

Guideline for labeling of scented candles according CLP regulation.

1. What is CLP regulation?

The Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008) is based on the United Nations' Globally Harmonised System (GHS) and its purpose is to ensure a high level of protection of health and the environment, as well as the free movement of substances, mixtures and articles.

The CLP Regulation amended the Dangerous Substances Directive (67/548/EEC (DSD)), the Dangerous Preparations Directive (1999/45/EC (DPD)) and Regulation (EC) No 1907/2006 (REACH), and since 1 June 2015, is the only legislation in force in the EU for classification and labelling of substances and mixtures.

2. How does it apply to candles?

In CLP regulation Title I, General Issues, Article 2, Definitions 8. candle is defined as a mixture:

8. 'mixture' means a mixture or solution composed of two or more substances;

CLP regulation Title I, General Issues, Article 4, point 4. Says that candle, which is classified as hazardous has to be labeled and packed accordingly:

4. Where a substance or mixture is classified as hazardous, suppliers shall ensure that the substance or mixture is labelled and packaged in accordance with Titles III and IV, before placing it on the market.

3. Labeling of scented candles.

Article 17

General rules

1. A substance or mixture classified as hazardous and contained in packaging shall bear a label including the following elements:

- (a) the name, address and telephone number of the supplier;
- (b) the nominal quantity of the substance or mixture in the package made available to the general public, unless this quantity is specified elsewhere on the package;
- (c) product identifiers as specified in Article 18 (see point 3.1.);
- (d) where applicable, hazard pictograms in accordance with Article 19 (see point 3.2.);
- (e) where applicable, signal words in accordance with Article 20 (see point 3.3.);
- (f) where applicable, hazard statements in accordance with Article 21 (see point 3.4., table 3.4.6);
- (g) where applicable, the appropriate precautionary statements in accordance with Article 22 (see table 3.4.7);
- (h) where applicable, a section for supplemental information in accordance with Article 25.

2. The label shall be written in the official language(s) of the Member State(s) where the substance or mixture is placed on the market, unless the Member State(s) concerned provide(s) otherwise.

Suppliers may use more languages on their labels than those required by the Member States, provided that the same details appear in all languages used.

3.1. Product identifiers

3. The product identifier for a mixture shall consist of both of the following:

- (a) the trade name or the designation of the mixture;
- (b) the identity of all substances in the mixture that contribute to the classification of the mixture as regards acute toxicity, skin corrosion or serious eye damage, germ cell mutagenicity, carcinogenicity, reproductive toxicity, respiratory or skin sensitisation, specific target organ toxicity (STOT) or aspiration hazard.

3.2. Hazard pictograms

Candles, which have to be marked with below shown hazard pictogram, are classified in Skin sensitizer category 1. ANNEX I, 3.Part: Health hazards, 3.1.3.3.1

3.4.3.3. *Classification of mixtures when data are available for all ingredients or only for some ingredients of the mixture*

3.4.3.3.1. The mixture shall be classified as a respiratory or skin sensitiser when at least one ingredient has been classified as a respiratory or skin sensitiser and is present at or above the appropriate generic concentration limit as shown in ►M2 Table 3.4.5 ◀ for solid/ liquid and gas respectively.



3.3. Signal words.

1. The label shall include the relevant signal word in accordance with the classification of the hazardous substance or mixture.
2. The signal word relevant for each specific classification is set out in the tables indicating the label elements required for each hazard class in Parts 2 to 5 of Annex I.
3. Where the signal word 'Danger' is used on the label, the signal word 'Warning' shall not appear on the label.

3.4. Hazard statements

1. The label shall include the relevant hazard statements in accordance with the classification of the hazardous substance or mixture.
2. The hazard statements relevant for each classification are set out in the tables indicating the label elements required for each hazard class in Parts 2 to 5 of Annex I.
3. Where a substance is included in Part 3 of Annex VI, the hazard statement relevant for each specific classification covered by the entry in that Part shall be used on the label, together with the hazard statements referred to in paragraph 2 for any other classification not covered by that entry.
4. The hazard statements shall be worded in accordance with Annex III.

ANNEX II Special rules for labeling and packaging of certain substances and mixtures. 2.8.

2.8. Mixtures containing at least one sensitising substance

The label on the packaging of mixtures not classified as sensitising but containing at least one substance classified as sensitising and present in a concentration equal to or greater than that specified in Table 3.4.6 of Annex I shall bear the statement:

EUH208 — ‘Contains (name of sensitising substance). May produce an allergic reaction’.

Mixtures classified as sensitising containing other substance(s) classified as sensitising (in addition to the one that leads to the classification of the mixture) and present in a concentration equal to or greater than that specified in Table 3.4.6 of Annex I shall bear the name(s) of that/those substance(s) on the label.

Table 3.4.6

Concentration limits for elicitation of components of a mixture

Component classified as:	Concentration limits for elicitation		
	Respiratory sensitiser Category 1		Skin sensitiser Category 1
	Solid/liquid	Gas	All physical states
Respiratory sensitiser Category 1	≥ 0,1 % (Note 1)	≥ 0,1 % (Note 1)	
Respiratory sensitiser Sub-category 1A	≥ 0,01 % (Note 1)	≥ 0,01 % (Note 1)	
Respiratory sensitiser Sub-category 1B	≥ 0,1 % (Note 1)	≥ 0,1 % (Note 1)	
Skin sensitiser Category 1			≥ 0,1 % (Note 1)
Skin sensitiser Sub-category 1A			≥ 0,01 % (Note 1)
Skin sensitiser Sub-category 1B			≥ 0,1 % (Note 1)

Table 3.4.7

Respiratory or skin sensitisation label elements

Classification	Respiratory sensitisation	Skin sensitisation
	Category 1 and subcategories 1A and 1B	Category 1 and subcategories 1A and 1B
GHS Pictograms		
Signal Word	Danger	Warning
Hazard Statement	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	H317: May cause an allergic skin reaction
Precautionary Statement Prevention	P261 P284	P261 P272 P280
Precautionary Statement Response	P304 + P340 P342 + P311	P302 + P352 P333 + P313 P321 P362 + P364
Precautionary Statement Storage		
Precautionary Statement Disposal	P501	P501

4. Labeling, where mixture/candle is classified as hazardous.

4.1. Placement of label.

CLP requires that the labels are firmly affixed to one or more surfaces of the immediate container of mixture and that they must be readable horizontally when the package is set down normally. The label elements themselves, in particular the hazard pictograms, must stand out clearly from the background. Furthermore, all label elements must be of such size and spacing as to be easily read. They must be clearly and indelibly marked. A physical label is not required when the label elements are shown clearly on the packaging itself.

Table 1: CLP labelling requirements versus discretion of the supplier

CLP requirement (Article 32)	Example of decision left to the discretion of the supplier
The hazard pictograms, signal word, hazard statements and precautionary statements must be kept together on the label.	The supplier is free to choose the arrangement of the pictograms.
Hazard statements must be grouped together on the label.	The supplier may choose the order of the hazard statements. The supplier may choose whether these groups are to be presented on the left, on the right or elsewhere on the label.
Precautionary statements must be grouped together on the label.	The supplier may choose the order of the precautionary statements, but should ensure that they are grouped with the hazard statements. The supplier may choose whether these groups are to be presented on the left, on the right or elsewhere on the label.
In case more than one language is used on the label, the hazard and precautionary statements of the same language must be grouped together on the label.	Where the supplier needs to use alternative means to meet the requirements of CLP Article 31 in relation to the language(s) required in a particular Member State, he may choose whether to accomplish this using fold-out labels, tie-on tags or on an outer packaging, in accordance with section 1.5.1 of Annex I
Any supplemental information as referred to in CLP Article 25 must be included in the section for supplemental labelling and placed alongside the label elements referred to in CLP Article 17(1)(a)-(g).	The supplier may choose how to visibly separate this section from the section containing the label elements referred to in CLP Article 17(1)(a)-(g). He may also decide to place this information in more than one location on the label.
The label elements must be easily readable (Article 31(3)).	It is recommended to keep full sentences together and in one line, if possible. The font size and spacing must be large enough and in relation to the dimensions of the label.

4.2. Size of label and label elements

Table 6: Minimum dimensions of labels and pictograms under CLP

Capacity of the package	Dimensions of the label (in millimetres) for the information required by Article 17	Dimensions of the pictogram (in millimetres)
≤ 3 litres	If possible, at least 52 x 74	Not smaller than 10 x 10 If possible, at least 16 x 16
> 3 litres but ≤ 50 litres	At least 74 x 105	At least 23 x 23
> 50 litres but ≤ 500 litres	At least 105 x 148	At least 32 x 32
> 500 litres	At least 148 x 210	At least 46 x 46

The exact **size of the letters** of the signal words, hazard statements, precautionary statements and any supplemental information is not further defined in the legal text, i.e. it is left to the discretion of the supplier to determine the size of the letters that allow the label elements to be easily read. However, the minimum letter size of 1.2 mm ('x-height') can be used as a reference.

CLP links the **size of the hazard pictograms** to the minimum dimensions of the label. The minimum size label can only accommodate 10 x 10 mm pictograms; these 1 cm² pictograms are the smallest allowed and can be used only if there is no space for the larger ones. A pictogram of at least 16 x 16 mm must always be used if this is possible.

The packaging of a mixture/candle can be so small or in such a shape or form that it is impossible to display the label elements in line with the requirements of CLP Article 31.

In particular, it may be impossible for the label to be read horizontally when the package is set down normally or the label elements are of insufficient size and spacing as to be easily read.

In this situation the label elements defined under CLP Article 17 may be provided either on

- fold-out labels; or
- tie-on tags; or
- outer packaging.

4.3. Content, quality and design of a fold-out label

A fold-out label generally consists of three parts:

♦ The **front page** must contain at least:

- the product identifier (Article 18(2) for substances, Article 18(3)(a) for mixtures);
Please note that for mixtures, the product identifier on the front and back page does not need to specify all the components contributing to the classification of the mixture;
- hazard pictogram(s) (Article 17(1)(d));
- signal words in all languages of the label (Article 17(1)(e) (in alphabetical order));
- nominal quantity (packages made available to the general public, unless specified elsewhere in the package) (Article 17(1)(b));
- contact details of supplier(s) (name, address and phone number);
- a reference to the full safety information inside the fold-out label, for example: “*safety information, see inside*” in all languages of the label or a symbol to inform a user that the label can be opened and to illustrate that additional information is available on inside pages;
- an abbreviation of the language (country code or language code); to avoid non-standard or confusing abbreviations it is recommended to use the language code according to e.g. ISO 639-1;

♦ **Inside page(s)** should contain:

- full labelling information (except for the hazard pictogram and the supplier identification) as required by Article 17(1) of CLP (including supplemental information) for each language mentioned on the front page and grouped by language, for example one language per page (in alphabetical order);
- an abbreviation of the language featured at the top of each of the inside pages (country code or language code).

♦ The **back page** should repeat the information given on the front page, except for the indication of the different languages in the inner layers.

General requirements for fold-out labels and tie-on tags

The CLP Regulation does not foresee any separate provisions for tie-on tags or fold-out labels. Both types of label must meet the same performance standards as any other "normal" label, namely:

- the label elements must be indelible, easy to read and stand out from the background;
- the size of the pictograms must be the same as the pictograms on the equivalent, normal label.

The fold-out label or tie-on tag must be securely attached to the packaging, i.e. the label remains attached to the packaging during reasonably expected handling of the package.

At least the following CLP information must be firmly attached to the immediate container:

- hazard pictograms,
- the product identifier and
- the name and telephone number of the supplier of the substance or mixture.

4.4. Specific rules for labeling of outer packaging, inner packaging and single packaging.

Article 33, point 2.:

2. Where the outer packaging of a package is not required to meet labelling provisions in accordance with rules on the transport of dangerous goods, both the outer and any inner packaging, including any intermediate packaging, shall be labelled in accordance with this Regulation. However, if the outer packaging permits the inner or intermediate packaging labelling to be clearly seen, the outer packaging need not be labelled.

5. Label examples

5.1. Example of candle label front and backside, where candle is classified as hazardous.



Example of candle carton label



**T-LIGHT IN PLASTIC CUP
WHITE WITH CINNAMON SCENT
ø3,7 x h1,7cm
12 PPBOX**



Warning 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

WEIGHT: 0.198KG

May cause an allergic skin reaction. IF ON SKIN: Wash with plenty of water.
If skin irritation or rash occurs: Get medical advice.
Dispose of contest/ container with national regulations.
Contains: eugenol, cinnamic aldehyde, eucalyptol.

Name of supplier and contact information

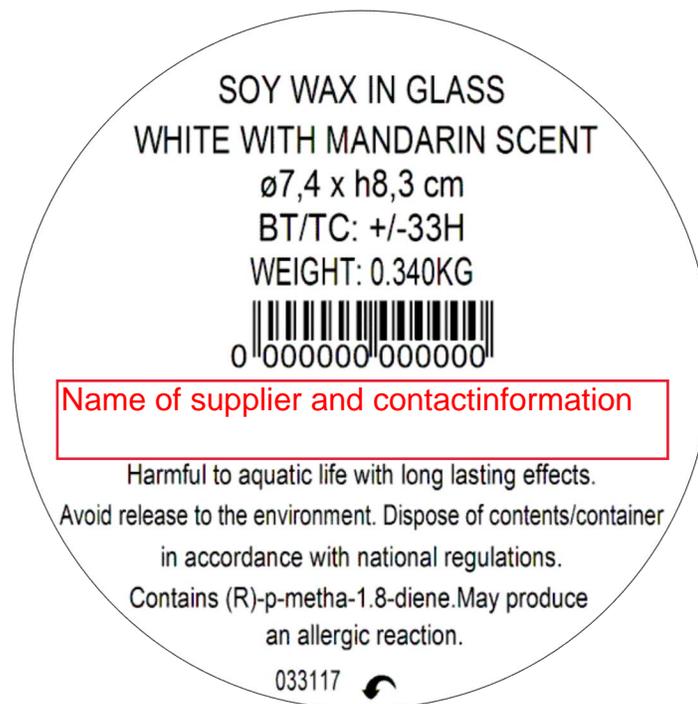
5.2. Example of labels where candle is not classified as hazardous, but containing at least one substance classified as sensitizing.

Special rules for labeling and packaging of certain substances and mixtures.

Label on the mixture not classified as sensitizing, but containing at least one substance classified as sensitizing has to contain sentence:

Contains (name of sensitizing substance). May produce an allergic reaction.

Example of candle label front and backside



Languages required for labels and safety data sheets

Country	Language 1	Language 2	Language 3
Austria	German		
Belgium ¹⁾	French	Dutch	German
Bulgaria	Bulgarian		
Croatia	Croatian		
Cyprus	Greek		
Czech Republic	Czech		
Denmark	Danish		
Estonia	Estonian		
Finland	Finnish	Swedish	
France	French		
Germany	German		
Greece	Greek		
Hungary	Hungarian		
Iceland	Icelandic		
Ireland	English		
Italy	Italian		
Latvia	Latvian		
Liechtenstein	German		
Lithuania	Lithuanian		
Luxembourg	German ²⁾	French ²⁾	
Malta	Maltese	English	
Netherlands	Dutch		
Norway	Norwegian		
Poland	Polish		
Portugal	Portuguese		

Country	Language 1	Language 2	Language 3
Romania	Romanian		
Slovakia	Slovakian		
Slovenia	Slovenian		
Spain	Spanish		
Sweden	Swedish		
Switzerland ³⁾	German	French	Italian
United Kingdom	English		

¹⁾ Please check with the local authorities, requirements can vary depending on region.

²⁾ German OR French

³⁾ The labelling must be written in at least two official languages. With the agreement of individual professional final users, a substance for supply to these final users may be labelled in only one official language or in English. SDS must be provided in the official languages as requested by the customer or, by mutual agreement, in another language; the annex to the safety data sheet may be written in English.