

## Classification Labelling and Packaging (CLP)- What businesses need to do in the event of a no-deal Brexit

The table below outlines the steps companies would need to take to comply with UK CLP regulations in the event the UK leaves the EU on 29 March 2019 with no agreement in place.

This information reflects the position at the time of publication and you are advised to check the HSE website regularly for any updates.

Your company is...	You want to...	You need to...	By when...
1. UK based <b>manufacturer</b> - manufacturing substance/mixture <u>after</u> exit day	access the UK market	classify (identify hazardous properties), label and package the substances and/or mixtures you want to place on the UK market according to CLP (UK). Labels must be in English but other languages are also permitted	from exit day
		check for mandatory classification and labelling (MCL) in the UK mandatory classification and labelling list and apply them as needed	from exit day
		notify to HSE the classification and labelling of any of your substances that meet the notification criteria (IT arrangements including the establishment of a UK notification database being developed)	from exit day, unless the substance has already been notified to ECHA for inclusion in the Classification and Labelling Inventory before exit day and the classification has not changed
	propose new or revised mandatory classification and labelling	submit a dossier to HSE in accordance with the new arrangements	when new scientific information justifies the proposed change. Must initiate MCL proposal where you identify new

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	access the EU/EEA market	identify an importer in EU27/EEA Member State who will place your substance/mixtures on the market	information leading to a revision of an entry in the MCL list from exit day
<b>2.</b>	UK based <b>importer</b> . Importing substance/mixture not already on EU/EEA market <u>after</u> exit day. <b>NOTE:</b> UK based distributors who are currently supplied by EU27 will become UK importers <u>after</u> exit day and must fulfil the duties and obligations placed on importers by CLP (UK). See 4 below	access the UK market	<p>classify (identify hazardous properties), label and package the substances and/or mixtures you want to place on the UK market according to CLP (UK). Labels must be in English but other languages are also permitted</p> <p>check for mandatory classification and labelling (MCL) in the UK mandatory classification and labelling list and apply them as needed</p> <p>notify to HSE the classification and labelling of any of your substances that meet the notification criteria</p> <p>from exit day, unless the substance has already been notified the substance to ECHA for inclusion in the Classification and Labelling Inventory before exit day and the classification has not changed</p>

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		submit information about hazardous mixtures you place on the market to the UK's national poison centres – National Poisons Information Service (NPIS)	from exit day, unless already submitted and no change has been made to the formulation
	propose new or revised mandatory classification and labelling	submit a dossier to HSE in accordance with the new arrangements	when new scientific information justifies the proposed change. Must initiate MCL proposal where you identify new information leading to a revision of an entry in the MCL list
	access the EU/EEA market	identify an importer in EU27/EEA Member State who will place your substance/mixtures on the market	from exit day
<b>3.</b>	UK based <b>downstream user:</b> Supplying mixture already on EU/EEA market <u>after</u> exit day	access the UK market	classify (identify hazardous properties), label and package the substances and/or mixtures you want to place on the UK market according to CLP (UK). Labels must be in English but other languages are also permitted.
			from exit day

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		check for mandatory classification and labelling (MCL) in the UK mandatory classification and labelling list and apply them as needed.	from exit day
	propose new or revised mandatory classification and labelling	submit a dossier to HSE in accordance with the new arrangements.	when new scientific information justifies the proposed change. Must initiate MCL proposal where you identify new information leading to a revision of an entry in the MCL list
		submit information about hazardous mixtures you place on the market to the UK's national poison centres – National Poisons Information Service (NPIS).	from exit day, unless already submitted and no change has been made to the formulation
	access the EU/EEA market	identify an importer in EU27/EEA Member State who will place your substance/mixtures on the market.	from exit day
<b>4.</b>	UK based <b>distributors:</b> Supplied by EU27 substances and mixtures <u>after</u> exit day – see 2 above	access the UK market	<b>recognise that you are now an importer for the purposes of CLP(UK)</b> and must now classify (identify hazardous properties), label and package the substances and/or mixtures you want to place on the UK market according to

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	CLP (UK). Labels must be in English but other languages are also permitted.	
	check for mandatory classification and labelling (MCL) in the UK mandatory classification and labelling list and apply them as needed.	from exit day
	notify to HSE the classification and labelling of any of your substances that meet the notification criteria.	from exit day, unless the substance has already been notified to ECHA for inclusion in the Classification and Labelling Inventory before exit day and the classification has not changed
	submit information about hazardous mixtures you place on the market to the UK's national poison centres – National Poisons Information Service (NPIS).	from exit day, unless already submitted and no change has been made to the formulation
propose new or revised mandatory classification and labelling	submit a dossier to HSE in accordance with the new arrangements.	when new scientific information justifies the proposed change. Must initiate MCL proposal where you identify new information leading to a

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		access the EU/EEA market	identify an importer in EU27/EEA Member State who will place your substance/mixtures on the market.	revision of an entry in the MCL list from exit day
<b>5.</b>	UK based distributors: supplied from within the UK and distributing substance/mixtures <u>after</u> exit day.	access to the UK market	classify (identify hazardous properties), label and package the substances and/or mixtures you want to place on the UK market according to CLP (UK). Labels must be in English but other languages are also permitted. You can rely on the classification provided to them by those further up the supply chain (e.g. the manufacturer).	from exit day
		access to the EU/EEA market	identify an importer in EU27/EEA Member State who will place your substance/mixtures on the market.	from exit day

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