



P19. CLASSIFICATION AND LABELLING FOR BIOCIDES

Maristella RUBBIANI

Istituto Superiore di Sanità, Viale Regina Elena 299 00161 Roma ITALIA

CLP and biocides

The EU Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures, the CLP-Regulation, entered into force on 20th January, 2009. Since 1st December, 2010 the classification, labelling and packaging of substances has to comply with this Regulation. For mixtures, the rules of this Regulation are mandatory from 1st June, 2015; this means that until this date classification, labelling and packaging could either be carried out according to Directive 1999/45/EC (Dangerous Preparations Directive) or according to the CLP-Regulation. Substances, as components of a mixture, however, have to be classified according to both, Directive 67/548/EEC (Dangerous Substances Directive) and Regulation (EC) No. 1272/2008 from 1st December, 2010 until 1st June, 2015.

Article 69 BPR stipulates certain information for the labelling of biocidal products in addition to the general labelling requirements for hazardous substances. This information is also required for biocidal products, which are not classified as dangerous preparations according to Dangerous Preparations Directive.

The label of the biocidal product should clearly and indelibly show the information according to Article 69 (1) subparagraph 2 sentence 1 and Article 69 (2) a), e), h), i), j), k), l) and where applicable n) and o).

In addition, it shall be ensured that labels are not misleading in respect of the risks from the product to human health, animal health or the environment or its efficacy and, in any case, do not mention the indications 'low-risk biocidal product', 'non-toxic', 'harmless', 'natural', 'environmentally friendly', 'animal friendly' or similar indications.

Notification for the poison information database

In addition, anyone who, in his capacity as the manufacturer or importer or who is using his own trade name, places a biocidal product on the market must submit the following details to the National database for dangerous products .

Furthermore, the manufacturer or importer must also submit details of any later changes to this information which are relevant when treating health disorders that could be caused by the biocidal products. These details must be notified before the preparation is placed on the market for the first time or when it is changed.

The forms for the notification of dangerous preparations/biocides can vary from country to country and new possible harmonization is now ongoing at EU level.

Advertisement

Advertisement must be distinguished from the classification and labelling. According to Article 72 BPR, any advertisement for biocidal products shall, in addition to complying with the CLP-Regulation, include the sentences "Use biocides safely. Always read the labelling and the product information before use.").

The sentences shall be clearly distinguishable and legible in relation to the whole advertisement.

Advertisers may replace the word 'biocides' in the prescribed sentences with a clear reference to the product-type (e.g. disinfectant, wood preservative or similar) being advertised.

Advertisements for biocidal products shall not refer to the product in a manner which is misleading in respect of the risks from the product to human health, animal health or the environment or its efficacy. In any case, the advertising of a biocidal product shall not mention 'low-risk biocidal product', 'non-toxic', 'harmless', 'natural', 'environmentally friendly', 'animal friendly' or any similar indication. Apart from that, the term "advertisement" shall be interpreted in a broad sense; the rules particularly apply to offers of biocidal products in the internet.