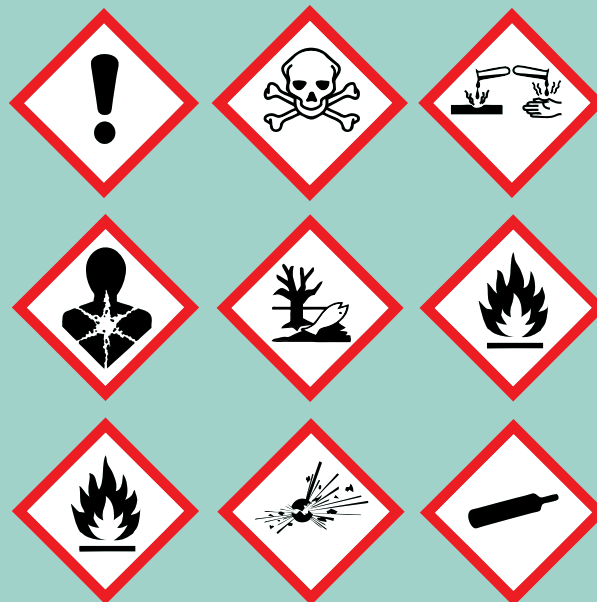


Hazard Labelling & Packaging according to the CLP Regulation

May, 2014

Information Sheet

The Classification, Labelling and Packaging (CLP) Regulation covers hazardous chemicals sold to professional users and consumers. This information sheet outlines the key requirements for the labelling and packaging of hazardous chemicals under the CLP Regulation.



All hazardous chemicals (substances and mixtures) placed on the market must be classified, labelled and packaged according to the **CLP Regulation (EC) No. 1272/2008 by 1st June 2015**.

The responsibility for labelling and packaging of hazardous substances and mixtures lies with:

- manufacturers of substances,
- importers of substances or mixtures,
- formulators of mixtures, and
- distributors or Downstream Users, who do not reformulate or change the substances or mixtures but relabel/repackage them.

Exemptions from CLP

Waste and cosmetics, medicines, medical devices, veterinary products, foodstuffs or animal feed **which are in their finished state, intended for the final user** are not covered by the CLP Regulation

Classification of Hazardous Substance/Mixtures:

The physical properties along with health and environmental effects of chemicals must be identified and evaluated to determine if they need to be classified. Some hazardous chemical substances have

legally harmonised (agreed) classifications which are listed in Annex VI of the CLP Regulation.

If a chemical substance does not have a classification listed in Annex VI, then the manufacturer or importer is legally obliged to examine all relevant available information against the CLP classification criteria and self classify the hazardous substance when it meets the criteria.

Similarly, formulators or importers of mixtures must examine all relevant available information against the CLP classification criteria and self classify hazardous mixtures.

Once the chemicals hazards are identified, communication of these hazards must be provided on the hazard label and the chemical must be contained in packaging that meets the requirements of CLP.

Labelling of Hazardous Substances/Mixtures:

A hazard label **must contain** the following elements applicable to the substance or mixture placed on the market as shown in figure 1.

- **name, address and telephone number** of the EU supplier(s),
- **product identifiers** e.g. chemical name and CAS/EC no. of the substance/trade name of a mixture along with the chemical name(s) of all substances responsible for classification of the mixture (excluding skin and eye irritants),
- **hazard pictogram(s):signal word**: either Warning or Danger depending on the classification
- **hazard statement(s)** description of the hazardous effect e.g. Harmful if inhaled,
- the appropriate **precautionary statements** to allow the user of the chemical to take measures to protect health/environment e.g. Keep out of reach of children,
- **nominal quantity** (when the chemical is supplied to the general public), and
- **supplemental information**.

Obligatory supplemental information includes hazard statements taken from the previous chemical legislation e.g. EUH001 Explosive when dry and EUH204 Contains isocyanates. May produce an allergic reaction".

Non-obligatory supplemental labelling information, for example, instructions for use is not part of the legal labelling requirements under CLP. However, if provided it must not distract from nor contradict the obligatory label elements, hazard and precautionary statements. Statements such as 'non-toxic', 'non-polluting' may not be used on labels.

The hazard information on the label must be consistent with the classification in Section 2.1 and the label elements in Section 2.2 of the **Safety Data Sheet** (SDS) provided for the same product.

Layout and dimensions of the Hazard Label:

The label must:

- be firmly attached to the surface of the product,
- be visible, legible and readable in English, and
- have the following dimensions:

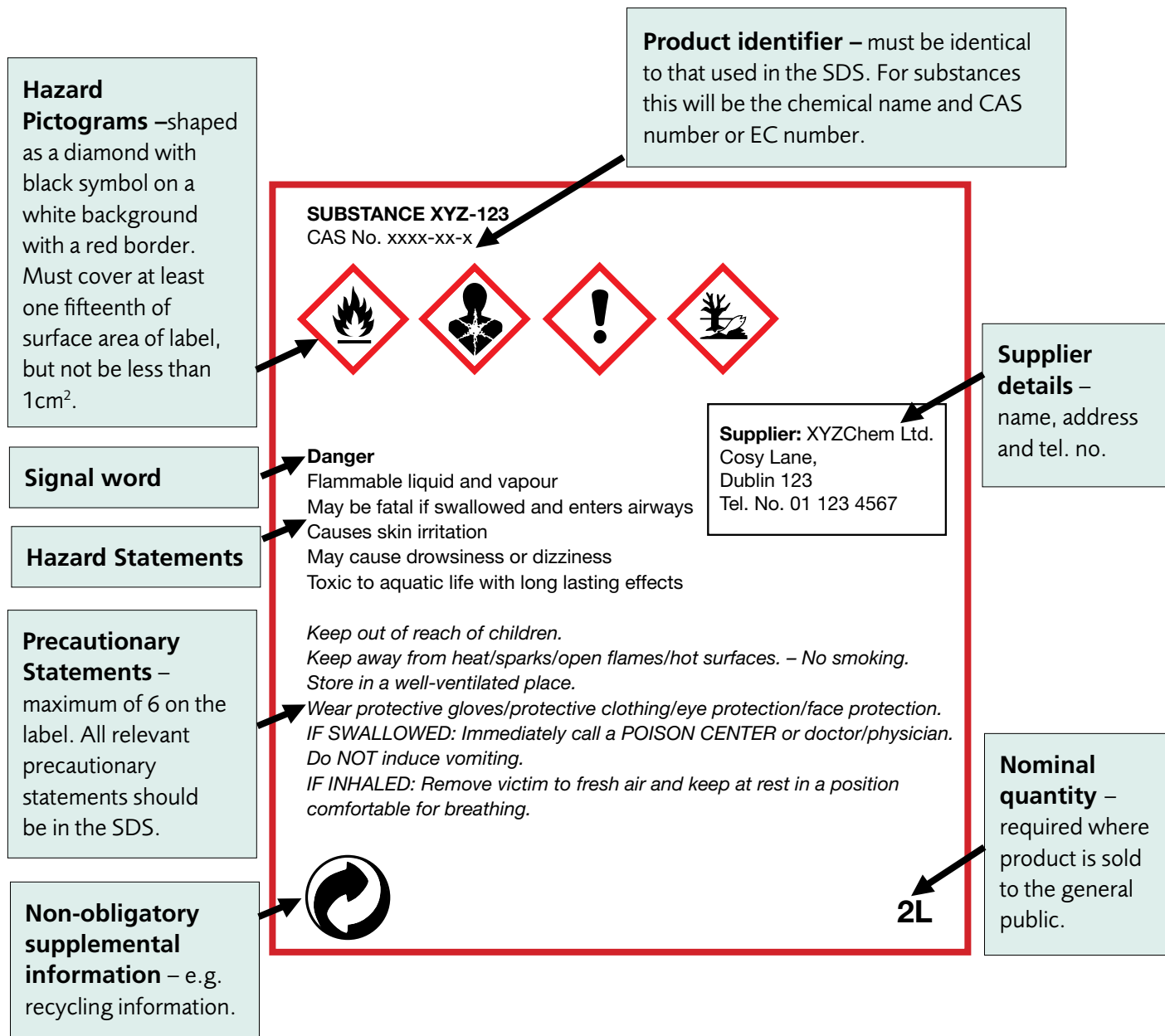
Capacity of the package	Dimensions of label (mm)
≤ 3 litres	If possible at least 52 x 74
> 3 litres but ≤ 50 litres	At least 74 x 105
> 50 litres but ≤ 500 litres	At least 105 x 148
> 500 litres	At least 148 x 210

- have all the hazard pictograms, signal word, hazard and precautionary statements together,
- have, where more than one language is used, all the hazard and precautionary statements of the same language grouped together,
- ensure that the hazard pictogram stands out clearly (black print on white background surrounded by red frame being at least one fifteenth and at least 1 cm² of the label), and
- have no blank pictograms (where blank pictograms are unavoidably printed on the label they should be blacked out).



¹ free of charge for download from the website <http://www.unece.org/trans/danger/publi/ghs/pictograms.html>

Figure 1: Example of Hazard Label for Supply



Updating the Hazard Label

The label should be updated **without undue delay**, when there is a change in classification of the substance or mixture which results in a **more severe hazard** or where new supplemental information is required on the label taking account of the nature of the change.

Other required label changes e.g. change in supplier address shall be done within **18 months** of the required change. Suppliers should cooperate to ensure that labels are updated without undue delay.

Labelling of workplace chemicals

The requirement for a CLP hazard label is dependent on whether the chemical is being **placed on the market** or not, noting that **import** is deemed to be **'placing on the market'**.

All incoming or *outgoing* **chemicals** to or from a workplace require a CLP hazard label if they are being 'placed on the market'. Therefore, all incoming chemicals to a workplace should be labelled by the supplier, and all *outgoing* chemicals from a workplace equally should be labelled before being placed on the market.

However, for chemicals **produced and used** within a workplace' the situation is different, because they are stored and transported within the workplace and not **being placed on the market** e.g. in containers and pipe work on site, the CLP hazard labelling rules do not apply.

However, there is still a requirement to ensure a *risk-based approach* is undertaken to determine any potential hazards from such chemicals produced, stored, transported and used within the workplace. This may result in a requirement to produce an **'in-house' hazard label**.

Such workplace chemicals come under the remit of the **Chemical Agent** and **Work Place Signs** Regulations. These Regulations will be amended before 1st June 2015 to align them with CLP.

Unpackaged chemicals

There is a **new provision** under CLP for **'wet cement'** which is sold to the **general public without packaging'**. It must be accompanied by a copy of the label elements required under CLP (see part 5 Annex II of the CLP Regulation for further details).

Derogations from labelling

Derogations from hazard labelling requirements are permitted in special cases including transportable gas cylinders, gas containers intended for propane, butane or liquefied petroleum gas, certain aerosols, certain mixtures containing elastomers and explosives. (See section 1.3 Annex I of the CLP Regulation for further details).

Exemptions from labelling

Certain labelling elements may be omitted where the contents **do not exceed 125ml**, depending on the hazard classification of the substance or mixture (see Section 1.5 Annex I of the CLP Regulation for further details)

Where packaging is either in such a shape or form or so small as to not allow the necessary hazard labelling information to fit on the label, derogation exists. In such cases and where applicable, the label elements may be provided either on:

- fold-out labels, or on
- tie-on tags, or on
- outer packaging.

With the exception of biocides and plant protection products, all label elements for certain hazard classes which **do not exceed 25ml** may be omitted from **soluble packaging** for **single use** where the label of the outer packaging is fully compliant.

An exemption also applies for chemicals supplied for **R&D or Quality Control analysis** where the contents of the inner package **do not exceed 10ml** and where the label of the outer packaging is fully compliant.

Hazard Labels for Supply and Transport

Outer and inner packaging classified for supply but not for transport

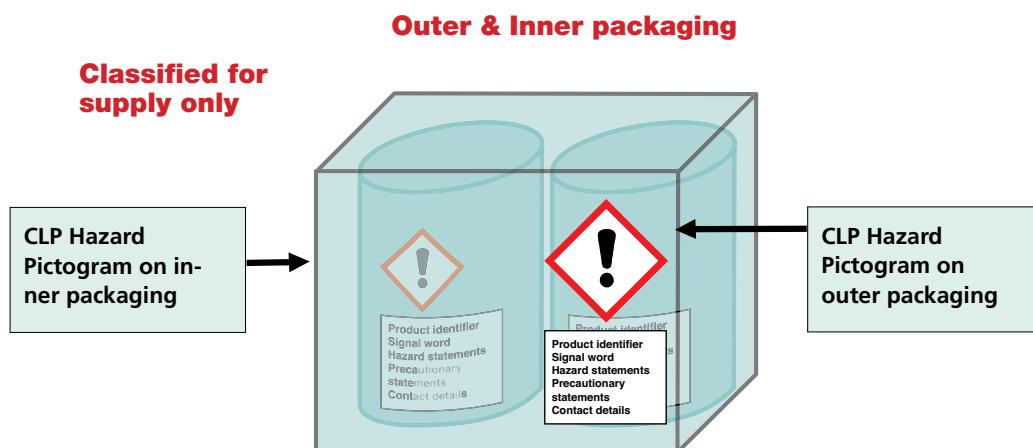
Not all substances and mixtures classified and labelled according to the CLP Regulation require classification and labelling under the provisions of the transport of dangerous goods legislation, i.e. if they are not considered hazardous for transport.

Substance and mixtures which are not required to be classified and labelled under the provisions of the transport of dangerous goods need to still display CLP labels on the inner, intermediate and **outer packaging**.

This is an **important new rule** under the CLP Regulation as under the old rules, the outer packaging would previously have been left blank if transport rules did not apply, which meant that it was not apparent that a hazardous substance or mixture was being transported.

An example of a product which does not require classification or labelling under the transport of dangerous goods rules would be a mixture which is classified for supply, as being harmful or causing skin sensitization. See figure 2 for an example of the labelling required on outer and inner packaging for a substance or mixture classified under supply legislation but not under transport legislation.

Figure 2: Substance or mixture classified under supply legislation but not under transport legislation



Outer and Inner packaging classified for both transport and supply

In cases where labelling is required under both the provisions of the transport of dangerous goods legislation **and** under the CLP Regulation for the same hazard, and the package consists of an outer and inner packaging, the outer packaging must display the transport label elements but the CLP supply labelling on the outer packaging is optional. However, the inner and intermediate packaging must be labelled in accordance with CLP. See figure 3 for an example of the labelling required on **outer** and inner packaging for a substance or mixture classified under both supply and transport legislation.

Figure 3: Substance or mixture classified under both transport and supply legislation



Single packaging classified under both supply and transport

Where there is no inner packaging (i.e. single packages), labelling under the provisions of both the transport of dangerous goods legislation and the CLP Regulation is required. When the hazard pictograms for transport and CLP are the same, the CLP pictogram(s) need not appear. Figure 4 depicts a single package that is classified under both transport and supply legislation. While the CLP pictogram has been omitted, the CLP supply label elements are still provided below the transport pictogram, as demonstrated in Figure 4 and 5.

Figure 4: Single packaging classified under both supply and transport legislation

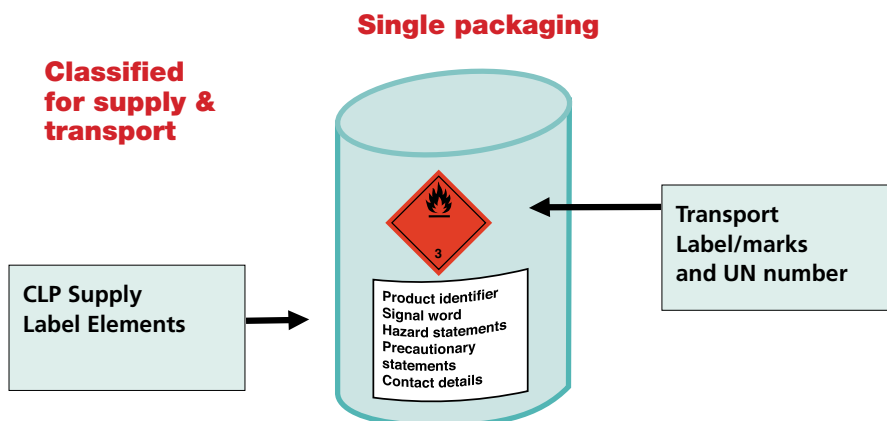
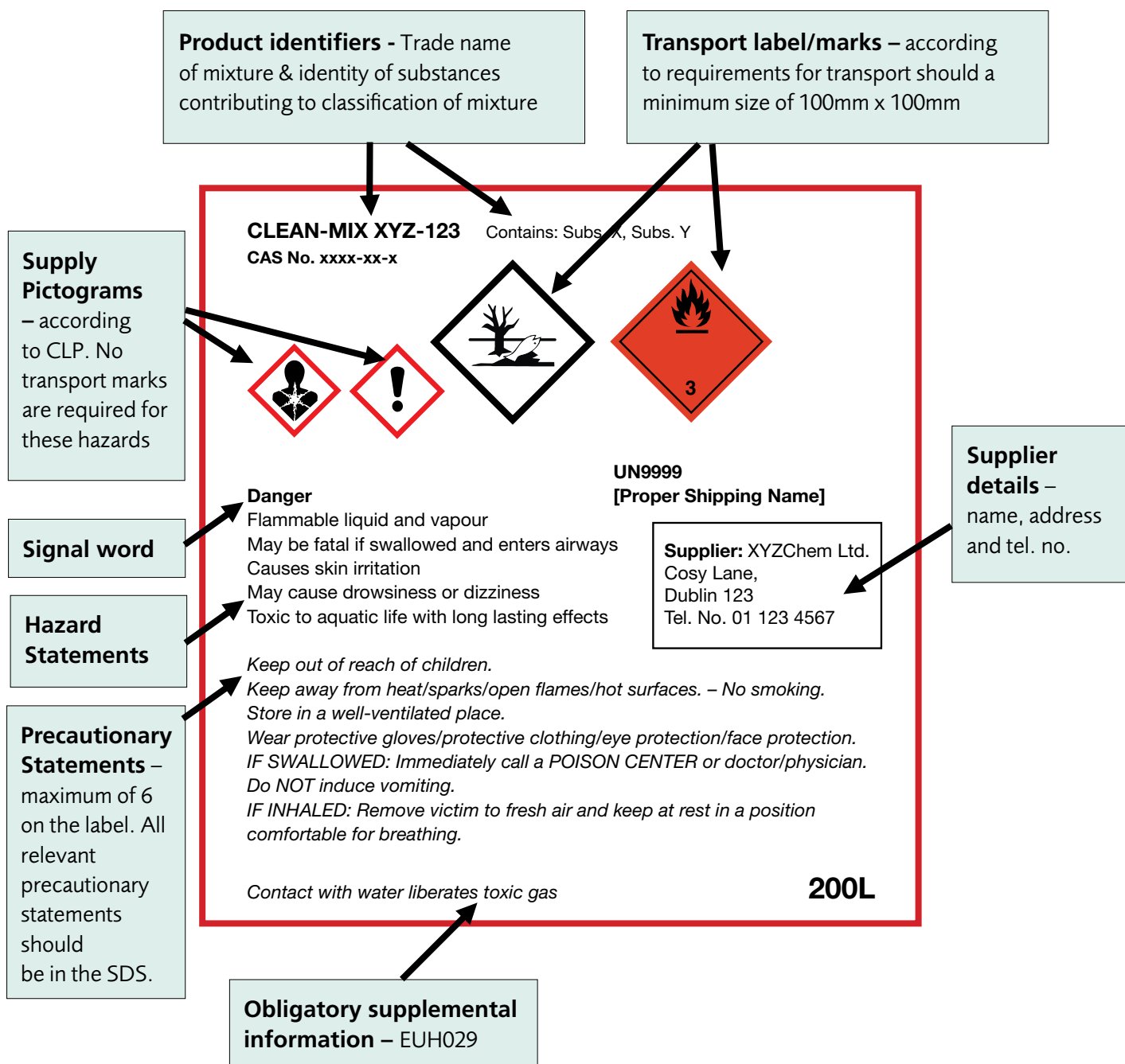


Figure 5: Single packaging label classified under both supply and transport legislation.

This is an example of a single packaging label (e.g. a 200 litre drum) for a mixture classified under both transport and CLP criteria. Transport and CLP label elements must be shown on the packaging. The CLP pictograms for flammability, dermal toxicity and aquatic hazards (acute and chronic) have been omitted as the underlying hazards are already covered by the corresponding transport pictograms.

Transport labels/marks take precedence over a CLP pictogram on single packaging



Packaging of Hazardous Substances/Mixtures:

Packaging should be designed so the hazardous contents **cannot escape**, except where more specific safety devices are required to be in place. Therefore, the packaging material shall not be **susceptable to damage** by its contents and should be strong enough throughout to meet the **normal stresses** and strains of handling.

Depending on the classification of the substance or mixture Child-resistant fastenings and tactile warnings of danger are required for certain hazardous chemicals. Details of which is set out in Annex II of CLP.

Replaceable fastenings should be designed so that they can be repeatedly refastened without the contents escaping.

When sold to the **general public** the packaging should not have either a shape or a design that would **attract or arouse the active curiosity of children** or be misleading to consumers. It should not have a similar presentation or design to that is used in foodstuff, animal feed, medicines or cosmetics.

Note: Packaging that meets the requirements of the rules of the transport of dangerous goods shall be deemed to meet most of the provisions of the CLP Regulation.



Further Information:

- The Health and Safety Authority's Chemicals web pages: www.hsa.ie/chemicals
- E-mail the HSA's Chemicals Helpdesk: chemicals@hsa.ie
- European Chemicals Agency's (ECHA) Publication: [Guidance on labelling and packaging in accordance with the CLP Regulation](#)
- [Q&A Support](#) on ECHA's website

HSA Publications:

- [Information for Retailers on Hazard Labelling & Packaging of Chemical Products](#)
- [Information Sheet on Safety Data Sheets \(SDSs\)](#)
- [Chemical Importers Information Sheet](#)
- [Chemical Distributors Duties under REACH and CLP](#)
- [Chemical Agent Regulations](#)
- [Work Place Signs Regulations](#)
- [Chemical Handling Directive](#)