



INCPA Position Statement Labelling of Cleaning Products

Function of product labels

Product labels are important means of communication for the end user, providing relevant and useful information to the end user. Product labels can help protect the end user and the environment from potential harms that may be caused by misuse of chemical products.

Information provided on product labels can and should vary depending on the product, the end-use and the intended end user to ensure that only targeted information that is relevant and useful to the end user is provided on the label. Cluttered labels which overwhelms the end user will reduce the effectiveness of the label.

Information that should be conveyed on the label includes the name of the product, the manufacturer/supplier information, and for formulated end use product such as cleaning products, the use/function of the product and use instructions along with relevant safety information.

Different categories of end users

There are two broad categories of end users of chemicals.

- *End users that receive hazard communication training.*
Chemical hazard communication training is essential where chemical handling makes up a significant proportion of work e.g. manufacturing, laboratories, warehousing. Chemical hazard communication training is an important aspect of risk management in workplace settings.
- *End users that do not receive chemical hazard communication training.*
These end users include consumers and others for whom handling chemicals is an incidental or peripheral element of their daily lives.

GHS and cleaning product labels

Cleaning products are used ubiquitously. They are used by consumers in households, and in offices, hospitals, schools and other workplaces by all types of workers, including cleaning and maintenance staff.

When considering regulation of cleaning product labels, the following should be considered:

- End users understanding of information that will be provided:
 - Overly codified or jargonistic language will not be understood by most end users of cleaning products.
 - Actionable directions that take into account how a product will be used are better understood than a generic statement that may rely on user's understanding and interpretation e.g. for a bathroom cleaner, "Do not use in enclosed spaces. Open windows and doors during use" is easier to comprehend than "Use only outdoors or in a well-ventilated area."
 - Local language(s), customs, social norms, literacy levels and other unique local variances may impact on end user understanding.

- Allow, but not mandate, localized use of pictorial representations of safety information where the meaning is clearly understood locally.
- The use of GHS pictograms or any other pictorial representations should be in connection with training to ensure end user understanding.
- Trade implications:
 - Language, not geography, may play a bigger role in trade of cleaning products across borders: Label requirements that are aligned with countries/economies that share the same language may deliver the best practical trade benefits.
 - The meaning of the GHS pictograms, where used, should remain consistent with the UN text so that they are universally understood.
- All available innovation and technology:
 - New and widely available innovations in labelling such as QR codes and others can assist in simplifying and decluttering product labels in developed regions where it is reasonable to expect the end user to have access to such technology.
 - Digital labelling should be translated into the languages which it is reasonable to expect the end user to be able to read.

Note:

This Position Statement should be read in conjunction with the *INCPA Position Statement on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)* on the [INCPA website](#).

To summarise the INCPA Position Statement on GHS, our global industry supports implementation of GHS that promotes:

1. Science-based/evidence-based chemical risk management,
2. Protection of human health and the environment,
3. Clear communication to the end user,
4. Trade facilitation, and
5. Innovation and new technologies.

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