



EurEau reaction on the IIA roadmap “Revision of the EU legislation on hazard classification, labelling and packaging of chemicals”, CLP

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EurEau is the European association of water service providers with 34 national member organisations in 29 countries.

- ~ The zero-pollution ambition from the European Green Deal delivered the Chemicals Strategy for Sustainability. One of its objectives is to better protect the environment against hazardous chemicals.
- ~ Drinking water suppliers have been raising concerns about persistent, mobile and toxic (PMT) and very persistent, very mobile (vPvM) substances as they can still be detected decades after their withdrawal from the market.
- ~ EurEau supports the **review of the CLP to amend the absence of classification and labelling for hazardous products** currently outside the scope of the existing CLP regulation, in order to prevent the continued release of PMT /vPvM substances and other hazardous substances into the environment.
- ~ Protection of drinking water resources – groundwater and surface water bodies – must be the top priority to avoid expensive and energy-intensive extra treatment by drinking water suppliers, in line with the Water Framework Directive (WFD) Art. 7 (3).

## **Hazard classification and labelling must be based on the extension of the generic risk approach**

In line with article 191.2 of the TFEU, any sustainable chemicals strategy must start from rigorous control-at-source measures and fully apply the Precautionary Principle.

For this reason, EurEau supports the extension of the generic risk approach (GRA) to all chemical substances so that they are regulated according to the intrinsic hazards they pose.

The hazard based approach should permeate the classification and labelling of CLP. This hazard approach is aligned with the measures, included in the Objectives and Policy options in the CLP IIA, i.e. “introduction of **new hazard classes** (such as endocrine



disruptors, EDS)” and “the **obligation to provide information of hazards** on the label for products currently outside the scope of CLP”. New hazard classes should cover EDS, PMT and vPvM substances.

### **Combination effects must be determined**

EurEau supports efforts to determine and regulate the combination effects of priority chemicals and to include this in the authorisation process of chemicals. We also support the need highlighted in the IIA for clarifying “**the obligations to classify mixtures and complex substances**”, **considering the combination effects**. Close coordination with the work under the WFD, the Environment Quality Standards Directive and the Groundwater Directive is necessary.

