**July 2015**

**Comments on CARACAL 18 Document CA/51/2015**

**Labelling and Packaging issues**

A.I.S.E. appreciates that significant progress has already been made on practical labelling and packaging issues. We would like to offer the following comments in relation to the CARACAL18 document entitled: ‘Feedback from the CARACAL sub-group on labelling and packaging issues (CASG-LP)’.

**1. Multi-lingual fold-out labels**

We welcome the suggestion to develop guidance on the design and the quality of fold-out labels (durability, robustness). Besides these considerations, we firmly believe that readability of the text on the label is the most safety-critical element for users. Therefore, we cannot understand the ‘compromise’ proposal to allow only a *maximum of three languages for fold-out labels*. This is arbitrary and not justified by safety considerations: why would more than three languages compromise legibility or safety?

* On the contrary, we believe that multi-lingual fold-out or multi-layer labels of good quality and sufficient legibility can positively contribute to safety and protection of users.
* Allowing multi-lingual labels, regardless of the format (fold-out or not) is a must in a European Union founded on the principle of internal market and free movement of people, including for example workers from neighbouring countries. There are many clusters of countries where multiple languages on labels make sense (Scandinavia/Baltic states, Germany speaking area with many neighbouring countries from Eastern Europe).
* The use of multi-lingual fold-out labels is economically essential for niche products that have a relatively slow turnover and are sold in multiple countries. Many SMEs rely on such products. Managing multiple SKUs (Stock Keeping Units) of the same item/good simply because of label variations does not make sense economically.
* There is no limitation on the number of languages allowed for ‘regular’ (non fold-out) labels. Companies have been providing multi-country information via multi-lingual labels for many years.

**In summary, the use of multi-lingual labelling is a key component of sustainable production and economic portfolio management. As long as legibility and durability is ensured, the safety purpose is fulfilled.**

We understand the concerns associated with excessively long fold-out labels but we think that Guidance can help in this respect. Since the amount of information on a label depends on the hazards of the mixture, the number of applicable H and P statements, and other requirements, fixing the amount of pages, or a given font size by default is not an easy thing to do. A.I.S.E. would like to contribute to the development of guidance on the matter. We are currently working on general tips to improve legibility, as well as developing examples of fold-out labels that allow increasing legibility.

**2. CLP-TDG interplay**

Introducing the concept of consolidation packaging has merit in that it allows differentiating specific packaging used solely for convenience during transport from outer packaging under CLP. Limiting the flexible approach to less hazardous chemicals with the signal word ‘Warning’ creates an unnecessary and arbitrary constraint.

As the Commission indicated at CARACAL, there are on-going discussions at UN-SCE TDG level. We need to ensure consistency between UN and CLP approaches.

**3. Chemical names**

We welcome the proposals and recommendations made in the document for chemical names. We note that some concerns were raised about potential ‘ambiguity’ of such names as well as reference to INCI names in the C&L Inventory.

CosIng, the European Commission database for information on cosmetic ingredients is a public and searchable database of cosmetic substances and ingredients which contains INCI names. CAS numbers for example can also be searched.

The process of INCI name assignment is managed by the Personal Care Products Council : <http://www.personalcarecouncil.org/science-safety/inci>

Concerning INCI names and other international nomenclatures, we suggest that this could be also subject to guidance explaining the INCI name assignment and how ambiguity can be avoided.

**4. Goods without packaging**

A.I.S.E. is aware of the fact that ‘bulk sales of detergents’ take place in a number of Member States (with limited commercial success).

Where a receptacle/container is used for re-filling, there is a higher potential for accidental exposure, as well as potential for mistake should any container be allowed. Ensuring that such receptacles/containers are appropriately designed (resistant to the content) and properly labelled is essential for safety and fully in line with CLP. We agree with the differentiation being made between ‘poured directly into operating equipment’ (like a fuel tank of a car) and ‘filled into a receptacle’ (that can be carried back home and used later). Finding a solution for the latter may simply rely on stressing general labelling and packaging requirements to equipment manufacturers.