



Downstream Users of Chemicals Co-ordination group



TACTILE WARNING OF DANGER

Industry Guidance at a Glance



All chemical substances and mixtures supplied in Europe need to be classified, labelled and packaged according to the hazard they pose 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. Tactile Warning of Danger (TWD) are an example of a special packaging requirement that help to protect vulnerable people (i.e. the blind or partially sighted) 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, TWD obligations may apply. If you or your company supply certain chemicals to the general public, you are responsible for ensuring that TWD requirements are fulfilled. European authorities acknowledge that retailers, wholesalers, distributors typically do not package chemicals, however authorities expect that retailers, wholesalers and distributors work with their suppliers to ensure proper packaging of the chemicals they sell to the general public.

WHAT TYPE OF CHEMICALS REQUIRE A TWD?

Under CLP, a chemical that is supplied to the general public must be packaged with a TWD (regardless of package capacity) if that chemical is classified for one or more of these hazards:

- Acute toxicity
- Skin Corrosion
- Toxic to specific organ(s) – Repeated/Single Exposure (STOT RE/SE)
- Respirator sensitisation
- Aspiration hazard (excluding aerosols or packaging with a sealed spray attachment)
- Germ cell mutagenicity (category 2)
- Carcinogenicity (category 2)
- Reproductive toxicity (category 2)
- Flammable gases (including chemically unstable gases)
- Flammable liquids (category 1 and 2)
- Flammable solids

Note: A TWD is not required on flammable or non-flammable aerosols which are not classified in the above hazards

TWD - THE BASICS

As well as requiring the use of a TWD, CLP also prescribes that the TWD conforms to ISO standard 11683. It is recommended that a supply chain actor obliged to use a TWD also obtains and retains evidence of conformity with this standard. This evidence should be readily available in an appropriate European language. Conformity certificates may be subject to inspection by enforcement authorities.

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

TWD - 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 a quarter (24.8 %) were not compliant with TWD obligations.

If you supply chemicals to the general public and they are classified for one (or more) of the hazards that require a TWD you must be able to demonstrate conformity with ISO standard 11683, ensuring:

- The TWD is sufficient prominent from the surface
- The TWD is appropriately placed on the packaging



Example of a front label with a tactile warning of danger on pack.

A tactile warning of danger.



Example of a back label, including CLP pictograms.

CLP pictograms for skin corrosion and environmentally hazardous properties.

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.

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 CLP³.

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