

Customer Information Note

CLP Regulation: Lower Classification Limits for Eye/Skin Irritation

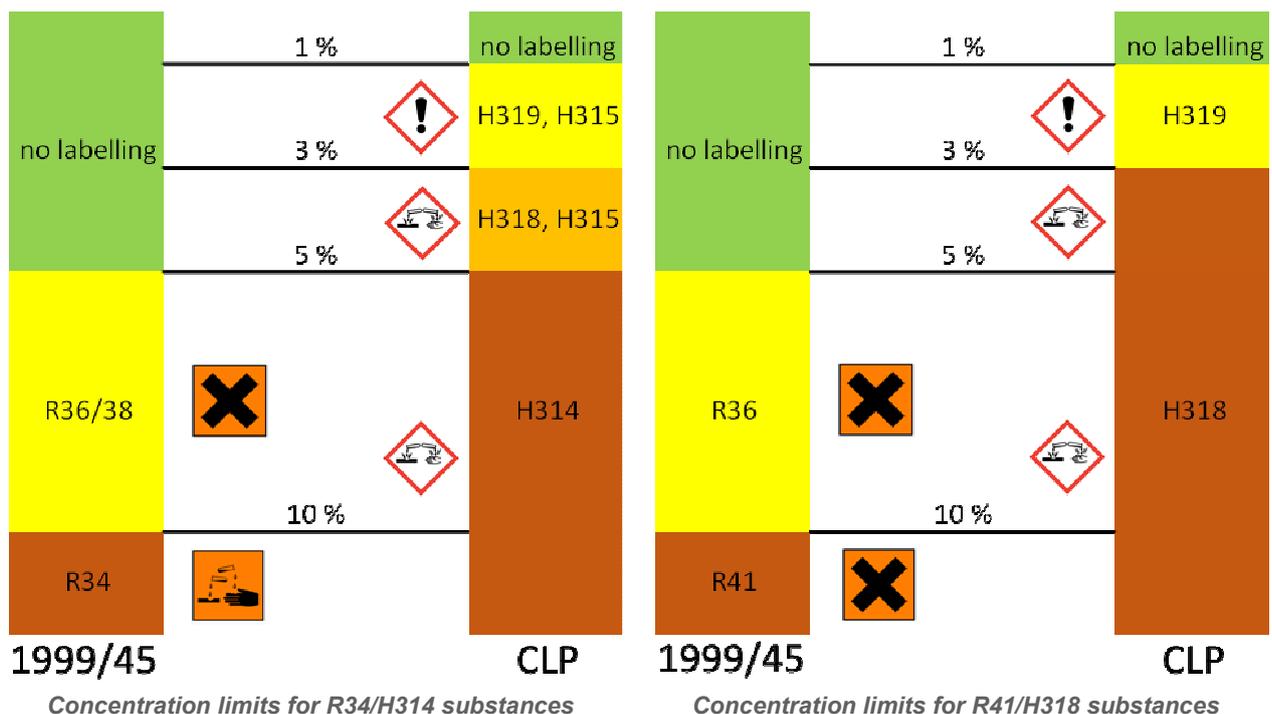
GHS, the **Globally Harmonized System of Classification and Labelling of Chemicals** initiated in 1992 and first published in 2003 by the United Nations, addresses the classification and hazard communication of chemicals, including labels and safety data sheets.

The **CLP Regulation** (Regulation (EC) No 1272/2008 on **Classification, Labelling and Packaging of substances and mixtures**) represents the implementation of GHS in EU chemicals legislation. CLP has replaced the former Dangerous Preparations Directive 1999/45/EC ('DPD'), which was repealed on 1 June 2015.

Additivity approach: lower classification limits for eye/skin irritation

Although the intrinsic hazard properties of chemicals remain the same, there are some hazard classes in CLP where the generic concentration limits leading to classification of a mixture have been significantly lowered compared with DPD.

The most prominent difference is in the classification and labelling of mixtures containing substances corrosive to the skin or eyes. In the most extreme examples, 3% of a substance causing serious eye damage (R41/H318) now results in a 'corrosive' pictogram, whereas previously even >10% gave rise only to an 'irritant' symbol – see figure below. This change in the classification criteria has had a considerable impact on product labelling, especially in the cleaning products sector.



This change also affects the product labels of some printing inks, for example solvent-based inks containing *n*-propanol (R41/H318) or water-based inks containing residual amounts of amines like monoethanolamine, also known as MEA (R41/H318). Unlike in the past, a product containing e.g. 1.5% of MEA will need to be labelled with the hazard statement H319 ('Causes serious eye irritation') and the CLP pictogram 'Exclamation Mark'. The same applies to water-based dispersion varnishes containing, inter alia, the wetting agent sodium bis(2-ethylhexyl) sulfosuccinate or DOSS (R41/H318).

Customers are reminded that neither the affected product formulations nor their hazard potentials have actually changed. The new classification and labelling are simply a consequence of the change in legislative system, with its different thresholds as described above.

EuPIA Technical Committee
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