



DUCC



Downstream Users of Chemicals Co-ordination group



CHILD RESISTANT FASTENINGS

Industry Guidance at a Glance



All chemical substances and mixtures placed on the European market need to be classified, labelled and packaged according to the hazard posed to humans and the environment. The rules set out in the Classification Labelling and Packaging (CLP) Regulation¹ help to protect humans and the environment by ensuring that users of chemicals are informed about hazardous properties in a consistent and harmonised manner.

Depending on the hazard of a chemical and where it is used, special requirements may be required to enhance protection for the user and vulnerable members of society. Child Resistant Fastenings (CRF) are an example of a special packaging requirement that help to protect vulnerable people (i.e. young children) when particularly hazardous chemicals are made available to the general public.

CLP – TO WHOM DOES IT APPLY?

CLP relates to chemicals placed on the European market. Depending on how a chemical is supplied, CRF obligations may apply. If you or your company supply certain chemicals to the general public, you are responsible for ensuring that CRF requirements are fulfilled. European authorities acknowledge that retailers, wholesalers, distributors typically do not package chemicals, however authorities expect that retailers, wholesalers and distributors to work with their suppliers to ensure proper packaging of the chemicals they sell to the general public.

WHAT TYPE OF CHEMICALS REQUIRE A CRF?

Under CLP, a chemical that is supplied to the general public must be packaged with a CRF (regardless of package capacity) if it is:

Classified for one or more of these hazards:

- Acute toxicity (category 1 – 3)
- Toxic to specific organ(s) – Repeated/Single Exposure (STOT RE/SE category 1)
- Skin Corrosion
- Aspiration hazard (excluding aerosols or packaging with a sealed spray attachment)

Or if a chemical contains:

- methanol (at concentrations $\geq 3\%$ (w/w))
- dichloromethane (at concentrations $\geq 1\%$ (w/w))

CFR - THE BASICS:

As well as requiring the use of a CRF, CLP also prescribes standards for CRFs, specifically:

- For reclosable packages: the CRF must comply with ISO standard 8317 (as amended)
- For non-reclosable packages: the CRF must comply with ISO standard 862 (as amended)

CLP also requires that a supply chain actor obliged to use a CRF must also obtain and retain evidence of conformity with the applicable standards. This evidence can only be obtained from testing laboratories which confirm to Standard ISE/IEC 17025 (as amended) and should be readily available in an appropriate European language. Conformity certificates may be subject to inspection by enforcement authorities. Derogation from these requirements may be possible in specific cases.

¹ Regulation (EC) No. 1272/2008, see: <https://echa.europa.eu/regulations/clp/legislation>

CRF - ADVICE ON COMPLIANCE:

During 2015 European authorities conducted an enforcement project on CLP packaging requirements for hazardous chemicals supplied to the general public. The project report² revealed nearly one third (29 %) of inspected products were non-compliant with CLP packaging requirements, of which nearly half (43.7 %) were not compliant with CRF obligations.

If you supply a chemical(s) to the general public and that chemical(s) requires a CRF, you must be able to demonstrate that:

- Your (reclosable) CRFs are compliant with ISO 8317³ and/or your (non-reclosable) CRFs compliant with ISO 862³
- The conformity of these CRFs been tested by an ISO/IEC 17025³ certified lab
- Your conformance certification documents must also be readily available (in the language(s) of your country or another EEA member state).



Child resistant fastening

IMPORTANT

CLP requires that information on classification and labelling must be retained for at least 10 years after the last supply of a given chemical. It is suggested that this practise is also applied to information on CRFs.

FURTHER INFORMATION

This document provides targeted information to promote safety standards for hazardous chemicals. For more detailed information, the European Chemicals Agency (ECHA) provides detailed information and guidance on CLP⁴. Chemical hazard classifications often change over time. CLP compliance should be reviewed periodically for all chemicals that you or your organisation supply.

About DUCC

DUCC is a collaboration between 11 sectors of European industry who make chemical mixtures for consumer, professional and industrial use. With a diverse membership ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants and chemical distributors, DUCC seeks to address the needs, rights and duties of these sectors in common and co-ordinated manner.

About SMEunited

SMEunited is the association of crafts and SMEs in Europe with around 70 member organisations from over 30 European countries. SMEunited is a recognised employers' organisation and European Social Partner and acts on behalf of its members in the European Social Dialogue and in discussions with the EU institutions. SMEunited speaks on behalf of the 24 million SMEs in Europe which employ almost 95 million people.

² European Chemicals Agency's Forum. (2016) Report - [Forum Pilot Project on Child-resistant fastening](#). Helsinki: European Chemicals Agency

³ Standard as amended

⁴ ECHA information on CLP, see: <https://echa.europa.eu/regulations/clp/understanding-clp>