Simplification and digitalisation of labels on chemicals (CLP, Detergents, Fertilising Products)

Fields marked with * are mandatory.

Introduction

This initiative concerns the labelling requirements of many daily used chemical products such as paints, glues, lamp oils, solvents, detergents and fertilising products; under the Regulation on classification, labelling and packaging of substances and mixtures ('CLP' Regulation), the Detergents Regulation and the Fertilising Products Regulation.

Classification and labelling identify hazardous chemicals and inform users throughout the EU about their hazards and precautionary measures through standard symbols and phrases. Harmonised labels ensure widespread understanding and facilitate the free flow of goods with minimised cost. The Detergents Regulation lays down specific labelling requirements for detergents to inform consumers about the presence of certain substances in the product e.g. allergens. In addition, it provides use instructions to ensure safe use and prevents product overuse. The new Fertilising Products Regulation ensures free movement of fertilising products in the single market, and sets out rules for the labelling of those products.

Given that labels are the primary means to communicate essential product information to users, including hazard and safety information as well as product use-instructions, clear communication is vital for the effectiveness of chemicals legislation in protecting human health and the environment. The Fitness Check of the most relevant chemicals legislation (excluding REACH) and the evaluation of the Detergents Regulation (hereafter 'the evaluations') found that label comprehension and consequently consumer protection can be further improved by avoiding that labels are overloaded with information.

Furthermore, the evaluations suggest that communication could be improved by digital tools for labelling. Similar concerns have come to light following the adoption of the new Fertilising Products Regulation in 2019. However, the current legal labelling requirements do not allow the use of digital labelling on its own, nor incentivise it as an addition to existing labelling information. At present, digital communication of product label information is done only on a voluntary basis. To secure effective digital labelling, it must be avoided that a range of voluntary schemes lead to market fragmentation or barriers to transboundary trade.

This initiative will therefore look into:

- The digitalisation of labels under the **all above mentioned Regulations.**
- Following the findings of the detergents evaluation, address any overlaps and inconsistencies in the labelling requirements of the **Detergents Regulation**, with other pieces of legislation.

The main objective of this initiative is to improve the communication of chemicals to product users. It will further look at how the simplification and digitalisation of labels could reduce the costs for companies.

Findings indicate that although the internet is an almost constant part of the lives of many people in the EU, some people are excluded to a greater or lesser extent from its access. For example, people living in remote regions may be excluded as a lack of infrastructure leads to access and/or performance issues when trying to use the internet; this may result in socially undesirable outcomes. Some other people, particularly within older generations but also people with disabilities, or people that cannot afford internet access, may not be able to take full advantage of various services that are provided via the IT solutions or digital tools. With a growing share of day-to-day tasks being carried out online, the ability to use modern technologies becomes increasingly important to ensure everyone can participate in the society. This must be kept in mind while responding to this survey.

For the purpose of this survey, the term '**IT solution**' refers to a specific technology that could be integrated in a product label to encode information and provide communication opportunities (e.g. a website address or QR code). The term '**digital tool**' refers to a piece of software or hardware that could be used to interact with IT solutions and access the information stored in them (e.g. a computer or smartphone). A **'digital label'** therefore refers to label information which can be accessed via an IT solution provided on the on-pack label using a digital tool. The term **'on-pack label'** refers to the physical label affixed to a product package, or a separate leaflet accompanying that product (for example, for products supplied in bulk).

Please note that parallel to this initiative, the Commission is working on:

- A revision of the CLP Regulation, following the Chemicals Strategy for Sustainability. A Public Questionnaire on the revision of the CLP Regulation, which presents more detailed questions regarding the CLP Regulation, has already been launched and the feedback period for this initiative is open until 15 November 2021. This initiative will also analyse the simplification of labelling in terms of non-digital options under the CLP Regulation.
- A revision of the Detergents Regulation, following the findings of the evaluation of the Detergents Regulation. Another Public Questionnaire will be developed separately for the revision of the Detergents Regulation, and is expected to be launched this autumn.

This survey will take around 15 minutes to complete. Thank you very much for your time.

About you

* Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ● English

- ◉ Estonian
- ◉ Finnish
- ◉ French
- ◉ German
- ◉ Greek
- ◉ Hungarian
- ◉ Irish
- ◉ Italian
- ◉ Latvian
- ◉ Lithuanian
- ◉ Maltese
- ◉ Polish
- ◉ Portuguese
- ◉ Romanian
- ◉ Slovak
- ◉ Slovenian
- ◉ Spanish
- ◉ Swedish

*I am giving my contribution as

- ◉ Academic/research institution
- ● Business association
- ◉ Company/business organisation
- ◉ Consumer organisation
- ◉ EU citizen
- ◉ Environmental organisation
- ◉ Non-EU citizen
- ◉ Non-governmental organisation (NGO)
- ◉ Public authority
- ◉ Trade union
- ◉ Other

*First name

Giulia

* Surname

Sebastio

* Email (this won't be published)

Giulia.sebastio@aise.eu

* Organisation name

255 character(s) maximum

Downstream Users of Chemicals Cooperation Group (DUCC)

* Organisation size

- ◉ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

70941697936-72

* Country of origin

Please add your country of origin, or that of your organisation.

- ○ Afghanistan
- ○ Åland Islands
- ○ Albania
- ○ Algeria
- ○ American Samoa
- ○ Andorra
- ○ Angola
- ○ Anguilla

- ○ Djibouti
- ○ Dominica
- ○ Dominican Republic
- ○ Ecuador
- ○ Egypt
- ○ El Salvador
- ○ Equatorial Guinea
- ○ Eritrea

- ○ Libya
- ○ Liechtenstein
- ○ Lithuania
- ○ Luxembourg
- ○ Macau
- ○ Madagascar
- ○ Malawi
- ○ Malaysia

- ○ Saint Martin
- ○ Saint Pierre and Miquelon
- ○ Saint Vincent and the Grenadines
- ○ Samoa
- ○ San Marino
- ○ São Tomé and Príncipe
- ○ Saudi Arabia
- ○ Senegal

- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- ⦿ Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory

- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand

- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba

- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan

- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia

- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna

○ Curaçao	○ Laos	○ Rwanda	○ Western Sahara
○ Cyprus	○ Latvia	○ Saint Barthélemy	○ Yemen
○ Czechia	○ Lebanon	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Democratic Republic of the Congo	○ Lesotho	○ Saint Kitts and Nevis	○ Zimbabwe
○ Denmark	○ Liberia	○ Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

◉ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

Part II - General Questions

Question 2.

Please rate your knowledge of the following:

	No knowledge/ understanding	Little knowledge/ understanding	Average knowledge/ understanding	Good knowledge/ understanding	Expert knowledge/ understanding	I don't know /I can't answer
Fertilising Products Regulation	○	○	○	○	⦿	○
Detergents Regulation	○	○	○	○	⦿	○
CLP Regulation	○	○	○	○	⦿	○
The interaction between CLP Regulation and other Regulations	○	○	○	○	⦿	○

Recent Commission evaluations found that chemical labels are becoming overloaded with information (e.g. too much text or chemical names that consumers are not familiar with, printed in multiple languages) making it difficult for consumers to focus on the essential hazard information.

Question 3.

Do you usually understand the information provided on the label of a:

	Yes	Yes, to some extent	Some of it	Not at all	I do not use such products	I don't know/I can't answer
Fertilising Product	◉	○	○	○	○	○
Detergent	◉	○	○	○	○	○
Chemical product such as a glue or paint	◉	○	○	○	○	○

Question 4.

In which ways, do you consider that the communication of information on labels of chemicals, (e.g. paints, lamp oils, glues, solvents, fertilising products or detergents) could be improved? (multiple choice possible)

- ☐ Larger text
- ☑ Simplify the text on labels (e.g. to have only relevant information to a consumer presented and/or to address duplications of information, etc.)
- ☐ More detailed information provided on the on-pack label (e.g. more detailed use instructions, etc.)
- ☑ Less information on the on-pack label and instead providing full details via digital labels
- ☐ All information only provided via IT solutions and not on the on-pack label
- ☑ Reducing the number of additional languages provided on the on-pack label, and provide languages other than the official language/s in your country via digital labels
- ☑ Using more pictograms or graphic symbols instead of text
- ☐ No changes are needed, the current situation should be kept
- ☐ Other (please specify below)
- ☐ I don't know/cannot answer

Question 5.

Do you currently access **any** product information via IT solutions or digital tools?

- ◉ Yes

○ No

○ I don't know/I can't answer

Question 6.

How often do you look for product information online (for any product)?

○ Daily

○ Weekly

○ Monthly

○ A few times a year

○ Once a year or less

○ I don't know/I cannot answer

Question 7.

In the context of the below chemical products, how would you evaluate it if some information was removed from the on-pack label and could only be obtained via digital labels?

	Very positively	Moderately positively	Neither positively nor negatively	Moderately negatively	Very negatively	Other	I don't know /I cannot answer
Fertilising Products	◉	○	○	○	○	○	○
Detergents	◉	○	○	○	○	○	○
Other chemical products such as glues, lamp oils, paints, solvents, etc.	◉	○	○	○	○	○	○

Question 8.

If labelling information of a product would be available via IT solutions, what device would you prefer to use to access this information? (multiple choice possible)

- ☑ Smartphone
- ☑ Tablet
- ☑ Laptop
- ☑ Desktop Computer
- ☐ Smart watch
- ☑ Virtual Assistant Device
- ☐ Other (please specify below)
- ☐ None of the above
- ☐ I don't know/I cannot answer

Question 9.

What digital solution would you prefer to use, to access the information online?

- ☑ QR code
- ☑ Other barcodes
- ☑ Contactless technologies such as NFC or RFID tags
- ☑ Website address
- ☑ Doesn't matter as long as it with works with my preferred device
- ☐ Other (please specify below)
- ☐ I don't know/cannot answer

Question 10.

In your view, what would be the main **benefits** of presenting some label information via IT solutions?

- ☑ Ease of accessing information (e.g. quick searches, zooming in on text, etc.)
- ☑ More relevant/targeted information
- ☑ The possibility to provide more detailed information
- ☑ The possibility to provide information in additional languages
- ☑ The possibility to have updated information (e.g. for products purchased a long time ago)
- ☑ The possibility to provide all relevant information also in cases where the packaging is too small to have all information on the on-pack label
- ☑ Cost savings

☑ Environmental benefits

☐ Other

☐ I don't know/cannot answer

Question 11.

In your opinion, what would be the main **challenges** of presenting some label information via digital labels?

☑ Difficulty to access information (e.g. poor internet connection, lack of electricity)

☑ Creating inequalities for certain population groups

☐ Increased operating costs for industry

☐ increased costs for consumers

☐ Difficulties for authorities to ensure the new rules are properly implemented

☑ Potential differences between the information displayed on the on-pack label and via digital labels (e.g. due to updates, inconsistencies)

☐ Other

☐ I don't know/cannot answer

Part III - Specific Questions for Product Users

Fertilising products include simple household products such as potting mix or fertilisers to help plants grow. They also include products which are used professionally, for example by farmers, and also include more specialised products such as liming material, soil improvers, growing media, inhibitors and plant bio stimulants.

Detergents are products that are commonly used by everybody and include a wide range of products - from laundry detergents and fabric softeners to dishwashing and all-purpose/surface cleaners. Detergents are also used professionally, to deliver health and hygiene in places such as hospitals, restaurants and in industry.

Chemicals are used by consumers, professionals and workers in industrial settings or in the household, and can include glues, paints, lamp oils, solvents and fuels. Fertilisers and detergents are also chemicals, however, the term 'chemicals' is much wider and comprises many more products. Chemicals are subject to CLP labelling (in other words, labelling as required by the 'Regulation on the classification, labelling and packaging of chemical substances and mixtures') if no specific product legislation applies, or sometimes CLP labelling applies in addition to product legislation.

Question 12.

Do you use the following:

	Yes, I use them at home	Yes, I use them at work	No

Fertilising Products	☐	☐	☐
Detergents	☐	☐	☐
Other Chemical Products (e.g. glues paints, lamp oils, solvents, etc.)	☐	☐	☐

Part IV - Specialist Questions for Professionals and Industry

Question 23.

Please select which apply to you: (multiple choice is possible)

	Fertilising products	Detergents	Other chemical products
Manufacture or produce	☑	☑	☑
Blend	☑	☑	☑
Sell	☑	☑	☑
Import/Export	☑	☑	☑
Repackage/Relabel	☑	☑	☑
Representative	☑	☑	☑
Distribute	☑	☑	☑
Use	☑	☑	☑
Other (please specify below)	☐	☐	☐
None of the above/cannot answer	☐	☐	☐

Question 23.a.

If 'other', please explain:

1000 character(s) maximum

Question 24.

Do you currently provide any product information via IT solutions or digital tools?

- ☐ Yes, we provide online the same information presented on the on-pack label
- ☑ Yes, we provide online additional/complimentary information to an on-pack label
- ☐ No product information is available online
- ☑ Other
- ☐ I don't know/cannot answer

Question 24.a.

If 'other' please explain:

500 character(s) maximum

> The answer here is sector dependent. Some examples:
> - Detergent Regulation: requirement to list ingredients online.
> - Online sales of products
> - Provide the same information online as presented on the on-pack label, also because of safety data sheets and product/technical data sheets being made available online

Question 25.

What are the main reasons for providing information online? (multiple choice possible)

- ☑ We sell our products online
- ☑ The information does not fit on the on-pack label
- ☑ Improved customer service
- ☐ Cost savings
- ☑ This is preferred by our customers or product users
- ☑ It is easier to keep this information up-to-date
- ☑ Other (please specify below)
- ☐ I don't know/cannot answer

Question 25.a.

If 'other', please explain below:

500 character(s) maximum

> Can highlight information on-pack
>
> Can provide information in a way that is more end-user relevant through other means (e.g. online, also multilingual booklets, SDSs, technical data sheets etc.)

Question 26.

Please rate the main benefits of introducing a regulatory framework on digital labelling of chemicals for your organisation?

	Not beneficial at all	A little beneficial	Neither beneficial nor disadvantageous	Moderately beneficial	Extremely beneficial	I don't know /cannot answer
Cost savings	○	○	○	●	○	○
Better targeted communication	○	○	○	○	●	○
Increased ease of complying with labelling requirements (i.e. through better management of the amounts of label information)	○	○	○	○	●	○
Better management of fast changing label information	○	○	○	○	●	○
Other (please specify below)	○	○	○	○	○	○

Question 26.a.

If 'other', please explain:

500 character(s) maximum

Question 27.

How would you see the following challenges if digital labelling was introduced?

	Not challenging at all	A little challenging	Neither challenging nor easy	Moderately challenging	Extremely challenging	I don't know /cannot answer
Managing different data formats	○	○	○	●	○	○
Managing changes in labelling processes (e.g. design, packaging)	○	○	○	●	○	○
Implementing IT solutions	○	○	○	●	○	○
Increased costs associated with implementing technological aspects (e.g. creating and keeping up-to-date a website)	○	○	●	○	○	○
Increased costs associated with changes to design/packaging	○	●	○	○	○	○
Increased costs associated with training	○	○	○	●	○	○
Other (please specify below)	○	○	○	○	○	○

Question 27.a.

If 'other', please explain:

1000 character(s) maximum

Question 27.b.

If 'extremely challenging', please provide more details:

1000 character(s) maximum

Question 28.

Would your organisation implement digital labelling if it were an option under the revised regulations?

- ◉ Yes
- ○ No
- ○ I don't know/I cannot answer
- ○ Not relevant

Question 29.

In your view, how should any label information presented via IT solutions be organised?

- ☐ Centralised, in an EU operated database
- ☑ Centralised, in one or more databases operated by industry
- ☑ Decentralised, in a database operated individually by each manufacturer following standardised templates or guidelines
- ☐ Decentralised, in a database managed by Member State authorities
- ☐ Other
- ☐ No preference
- ☐ I don't know/I cannot answer

Question 29.a.

If 'other', please explain:

1000 character(s) maximum

Part V - Other Comments

Do you have any further inputs that have not been included in the questionnaire? Please explain:

1000 character(s) maximum

> Although biocidal products are not in the scope of the consultation, the labelling of the biocidal products is also complex and it might be relevant to think about its simplification. Learnings of label simplification and digitalisation could be applied to biocidal products in the future

Can you recommend any organisations, businesses or researchers that we could contact to gather further information on these topics?

200 character(s) maximum

> DUCC refers to the work done by it's member organisations on digitalisation, digital labelling and label simplification

Do you have any relevant documents or resources you would like to share with us? If so, please share using the following upload button:

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Would you like to be contacted for any further input on this topic (i.e. for an interview)? If yes, please leave your e-mail address below:

Please note that by providing an e-mall address it does not commit the European Commission or any consortium working on behalf of the European Commission to an interview.

> giulia.sebastio@aise.eu

Contact

GROW-F2@ec.europa.eu