

A.I.S.E. POSITION ON TRANSITION PERIODS FOR UPDATING MIXTURE LABELS FOLLOWING TRANSFER ATPS UNDER CLP

April 2026

Following the discussions at CARACAL-57 (agenda point 3), A.I.S.E. welcomes the opportunity to submit comments in response to the Commission's call for feedback. As the association representing downstream users formulating and placing detergents, cleaning and maintenance products on the EU market, A.I.S.E. wishes to provide its views on the appropriate transition period for updating mixture labels following the adoption of transfer Adaptations to Technical Progress (ATPs) under the CLP Regulation, in light of their regulatory and operational implications.

A.I.S.E. supports the objectives of the CLP Regulation to ensure a high level of protection for human health and the environment through clear and harmonised hazard communication. To ensure these objectives are effective in practice, changes to harmonised classification must be implemented in a way that is **predictable, proportionate and workable**, particularly for downstream users formulating and placing mixtures on the EU market.

In this context, A.I.S.E. considers that a **transition period of 18 months between publication and application** is essential for mixtures also where new classifications are introduced via transfer Adaptations to Technical Progress (ATPs) under Article 37(7).

A.I.S.E. therefore strongly encourages the European Commission and CARACAL to maintain an 18-month transition period between publication and application for all Annex VI changes affecting mixtures, including those introduced via transfer ATPs.

Context

The inclusion of a substance in Annex VI of CLP constitutes a new and legally binding trigger, creating uniform classification and labelling obligations across the EU. This is distinct from earlier hazard identification under REACH (including SVHC identification), the Biocidal Products Regulation or the Plant Protection Products Regulation. Only once a harmonised classification is formally adopted and published do downstream users have legal certainty regarding the final hazard classes, notes and label elements to be applied. This need for legal certainty is particularly important for transfer ATPs, which do not follow the standard harmonised classification and labelling procedure and therefore offer reduced predictability.

For mixtures, implementing a new harmonised classification is not an isolated administrative action but part of a **complex, sequential compliance process**, as shown in the two flowcharts in Annex I of this document. A reclassification of a single ingredient can affect large portfolios of formulated products, requiring reassessment of mixture classification, updates to safety data

sheets and supply-chain communication, and changes to physical labels across multiple pack sizes and languages.

Where a more severe classification applies, existing mixtures may no longer meet regulatory or market requirements and may require reformulation. For detergents and maintenance products, reformulation typically involves R&D, testing, validation, customer approval and market transition, which cannot be safely compressed without risking product withdrawal or supply disruption, without additional benefits for consumer safety.

Practical implementation constraints must also be taken into account. Downstream users depend on upstream suppliers for updated safety data and on SDS authoring software providers to integrate new classifications. In practice, the development and deployment of updated IT tools often require **nine to twelve months or more**, reducing the effective time available for companies to implement changes. Label updates further require time for redesign, multilingual validation, production and stock management, especially where pre-printed packaging is used.

In addition, in case of mixtures sold to the general public, a new classification may trigger the need for developing a child resistant fastening or a tactile warning of danger, which require a full packaging re-design, not just a re-labelling. Therefore, only an adequate transition period allows responsible stock management, avoiding unnecessary packaging waste.

The revised CLP Regulation (2024/2865) confirms that, in cases of harmonised classification and labelling, the standard deadline to update labelling information is **18 months**. From the perspective of mixture suppliers, transfer ATPs have the same practical implications as regular ATPs updating Annex VI and should therefore follow the same implementation logic.



A.I.S.E. is the voice of the cleaning and hygiene products industry

A.I.S.E. represents an industry that supplies essential detergents, cleaning and maintenance products, disinfectants and biocidal products for cleanliness and hygiene at home and in public spaces across Europe. Based in Brussels, the association has been the voice of the industry since 1952.

Membership includes 30 national associations across Europe, 19 corporate members, and 18 value chain partners, collectively representing a broad network of over 900 companies supplying household and professional cleaning and hygiene products and services. The A.I.S.E. network works with EU and national decision-makers to strengthen the Single Market through innovative, science-based solutions that ensure user safety, environmental protection, and regulatory compliance.

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Annex I

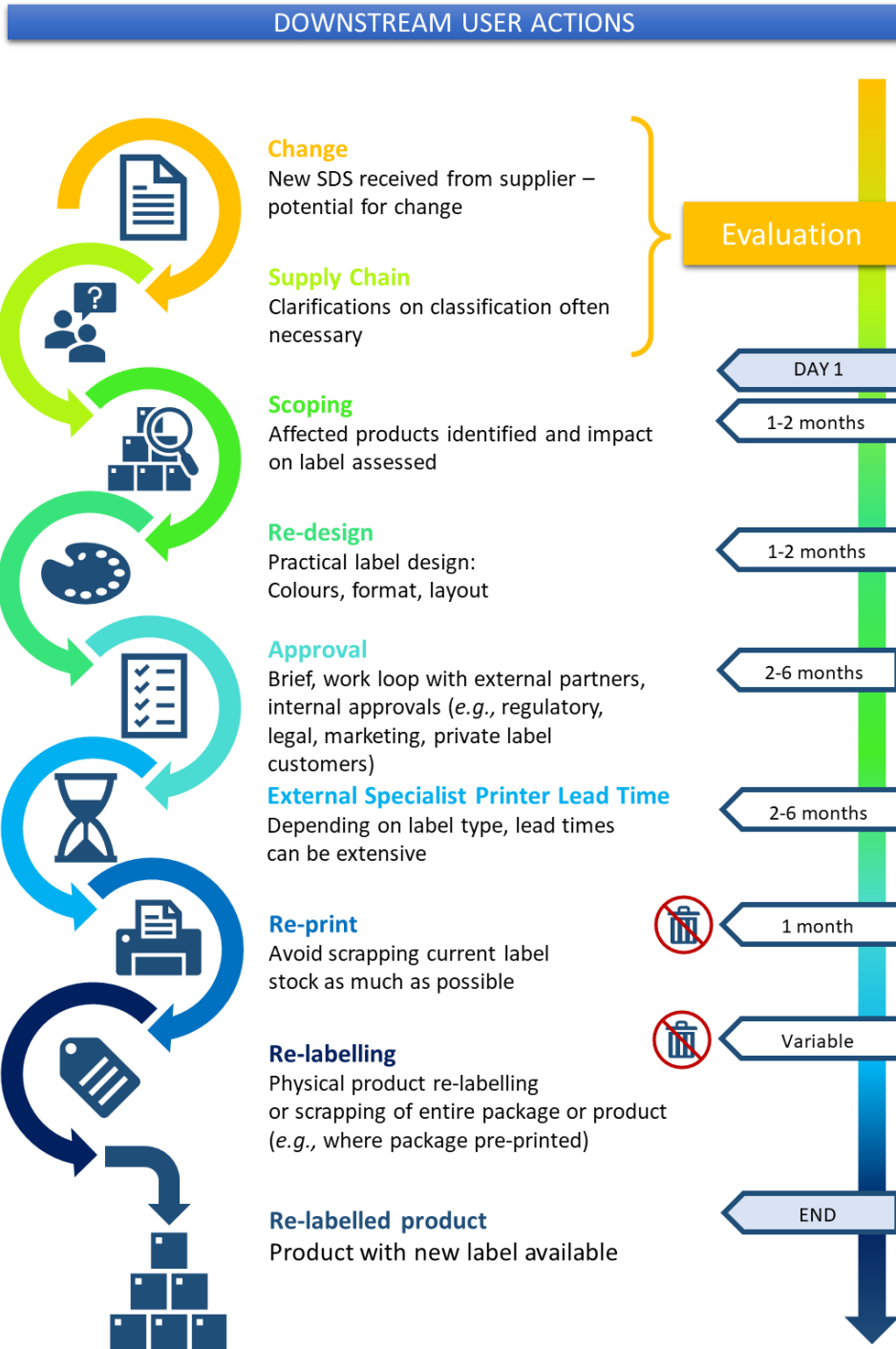


Figure 1. Overview of downstream users' actions to update labels in case of a change in classification.



SUPPLY CHAIN OVERVIEW

ACTOR: Raw Material Supplier

Data generation starts
Draft SDS and Label update
Results → New classification

- 6 MONTHS START**
- Actions: Issue documentation

ACTOR: Downstream User

- 6 MONTHS START**
- Actions →

ACTOR: Retailer

- 6 MONTHS START**
- Actions: Sell through of product
 - Crucial to avoid any further scrapping



Figure 2. Overview of supply chain's actions to update labels in case of a change in classification.

