

CLP Regulation revision - Targeted Stakeholder Survey

2. PART I. About you

1. Please provide the following details

Your Name : Anna Patera
Organisation name: : PSVAK
e-mail address: : manager@psvak.gr

Country of operation:

Greece

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.

C32 - Other manufacturing

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.

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

Comments: Cosmetics manufacturers and distributors

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

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:

The introduction of new hazard classes will not provide higher level of protection while it could result to problems for the international trade. Safety of products and free movement of chemicals are addressed by the risk assessments carried out under sector-specific legislation.

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:

not applicable

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.

Final products manufactured are affected by new hazard classes. This could lead to withdrawal of products that are manufactured with chemicals classified as hazardous even if these chemicals are safe for the specific use. This would affect consumers and the whole chain of the economy.

12a. How would the measures considered in question 8 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			

12b. How would the measures considered in question 8 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				

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

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:

Safety of products are addressed by the risk assessments carried out under sector-specific legislation. Hazard assessments are a starting point for risk assessors to evaluate all available evidence. REACH is the relevant regulatory tool.

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?

do not know

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.

not applicable

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.

not applicable

5. PART IV. Harmonised classification and labelling

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:

not applicable

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: not applicable

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

not applicable

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.

not applicable

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.

not applicable

6. PART V. Self-classification

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:

not applicable

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.

not applicable

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.

not applicable

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.

not applicable

7. PART VI. Labelling

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:

not applicable

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:

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

not applicable

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.

not applicable

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.

not applicable

8. PART VII. CLP scope exemptions

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:

The Cosmetic Products Risk Assessment takes under consideration all hazards (Cosmetic Products Regulation provides for human safety while REACH provides for environmental safety). The current exemption of the cosmetic products from CLP hazard labelling is in line with the GHS system and it is in favor of the global trade.

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.

No further measure are necessary as Cosmetic Products Regulation and REACH cover all hazards and ensure the safe use of the finished cosmetic products.

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.

not applicable

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.

not applicable

9. PART VIII. Online sales of chemicals

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:

Products that are sold online sales should have the same labeling requirements as the other products so that consumers are fully informed before the purchase.

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.

do not know

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.

not applicable

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.

not applicable

10. PART IX. Poison centres

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:

not applicable

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.

Cosmetic Products Regulation is already addressing this issue.

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.

not applicable

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.

not applicable

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.

uploaded file

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

[CLP_Contribution_PSVAK_0c22acec-6af8-462c-81da-89793f3583fb.pdf](#)