



**Changes to the EU Regulations  
on the  
Classification, Labelling & Packaging  
of Chemicals  
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# Regulatory changes to printed labels on Chemical products

Important news for any company who manufacture, fill, supply, package or even just label any chemical substances and / or mixtures which are to be sold within the European Union\*.



The European Commission have been working for some time to improve the regulations surrounding the Classification, Labelling and Packaging (CLP) of Chemical substances and mixtures, and have now fully agreed and published their amended legislation, as of 20<sup>th</sup> November 2024.

What some might consider to be minor legislative changes in the technical / small print, does in fact bring about quite significant changes to the design and display of the safety and hazard information required on all relevant products sold in physical stores / outlets *and* online.

## Why are these changes being made?

The CLP (Classification, Labelling and Packaging) of Chemicals legislation is being updated to make it easier for users to access and understand the product and safety information required by law to appear on the packaging, and also to enable and authorise the introduction and use of more modern methods of accessing this information.

Where there has been some ambiguity or design flexibility in the past, the amended regulations not only make the rules much clearer, but also, quite literally, make the safety information required on all of the product labels and / or inner packaging much clearer as well.



## What is changing?

There are a number of very important changes that are too numerous to be outlined here (for more detailed information on all of the changes, contact one of our team on 01543 431070), but the main changes and requirements regarding the design and printing of self-adhesive labels for chemicals are:

- ◆ All text required under Article 17 must appear in black on a white background
- ◆ Minimum dimensions of labels (for the above information) are specified (in mm)
- ◆ Minimum dimensions of each Pictogram are specified (in mm)
- ◆ The same font should be used throughout (this must be easy to read and must be a sans-serif font (such as Arial, Calibri, Verdana, Futura, Avenir, Open Sans, etc.) ([https://en.wikipedia.org/wiki/List\\_of\\_sans\\_serif\\_typefaces](https://en.wikipedia.org/wiki/List_of_sans_serif_typefaces))
- ◆ Minimum font size‡
- ◆ Minimum line spacing which must be related to the size of the font
- ◆ Multi-language labels to have the languages listed alphabetically
- ◆ Labels must be firmly affixed to one or more surfaces of the packaging immediately containing the substance or mixture and shall be readable horizontally when the package is set down normally

\* As part of the Northern Ireland Protocol agreement with the UK government, the same rules will also apply to any goods sold within Northern Ireland

‡ Minimum size of the label, minimum dimensions of the GHS pictogram and the minimum font size is related to the capacity of the package (with one minor exception‡‡)

‡‡ For the labelling of inner packaging where the contents do not exceed 10 ml, the font size may be smaller than indicated in Table 1.3, as long as it remains easily legible, where it is deemed important to place the most critical statement, such as a hazard statement or EUH statement, and where the outer packaging meets the requirements of Article 17.'

## Improving accessibility

With the changes to font size and line spacing it will be more difficult to fit all the required regulatory information on the face of the label, so the new regulations now allow for Peel & Reveal labels (sometimes known as Peel & Read, Booklet, or multi-page labels) to be used where the rules cannot be met due to the shape or form of the packaging or its small size, thereby allowing manufacturers to fit much more information within the same space on the packaging. However, be aware that the regulations also stipulate which details must appear on which pages of the label to ensure that safety information (outlined in Article 17(1)) is available at every opportunity and in every language. (see our separate information sheet on this).

## Smart Labels / QR Codes

In order to benefit from the greater availability of technology and to improve accessibility for more vulnerable groups such as people with visual impairments and / or people who do not speak the national language of the member state, the new regulations allow for the voluntary use of 'digital labels', the content of which is accessible through a data carrier link which must be printed on the label or next to the label and is scannable through an individual's digital device. This does not however, remove the responsibility of the suppliers to ensure that the above labelling requirements are fulfilled.



This option of digital labelling only applies to information which is not essential for the safety of the user or the protection of the environment.

Where label elements are provided on a digital label only, the data carrier (QR code) shall be accompanied by the statement "More hazard information available online".

## Do I have to update my labels?

With the growth of global markets and trade, and with European Union member countries being some of our largest export markets, we would strongly recommend that you do, but, if you are absolutely sure that none of your products are sold within the EU (or Northern Ireland, where the rules will also apply under the Northern Ireland Protocol) and none are available online where they could be sold or delivered into the EU, then you may not have to update your labels at this time, but there is a strong possibility that UK legislators will mirror these new regulations for the safety of UK citizens as well.

## When do I have to make these changes?

Our advice would be to do so as soon as possible so that your customers can benefit from the changes which have been made to improve legibility and accessibility.

However, if you are in no rush to update your labels, there are still some strict deadlines which need to be adhered to, especially after a change in the classification or labelling of a substance or mixture.



1. Where the new hazard class is additional to an existing or represents a more severe hazard class or category, or where new supplemental label elements are required under Article 25, the deadline for updating the label information should be set at 6 months from the date on which the results of a new evaluation on the classification of that substance or mixture were obtained.
2. Where a classification is updated to a less severe hazard class or category without triggering classification in an additional hazard class or new supplemental labelling requirements, the deadline for updating the labels should remain at 18 months.
3. If your labels are, or will need to be due to the increase in font sizes and line spacing, etc., provided in a peel & reveal format, then the updated regulations will apply from 1<sup>st</sup> July 2026.
4. If you are simply updating your existing single layer labels to meet the new CLP labelling requirements, then the updated regulations will apply from 1<sup>st</sup> January 2027.

## Will it apply to existing stock / items already on retailers shelves?

No, you will not have to retrospectively update labels on products which have already been produced and are already in the marketplace.

## Is there anything else I need to do?

The rules have been updated to keep pace with technological developments and new means of sale such as online sales and sales through refill stations. Ensuring that the same information is displayed with the same level of legibility and accessibility, wherever a customer might purchase your product.

This means that the same information must accompany any online advertisements and offers and additional copies of the product labels should be made available for end users to take and manually apply to whichever packaging they use to carry and store the chemicals when purchased from a refill station.

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## Further information

**Table 1.3**

Minimum dimensions of labels and pictograms and minimum font size

Capacity of the package	Dimensions of the label (in millimetres) for the information required by Article 17	Dimensions of each pictogram (in millimetres)	Minimum font size (with the x-height in millimetres)
Not exceeding 0.5 litres	If possible, at least 52 x 74	Not smaller than 10 x 10	1.2
Greater than 0.5 litres but not exceeding 3 litres		If possible, at least 16 x 16	1.4
Greater than 3 litres but not exceeding 50 litres	At least 74 x 105	At least 23 x 23	1.8
Greater than 50 litres but not exceeding 500 litres	At least 105 x 148	At least 32 x 32	2.0
Greater than 500 litres	At least 148 x 210	At least 46 x 46	2.0

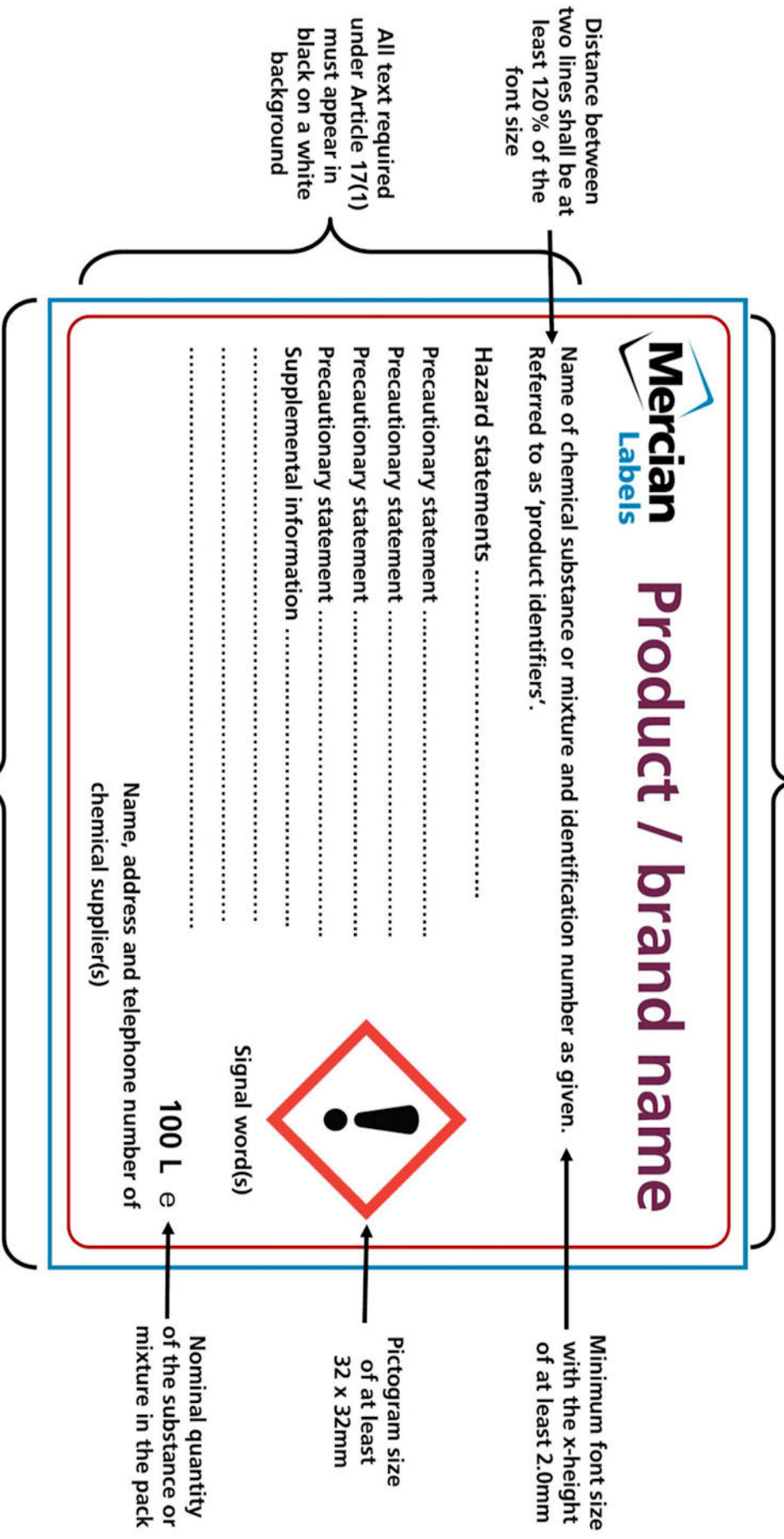
Link to the full details of the amendments made in November 2024 <http://data.europa.eu/eli/reg/2024/2865/oj>

Link to the original legislation (Regulation (EC) No. 1272/2008) to which the amendments have been made: [https://publications.europa.eu/resource/cellar/6bf54b59-7673-461b-b8e1-f24c545cbd3c.0006.05/DOC\\_1](https://publications.europa.eu/resource/cellar/6bf54b59-7673-461b-b8e1-f24c545cbd3c.0006.05/DOC_1)

Example highlighting the requirements for labels on chemical products with a packaging capacity greater than 50 litres, but not exceeding 500 litres

Minimum label size / area (to red line) of at least 105 x 148mm required to display all text required under Article 17(1)

# Worked example



The same font, and always being one that is easily legible and without serifs, shall be used throughout and the letter spacing shall be appropriate for the selected font to be easily legible