

# Existing Systems of Product Labelling

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- **Labelling**
- **Where Labelling is implemented**
- **CE and other Examples**
- **„Nano“- Labelling**
- **The Product - Identification Problem**
- **EU Art. 45 CLP - Database of Products**
- **Discussion**

# What does Labelling mean?

**Labelling** is any written, electronic, or graphic communications on the packaging or on a separate label

## Labelling is used for

- Information transmission
- Marketing
- Security
- Convenience
- Portion Size
- Warnings
- Controlling
- Categorisation
- Tradetransfer/-logistic



The **Globally Harmonized System of Classification and Labeling of Chemicals** or **GHS** is an internationally agreed upon system, created by the United Nations

## Essential Informations for GHS-Labels:

- Pictograms
- Signal words
- Hazard statements
- Precautionary statements and pictograms
- Product identifier!
- Supplier information

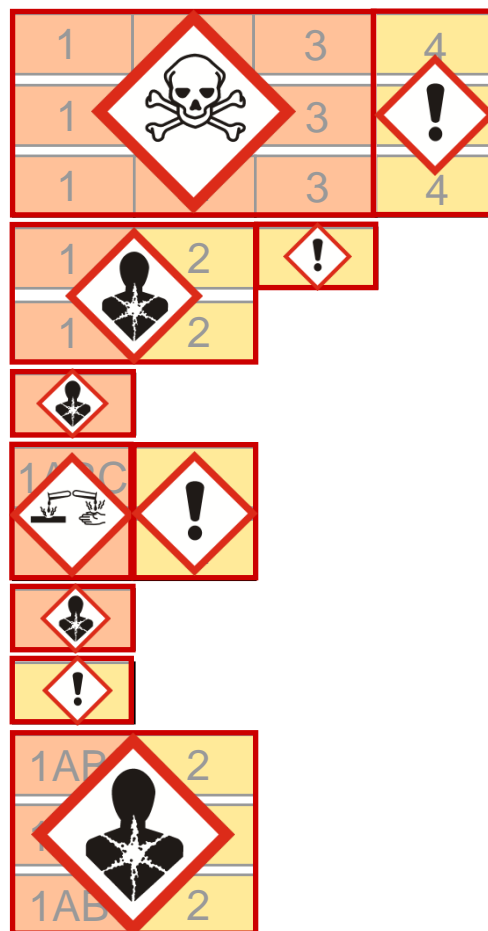
# CLP-Regulation: Hazard Classes, Categories and Classification

## CLP Regulation (EC) No 1272/2008

### Health hazard classes

### Categories

Acute toxicity Oral  
 Acute toxicity Dermal  
 Acute toxicity Inhalation  
 STOT\* - single exp  
 STOT\* - repeated exp  
 Aspiration hazard  
 Skin corrosion/irritation  
 Eye damage/irritation  
 Respiratory sensitisation  
 Skin sensitisation  
 Carcinogenicity  
 Mutagenicity  
 Reproductive toxicity  
 Effect during lactation



\* Specific Target Organ Toxicity

## Directive 1999/45/EC

### Classification

T<sup>+</sup> R28 / T R25 / Xn R22  
 T<sup>+</sup> R27 / T R24 / Xn R21  
 T<sup>+</sup> R26 / T R23 / Xn R20  
 T<sup>+</sup> R39 / T R39 / Xn R68 / R37 / R67  
 T R48 / Xn R48  
 Xn R65  
 C R35 / C R34 / Xi R38  
 Xi R41 / Xi R36  
 Xn R42  
 Xi R43  
 cat.1/2 (T R45/R49) / cat.3 (Xn R40)  
 cat.1/2 (T R46) / cat. 3 (Xn R68)  
 cat.1/2 (T R60/R61) / cat.3 (Xn R62/R63)  
 R64

## Examples for “Nano”- Labelling?

- **EU - Cosmetics Regulation:**

From 2012 onwards the Use of Nanoparticles in Cosmetics

- **Food:**

From Autumn 2014 a „Nanoindication“ on Packages

- **Art. 45 CLP- Regulation:**

From 2014 (?) onwards the Indication of Nano-formulated Substances (Yes/No)

Scope: All Products with Hazard Labels for Consumers and Non-Consumer Use?



GHS05



GHS06



GHS08



GHS07



# Labelling and Clear Product Identification (Product Identifier)

## The Tradename is a Problem for Consumers and Risk Management



AS Ultra



# BfR-Examples: Tradename, Products, Versions and Variations

BfR GIFAS-Database (2010)

Tradename	Products	Versions	BfR-Variations in Formula (Minimum)
Calgonit	100	116	216
Sidol	90	208	298
Loctide	95	115	210
P3	813	1562	2.375







# The CLP Art. 45 UPI (Product Identifier in a Product Identification Area)

EU Standard CEN (EN 15178) since Nov 2007



BfR Recommendations based on the former UBA-Number

	Intern. Company Code	Comp.-Code for Formulation	Hazard Symbol C Xn Xi T T+
	12345	99999	C

# EU Art. 45 CLP-Database of Products (2014)

## BfR Poison Information Database



1. Identification-No.
2. Trade Name (!) /UPI
3. Manufacturer/Distributor
4. Address
5. Product-Classification
6. Physic. chem. Properties
7. R/S - H -Phrases
8. Ingredients /Substances /Nano (Y/N)
9. - Name (Manufacturer)
10. - Name (Preferred Term)
11. - Share
12. - Rank of Toxicity
13. Tox. Additional Information
14. - LD-Values
15. - Warnings
16. - First Aid Measures
Optional
18. - Barcode (EAN-Code) etc.

## COMPANY INFORMATION

- **Company placing the mixture on the market**  
Name, address, company identifier
- **Company submitting the mixture information**  
Name, address, telephone, e-mail, fax, company identifier
- **Contact Point(s) in case of emergency**

## IDENTIFICATION OF THE MIXTURE

- **Mixture identifiers**  
Mention the complete trade name(s) (in all relevant languages of the country of marketing)  
Other mixture identifiers present on the label (type should be specified)  
Under special conditions grouping of mixture variants is allowed.
- **Product identification element**  
*A unique product identification element is highly recommended*

## COMPOSITION

- **Substances in the mixture**  
Mention all substances (whatever their toxicity) present in the mixture.  
Names 'perfumes', 'fragrances', 'colouring agents', 'essential oil of ...' and 'extract of ...' can be used.  
CAS- and EC (EINECS/ELINCS) number (if available),  
'functional group name', hazard classification, H-statements,  
**nanoformulated yes/no**

## **-Substance concentrations**

Actual concentrations for substances classified as

- acute toxicity (oral, dermal, inhalation), category 1,2 and 3
- STOT single/repeated, category 1 and 2
- skin corrosion, category 1A, 1B and 1C
- serious eye damage, category 1

Specified concentration bands for other substances:

0-0,1%, 0,1-1%, 1-3%, 3-10%, 10-20%, 20-30%, 30-50%, 50-75%, >75%

Exact concentration for all substances is preferred but voluntary

## **- Reformulation rules**

- substitution, addition or deletion of one or more substances
- change to other concentration bands
- change of exact concentration above specified limit (when review of classification is necessary)

## **CATEGORISATION**

### **- Product Category**

Describe the intended use of the mixture.

### **-Consumer / Professional use**

<b>CLASSIFICATION</b> <ul style="list-style-type: none"><li>- Classification</li><li>- Label Elements</li></ul>	<b>SDS</b>
<b>Packaging</b> <ul style="list-style-type: none"><li>- Type(s)</li><li>- Size(s)</li><li>- Labels</li></ul>	
<b>PHYSICAL/CHEMICAL CHARACTERISTICS</b> <ul style="list-style-type: none"><li>- Physical state</li><li>- pH</li><li>- Total reserve acidity/alkalinity (If available).</li></ul>	<b>SDS</b>
<b>TOXICOLOGY</b> <p>Supplied on the SDS and expected to improve with future requirements from the REACH Regulation</p>	<b>SDS</b>
<b>OTHER INFORMATION</b> <ul style="list-style-type: none"><li>- Date of first marketing.</li><li>- Date product information form completed.</li><li>- Remarks</li></ul>	



# BfR Assessment and Monitoring

„Toxicovigilance“

„Poison“Committee (47 Years)

