

## Adjustment of the criteria for environmental hazards with long-term adverse effects - chronic category 3

SundaHus is going to adjust the criteria for the property environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3. The reasons for this change are as following: i) this property is considered less dangerous than other categories of environmental hazards according to the current chemical legislation, ii) it makes it easier for clients to make informed choices.

After this adjustment, substances classified as environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3, will no longer lead to C- but instead prevent an A-assessment.

This change will affect products containing larger amounts of plastic, e.g. electrical installation products, other electronic products with plastic casings, lighting fixtures, textile and plastic floors and certain ventilation products. In practice, with the new criteria (6.1.7), some of these products will receive better ratings than under the current criteria (6.1.6).

### Background

The basic principle in the SundaHus assessment criteria has been that products with too high levels of environmentally hazardous substances lead to C-. Criterion numbers C16 and C17 in SundaHus criteria 6.1.6 refer to products with too high levels of substances classified as environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3 (see figure 1 below).

On the 22nd January, criteria 6.1.6 was implemented, which included an adjustment of the formula used to calculate which products have an excessive content of substances classified as environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3. The adjustment was made to increase our compliance with the CLP Regulation. This change resulted in many more products receiving the rating C-.

C16	Environmentally hazardous, long-term aquatic hazard - Aquatic Chronic Category 3 – chemical products	The product is classified with the hazard statement H412.		–	Classification according to the rules in the regulation (EC) No 1272/2008 for mixtures with chronic (long-term) hazards.
C17	Environmentally hazardous, long-term aquatic hazard - Aquatic Chronic Category 3 – other products	The product contains a sum of substances classified with the hazard statements H410, H411 and/or H412 according to the formula $([H410] \times M\text{-factor} \times 100) + ([H411] \times M\text{-factor} \times 10) + ([H412]) \geq 25.$		Yes	Adapted to the rules for the classification of mixtures with chronic (long-term) hazards, table 4.1.2 of the (EC) No 1272/2008 regulation.

Figure 1: SundaHus assessment criteria 6.1.6 regarding environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3.

The result of this change in the criteria has meant that a very large number of plastic products have received a "C -" rating, mainly due to the stabilizers they contain, that increase their lifespan (mostly



UV stabilizers). This makes it more difficult for our clients to make conscious choices when positive environmental aspects in the criteria, such as that the plastic is produced in a safer way (i.e. that there is a residual monomer certificate attached to it) can in practice no longer lead to better assessments than C-.

The new criteria will involve less stringent assessments due to environmentally hazardous substances with harmful long-term effects in the aquatic environment - chronic category 3. For other categories of environmental hazards, the criteria will not change. The reason is that category 3 belongs to the lowest level of environmental hazard and is not a [PRIO](#) property. Furthermore, the rules for labeling products as environmentally hazardous in the CLP Regulation do not require a hazard symbol on product packaging for the hazard category environmentally hazardous with long-term adverse effects in the aquatic environment - chronic category 3. Instead this requirement applies to categories 1 and 2, which are considered more serious (see Annex V, Part 3 of the CLP Regulation).

### New criteria (6.1.7) for environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3

Given that the property environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3 is considered less dangerous in our current chemical legislation, and that our current criteria for the property (criterion 16 and 17) lead to poorer opportunities for our clients to make informed choices, the criteria will be adjusted so that it does not lead to C-, but instead prevent an A- assessment. In practice, this means that the criteria in Figure 1 above, instead of leading to C-, will be placed among the other criteria that prevent an A rating.

### Other information

Any comments or questions regarding the adjustment in the criteria should be sent to [jane@sundhahus.se](mailto:jane@sundhahus.se) no later than **7th April, 2021**.

We expect to implement the new criteria 6.1.7 in April. The [current criteria \(6.1.6\)](#) can be downloaded from our website.

In SundaHus Material Data, you can click on the assessment letter to see the justification for the assessment. The products affected by the current criteria for environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3 usually have the following type of justification: "The product contains substances (substance x, substance y, substance z), with a weighted sum of X, which corresponds to our adaptation to the CLP classification environmentally hazardous with harmful long-term effects in the aquatic environment - chronic category 3 (for B, the weighted sum must be less than 25)".