

## Labelling of substances and mixtures

### From classification to labelling

Classification is all about evaluating and identifying the hazards of a chemical. But users need basic information about the chemical and its supplier and practical handling advice on the packaging. To provide a consistent approach, CLP sets down basic rules on how this information must be communicated; and examples of labels for CLP can be found in the ECHA guidance. Labelling demands competence – but it's a different skill set to classification. This guidance note should enable you to decide if you can do the job or need help.

### Where do you start?

#### Classification

You need the classification of the substance or mixture before you can label. The act of classifying will have allocated the chemical to one or more hazard classes and then into categories. Annex I to the CLP regulation has separate sections for each hazard class and in each of these there is a specific section on hazard communication. A simple table sets out the required pictogram, signal word, hazard statement and precautionary statements; they all have shorthand codes to simplify cross-referencing. This information is your starting point. If you are using a classification from Annex VI you will have to select precautionary statements from Annex IV using Annex I as a guide. Don't worry at this stage if there seem to be too many phrases.

In addition to the classification you will need to know the product identifier (specific rules for this are set out in Art. 18 of the CLP regulation), the identity details of the EU supplier, some information about the use of the chemical and its market, and the quantity in the package. You will also need a copy of the CLP Regulation to hand (see <http://echa.europa.eu/web/quest/regulations/clp/legislation>).

#### Special provisions

For some chemicals special labelling provisions apply. This may depend on the chemical type (e.g. cyanoacrylate adhesives, plant protection products), the form (e.g. massive form metals) or the customer base (e.g. the general public). The provisions may allow simpler forms of labelling or may require extra information. Annex I to CLP regulation, from Section 1.2 onwards, and Annex II describe and explain the derogations and special rules in detail; you should read these short sections to decide if any of the features are relevant to your chemical.

#### Removing excess information

The next stage is to make the label user-friendly by removing duplication and confusion which may result from too much information. Some pictograms can be omitted where others apply - see Art. 26 of the CLP regulation for the principles of precedence for pictograms. Only one (the more severe)

signal word is needed. Some hazard statements can be eliminated if there is evident duplication or redundancy (see Art. 27) and others can be combined.

The final selection of precautionary statements follows similar principles (see Art. 28); remember you must take into account the likely use of the chemical and its market base. The ECHA [Guidance on Labelling and Packaging](#) has some helpful advice on precautionary statements. The aim is to have no more than 6 precautionary statements to reflect the nature and the severity of the hazards if possible.

## Laying out the label

You now need to decide how much space the label needs. The size of the label used for the CLP labelling information depends on the volume occupied by the container. The latest version of Annex I has the rules in Section 1.2 and Table 1.3 and there is advice in the [ECHA guidance](#). Each pictogram must be at least 10 mm<sup>2</sup> and occupy 1/15<sup>th</sup> of the total CLP label. According to the ECHA guidance, a pictogram of at least 16 mm x 16 mm must always be used if possible. “If possible” refers to the size of the label and thus if the label size allows for a larger pictogram, then this must be used. The rest of the space is used to provide the text information which consists of the items listed in Art. 17 of the CLP regulation. Make sure this stands out clearly and is legible – there are no specific rules about font style and size, but the label elements must be sized and spaced such that they are easily read. Be careful about the colour of the text and the background; the pictogram with its red border must stand out clearly (note: there is no specific Pantone number for the red frame).

## Languages

The label must be in an official language of the Member State in which it is placed on the market. Official phrase translations are in the CLP Annexes. You can choose to use several languages, but this practice can make label sizing difficult. Fold-out labels cannot be used simply to increase the number of languages on the label.

## No room?

There is no minimum package size below which you needn't label. However, you may be able to reduce the information if the hazards are relatively low – see Art. 29 and Section 1.5.2 of Annex I. And if you can't fix the label on the package then some alternatives are given in Section 1.5.1 of Annex I and there is help in the [ECHA guidance](#).

## Avoiding problems

Try to avoid using blanked out pictogram frames or empty red diamonds. This practice is not contrary to CLP but is controversial and may cause confusion. If you feel you cannot avoid using them, our advice is to use them only on a temporary basis and have a plan to change.

## Need further help?

If you need more help understanding the CLP Regulation and how it affects your business, why not attend one of our CLP training courses? For details about our workshops, including the next available dates, please see our events webpage at <http://www.reachready.co.uk/events>, or contact us on



[events@reachready.co.uk](mailto:events@reachready.co.uk) or +44 (0) 207 901 1443. Remember, all our training can be provided in house either as a standard or tailored package.

As one of our Gold subscribers one of our experts will answer your questions – simply call us on +44 (0) 207 901 1444 or email [enquiries@reachready.co.uk](mailto:enquiries@reachready.co.uk).