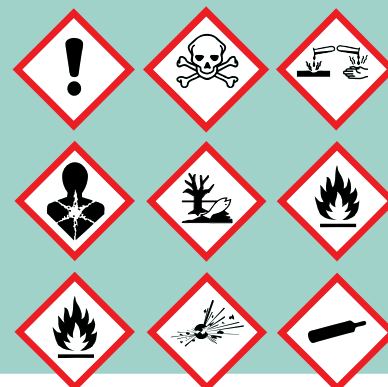


Classification, Labelling & Packaging according to the CLP Regulation

October 2021

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 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**.

In addition, substances imported on their own or in a mixture require notification to the **classification and labelling inventory**, within one month of placing on the market, while certain hazardous mixtures require **notification to the national poison centre**, via the ECHA PCN portal, before being placed on the market.

CLP requirements depend on the **suppliers role** in the supply chain.

The responsibility for **classification** of hazardous substances and mixtures lies with:

- manufacturers of substances,
- importers of substances or mixtures, and
- formulators of mixtures.

The responsibility for **labelling and packaging** of hazardous chemicals lies with all suppliers including downstream users or distributors, who do not reformulate or change the chemical, but relabel or repackage it.

The responsibility for **notification to the classification and labelling inventory** lies with the manufacturer or importer of the hazardous substance, regardless of tonnage, unless it is already registered under REACH.

The responsibility for **notification to the poison centre** lies with the importer or formulator of the mixture but, in certain cases, lies with the distributor if re-labelling/re-branding.

Exemptions from CLP

Waste is exempt from the CLP Regulation along with cosmetics, medicines, medical devices, veterinary products, foodstuffs or animal feed **which are in their finished state, intended for the final user**.

Classification of hazardous chemicals

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) hazard classifications which are listed in Annex VI of the CLP Regulation.

If a chemical substance does not have a hazard 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 substance as hazardous 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 as hazardous, where appropriate. For more information see [Mixture Classification on the ECHA website](#).

Once the chemical's hazards are identified, communication of these hazards must be provided on the hazard label or directly onto the packaging that meets the requirements of CLP.

Labelling of hazardous chemicals

A hazard label **must contain** the following elements applicable to hazardous chemicals 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)**: illustrates relevant hazard symbol.
- **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).
- **Supplemental information**.

Obligatory supplemental information includes label elements such as the Unique Formula Identifier (UFI) or 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 chemical 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:

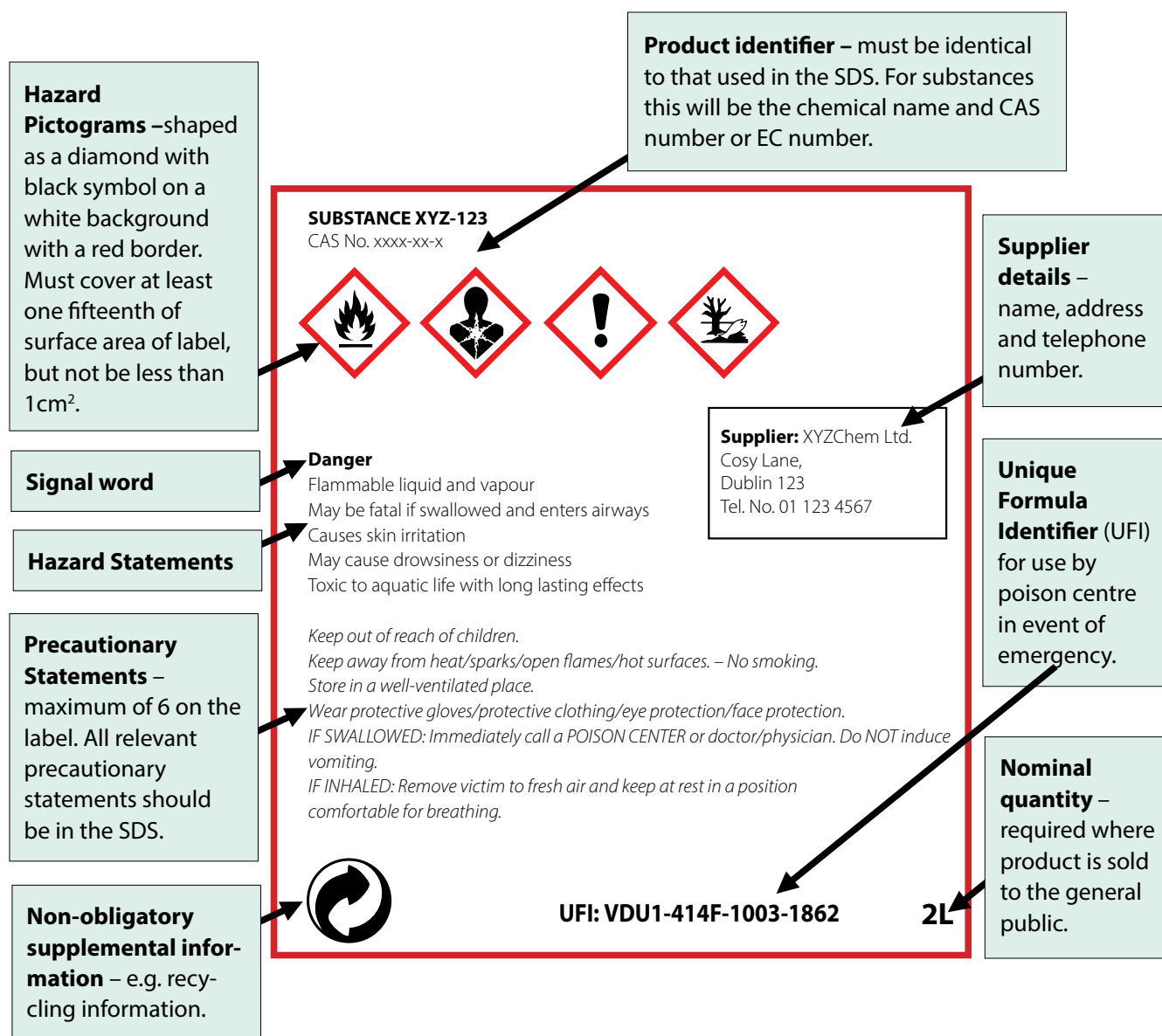
Capacity of the package	Dimensions of label (mm)	Dimensions of each pictogram (mm)
≤ 3 litres	If possible at least 52 x 74	>10 x 10, if possible > 16 x 16
> 3 litres but ≤ 50 litres	At least 74 x 105	>23 x 23
> 50 litres but ≤ 500 litres	At least 105 x 148	> 32 x 32
> 500 litres	At least 148 x 210	> 46 x 46

- have all the hazard pictograms, signal word, hazard and precautionary statements together, and readable horizontally when set down normally,
- 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



Unique Formula Identifier

Certain hazardous chemical products, classified with a physical or health hazard, not already notified to the National Poisons Information Centre (NPIC) at Beaumont Hospital, requires a **Unique Formula Identifier (UFI)**, on the label. This sixteen digit alpha-numeric number, should be notified to the NPIC, via the European Chemicals Agency PCN portal, before the product is placed on the Irish market. After notification, the NPIC should also be notified **directly** regarding the use of their emergency number in Section 1.4 of the safety data sheet.

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 classified as hazardous and 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 are not **being placed on the market** e.g. in containers and pipe work on site, so 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**.

Please see our Information Sheet on ['Communicating Chemical Hazards at Work'](#).

Unpackaged chemicals

There is a **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

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, derogations exist. In such cases and where applicable, the label elements may be provided either on:

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

Certain labelling elements may be omitted where the contents **do not exceed 125ml**, depending on the hazard classification of the substance or mixture.

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 **scientific research and development 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. See Section 1.5 Annex I of the CLP Regulation for further details.

Selling hazardous chemical products online

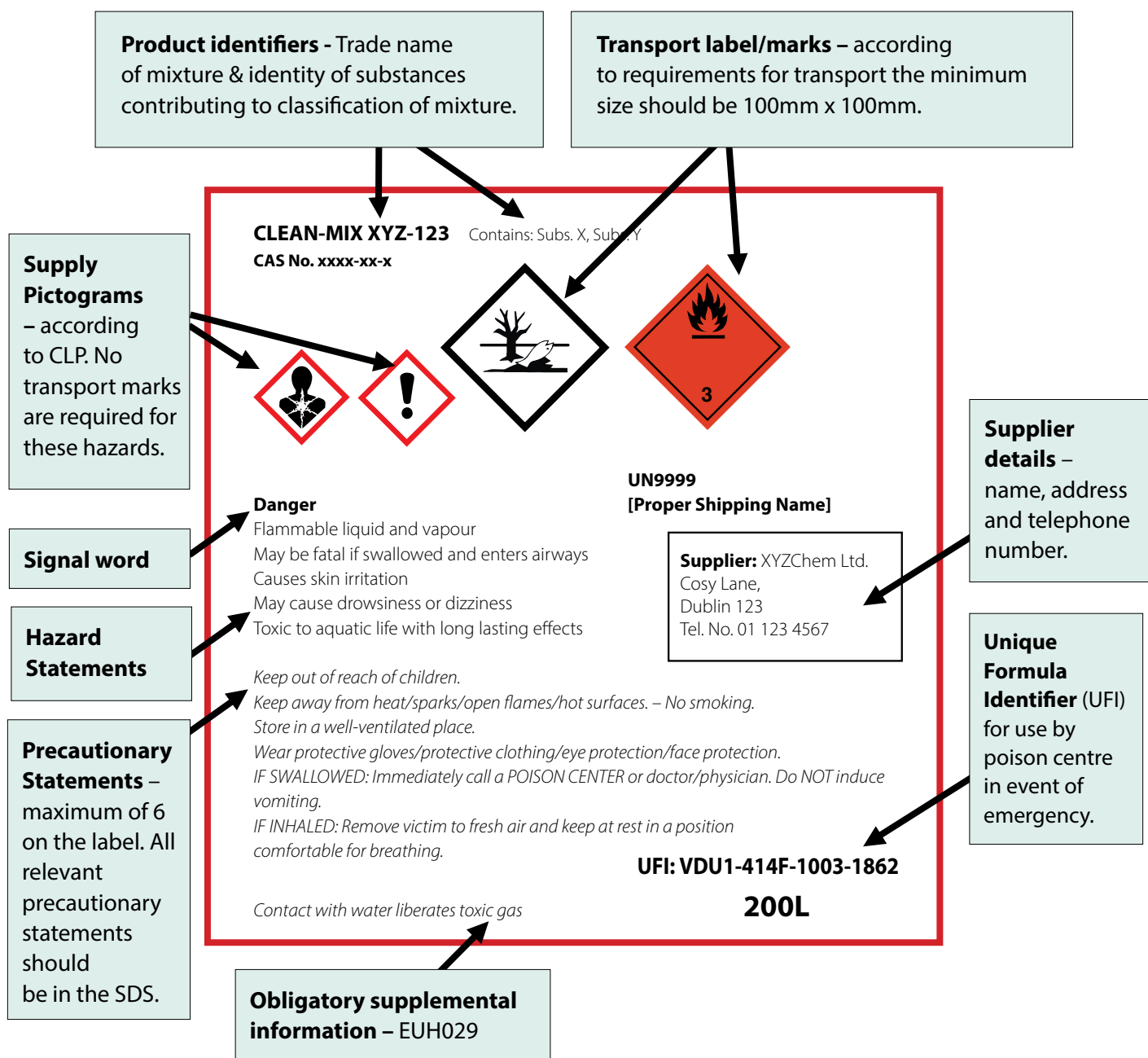
When a supplier sells hazardous chemical products online, e.g. company website or on a marketplace platform (e.g. eBay), then the advert must include relevant hazard information. For example, if a product is classified as irritating or sensitising to skin, then the advert should either include a copy of the hazard label (hazard pictograms/hazard statements) or include the hazard information in the product description. Including an image of the product package (front and back) with a zoom function in the advert will suffice and if this is not possible, the information from the hazard label or Section 2.2 of the safety data sheet (SDS) for that product should be included into the product description. The requirement to include hazard information in online adverts only applies when a purchase can be concluded online so does not apply when a website/platform only offers a reserve/collect-in-store option, as the sale is not concluded online.

Where a chemical comes under the scope of CLP and transport legislation and where the hazard pictograms required are the same, then those pictograms under CLP do not need to appear on the packaging.

Figure 2: Example of a Hazard Label for Supply and Transport

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 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



Hazard Labels for Supply and 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. However, where suppliers, including distributors, include additional layers of packaging, to protect supply packages during transport or consolidation of several different supply packages into a larger box for transport, such packaging is considered to be outside the scope of CLP and does not require a CLP label. See Section 5.4.2 of the [ECHA labelling and packaging guidance](#) for more information.

Packaging of hazardous chemicals

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 **susceptible 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

- National Poison Information Centre web pages: www.poisons.ie.
- 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 ECHAs website.

HSA Publications

- [Chemical Distributors Information Sheet](#).
- [Communicating hazards at work](#).
- [Information for Retailers on Hazard Labelling & Packaging of Chemical Products](#).
- [Safety Data Sheets for Hazardous Chemicals](#).
- [Chemical Importers Information Sheet](#).

Further Information and Guidance:

Visit our website at www.hsa.ie, telephone our contact centre on **1890 289 389** or email wcu@hsa.ie

Use BeSMART, our free online risk assessment tool at www.besmart.ie
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