtures or products sold online from EU and non-EU countries'*

identified by the different evaluation activities carried out for the review of the Regulation, hinders the ability of CLP to reach the goals mentioned in the table below? Please rate your answer on the scale from 'strongly agree' to strongly disagree'.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health			X			
The issue hinders the ability of CLP to ensure a high level of protection of the environment			X			
The issue hinders the ability of CLP to ensure free movement of chemicals			X			
The issue hinders the ability of CLP to ensure competitiveness on the internal EU market			X			
The issue hinders the ability of CLP to ensure competitiveness in the EU trade with third countries			X			

**Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:**

**50. How important is it to implement the following measures to improve the ability of the CLP Regulation to reach its goals? Please rate the importance of each option from 'very important' to 'not important at all' and explain your response in the textbox below.**

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Clarifying responsibilities and obligations for compliance with the CLP Regulation in online sales of chemicals.			X			
Establishing uniform conditions and frequency of checks for compliance with the CLP Regulation for products sold online.			X			
Introducing the responsibility of online marketplaces for the safety of goods they sell or facilitate selling on their apps and websites.			X			
Improving cooperation between competent authorities and consumer groups on the EU and national levels.			X			
Harmonising the way hazard information must be provided online.			X			

**Comments:**

**51. What other measures do you consider important for addressing the problem indicated in question 49? Please specify.**

**52. Are the following groups affected by the measures listed in question 50? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Please specify other groups if required.**

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

**53. Please describe how the groups you indicated above are affected.**

**54a. How would the measures listed in question 50 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Hazard assessment				X
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X

**54b. How would the measures listed in question 50 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**55. Please specify any other important positive or negative impact of the measures listed in question 50, including quantitative information.**

## 10. PART IX. Poison centres

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56. Do you agree that the following issue:

*'National poison centres may not have all available information on chemicals placed on the market required for an adequate health emergency response'*

hinders the ability of CLP to reach the following goals? Please rate your answer on the scale from 'strongly agree' to 'strongly disagree'.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
The issue hinders the ability of CLP to ensure a high level of protection of human health						X
The issue hinders the ability of CLP to ensure free movement of chemicals						X
The issue hinders the ability of CLP to guarantee a level playing field						X

Please explain why you agree or disagree that the issue hinders the ability of CLP to reach one or more of its goals:

57. How important is the implementation of the following measures to improve the ability of the CLP Regulation to reach its goals? Rate the importance of each option from 'very important' to 'not important at all'.

	Very important	Fairly important	Neither important nor unimportant	Fairly unimportant	Not important at all	Don't know
Introduce an obligation on distributors (including re-branders/re-labellers depending on their activity) under Article 45 to notify information relevant for poison centres following the format under Annex VIII.						X
Add a notification obligation in case of hazardous substances (classified for human health and physical hazards) in the scope of Article 45 of the CLP Regulation.						X

58. What other measures do you consider important for addressing the problem indicated in question 56? Please specify.

59. Are the following groups affected by the measures listed in question 57? Please rate your answer on the scale from 'largely affected' to 'largely unaffected'. Please specify other groups if required.

	Largely affected	Affected	Neither affected nor unaffected	Unaffected	Largely unaffected	Don't know
Consumers						X
Workers						X
Regional/local public authorities						X
National public authorities						X
European institutions						X
Manufacturers of chemical substances						X
Manufacturers of mixtures						X
Importers of chemical substances and mixtures						X
Distributors of chemical substances and mixtures						X
Downstream users of chemicals (e.g., manufacturers of articles)						X

60. Please describe how the groups you indicated above are affected.

61a. How would the measures listed in question 57 affect the following activities? Please specify other activities if required.

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Classification and reclassification of substances				X
Notification to the Classification and Labelling Inventory (CLI)				X
Labelling and relabelling of substances and mixtures				X
Update and distribution of revised safety data sheet (SDS)				X
Packaging				X
Reformulation of mixtures				X
Update of IT systems				X
Training of staff				X



**61b. How would the measures listed in question 57 affect the following activities? Please specify other activities if required.**

	Increase in costs	No change	Decrease in costs	Not applicable / Don't know
Preparation and assessment of regulatory proposals (CLH, SVHC identification, restrictions)				
Evaluation of substances				
Operation of health responses				
Update of IT systems				
Training of staff				
Monitoring				
Reporting				
Enforcement activities				

**62. Please specify any other important positive or negative impact of the measures listed in question 57, including quantitative information.**

## **11. PART X. Wrap-up**

**63. Please provide any other comments or suggestions you would like to share regarding the revision of the CLP Regulation here. The next question will provide the option of uploading any files you deem relevant to the study.**

**64. Please upload any files of relevance that you wish to provide here. There is a limit of 3 files, if you have further information to provide, please contact the study team via [clp.revision@rpa-europe.eu](mailto:clp.revision@rpa-europe.eu)**