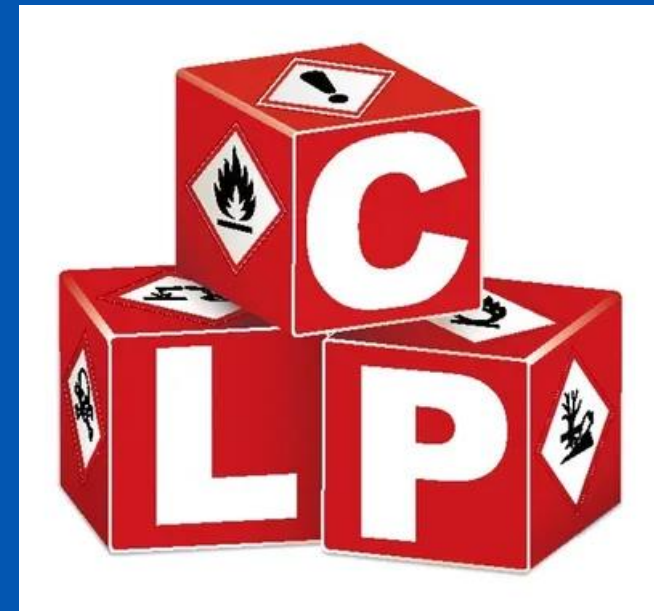


Ad-hoc CARACAL meeting - CLP labelling

Meeting of 6 December 2021

GROW / ENV CLP team

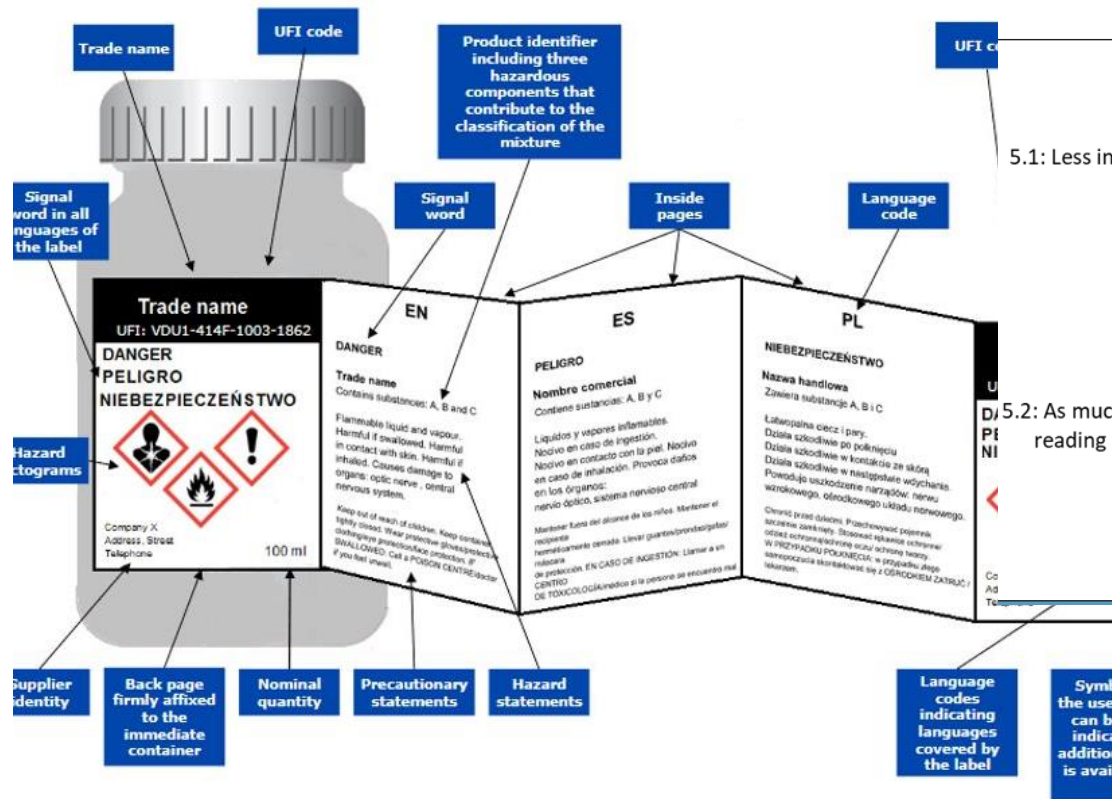


Public Consultation outcomes on labelling

...let's start with some figures!

Labelling example and answer

2→ Question 5: Considering the example above, if you would like to improve this label, what would you prefer? (Only one answer possible) (N=573), values=percentage (count)¶



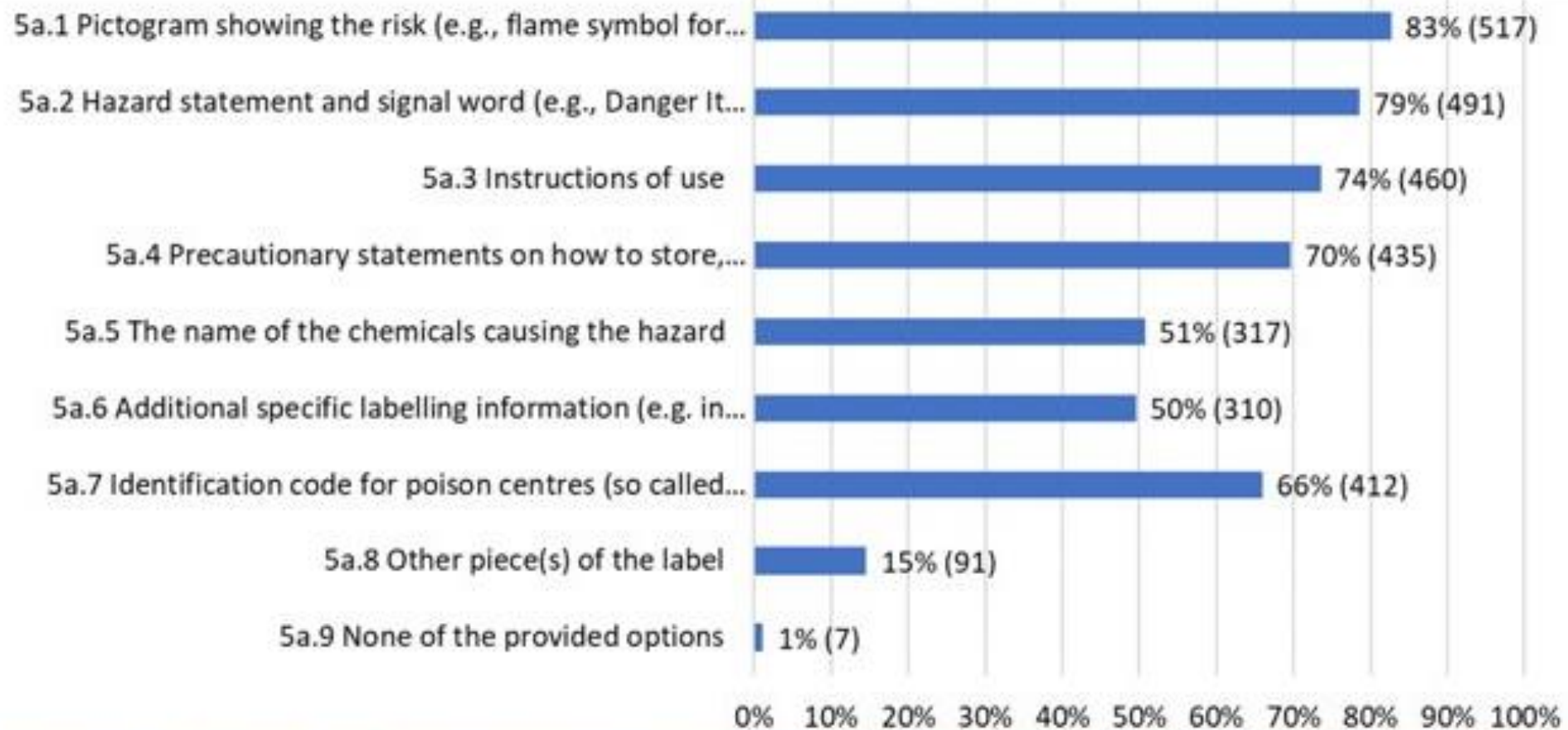
5.1: Less information but clearer information on the label

80% (456)

5.2: As much information as possible. This may make reading the label more difficult in some cases.

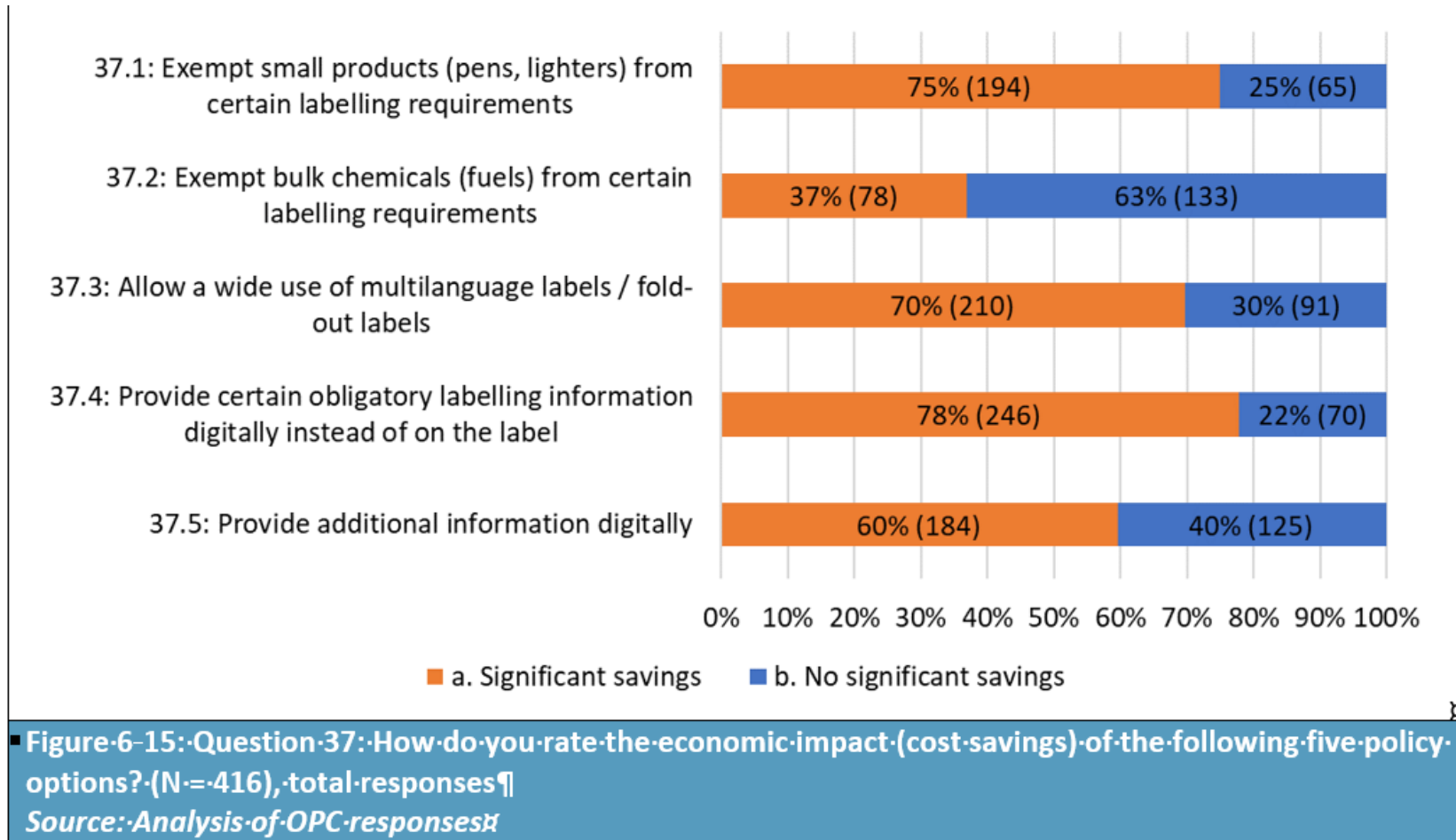
20% (117)

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

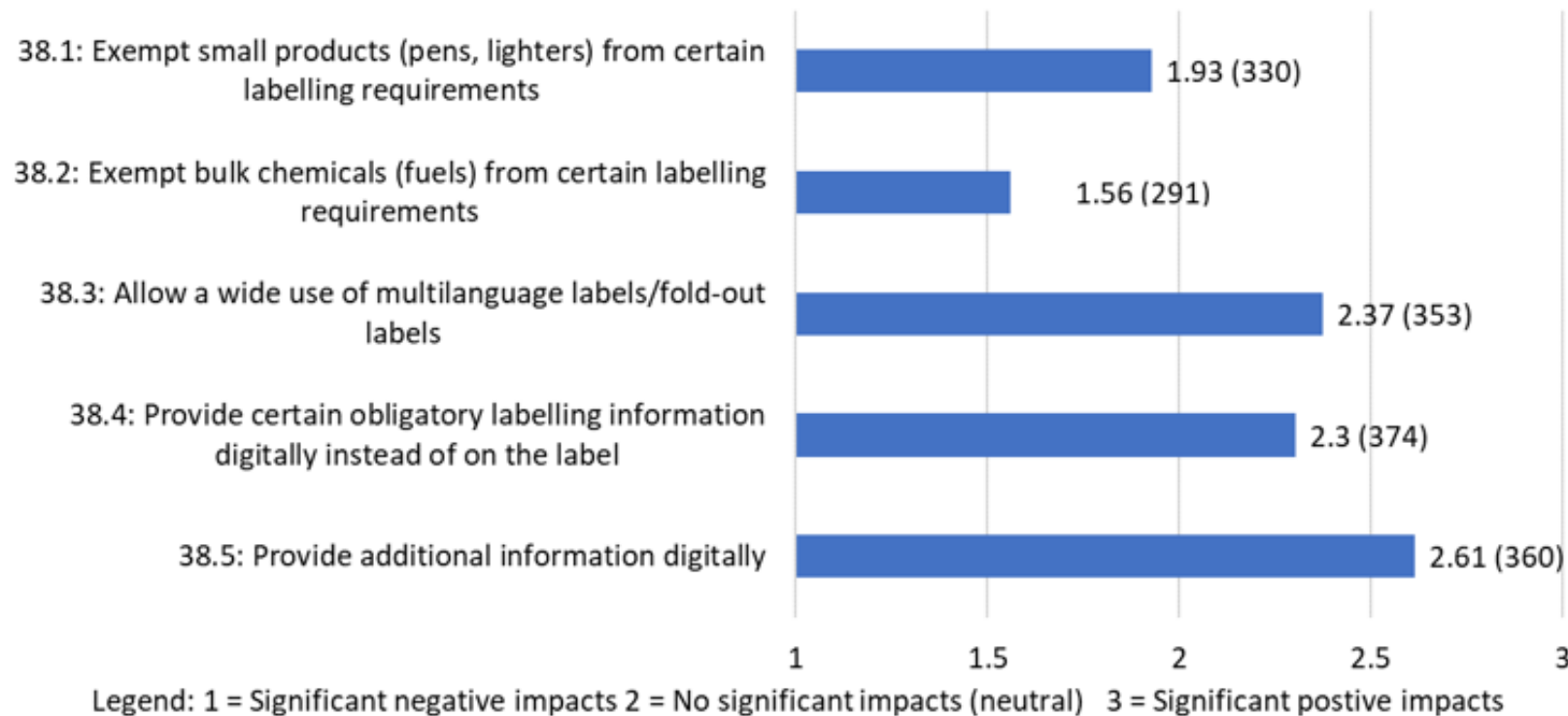


■ **Figure 6-5: Question 5a: Considering the example above, which pieces of the label would you like to keep? (Select as many options as needed) (N=585), total responses**
Source: Analysis of OPC responses

Economic impact of five policy options



Health, safety and env impact of 5 policy options



■ Figure 6-17: Question 38: How do you rate the health, safety, and environmental impacts of the following policy options? Please justify your choice in box below (N=421), total responses¶
Source: Analysis of OPC responses¶

CLP labelling of small items

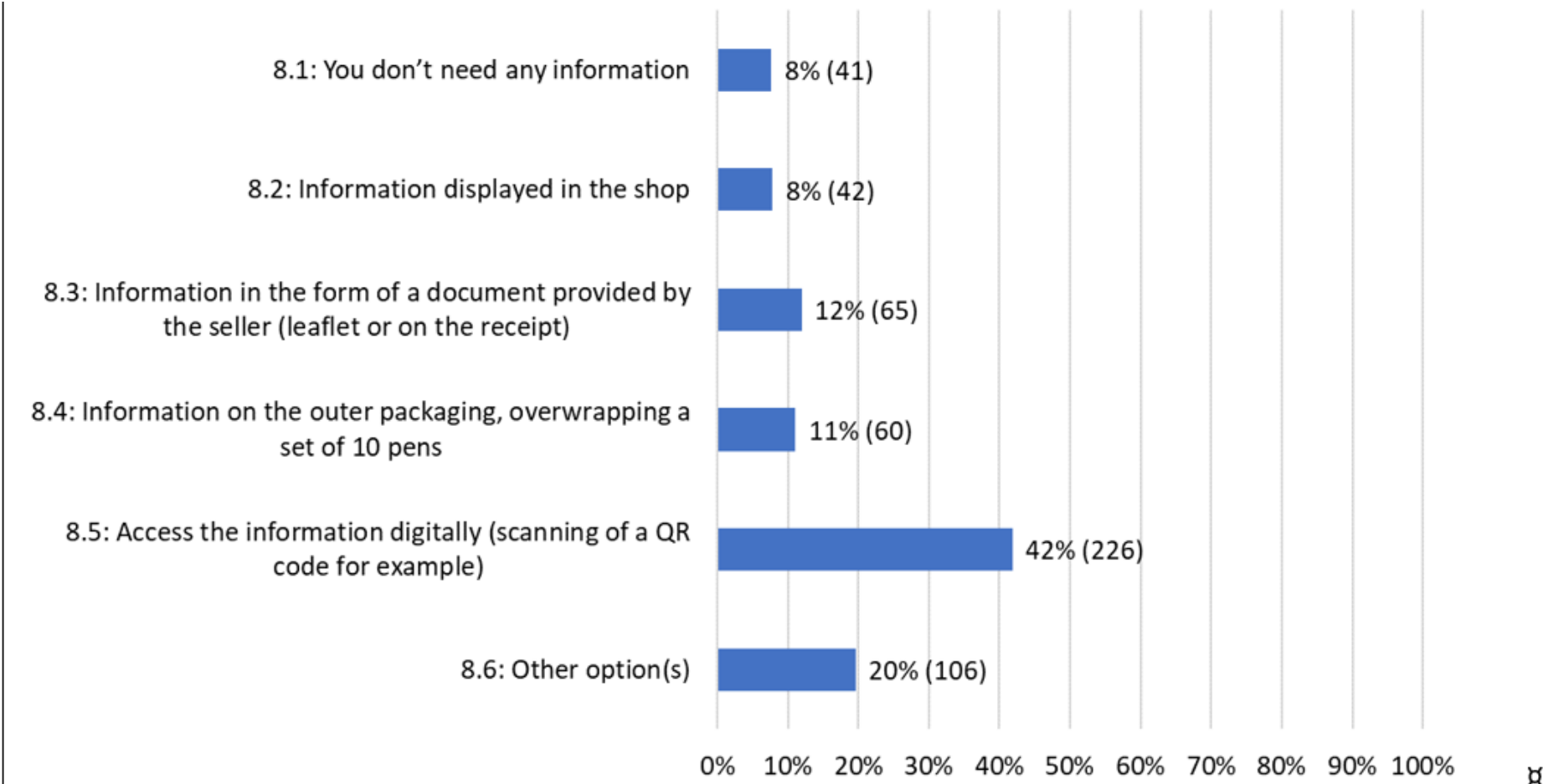


Figure 6-11: Question 8: Individual pens are very small items, with little room for a label and information about hazards. What would be the best option for you to inform on the hazardous substances they may contain and the safety instructions? (N=588), total responses¶
 Source: Analysis of OPC responses¶

Questions

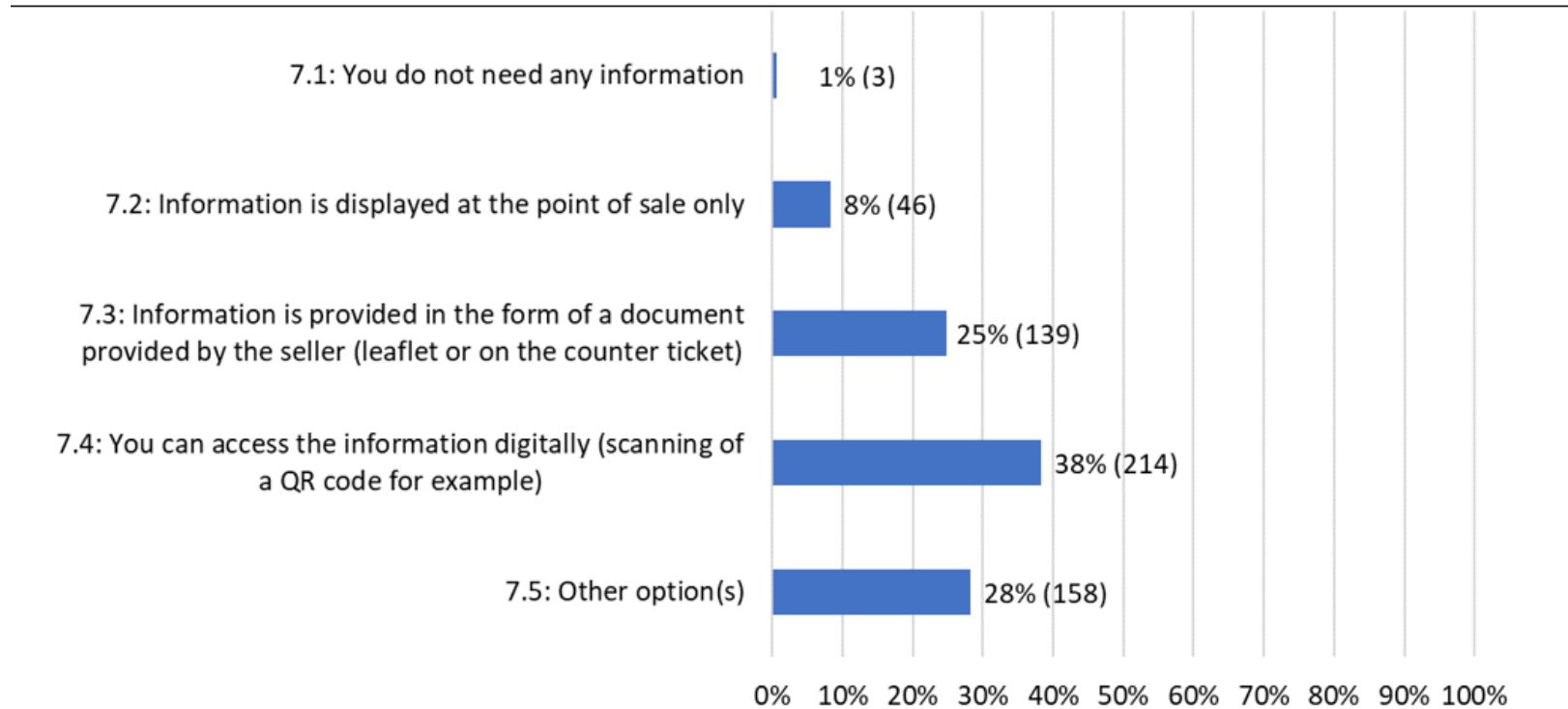


- a1) Do certain small items containing mixtures deserve **additional derogations from CLP labelling**? If yes, please indicate why and what elements.
- a2) Should the **labelling exemptions in Article 23 of CLP be extended**?
- a3) Should the labelling exemptions under **Section 1.5.2.4.** of Annex I to CLP be extended?
- a4) Do you consider that CLP should introduce a digital labelling option for those products (see last bullet in heading 4)? If yes, for which information?

CLP labelling of chemicals supplied to consumers without packaging / refill sales

- 1. Chemicals supplied to consumers without packaging (e.g. fuels)**
- 2. Re-fill sales**

Purchase of detergents in bulk



■ Figure 6-9: Question 7: Imagine you buy a detergent in bulk in a grocery. You have brought your own bottle which does not bear a label for this detergent. What would be the best option to inform you on the hazards and safety instructions? (Only one answer possible) (N=586), total responses

Source: Analysis of OPC responses

Questions



- b1) **For unpackaged chemicals**, is there a **concrete issue** in the lack of CLP labelling for certain consumer mixtures (e.g. divergent Member States approaches on fuel, accidents with fuel products)?
- b2) If no concrete issues and/or practical impossibility and unenforceability to label certain chemicals supplied in bulk, **should CLP exempt them from labelling**, or, alternatively, **introduce obligations to label only digitally** or via other means?
- b3) **For re-fill chemicals**, should CLP introduce additional specific rules (stickers etc.)? Or go for digital labelling?

Format of labels

- 1. Multilingual labels (focus on fold-out labels)**
- 2. Readability / Font size**

Questions

c1) Multilingual fold-out labels **in addition to the official language(s)** of the MSs?

Maximum number of languages?

Instead, provide labelling information **in additional languages digitally?**

c2) **Provisions for minimum format requirements** (e.g. font size, contrast) for labels instead of the current CLP guidance?

Digital labelling

6: Would you like to be able to consult labels of chemicals digitally in the future (e.g. on your computer or smartphone)?

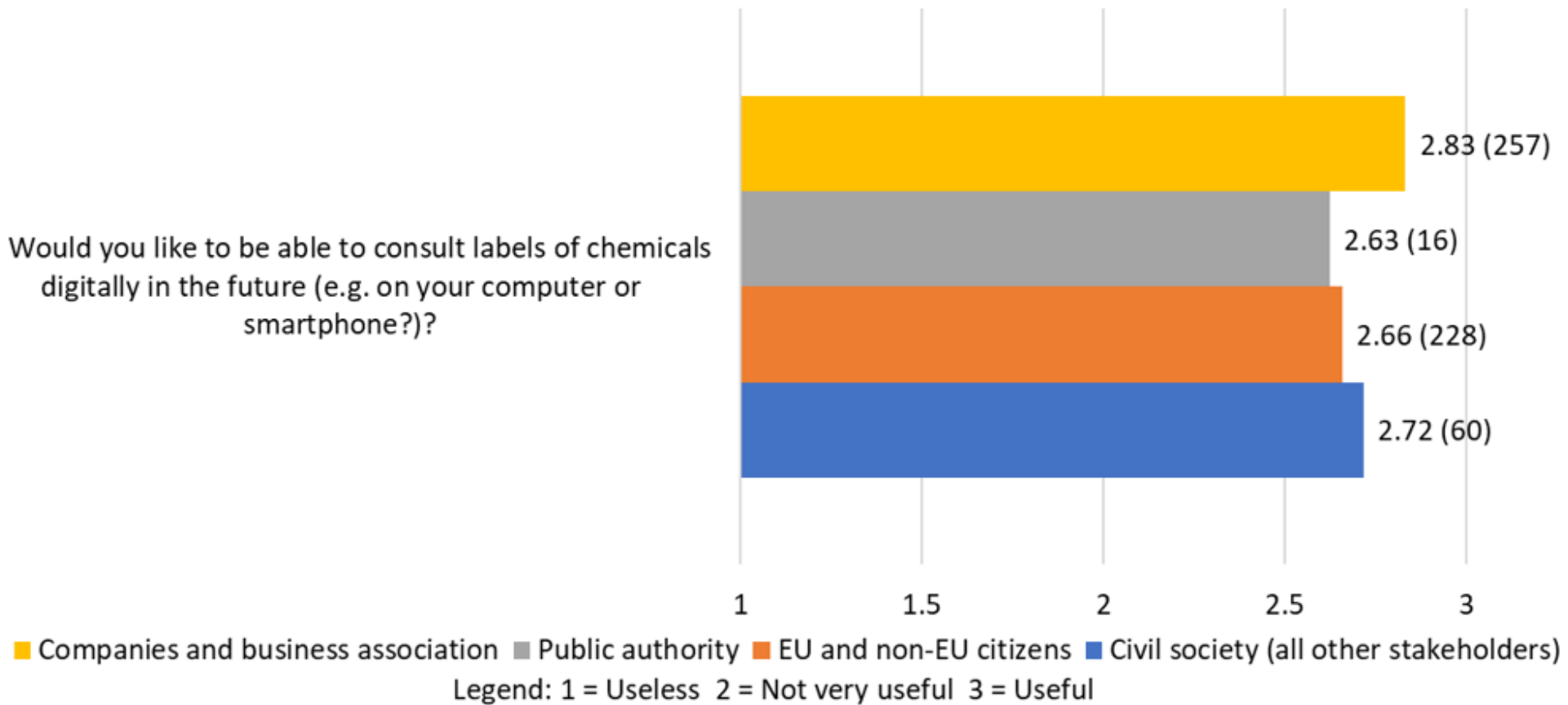


Figure 6-8 Question 6: Would you like to be able to consult labels of chemicals digitally in the future (e.g. on your computer or smartphone)? It might be a digital consultation of the whole label or just part of it. (Only one answer possible) (N=593), by stakeholder group

Source: Analysis of OPC responses

(Preliminary) policy options (slide 1 of 2)

Regulations = CLP and Detergents Regulation

- 1) No new policy actions (baseline):** no change, *i.e.* also no rules at all on e-labelling;
- 2) Non-legislative measures: Physical labels and voluntary use of e-label:** all labelling requirements on physical label would remain. Commission guidance document on e-labelling;
- 3) Revision of the labelling rules in the regulations:** align the two regulations and address inconsistencies **on the physical label only;**

(Preliminary) policy options (slide 2 of 2)

4) Revision of the labelling rules in the regulations, introducing optional digital labelling: All requirements for the physical label would remain. A framework set up within CLP would regulate the optional use of digital labelling, *i.e.* to provide the *option* to move certain (mandatory) labelling requirements on the e-label only;

5) Revision of the labelling rules in the regulations, introducing optional digital labelling: All relevant requirements for the physical label would remain. A framework set up within CLP would regulate the optional use of digital labelling, *i.e.* to provide the *option* to move further (mandatory) labelling requirements on the e-label only;

6) Revision of the labelling rules in the regulations, providing for digital labelling only in specific cases (to be kept in mind for products which currently do not bear a label at all).

Question

d) What are your views on the different policy options outlined for digital labelling?

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