

From **1st June 2015** all Jangro products will be labelled under the new Globally Harmonised System of Classification and Labelling of Chemicals (GHS). It is implemented in the EU via the Classification, Labelling and Packaging Regulation (CLP), where previously chemical products were regulated in the UK under CHIP (Chemical Hazard Information and Packaging for Supply).

New Pictograms, Signal Words and Statements

New red diamond shaped Hazard Pictograms will replace the orange square Hazard Symbols, though some of the internal images are similar.

'Indication of Danger' words, such as Toxic, Corrosive, Irritant etc will be replaced by two 'Signal Words' - severe hazards include the word 'DANGER', all others include the word 'WARNING'.

The 'Risk (R) Phrases' are changing to 'Hazard (H) Statements' and the 'Safety (S) Phrases' are changing to 'Precautionary (P) Statements'.

How products are classified

As before, a system of calculations and thresholds is used to classify the products. This avoids the need for any unnecessary animal testing. Products containing ingredients that are over a certain threshold level are required to display the corresponding Hazard Pictogram and Statements on the label.

Previously 'Not Classified' products

Some of the threshold levels in CLP are lower than under CHIP. For example under the CHIP system a product would need to contain more than 20% of an ingredient classified as R36 (Irritating to eyes) to trigger an 'Irritant' hazard symbol but under CLP this is reduced to 10% to trigger a hazard pictogram. This has resulted in many products being classified where previously they were not. In our estimation, this may be as many as 80%.

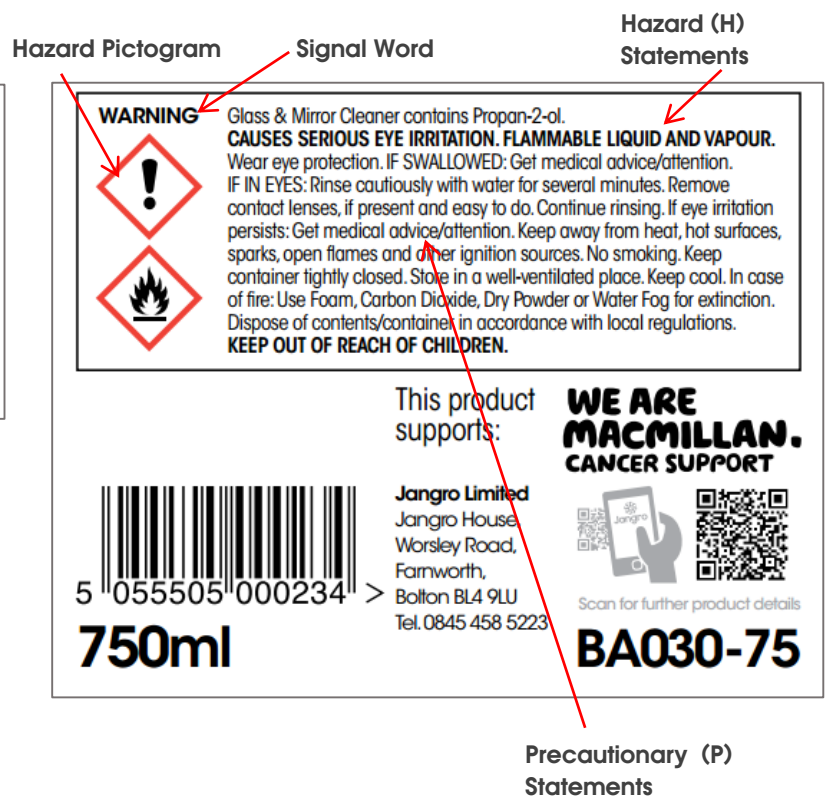
The product formulation has not changed, only the system used to classify it.

Changes to the label

Example of label under CHIP



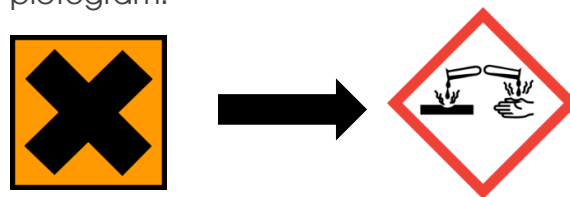
Example of label under CLP



Interpretation of the “Corrosive” image

As we have mentioned, some threshold levels are lower under CLP than under CHIP.

This particularly affects the Hazard H318 ‘Causes serious eye damage’ (Which was R41 ‘Risk of serious damage to eyes’ under CHIP). This has changed significantly from a 10% threshold triggering an ‘Irritant’ symbol to a 3% threshold, triggering a GHS05 ‘Causes Damage’ pictogram.



The image we currently recognise as “corrosive” is and still will be used on Caustic Soda based products such as DISHWASH and OVEN CLEANER. However in the future it will ALSO be used on products which may contain only 3% of certain types of ingredients.

It is now very important that users read the Hazard Statements on CLP labels rather than just relying on a glance at the image.

Concerns over Classification

We accept, and agree, a global system of classifying cleaning chemicals is necessary but obviously there are concerns about how end users will react to seeing Hazard Pictograms on products where previously there were none.

After 20 plus years of CHIP symbols it is important that users are educated to understand the new Pictograms and Statements and how these affect the assessment and subsequent use of PPE if required.

We would like to point out that the hazard classification on the label applies to the undiluted product only.

Communication and Training

It is going to be very important that users of chemicals are fully aware of the changes and understand the regulations. It is the responsibility of cleaning chemical manufacturers, to communicate with customers and issue detailed product support information as the changes occur. This information will need to be relayed to end users so they recognise the new Pictograms, the associated risks and the need to review COSHH.

- Look out for communication on classification changes and check you are doing what is needed to use the chemical safely
- Check the Hazard and Precautionary Statements that accompany the Pictogram on label
- Follow advice on the new labels and, where appropriate, on SDS; use PPE if required
- Review COSHH Risk Assessments and update if necessary
- If you are an employer, alert your employees to these changes and provide adequate information, instruction and training

Further information on CLP Regulation can be found via the HSE Website
<http://www.hse.gov.uk/chemical-classification/index.htm>