

DRAFT – CIRCULATED FOR CLEARANCE WITH BOARD
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28 OCTOBER 2008

**PROPOSALS FOR THE CHEMICAL (HAZARD INFORMATION AND
PACKAGING FOR SUPPLY) REGULATIONS 2009 – CHIP 4**

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PREFACE

The Health and Safety Executive (HSE) would like your comments on new Regulations proposed by the Board of the HSE to revoke and replace the Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP 3), as amended. These are sometimes referred to as CHIP. The new Regulations will be known as the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 (CHIP 4).

Please note that this consultation focuses on the proposed amendments to the CHIP Regulation that need to be made as a consequence of the CLP Regulation. It is not intended to re-open consultation on the provisions and impact of the CLP Regulation, which was subject to extensive consultation during 2007 and throughout formal negotiations.¹

A response form is included at Appendix I at the back of this booklet to help you do this. Please feel free to circulate this consultative document more widely. You can download this document from the Internet on the HSE home page at:

<http://www.hse.gov.uk/consult/live.htm>

If you are reading this document on a computer screen and would prefer a printed version, it can be obtained on request. Furthermore, if you require a more accessible format, an Executive Summary is available in Braille, large print, disc, audio cassette or in another language. Please contact **Jan Harris** at the address given below.

Acknowledgements:

HSE wishes to thank all those who have assisted with the development of these proposals.

Why are we consulting you?

HSE seeks to inform its decision-making by consulting a wide range of interested bodies and individuals. HSE believes that this will enable an open and transparent approach to decision-making, which is essential if policies and decisions are to have widespread ownership and reflect the needs and aspirations of the people they will affect. HSE then decides on the best way forward based on an interpretation and analysis of the results of this exercise.

¹ See <http://www.hse.gov.uk/consult/condocs/cd213.htm>

EXECUTIVE SUMMARY

1. The Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP 3) need to be amended as a consequence of the adoption and entry into force of the European Regulation on the Classification, Labelling and Packaging of Substances and Mixtures, known as the CLP Regulation.
2. The CLP Regulation adopts in the European Union, the internationally agreed Global Harmonised System on the classification and labelling of chemicals, known as the 'GHS'. The GHS establishes a framework for describing and communicating the hazardous properties of chemicals for both transport and supply.
3. The GHS sets out internationally accepted definitions and criteria to identify the hazards of chemicals (called 'classification') and communicate these hazards via labels and safety data sheets. If the same classification criteria and labelling are used to describe the hazards, the level of protection of human health and the environment becomes more consistent, transparent and comparable throughout the world. Professional suppliers and users of chemicals, and consumers all over the world benefit from such harmonisation.
4. The GHS was endorsed at the World Summit in Johannesburg in 2002, with a commitment for countries to adopt the GHS in national legislation by 2008. The European Commission responded to this commitment by proposing the CLP Regulation to adopt and apply the principles and criteria of GHS throughout the European Union.
5. The CLP Regulation is expected to enter into force in all EU Member States late 2008/early 2009. With suitable transitional arrangements, the CLP Regulation repeals the Dangerous Substances Directive (67/548/EEC) and the Dangerous Preparations Directive (1999/45/EC).
6. Although the CLP Regulation will be directly acting on Member States, without the need for transposition, HSE needs to make the necessary amendments to the CHIP Regulations to accommodate the changes at European level. The proposed amendments are designed to allow the relevant domestic legislation to be aligned with the transitional period of the CLP Regulation, in preparation for the its repeal in 2015, and to ensure that the provisions of the CLP Regulation can be enforced in Great Britain, both throughout the transitional period and beyond.
7. To achieve this HSE proposes a number of amendments to the existing CHIP Regulations and to reissue them in a consolidated version (CHIP 4). As well as incorporating the necessary enforcing provisions, CHIP 4 will also: allow duty holders to apply the provisions of the CLP Regulation, as an alternative to CHIP, during the transitional period where they choose to do so, prior to the mandatory compliance

deadlines for substances and mixtures of 1 December 2010 and 1 June 2015; implement the outstanding provisions of Directive 2006/121/EC; incorporate the necessary ambulatory references to enable GB law to remain aligned with relevant European law without the need for constant amendment; incorporate key terminology changes; and to make two minor editorial changes to ensure CHIP refers to correct legislation.

8. It is proposed to bring the new CHIP Regulations into force in GB on **6 April 2009**.

Administrative Arrangements

9. The enforcement regime will be GB wide and existing enforcing agencies, currently responsible for CHIP 3, will enforce the proposed new CHIP 4 Regulations.

Impact Assessment

10. An initial Impact Assessment, set out at Appendix II, indicates that the costs of implementing these amendments will be minimal.

INTRODUCTION

1. Chemicals often have harmful or hazardous properties. People and/or the environment may suffer adverse effects from exposure to these properties. As a result, many countries have developed laws that require certain controls to be in place when supplying and using chemicals that could cause harm, to ensure the protection of people and the environment. Although existing laws and regulations around the world to identify and communicate the hazardous properties of chemicals are similar in many respects, their differences are significant enough to result in different classifications, labels or safety data sheets, for the same product in different countries. This affects both the level of protection and the extensive global trade in chemicals.

BACKGROUND

2. At the Earth Summit held in Rio de Janeiro in 1992, world leaders generated an international mandate, set out in Agenda 21 of the United Nations Conference on Environment and Development, to make available “a globally harmonised hazard classification and compatible labelling system, including material safety data sheets and easily understandable symbols”.
3. A number of key principles of harmonisation were agreed at an early stage, including a commitment that:

“the level of protection offered to workers, consumers, the general public and the environment [provided by existing systems] should not be reduced as a result of harmonizing the [different] classification and labelling systems”².

4. The UN GHS sets out internationally accepted definitions and criteria to identify the hazards of chemicals (called ‘classification’) and communicate these hazards via labels and safety data sheets. If the same classification criteria and labelling are used to describe the hazards, the level of protection of human health and the environment becomes more consistent, transparent and comparable throughout the world. Professional suppliers and users of chemicals and consumers all over the world will benefit from such harmonisation.
5. The outcome is a set of agreed definitions and criteria to identify the hazardous properties of chemicals – known as ‘the GHS’³. The GHS includes:

² *Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*, First revised edition, UNITED NATIONS, New York and Geneva, 2005, p.4

³ The GHS is available at: www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html

- *the hazard class* - this refers to the nature of the physical, health or environmental hazard;
 - *the hazard category* - this refers to the severity of the hazard within each hazard class;
 - *pictograms* – hazard symbols;
 - *signal words* – these refer to the relative severity of the hazard present for example: “danger” or “warning”;
 - *hazard statements and precautionary statements* – phrases that describe the nature of the hazard and the recommended measures to minimise or prevent the adverse effects from exposure due to its use.
6. The UK and other EU Member States contributed significantly to the development of the UN agreement and there are many similarities between GHS and the existing EU system. These include:
- a single system for hazard classification and labelling of both substances and mixtures (preparations) for supply;
 - coverage of virtually all hazards which are currently covered by the EU system (and allows additional hazards if they are not covered by the GHS, for example, the EU requirement to classify ‘hazardous to the ozone layer’);
 - broadly similar classification criteria;
 - broadly equivalent system of hazard communication consisting of both labels and safety data sheets (for workers). Under the GHS, safety data sheets also have the same 16 headings as in the current EU system.
7. The UN anticipates that, once fully implemented, the GHS will:
- enhance the protection of human health and the environment by providing an internationally comprehensible system for hazard communication;
 - provide a recognised framework for those countries without an existing system;
 - reduce the need for testing and evaluation of chemicals; and
 - facilitate trade in chemicals whose hazards have been properly assessed and identified on an international basis⁴.
8. The GHS is a voluntary international agreement and therefore countries must introduce implementing legislation in order to make the GHS requirements mandatory. Countries or jurisdictions may act alone or in groups or trading blocks to take this work forward.

⁴ *Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*, second revised edition, UNITED NATIONS, New York and Geneva, 2007 ISBN -13: 978-92-1-116957-7

Classification, Labelling and Packaging of Substances and Mixtures Regulation (the CLP Regulation)

9. As the classification and labelling of chemicals in Europe is already regulated at Community level rather than national level, the European Commission, on behalf of European Member States, produced a new European Regulation on Classification, Labelling and Packaging of Substances and Mixtures, known as the CLP Regulation. The CLP Regulation will adopt the principles and criteria of the GHS in the EU and will be direct acting on all Member States.
10. During negotiations the CLP Regulation was carefully considered to ensure that it achieved the intended objectives of contributing to a globally harmonised system that can operate effectively in the EU. Its aims are to secure the trade benefits of the GHS in terms of harmonised classification and labelling, to limit the costs to UK industry by keeping the scope of the new system broadly in line with the present one, and, by ensuring workable transitional arrangements, to migrate from the existing system to the new GHS criteria.
11. However, the introduction of the CLP Regulation will mean some new:
 - scientific criteria to identify hazardous properties of chemicals
 - hazard warning pictograms (symbols) and new standardised warning and precautionary text for labels
 - terminology, e.g. 'mixtures' instead of 'preparations', 'hazardous' instead of 'dangerous', 'hazard statement' instead of 'risk phrase' and 'precautionary statement' instead of 'safety phrase'.

Transitional arrangements

12. Practical, workable arrangements for migrating from the existing EU system to the GHS criteria are essential, as industry will have to review and adjust, as necessary, the classifications and labels for chemicals placed on the EU market.
13. The CLP Regulation sensibly proposes a two stage process in which substances are re-classified first, over a 2 year period (until 1 December 2010), and then mixtures over a further 4 ½ years (until 1 June 2015).
14. The transitional period is expected to start at the end of 2008/early 2009, once the CLP Regulation enters into force.

Consultation on the CLP Regulation

15. The HSC consulted stakeholders on the new CLP Regulation. Consultative Document (CD) No 213 was published on 14 August 2007. Consultation closed on 2 November 2007. The CD set out an introduction to the systems for the classification and labelling of

chemicals (both the current EU one and the GHS), an indication of key issues for the UK, the proposed Regulation text together with its technical annexes, and an initial Regulatory Impact Assessment (RIA).

16. The majority of respondents supported the adoption of the GHS by the CLP Regulation. The full CD and final Regulatory Impact Assessment can be found at <http://www.hse.gov.uk/consult/condocs/cd213.htm>

PROPOSALS FOR THE CHEMICAL (HAZARD INFORMATION AND PACKAGING FOR SUPPLY) REGULATIONS – CHIP 4

17. In Great Britain the Chemicals (Hazard Information and Packaging for Supply) Regulations 2002, implement the existing EU classification and labelling regime, governed by the Dangerous Substances Directive, the Dangerous Preparations Directive and the Safety Data Sheets Directive (the latter now being subsumed by the REACH Regulation). CHIP also sets out the necessary enforcement provisions.

Proposed amendments to CHIP Regulations

18. The adoption and entry into force of the CLP Regulation means that we have to make some adjustment to the CHIP Regulations. Although the CLP Regulation will act directly on Member States, including the UK, certain changes are needed in a number of areas to ensure that domestic legislation keeps in line with the changes at European level.

Proposed Amendment 1 – compliance with the CLP Regulation

19. The CLP Regulation will introduce requirements for chemical classification, labelling and packaging that will differ slightly from those in CHIP. These new requirements will enter into force over a phased transitional period, ultimately replacing CHIP and its parent European legislation in June 2015. CHIP, therefore, needs to be amended to require compliance with CLP, for substances from 1 December 2010 and for mixtures from 1 June 2015.
20. However, suppliers can comply with the provisions of the CLP Regulation, as an alternative to CHIP, from the date on which the Regulation enters into force. In practice, many suppliers will wish to make the changes to the GHS system well before the formal deadlines. The specific transitional arrangements are as follows:

Substances

Entry into force (late 2008/early 2009) – 1 st December 2010	Suppliers must classify substances according to CHIP, and may continue to label them according to CHIP. However they <u>may</u> label according to CLP, in which case they must classify according to CLP <u>in addition</u> to CHIP.
1 st December 2010 – 1 st June 2015	Suppliers must classify substances according to both CHIP and CLP. They must label according to CLP.
1 st June 2015 onwards	Suppliers must classify and label according to CLP

Mixtures

Entry into force (late 2008/early 2009) – 1 st June 2015	Suppliers must classify mixtures according to CHIP, and may continue to label them according to CHIP. However they may label according to CLP, in which case they must classify according to CLP in addition to CHIP.
1 st June 2015 onwards	Suppliers must classify and label according to CLP.

21. We are proposing to amend Regulation/s xx xx xx xx xx of CHIP to allow early compliance with the CLP Regulation from the date of entry into force until the end of the transitional periods for substances and mixtures respectively, as well as amendments to require compliance with the CLP Regulation instead of CHIP 4 by the deadlines of 1 December 2010 and 1 June 2015 for substances and mixtures respectively.
22. A further proposed amendment is incorporated in CHIP to ‘switch off’ all CHIP Regulations, with the exception of the enforcement provisions, when the CLP Regulation is fully mandatory from 1st June 2015.

Proposed Amendment 2 – enforcement of the CLP Regulation

23. The current classification and labelling regime is enforced under the provisions of Regulation 14 of CHIP. Regulation 14 draws on the relevant provisions of the Health and Safety at Work etc Act 1974 and the European Communities Act 1972. These provisions empower the relevant enforcing authorities to take action against those suppliers of dangerous chemicals who fail to meet their duties under CHIP regarding the classification, packaging and provision of information to users. However, these provisions do not extend to enforcement of the duties under the CLP Regulation.
24. Article 43 of the CLP Regulation states: “Member States shall appoint the authorities responsible for the enforcement of the obligations set out in this regulation.” How enforcing authorities carry out the duty placed on them is at their discretion. The CLP Regulation

does not specify any particular level of activity for the enforcing authorities and this will depend on Member States' enforcement programmes and resources.

25. In considering enforcement of the CLP Regulation, we took as our starting point the existing enforcement regime for CHIP which aims to ensure:
- effective compliance as failure to comply with CLP can have serious consequences for the environment or health.
 - that where compliance is lacking, the enforcing authorities should have the necessary powers to ensure compliance without the need for prosecution. Therefore, the enforcing authorities should all have powers to serve notices setting out any non-compliance or anticipated non-compliance. Failure to comply with a notice will be a criminal offence.
 - that prosecutions can be brought as a measure of last resort.
 - that there are effective and dissuasive penalties for a breach of the Regulation.
 - the enforcement regime is compliant with Hampton principles of inspection and enforcement.
 - that a consistent approach is achieved (in so far as possible) throughout GB.
26. We are therefore proposing that we amend Regulation 14 of CHIP to allow the existing enforcing authorities (HSE and local authorities, including input from the Environment Agency) to also enforce the provisions of the CLP Regulation where these take over from CHIP in line with the transitional arrangements in the CLP Regulation.
27. In carrying over the existing enforcement arrangements to apply to the new provisions under CLP Regulation, we do not propose any change to the existing enforcement powers, penalties or sanctions.

Proposed Amendment 3 - implement Directive 2006/121/EC⁵

28. Directive 2006/121/EC is sometimes referred to as the 'daughter' Directive to the REACH Regulation (EC) No 1907/2006⁶. It amends the Dangerous Substances Directive (67/548/EEC) in order to adapt it to the REACH Regulation.
29. The majority of the changes made by this Directive will be implemented by the REACH Enforcing Regulations, due to enter into force in the UK by 1 December 2008. We propose to amend CHIP to implement the few minor changes that remain. These changes are not substantive – most adjust the references to test methods following transfer from an

⁵ Directive 2006/121/EC can be found at:
<http://eur-lex.europa.eu?LexUriServ/LexUriServ.do?uri=OJ:L:2006:396:0850:0856:EN:PDF>

⁶ Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation

Annex of REACH. This transfer and deletion of Annex V was effected by Annex V of the Dangerous Substances Directive in *Council Regulation (EC) No 440/2008 of 30 May 2008 laying down test methods pursuant to Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)*. Nevertheless, the changes need to be given legal effect to ensure that the legal texts are coherent and consistent and that the UK fully implements Directive 2006/121/EC.

30. We propose amending CHIP to accommodate these changes.

Proposed Amendment 4 – inclusion of an ‘ambulatory reference’

31. The recent Legislative and Regulatory Reform Act 2006, allows Government to incorporate what is termed an ‘ambulatory reference’ in domestic legislation where it implements European law. An ‘ambulatory reference’ is merely a mechanism through which references to European law should be interpreted as referring to the *latest* version of that law, taking into account all relevant amendments. In practice, this means that fewer amendments will be needed to national law (where European law substantively alters legal duties and/or obligations, it is likely that domestic legislation would be amended too).
32. Technical and/or scientific updates to European law are usually referred to as Adaptations to Technical Progress, or ATPs. ATPs do not alter the main duties on suppliers but they update detailed requirements of the legislation in line with developing scientific and technical knowledge.
33. The implementation of ATPs will be familiar to chemical suppliers in GB. Under the current regime, it has been necessary to amend the CHIP regulations every 18 months to 2 years to give legal effect to changes agreed at EU level. A first amendment to the CLP Regulation is expected in June 2009 to incorporate changes that will be introduced in the 3rd revised edition of the GHS (the ‘Purple Book’), and to reflect changes in classifications and labels agreed as the 30th and 31st ATPs of the Dangerous Substances Directive.
34. In line with the existing regime, the CLP Regulation gives powers to the European Commission to “adjust and adapt” certain Articles and the supporting technical Annexes I to VII when scientific understanding and knowledge progresses, and as the GHS is amended. These changes will be achieved through ATPs.
35. We propose to include a new legal provision in CHIP 4, Regulation xx xx xx xx, to allow for an ‘ambulatory reference’ which will allow CHIP 4 to refer to the latest version of the CLP Regulation and/or its supporting technical Annexes. This provision will avoid the need to constantly

amend CHIP and will ensure that any enforcement action undertaken by the relevant enforcing authorities will refer to the latest version.

Proposed Amendment 5 – discontinuation of the Approved Supply List

36. Currently, the Health and Safety Commission (now the Board of the HSE) publishes a national version of Annex 1 of the Dangerous Substances Directive, and subsequent ATPs, through the Approved Supply List (ASL). Annex 1 and the ASL list all the harmonised classifications and labelling requirements agreed at EU level. As the ASL sets out legally binding requirements each reissue requires an amendment to the CHIP Regulations to give its contents legal effect in GB.
37. The ASL is only available in paper form. While many chemical suppliers found this useful, the existence of on-line, searchable chemical databases (including the forthcoming ECHA databases under the CLP Regulation), prompted us to consult on a proposal to stop publishing the ASL.⁷ The responses to consultation broadly confirmed this view. Furthermore, Annex VI of the new CLP Regulation presents a consolidated list of substances with their harmonised classifications and labels in both the existing EU system and in the GHS.
38. We propose to replace the references to the ASL in CHIP, with a reference to Annex VI of the CPL Regulation and authoritative chemical databases such as those maintained by the European Chemicals Agency.

Proposed Amendment 6 – changes to terminology

39. The CLP Regulation refers to “mixtures” rather than “preparations”.
40. We propose to delete the term “preparations” and replace it with “mixtures” throughout CHIP 4 to ensure consistent terminology.

Proposed Amendment 7 - minor editorial changes

41. There have been some recent changes to the legislation on medicines to separate out human medicines, clinical trials and veterinary medicines. For example, the Veterinary Medicines Regulations 2006 (as amended in 2007) change the Medicines Act 1968 so that it no longer includes veterinary medicines.
42. We propose to amend Regulation 3(3)(a) and (b) of CHIP to reflect these changes.

⁷ The proposal to end the publication of the HSC’s Approved Supply List was set out in the Consultative Document No 217: proposals for new amending Regulations about the Classification, Packaging and Labelling of Chemicals: CHIP 3.2 The CD is available at: <http://www.hse.gov.uk/consult/condocs/cd217.htm>

43. We are also proposing an amendment to Regulation 11 and Schedule 6 to ensure that CHIP refers to the most up to date International, European and British Standards relating to child resistant closures, packaging and tactile warnings of danger. These standards have either been updated or renamed since the latest version of CHIP was introduced, and HSE has received requests to update CHIP accordingly. The advent of the CLP Regulation has provided the legal basis to do this as Annex II refers to the relevant standards 'as amended'. Previously it has not been possible to make these amendments as Article 22 and Annex IX of the Dangerous Substances Directive were worded more restrictively and did not enable Member States to refer automatically to the latest standards.
44. Manufacturers are already to a large extent complying with the new standards, therefore it is not expected that this provision will have significant cost implications. Once CLP is introduced, the new standards will become mandatory by 1st December 2010 for substances and 1st June 2015 for mixtures.

Scope of the proposed CHIP Regulations

45. As with previous CHIP Regulations, the proposed legal instrument will apply to Great Britain.

IMPACT ASSESSMENT

46. The impact on duty holders of provisions set out by the CLP Regulation was assessed in detail in consultation document No 213 (see <http://www.hse.gov.uk/consult/condocs/cd213.htm>). The Impact Assessment for the proposed CHIP 4 Regulations does not address the costs and benefits assigned to provisions introduced by the CLP Regulation.
47. As the proposed CHIP Regulations apply existing enforcement arrangements, penalties and sanctions; do not extend the obligations on duty holders; and seek to make administrative amendments to align domestic legislation with the CLP Regulation for the duration of the transitional periods, the cost implications of CHIP4 are negligible.
48. A short Impact Assessment appears at Appendix II.

INVITATION TO COMMENT

49. We would welcome your comments on these proposals. Please send your comments to Jan Harris by xx xxxxxx xxxx at the address below:

Jan Harris
International Chemicals Unit

Health and Safety Executive
9th Floor South Wing
Rose Court
2 Southwark Bridge
London. SE1 9HS

Tel: 020 7717 6251 Fax: 020 7717 6417

E-mail: jan.harris@hse.gsi.gov.uk

50. For convenience, a response form is included at Appendix I. An electronic version is available at:
<http://www.hse.gov.uk/consult/condocs/>
You may find it helpful to use this form for your reply. We are happy to receive written comments in any form convenient to you. We will acknowledge receipt of all comments sent to us and will give them careful consideration.
51. The HSE would also like to know what you think of this consultation, both in terms of content and layout. Your views will help us to improve future consultations.
52. If you reply to this consultative document in a personal capacity, rather than as a post holder of an organisation, you should be aware that information you provide may constitute “personal data” in the terms of the Data Protection Act 1998. For the purposes of this Act, HSE is the “data controller” and will process the data for health and safety and environmental purposes. HSE may disclose these data to any person or organisation for purposes for which it was collected, or where the Act allows disclosure.
53. You have the right to ask for a copy of the data and to ask for inaccurate data to be corrected. Please note that all replies will be made public unless you specifically state that you wish yours to be made confidential.
54. Many business e-mail systems automatically append a paragraph stating that the message is confidential. If you are sending your comments by e-mail please state clearly if you are not content for your response to be made public.

What happens next?

55. We will give full consideration to the substance of arguments in all responses to the consultation.

Making responses public:

56. To make our consultation process as transparent as possible we make the comments we receive available to the public at our knowledge centre in Bootle, Merseyside. Copies will be made available at a small charge to cover costs, from the following address:

Knowledge Centre
Health and Safety Executive
1G Redgrave Court
Merton Road
Bootle
Merseyside L20 7HS

If you do not want your comments made publicly available please make this explicitly clear in your response.

Feedback, queries and complaints:

57. The Health and Safety Executive would also like to know what you think about the content and presentation of this consultation. Your views may help to improve other consultations. If you are not satisfied with the way in which this consultation exercise has been conducted we want to know, and we want to put things right. Please phone, or write to:

Robin Foster
International Chemicals Unit
Health and Safety Executive
9th Floor South Wing
Rose Court
2 Southwark Bridge
London SE1 9HS

Tel: 020 7717 6990

58. We aim to reply to all complaints within 10 working days. If you are not satisfied with the outcome, you can raise the matter with the Chief Executive at the same address. You can also write to your MP to take up the case with us. Your MP may refer the matter to the Parliamentary Ombudsman who will investigate your complaint.

APPENDIX I

Consultation on the proposed Chemicals (Hazard and Packaging for Supply) Regulations 2009 – CHIP 4

1. We would like you to tell us what you think about the proposals set out in this consultative document. We have asked a few questions, set out below, but we would welcome any additional views you may have. You may photocopy the response form below or tear it out and use. Please add extra sheets if you wish.
2. An electronic version of this response form is available at:
[http:// www.hse.gov.uk/consult/condocs/](http://www.hse.gov.uk/consult/condocs/)
3. You do not have to answer all the questions. But please answer as many as you can.
4. Please tick one box from the options below and then explain your answer in the space provided.

RESPONDENTS' DETAILS

Title: **First Name:** **Surname:**

Organisation Name:

Address: **Line 1:**
 Line 2:
 Line 3:
 Town:
 County:
 Postcode:

Telephone:

E-mail:

Q1 a. Do you currently classify, label and package chemical products (in other words, are you a chemical manufacturer, importer, supplier, distributor or retailer) or do you use chemicals in a professional capacity? (please tick all that apply)

- I currently classify, label and package chemical products
 I currently use chemical products in a professional capacity
 I do neither of the above

Q 1 b. Type of organisation: (*Industry, NGO, Trade Association, etc*)

Q 1 c. Size of organisation:

- Large**
- Medium**
- Small**
- Micro**

Explanation:

Large = over 250 Full Time Equivalent (FTE) employees

Medium = 50 – 249 FTE employees

Small = 10 – 49 FTE employees

Micro = 0 – 9 FTE employees

Q 1 d. Which of the following best describes your sector type? (*please tick all that apply*)

- | | |
|---|--|
| <input type="checkbox"/> Agriculture | <input type="checkbox"/> NGO |
| <input type="checkbox"/> Biocides | <input type="checkbox"/> Pesticides |
| <input type="checkbox"/> Chemicals | <input type="checkbox"/> Plastics |
| <input type="checkbox"/> Cleaning | <input type="checkbox"/> Police |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Printing |
| <input type="checkbox"/> Engineering | <input type="checkbox"/> Quarries |
| <input type="checkbox"/> Explosives | <input type="checkbox"/> Professional user |
| <input type="checkbox"/> Fire & rescue services | <input type="checkbox"/> Railways |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Recycling |
| <input type="checkbox"/> Haulage/transport | <input type="checkbox"/> Refractories |
| <input type="checkbox"/> Laundries/dry cleaning | <input type="checkbox"/> Retail / wholesale |
| <input type="checkbox"/> Local government | <input type="checkbox"/> Rubber |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Surface engineering |
| <input type="checkbox"/> Member of the public | <input type="checkbox"/> Textiles |
| <input type="checkbox"/> Mining | <input type="checkbox"/> Trade Association |
| <input type="checkbox"/> National Government | <input type="checkbox"/> Trade Union |
| | <input type="checkbox"/> Waste management |

- Other, please specify:

Q 1 e. – Confidentiality clause

- I wish my response to remain confidential

PROPOSED CHIP REGULATIONS (CHIP 4)

Please note: All views will be placed in HSE Information Centres unless you specifically state that this response, or a part of it, should be treated as confidential. All responses will be acknowledged.

Q1. Do you agree with the proposals to amend CHIP to allow compliance with the CLP Regulation (proposed amendment 1)?

Agree Partly Agree Don't Agree Don't know

Comments:

Q2. The CLP Regulation requires Member States, including the UK, to set out domestic enforcement regulations. This consultative document sets out a proposal to provide for the enforcement of the CLP Regulation through amendments to the CHIP Regulations. Do you agree with this approach?

Agree Partly Agree Don't Agree Don't know

Comments:

Q3. If you are a manufacturer, importer, formulator or distributor of chemicals, do the proposed changes to the CHIP Regulations cause you any specific problems?

Yes No Not Applicable Don't know

If there are problems, what are they:

Q4. If you are a person who works with chemicals (as an employee or self employed person) do the proposed changes to the CHIP Regulations cause you any specific problems?

Yes No Not Applicable Don't know

If there are problems, what are they:

IMPACT ASSESSMENT

Q5. Based on your experience, do you think that the assumptions made in the Impact Assessment are reasonable? If you do not agree, please provide sufficient detail to support your reasons.

Agree Partly Agree Don't Agree Don't know

Comments:

GENERAL

Q6. In your view how well does this consultation document explain the issue and proposed changes to the CHIP Regulations? (*Please tick one box*).

Very Well
 Well
 Not Well
 Very Poorly

Comment:

Q7. Is there anything you particularly liked or disliked about this consultation?

Please return your comments to Jan Harris by xx xxxx xxxx at the address below:

Jan Harris
International Chemicals Unit
Health and Safety Executive
9th Floor South Wing
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2 Southwark Bridge
London. SE1 9HS

Tel: 020 7717 6251 Fax: 020 7717 6417

E-mail: jan.harris@hse.gsi.gov.uk

APPENDIX II

Short Impact Assessment for the proposed amendments to Chemicals (Hazard Information and Packaging for Supply) Regulations 2002

Issue

1. This document examines the cost implications of the proposed amendments to CHIP and enforcement regulations for the EU Classification, Labelling and Packaging (CLP) Regulation.

Recommendation

2. That the cost implications of the above regulation are negligible and therefore it is not necessary to conduct a full Impact Assessment.

Background

3. The European Regulation on the Classification, Labelling and Packaging of Substance and Mixtures (CLP Regulation) adopts in EU Member States the criteria set out in the UN agreement on the Globally Harmonized System on the Classification and Labelling of chemicals. The CLP Regulation is expected to be adopted in late 2008/ early 2009, though it will only become fully mandatory for substances after 1st December 2010 and mixtures after 1st June 2015.
4. The CLP Regulation will act directly in all Member States. However it is necessary to produce national enforcing regulations and to make various further amendments to national legislation to align with the changes at European level.
5. The required amendments to national legislation are:
 - Amendments to CHIP to enable compliance with the CLP Regulation in line with the transitional arrangements in the EC Regulation.
 - Enforcement provisions
 - Implementation of the outstanding provisions of Directive 121/2006
 - Discontinuation of the GB Approved Supply list
 - Amendments to downstream legislation to align with CLP.
 - Two minor editorial changes.

Options considered

6. Options to the CLP Regulation itself were fully considered in the RIA to that Regulation. This regulation is a necessary concomitant of the CLP regulation and there is no possibility of non-legislative options.
7. We have considered the option of not introducing the proposed amendments to CHIP. However, failure to amend CHIP to enable compliance with the CLP Regulation (5(a) above) would create

problems for industry. Failure to introduce enforcement provisions (5(b) above) would leave the UK open to infraction by the European Commission for failure to meet the requirements of Article XXXXX which requires Member States to introduce penalties for non-compliance. Similarly, failure to complete implementation of Directive 121/2006 would also leave the UK open to infraction and would result in incoherent and inconsistent legal requirements.

Sectors and Groups Affected

8. The Impact Assessment for the CLP Regulation identified six main affected groups: chemical manufacturers; downstream businesses; wholesalers; retailers; the public authorities; and retail consumers of chemical products.
9. The sectors affected by this regulation are the same as those which are affected by the CLP Regulation itself.


Consultation

[DN: Small firms impact test to be carried out]

Costs and Benefits - Costs

10. The new regulation will make technical amendments to existing legislation to enable national law to align with the European CLP Regulation. It introduces no significant new duties beyond those introduced by the CLP regulation itself.
11. A full RIA was conducted for the CLP Regulation, in which the costs and benefits of the Regulation were considered. Although the proposed amendments to CHIP will contribute to the realisation of the CLP Regulation's costs and benefits, e.g. through national enforcing provisions, those costs and benefits are properly attributable to the CLP Regulation and it is not appropriate to further assess them in relation to this regulation.

Implementation of Directive 121/2006

12.  Directive sets out amendments that need to be made to the Dangerous Substances Directive (67/548/EEC), the Dangerous Preparations Directive (1999/45/EC) and the Safety Data Sheets Directive (91/155/EEC) as a result of the REACH Regulation. To transpose this Directive, corresponding amendments need to be made

to the national legislation which implements it. Most of these amendments are being dealt with through Defra's REACH Enforcing Regulation. However a few elements relate to classification and labelling, and will be made to CHIP through the CLP enforcement Regulations/amendments to CHIP.

13. The relevant amendments to CHIP relate to updating of cross-references to legislation and have no substantive effects and introduce no new duties. For example, references to test methods previously specified in the Annex V DSD will have to be updated to refer to the relevant provisions of REACH. These amendments are cost neutral.

Amendments to CHIP to enable compliance with the CLP Regulation

14. Currently in the UK chemical classification, labelling and packaging legislation applies the requirements of the Dangerous Substances Directive (67/548/EEC) and the Dangerous Preparations Directive (1999/45/EC), through the Chemical Hazard Information, Packaging and Supply (CHIP) Regulations. The CLP Regulation will introduce requirements for chemical classification, labelling and packaging which are broadly similar to those of CHIP, though there are some differences of detail. These new requirements will enter into force over a transitional period, and will ultimately replace the CHIP requirements altogether.

15. The specific transitional arrangements which will have to be taken into account are as follows:

Substances

Entry into force (late 2008/early 2009) – 1 st December 2010	Suppliers must classify substances according to CHIP, and may continue to label them according to CHIP. However they may label according to CLP, in which case they must classify according to CLP in addition to CHIP.
1 st December 2010 – 1 st June 2015	Suppliers must classify substances according to both CHIP and CLP. They must label according to CLP.
1 st June 2015 onwards	Suppliers must classify and label according to CLP

Mixtures

Entry into force (late 2008/early 2009) – 1 st June 2015	Suppliers must classify mixtures according to CHIP, and may continue to label them according to CHIP. However they may label according to CLP, in which case they must classify according to CLP in addition to CHIP.
1 st June 2015 onwards	Suppliers must classify and label according to CLP.

16. Amendments to CHIP are required to ensure that it remains consistent with the above transitional arrangements. First, CHIP needs to be amended so that it also allows substances and mixtures to be classified, labelled and packaged in accordance with CLP during the transitional periods, as an alternative to the classification arrangements it specifies itself. This will be accomplished by including in CHIP a derogation allowing compliance with CLP from its date of entry into force until the end of the transitional periods. Second, a provision needs to be included in CHIP to disapply it completely once CLP is mandatory from 1st June 2015 (except for the provisions for enforcing CLP).
17. It is not expected that the required amendments to CHIP have any cost implications. Amendments to CHIP are being introduced only to ensure legal consistency when the CLP Regulation is introduced. They are not in themselves the source of the transitional arrangements or of any other duties on suppliers. All costs of reclassification and relabelling have already been taken into account in the RIA to the CLP Regulation itself, as well as costs due to the transitional arrangements⁸, so it would be double counting to attribute any such costs to the amendments to CHIP. No further costs in addition to these are envisaged.

Enforcement provisions

18. Amendments to CHIP will include provisions to enforce all relevant requirements under the CLP Regulation. It is expected that existing enforcement provisions will be carried over from CHIP, together with provisions to enforce any new offences under CLP. As the scope of the existing EU system and the CLP Regulation are very similar, no significant additional costs are expected for duty holders.
19. Some modest training and other costs will be associated with introducing enforcement arrangements for CLP. However these were considered fully in the RIA to the CLP Regulation, so it would be inappropriate to cost them again in relation to this regulation.⁹

Discontinuation of the GB Approved supply list

20. HSE currently publishes Annex 1 of the Dangerous Substances directive and subsequent ATPs through the Approved Supply List or ASL. Annex 1 and the ASL contain all the harmonised classifications and labelling requirements agreed by Member States. The ASL is currently only available in paper form and requires the legal reference

⁸ See UK final Regulatory Impact Assessment (after consultation) on the proposed European Regulation on the Classification, Labelling and Packaging of Substances and Mixtures (based on the UN Globally Harmonised System – GHS), sections 5.11-5.16.

⁹ See UK final Regulatory Impact Assessment (after consultation) on the proposed European Regulation on the Classification, Labelling and Packaging of Substances and Mixtures (based on the UN Globally Harmonised System – GHS), section 5.15.

to it in CHIP to be amended with each re-issue. Once the CLP regulation comes into force, the provision in CHIP referring to the ASL will be 'switched off', and reference will be made instead to Annex VI of the CLP Regulation which will contain the harmonized list. The European Chemicals Agency will make this Annex available in the form of a searchable online database available free of charge over the internet.

21. There may be some small cost implications for businesses as a result of moving from a paper-based system to an internet-based system. Currently the ASL is only available in paper format and costs £34.95. To remain up-to-date a new version needs to be purchased each time Annex 1 to the DSD is updated (once every 1-2 years on average). If the ASL is replaced by an internet-based database, this charge will no longer have to be incurred. However companies without internet access will now have to seek this information from elsewhere.
22. Sales of the previous two editions of the ASL were 3690 and 2078 copies respectively. It would be reasonable to assume that the average of these two figures (2884) represents roughly the number of individual customers who would need to purchase a given edition of the ASL. If we assume that these customers will now save the cost of the ASL by moving to internet access, this would result in a saving of £100,796 to business as a whole.
23. Previous consultation with relevant stakeholders¹⁰ has indicated that not all suppliers of chemicals can be assumed to have internet access. If a supplier does not have such access, removal of the ASL would require that they spend some additional time finding the classifications of the substances they supply. It is assumed that larger companies which supply a significant number of different chemicals are likely to have internet access. If only a small number of substances are supplied, information about harmonized classifications could be obtained in a number of ways, for example by seeking public internet access facilities or by phoning HSE or the Competent Authority.
24. It seems reasonable to assume that the costs of such additional time will be relatively small in relation to the total cost savings to business detailed above. To give an indicative figure, if 25% of current customers for the ASL are required to spend an additional 2 hours seeking substance classifications compared with using the ASL this would give a cost of £74,696, assuming the average cost for an employee's time is £20.72.¹¹

¹⁰ Responses received to **CD217 - A consultative document on proposals for new amending Regulations about the Classification, Packaging and Labelling of Chemicals: CHIP 3.2**, <http://www.hse.gov.uk/consult/condocs/cd217.htm>

¹¹ This is based on the mean average wage for all employees in SIC 24 of £15.94 from the Annual Survey of Hours and Earnings (ASHE) 2006 (Office of National Statistics). Costs are multiplied by 1.3 to include non-wage employment costs.

25. In summary, the cost implications of discontinuing the ASL are expected to be minor, and probably to lead to a net benefit from removing the need to purchase the ASL. *[DN: include question in CD asking consultees to confirm this].*

Updating references to standards for child resistant fastenings

26. Regulation 11 and Schedule 6 of CHIP refer to British, European and international Standards relating to child resistant closures, packaging and tactile warnings of danger. These standards have either been updated or renamed since the latest version of CHIP was introduced, and stakeholders have requested that HSE update CHIP accordingly. Previously it has not been possible to make these amendments since the origin of these measures (Article 22 and Annex IX of the Dangerous Substances Directive) does not make available to Member States the facility to update to the latest standards.
27. Manufacturers are already to a large extent complying with the new standards, therefore it is not expected that this provision will have significant cost implications. Once CLP is introduced, the new standards will become mandatory by 1st December 2010 for substances and 1st June 2015 for mixtures.
28. However, since the CLP Regulation includes reference to the new standards, it is proposed at this stage to update the references in CHIP to refer to the new standards.

Further general cost considerations

29. **Familiarization costs.** It is not expected that there will be any significant familiarization costs for industry associated with this regulation. The legislation concerns legal amendments to ensure that the CLP Regulation can be enforced and implemented. It does not impose any new duties or significantly alter existing duties and the enforcing authorities remain the same. Therefore it should not be necessary for dutyholders to familiarize themselves with the detail of the regulation. It may be necessary for some suppliers to familiarise themselves with specific details within the regulation, such as the updated standards for child resistant closures, but this is not likely to impose significant costs. To be able to fully comply with the CLP regulation, including its transitional provisions, it is primarily necessary that dutyholders familiarize themselves with the CLP Regulation itself, but this has been fully costed in the RIA to that Regulation.

Benefits

30. The chief benefit of this regulation is that it will provide legal certainty that the CLP Regulation can be enforced and implemented, and its benefits realised. The benefits of the CLP Regulation itself have been fully considered in the RIA to that Regulation, therefore it is not

appropriate to provide additional cost estimates for these benefits in relation to this regulation. Because the legal provisions of this regulation are essential for the proper functioning of the CLP Regulation this regulation may be regarded as contributing to the benefits of the CLP Regulation but this is impossible to quantify in a meaningful way.

31. In addition to the above there may be a small cost benefits to businesses as a result of the information on harmonized classification becoming available over the internet rather than through purchasing the Approved Supply List, and as a result of clarifying and making fully consistent the requirements on child resistant closures. However, such benefits are likely to be of minor significance.

Competition assessment

32. The proposed regulation is not expected to have a significant impact on competition. The reasons for this are summarised briefly in relation to each element of the regulation below.

Implementation of Directive 121/2006

33. The amendments are routine and editorial and are expected to have no effect on competition.

Amendments to CHIP to enable compliance with the CLP Regulation

34. The amendments are being made to render CHIP consistent with the transitional arrangements in the CLP Regulation. The RIA for the CLP Regulation itself identified that transition to GHS would lead to greater costs for some businesses than some others, and could in the worst case cause some suppliers to exit their respective market as a result of these transitional costs, although no specific evidence was obtained that this would take place.
35. However, any effects of the transitional arrangements on competition would be attributable to the CLP Regulation and not the amendments to CHIP. Furthermore, no additional effects have been identified on competition beyond those of the transitional arrangements. Therefore, the amendments to CHIP are not expected to have any impact on competition.

Enforcement provisions

36. Effects of the enforcement provisions have been fully considered in the RIA for the CLP Regulation, so are not further considered in relation to this regulation. In any case, no impacts on competition have been identified.

Discontinuation of the GB Approved supply list

37. The removal of the ASL may impose very slightly greater costs on suppliers who do not have internet access in relation to those that do, in relation to looking up harmonised substance classifications. However, these costs are not expected to be significant, for reasons explained above (sections...) [DN: confirm when complete]. As a result, no significant impact on competition is expected as a result of these changes.

Updating references to standards for child resistant fastenings

38. There may be a small, short term impact on competition if some manufacturers incur extra one-off costs as a result of having to conform to updated standards on child-resistant fastenings (though most manufacturers are already applying the up-to-date standards). However, updating the standard will ultimately assist competition, by ensuring legal clarity about the standards to be applied, and ensuring that all manufacturers conform to a single standard. Therefore, the net impact of these amendments on competition is expected to be positive rather than negative.

39. In general is also worth noting that one of the aims of the GHS system is to remove trade barriers which arise from having several systems worldwide for classifying and labelling chemicals. By introducing the GHS system in the EU the CLP Regulation may therefore assist global competition, though the extent of this is uncertain and depends on the extent to which other countries and jurisdictions also introduce GHS. To the extent that CLP does enhance competition in this way, this can in part be attributable to the amendments to CHIP, however as with other benefits this is impossible to quantify meaningfully.

APPENDIX IV

LIST OF ORGANISATIONS & INDIVIDUALS CONSULTED

Government Departments

Cabinet Office – European Secretariat
Cabinet Office – Office of Public Service
Cabinet Office – Better Regulation Executive
Central Office of Information
Crown Estate Commissioners
Department of Agriculture and Rural Development – Northern Ireland
Department for Communities and Local Government
Department for Constitutional Affairs
Department for Education and Skills
Department for Environment, Food and Rural Affairs
 Chemicals and GM Policy Division
 Global Atmosphere Division
 Pesticides Safety Directorate
 Waste Management Division
 Water Quality Division
Department of Health
Department of Trade and Industry
Department of Trade and Industry – Small Business Service
Department for Transport
Department for Work and Pensions – Workplace Health Division
Foreign and Commonwealth Office
Health and Safety Agency for Northern Ireland
HM Prison Service
HM Revenue and Customs
HM Treasury
Home Office
Law Officers' Departments
Ministry of Defence
National Assembly for Wales
Northern Ireland Department of Enterprise, Trade and Investment
Northern Ireland Office
Scottish Executive Environment and Rural Affairs Department
Scottish Executive Health Department

Public Bodies

British Broadcasting Corporation
Civil Aviation Authority
Countryside Agency
Environment Agency
Forestry Commission
Historic Royal Palaces Agency

House of Commons Library
House of Lords Library
Joint Nature Conservation Committee
Laboratory of the Government Chemist
Law Commission
Maritime and Coastguard Agency
National Consumer Council
Office for National Statistics
Scottish Environment Protection Agency
Scottish Law Commission

European Union, Crown Dependencies and Overseas Territories

Government of Gibraltar – Ministry of Employment
Health and Safety Authority – Republic of Ireland
Health and Safety Executive, Guernsey
Department of Local Government and the Environment, Isle of Man
Department of Employment and Social Security, Jersey
UK Permanent Representation to the European Union

Local Government Organisations

Association of London Government
Convention of Scottish Local Authorities
LACORS
Local Government Association
National Association of Local Councils
Northern Ireland Local Government Association

Employers' Organisations and Small Firms' Representatives

Alliance of Independent Retailers
British Association of Entrepreneurs
British Chambers of Commerce
Building Employers Federation
Confederation of British Industry
CBI – Smaller Firms Council
Electrical Contractors Association
Engineering Employers' Federation
European Association of Craft, Small and Medium-Sized Enterprises
(UEAPME)
Federation of Small Businesses
Institute of Directors
Universities and Colleges Employers' Association

Trade Unions and Employee Organisations

Amicus
Association of Teachers and Lecturers
Bakers, Food and Allied Workers Union

BALPA
BECTU
British Medical Association
Communications Workers Union
Fire Brigades Union
Fire Officers Association
General Federation of Trade Unions
GMB
NATFHE
National Association of Colliery Overmen, Deputies and Shotfirers
National Union of Domestic Appliances and General Operatives
NUMAST
Police Federation of England and Wales
Prospect
Royal College of Nursing
Scottish Police Federation
Scottish Trades Union Congress
Society of Radiographers
Trades Union Congress
Transport and General Workers Union
UCATT
UNISON
USDAW

Trade Associations and Learned Bodies

Adhesive Tape Manufacturers Association
Agricultural Engineers Association
Agricultural Industries Confederation
Association of British Mining Equipment Companies
Association of the British Pharmaceutical Industry
Association of Light Alloy Refiners Ltd
Brick Development Association
British Adhesives and Sealants Association
British Aerosol Manufacturers Association
British Agrochemicals Association
British Apparel and Textile Confederation
British Association for Chemical Specialties
British Battery Manufacturers Association
British Ceramic Confederation
British Chemical Distributors and Traders Association
British Coatings Federation
British Colour Makers Association
British Contract Furnishing Association
British Electrotechnical and Allied Manufacturers Association
British Fluid Power Association
British Footwear Association
British Furniture Manufacturers Association
British Glass
British Institute of Professional Photography

British Jewellers' Association
British Leather Confederation
British Non-Ferrous Metals Federation
British Pest Control Association
British Plastics Federation
British Printing Industries Federation
British Pump Manufacturers Association
British Pyrotechnists Association
British Rigid Urethane Foam Manufacturers Association
British Rubber Manufacturers Association
British Secondary Metals Association
British Surface Treatment Suppliers Association
British Textile Technology Group
British Veterinary Association
British Wood Preserving and Damp Proofing Association
Building Employers Confederation
Castings Development Centre
Cast Metals Federation
Chemical Industries Association
Civil Engineering Contractors Association
Composites Processing Association
Confederation of British Wool Textiles
Construction Industry Research and Information Association
Construction Products Association
Cosmetics, Toiletries and Perfumeries Association
Crop Protection Association
Dairy Industry Federation
Defence Manufacturers Association
Digital and Screen Printing Association
Energy Institute
Engineering Industries Association
European Process Safety Centre
Explosive Industry Group - CBI
Farmers Union of Wales
Fertiliser Manufacturers Association
Food and Drink Federation
Freight Transport Association
Friends of Pyrethrum
Glass and Glazing Federation
Grain and Feed Trade Association
Horticultural Trades Association
Institute of Metal Finishing
Institution of Chemical Engineers
Institution of Electrical Engineers
Intellect
Law Society of England and Wales
Law Society of Scotland
National Farmers Union
National Farmers Union of Scotland
National Federation of Demolition Contractors

National Specialist Contractors Council
Offshore Contractors Association
Paint Research Association
Painting and Decorating Association
Paper Federation of Great Britain
Plastics and Board Industries Federation
Quarry Products Association
Resin Flooring Association
Road Haulage Association
Royal Agricultural Society of England
Royal Highland and Agricultural Society of Scotland
Royal Pharmaceutical Society of Great Britain
The Royal Society
Royal Society of Chemistry
Scotch Whisky Association
Scottish Food and Drink Federation
Scottish Pharmaceutical Federation
Shipbuilders and Ship repairers Association
Society of British Aerospace Companies
Society of British Gas Industries
Society of Chemical Industry
Society of Dyers and Colourists
Solvents Industry Association
Surface Engineering Association
Tank Storage Association
Textile Services Association
Tile Association
Timber Trade Association
UK Cleaning Products Industry Association
United Kingdom Lubricants Association
Water UK
Welding Manufacturers Association

Police and Emergency Services Bodies

Association of Chief Police Officers of England, Wales and Northern
Ireland
Association of Chief Police Officers in Scotland
Chief Fire Officers' Association

Health and Safety Specialists

Association of Port Health Authorities
Biotechnology and Biological Sciences Research Council
British Institute of Occupational Hygiene
British Occupational Hygiene Society
British Safety Council
Chartered Institute of Environmental Health Officers
Institute of Occupational Medicine
Institution of Occupational Safety and Health

Natural Environment Research Council
Newcastle Occupational Health
Royal Environmental Health Institute of Scotland
Royal Society for the Prevention of Accidents
Society/Faculty of Occupational Medicine

Academic Institutions

Institute of Cancer Research
University of Birmingham – Institute of Occupational and Environmental
Medicine
University of Manchester – Centre for Occupational and Environmental
Health

Other Organisations

Cancer Research UK
The Consumers Association
The Environment Council

Individual Companies

Adshead Ratcliffe and Company Ltd
Agropharm Ltd
Airbus UK Ltd
Akcros Chemicals
Alcohols Ltd
Allied Glass Containers
Arkema Ltd
Atofina UK Ltd
Avon Rubber plc
B&Q
BAE Systems
BASF plc Industrial Chemicals
Bayer UK Ltd
Becker Acroma Ltd
Britannia Refined Metals Ltd
Caswell Adhesives
Chemtek Ltd
Ciba Specialty Chemicals
Clariant UK Ltd
Contract Chemicals
Dexter Paints Ltd
Domino UK Ltd
Dunlop Aircraft Tyres Ltd
Elementis Chromium
Ellis and Everard (Chemicals) plc
Energys
Fenner Dunlop
Four D Rubber Co Ltd

Hickson and Welch Ltd
Home Retail Group Plc
Honeywill and Stein Ltd
Hornett Bros and Co Ltd
Huntsman Corporation UK plc
Huntsman European Chemicals
Ineos Chlor Ltd
International Paint Ltd
Kingspan Ltd
Kingspan Insulation Ltd
Luminescence
Mallinckrodt Chemical Ltd
Morris Lubricants
L'Oreal Manufacturing (UK) Ltd
PDM Neptec Ltd
Perstorp Ltd
Petrochem Carless
Pirelli UK Tyres Ltd
Polyflor Ltd
Rhodia UK Ltd
Safic-Alcan UK Ltd
SGS Vernolab Ltd
Sigma Aldrich Co Ltd
Solutia UK Ltd
Spray Nine Europe Ltd
Sun Chemical Ltd
Tennants Distribution Ltd
Wickes Building Supplies Ltd
Wincanton
Witham Oil and Paint (Lowestoft) Ltd
Whyte Chemicals Group