

2nd ATP of the Dangerous Preparations Directive (1999/45/EC) and what this means for you



In 2007, the 2nd Amendment due to Technical Progress of the EU Dangerous Preparations Directive 1999/45/EC (2nd ATP to the DPD) of the European Commission came into force.

This legislation has caused the range of chemical products carrying an "N" hazard classification, the "dead fish, dead tree" symbol (see illustration), and environmental hazard warnings on labels to be extended.



These label changes are the result of the way hazards are now viewed under the new European legislation. They do not indicate any change to product formulations.

The classification applies to products in their pure undiluted state, which may be considered harmful, or in some cases even toxic to the environment under this legislation. However, when applied in use rates as intended and disposed of as recommended, these products should pose no threat to the environment.

How the Legislation works

The regulations behind the environmental classification relate to the intrinsic properties of the chemical substances in the product. They are based on a number of criteria, of which toxicity to aquatic organisms is the most important..

The toxicity classification is always determined by concentration. In high concentrations, any material can be toxic or harmful, but in diluted form many toxic substances can be considered harmless. When diluted for use the solutions are no longer classified and can be disposed of safely as normal.

Furthermore when the concentrate is disposed of correctly as indicated in the Safety Data Sheet, the concentration in surface waters is so low that it is hardly measurable. In this low concentration there are no effects on the environment. The products will biodegrade over time and lose their toxicity altogether.



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Environmental impact unchanged

JohnsonDiversey could potentially avoid the requirement for this labeling by providing diluted, ready-to-use products. However, when considering the total effects of a product on the environment, the properties of the chemical itself are only part of the equation.

The factors of "waste" and "energy" are just as important. Diluted products need relatively more packaging material (waste) and cost more in transport (energy) than concentrates. Our view is that the environmental benefits of reduced waste and energy use offered by highly concentrated products outweigh the disadvantage of the environment classification of the chemicals in concentrated form.

JohnsonDiversey will continue to produce concentrated chemicals and install regulated dosing systems for one simple reason: we take a broad view of environmental responsibility. Removing water from ready-to-use products and making them ready-to-dispense is a sound environmental decision. Less water equals less energy used because plastic packaging is reduced and much less liquid is transported. Reduced energy use equals reduced greenhouse gas emissions.

JohnsonDiversey has a long history of commitment to sustainability, that is, to health, safety and the environment. We take that commitment seriously and comply, and often exceed, regulatory requirements in countries around the globe. Customers can have the peace of mind that JohnsonDiversey will continue to improve upon our commitment to sustainability.

