



## Position Paper on the European Lubricants Manufacturers on multilingual fold-out labels

UEIL is the European Association representing the lubricants manufacturers industry. We agree with the need to keep the legislation up-to-date and in line with the latest scientific findings.

The European Commission is currently reviewing the Regulation (EC) No 1272/2008 on classification, labelling and packaging of chemicals (the CLP Regulation). The last Ad-hoc meeting of the Competent Authorities for the REACH and CLP Regulations (CARACAL) on 6 December 2021 presented the Commission's conclusions of the Fitness Check with regard to multi-lingual labels, and UEIL would like to present its position and ask the Commission for the latest developments.

### Multi-lingual fold-out labels must be encouraged

According to a CARACAL document, the Commission services would like to add a new second subparagraph for Article 29(1) of the CLP Regulation:

#### *Text proposed by the Commission*

*"Where in accordance with the second subparagraph of Article 17(2) the supplier uses more languages on its labels than those required by the Member State in which the substance or mixture is placed on the market, and the packaging is either in such shape or form or is so small that it is impossible to meet the requirements of Article 31, the label elements in accordance with Article 17(1) may be provided in fold out labels. The number of languages on the fold-out label shall be limited to 6."*

#### *Proposed amendment by UEIL*

*"Where in accordance with the second subparagraph of Article 17(2) the supplier uses more languages on its labels than those required by the Member State in which the substance or mixture is placed on the market, **regardless the size or shape of the packaging**, the label elements in accordance with Article 17(1) may be provided in fold out labels. The number of languages on the fold out label **shall not be limited.**"*

### **Justification**

**From a societal perspective**, UEIL believes multi-lingual fold-out labels allow to better inform consumers by providing as much useful information as possible, without affecting readability. As every EU country is becoming more and more multi-cultural, **limiting the number of languages to six is counterproductive in terms of information**, as less consumers would be able to read important information regarding products. UEIL believes multi-lingual fold-out labels are beneficial because the HSE information is also available in many 'native languages.'



**From an economical perspective**, the use of multilingual fold-out labels is a very efficient way to achieve free movement of goods in the Single Market and a level playing field for all competitors, particularly for SMEs. For them, **having a single-layer label, and thus a single product for each EU Member State, is an extraordinary burden**. Indeed, SMEs do not necessarily have the resources in terms of staff, storage, logistics and cash availability to achieve this. Not using fold-out labels would only be beneficial for big organisations, because of their capacity of producing large quantities of individual products or have their own production facility in almost every single EU Member State.

In addition, the 7<sup>th</sup> revision of the Globally Harmonised System of Classification and Labelling of Chemicals<sup>1</sup> allows the use of fold-out labels for where there is a 'need to for label elements to appear in more than one official language', without making the reference to the state 'where the product is put on the market'.

**Finally, in terms of environmental protection, the use of multi-lingual fold-out labels offers many advantages both in terms of HSE and in terms of resources and CO<sub>2</sub> emissions savings**. Due to the increased storage (stockpiling for each EU Member State) and the destruction of products (non-sale before the expiry date), the current procedure (single-layer labels) involves a higher volume of waste, and consequently higher CO<sub>2</sub> emissions.

## About UEIL

UEIL (the Union of the European Lubricants Industry) represents the interests of the lubricants industry in Europe, with a special focus on SMEs and independent companies that produce lubricants and metal processing fluids essential for the automotive and industrial sectors.

Through its thirty-five members, UEIL covers the whole lubricants' value chain, from manufacturing and distribution to recycling, and represents over 450 companies and 100,000 employees.

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<sup>1</sup> GHS Rev. 7 (2017) : Part 1 document, 1.4.10.5.4.4. (b) (iii):  
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