



THIS WEEK IN HELPDESK

#2 Micro-organisms

Date: 03/07/2020

This is what companies have been asking the Poison Centre Team this week about micro-organisms.



Are micro-organisms exempt from CLP?

In general, living micro-organisms are exempt from CLP. According to the biocides guidance on micro-organisms, CLP provisions are not applicable to micro-organisms.

What if a biocidal product is classified as H317?

Quite often biocidal products containing micro-organisms are classified as H317 or trigger the warning phrase "*Micro-organisms may have the potential to provoke sensitising reactions*".

If the mixture is classified as H317 based on test data, bridging principles or due to sensitising ingredient substances of the mixture, and thus is a classified mixture under the scope of CLP Annex VIII, then a poison centre notification is required.

If the classification is derived on the basis that the mixture contains a living micro-organism, and is based on Directive 2000/54/EC (on the protection of workers from risks related to exposure to biological agents at work), then a notification is not required.

How do I identify a micro-organism in a notification?

In general, Annex VIII requires the identification of components as a name and product identifier. With regard to micro-organisms, any known information that enables their identification, either on the strain or on the species, must be notified.