



The (CLP) labeling of scented candles (EU)

Today and in the future

Andreas Fleckenstein

Product Compliance Expert, asseso AG

May 8th, 2025

Agenda

01

■ General Overview

02

■ Content and Attachment

03

■ Further Changes in CLP

Andreas Fleckenstein

- Product Compliance Expert at asseso AG

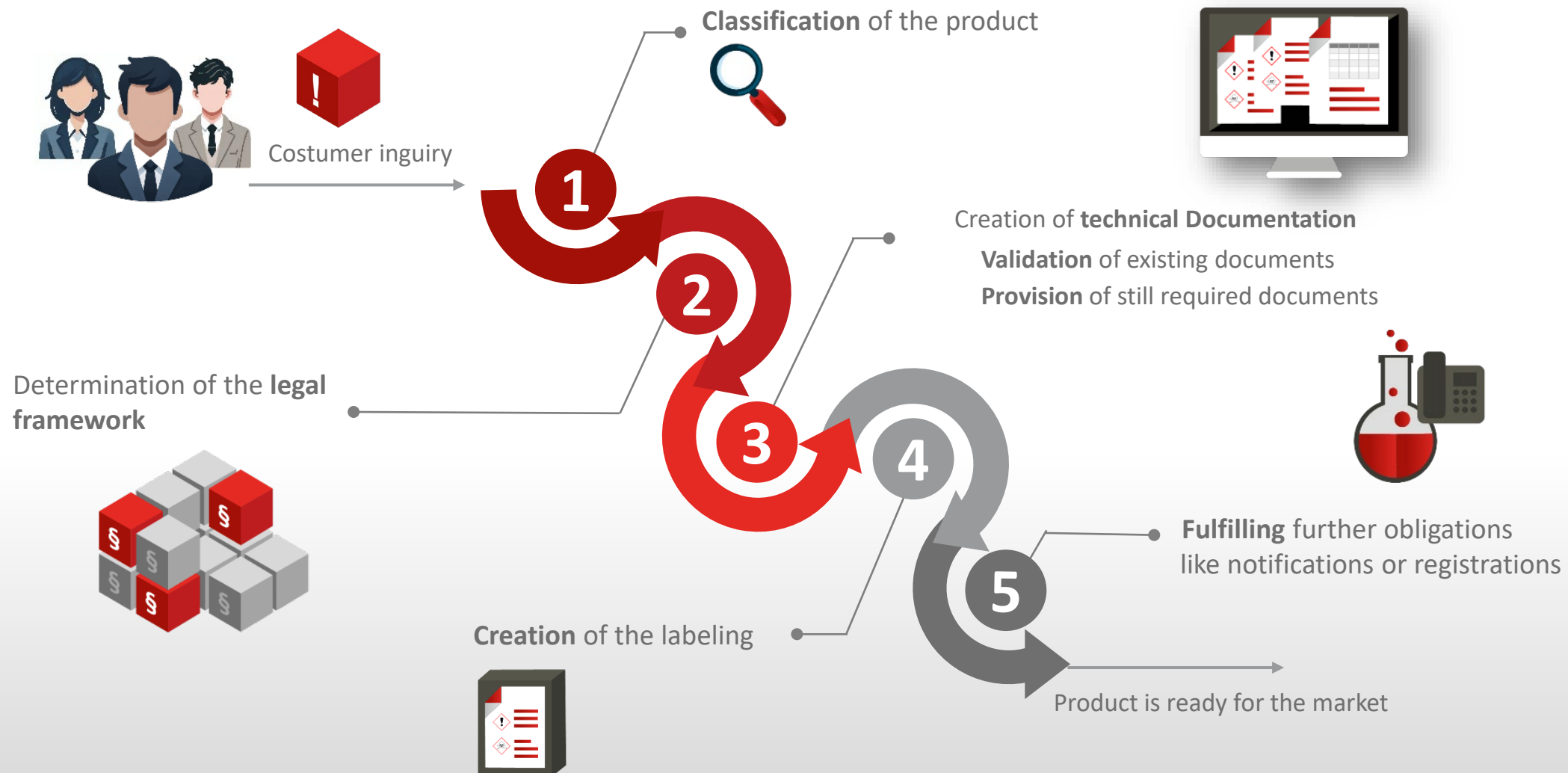


Mail: a.fleckenstein@assesso.eu

Fon: +49 6021 15086-50



Product Compliance Workflow



Overview CLP

GHS – Global Harmonized System:

System for globally uniform classification and labelling of chemical substances and mixtures.

Initiator: United Nations (UN)

European implementation:

„CLP“ („Classification, Labelling and Packaging of Chemicals“).

Aims:

- Globally consistent level of protection (health, environment, workplace)
- Globally consistent labelling, classification, safety data sheets
- Simplification of worldwide trading





01

General Overview



Example: label for a scented candle
classified as dangerous according to CLP



Example: label for a scented candle
classified as dangerous according to CLP

scented candle / Duftkerze / bougie parfumée Summer Night

UFI: 4JT2-JH63-5W50-U0K3



DE













Achtung
Enthält: LINALOOL, CITRONELLOL, LINALYL ACETATE
Kann allergische Hautreaktionen verursachen. Schädlich für Wasserorganismen, mit langfristiger Wirkung.
Ist ärztlicher Rat erforderlich, Verpackung oder Kennzeichnungsetikett bereithalten. Darf nicht in die Hände von Kindern
gelangen. BEI BERÜHRUNG MIT DER HAUT: Mit viel Wasser waschen. Bei Hautreizung oder -ausschlag: Ärztlichen Rat
einholen/ärztliche Hilfe hinzuziehen. Inhalt nicht mit dem Hausmüll entsorgen und gemäß den regionalen/nationalen
Vorschriften der Entsorgung zuführen.

EN

Warning
Contains: LINALOOL, CITRONELLOL, LINALYL ACETATE
May cause an allergic skin reaction. Harmful to aquatic life with long lasting effects.
If medical advice is needed, have product container or label at hand. Keep out of reach of children. If skin irritation or rash
occurs: Get medical advice/attention. IF ON SKIN: Wash with plenty of water. Do not discard content with household waste
and forward for disposal according to regional/national guidelines.

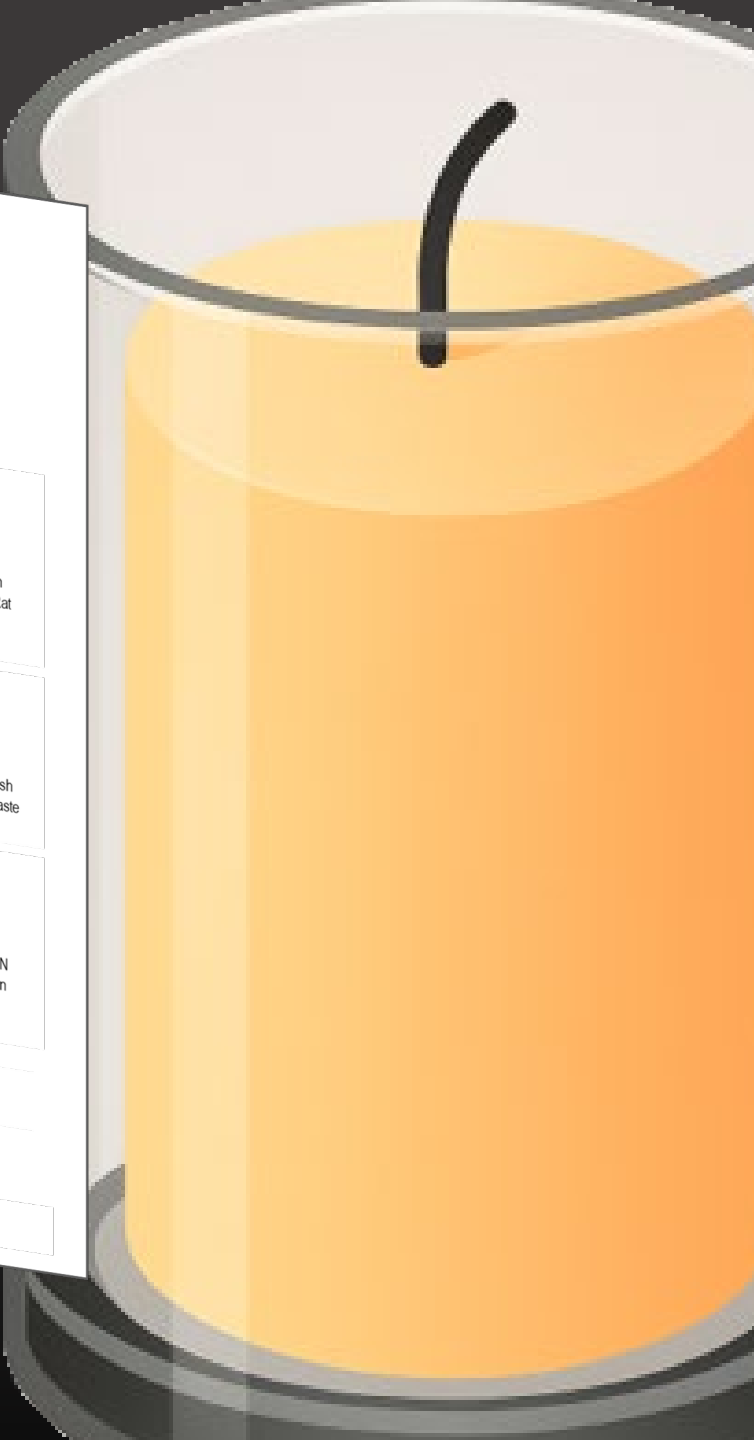
FR

Attention
Contient: LINALOOL, CITRONELLOL, LINALYL ACETATE
Peut provoquer une allergie cutanée. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme.
En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette. Tenir hors de portée des enfants. EN
CAS DE CONTACT AVEC LA PEAU: Laver abondamment à l'eau. En cas d'irritation ou d'éruption cutanée: Consulter un
médecin. Ne pas jeter le contenu avec les ordures ménagères et les éliminer conformément à la réglementation
régionale/nationale en vigueur.



140 g

Der Vertrieb - Am Tor 1, D 12345 Musterstadt -
www.dervertrieb.de • info@dervertrieb.de Tel.: 0123-987456



Example: label for a scented candle classified as dangerous according to CLP

scented candle / Duftkerze / bougie parfumée Summer Night

UFI: 4JT2-JH63-5W50-U0K3



DE
Achtung
Enthält: LINALOOL, CITRONELLOL, LINALYL ACETATE
Kann allergische Hautreaktionen verursachen. Schädlich für Wasserorganismen, mit langfristiger Wirkung.
Ist ärztlicher Rat erforderlich, Verpackung oder Kennzeichnungsetikett bereithalten. Darf nicht in die Hände von Kindern gelangen. BEI BERÜHRUNG MIT DER HAUT: Mit viel Wasser waschen. Bei Hautreizung oder -ausschlag: Ärztlichen Rat einholen/ärztliche Hilfe hinzuziehen. Inhalt nicht mit dem Hausmüll entsorgen und gemäß den regionalen/nationalen Vorschriften der Entsorgung zuführen.

EN
Warning
Contains: LINALOOL, CITRONELLOL, LINALYL ACETATE
May cause an allergic skin reaction. Harmful to aquatic life with long lasting effects.
If medical advice is needed, have product container or label at hand. Keep out of reach of children. If skin irritation or rash occurs: Get medical advice/attention. IF ON SKIN: Wash with plenty of water. Do not discard content with household waste and forward for disposal according to regional/national guidelines.

FR
Attention
Contient: LINALOOL, CITRONELLOL, LINALYL ACETATE
Peut provoquer une allergie cutanée. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme.
En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette. Tenir hors de portée des enfants. EN CAS DE CONTACT AVEC LA PEAU: Laver abondamment à l'eau. En cas d'irritation ou d'éruption cutanée: Consulter un médecin. Ne pas jeter le contenu avec les ordures ménagères et les éliminer conformément à la réglementation régionale/nationale en vigueur.

140 g

Tel: 0123-987456

Der Vertrieb - Am Tor 1, D. 12345 Musterstadt -
www.dervertrieb.de • info@dervertrieb.de



Content

scented candle / Duftkerze / bougie parfumée Summer Night

Trade name or name of the mixture

- Hazardous components
 - Signal word
 - Hazard statements (H-phrases)
- Precautionary statements (P-phrases)
- Supplemental information (EUH-phrases)

Der Vertrieb - Am Tor 1, D.12345 Musterstadt -
www.dervetrieb.de • info@dervetrieb.de

- Name and contact address of the EU supplier
- Electronic address (e-mail / Website)



Pictograms

EN 15494 / EN 16740 / EN 17617

UFI-Code

UFI: 4JT2-JH63-5W50-U0K3



Hazard pictograms

DE

Achtung

Enthält: LINALOOL, CITRONELLOL, LINALYL ACETATE

Kann allergische Hautreaktionen verursachen. Schädlich für Wasserorganismen, mit langfristiger Wirkung. Ist ärztlicher Rat erforderlich, Verpackung oder Kennzeichnungsetikett bereithalten. Darf nicht in die Hände von Kindern gelangen. BEI BERÜHRUNG MIT DER HAUT: Mit viel Wasser waschen. Bei Hautreizung oder -ausschlag: Ärztlichen Rat einholen/ärztliche Hilfe hinzuziehen. Inhalt nicht mit dem Hausmüll entsorgen und gemäß den regionalen/nationalen Vorschriften der Entsorgung zuführen.

EN

Warning

Contains: LINALOOL, CITRONELLOL, LINALYL ACETATE

May cause an allergic skin reaction. Harmful to aquatic life with long lasting effects. If medical advice is needed, have product container or label at hand. Keep out of reach of children. If skin irritation or rash occurs: Get medical advice/attention. IF ON SKIN: Wash with plenty of water. Do not discard content with household waste and forward for disposal according to regional/national guidelines.

FR

Attention

Contient: LINALOOL, CITRONELLOL, LINALYL ACETATE

Peut provoquer une allergie cutanée. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme. En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette. Tenir hors de portée des enfants. EN CAS DE CONTACT AVEC LA PEAU: Laver abondamment à l'eau. En cas d'irritation ou d'éruption cutanée: Consulter un médecin. Ne pas jeter le contenu avec les ordures ménagères et les éliminer conformément à la réglementation régionale/nationale en vigueur.

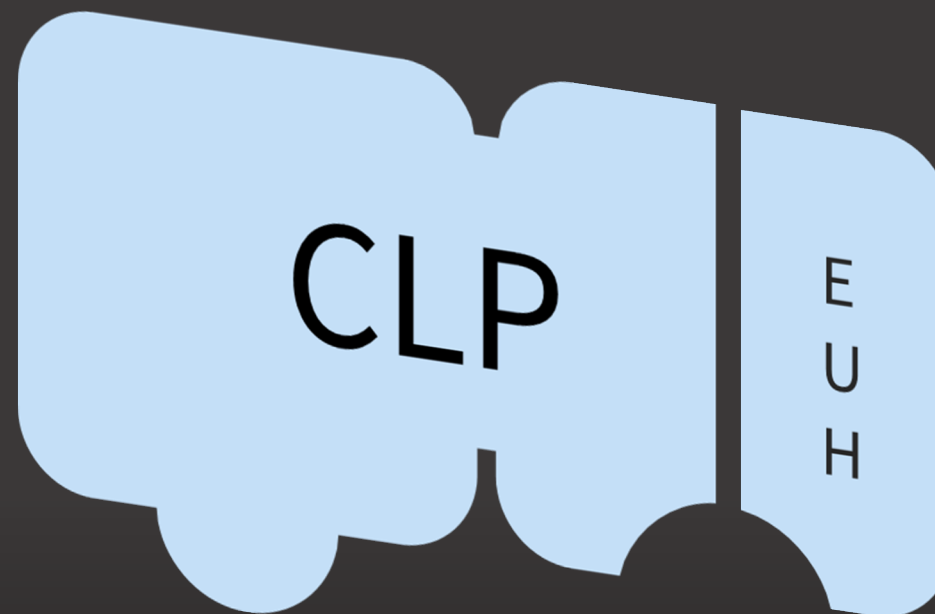
Nominal quantity of the mixture

140 g

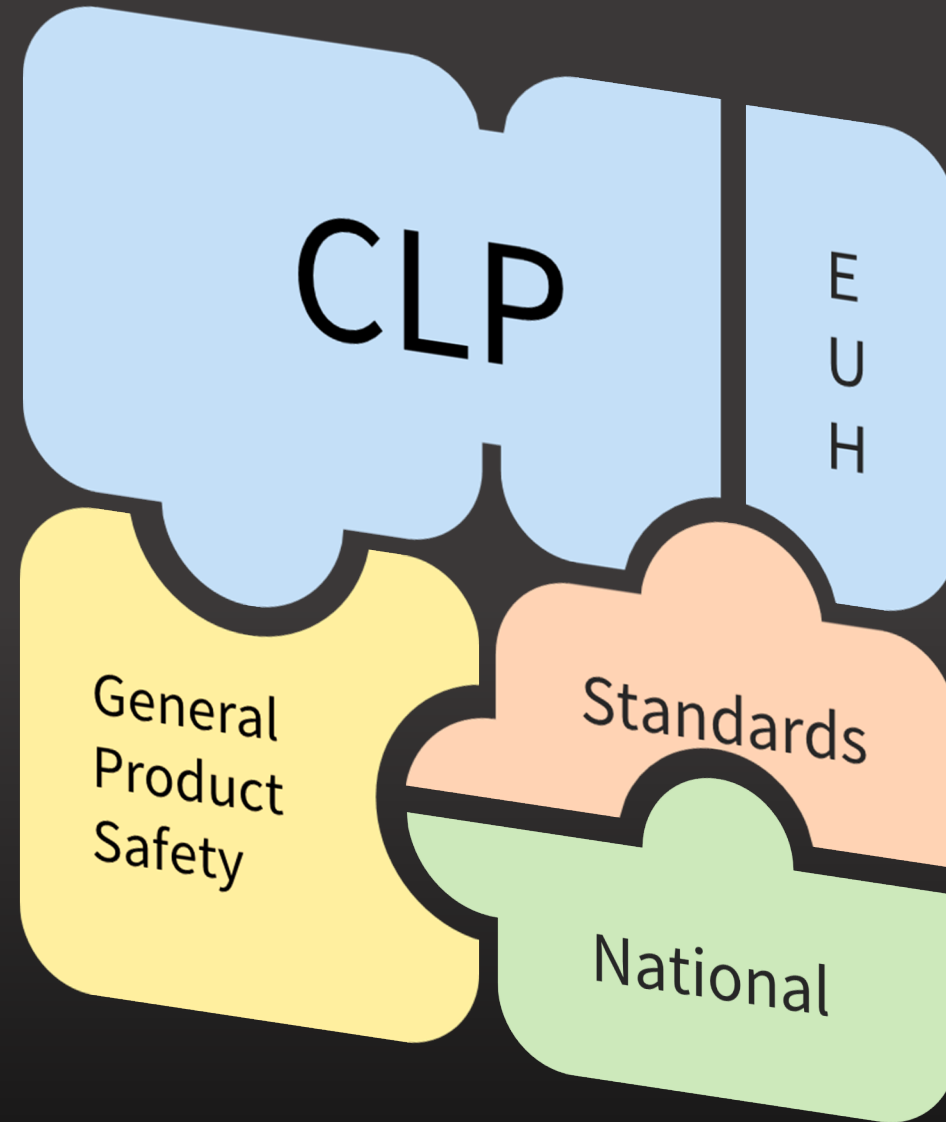
Tel.: 0123-987456

phone number

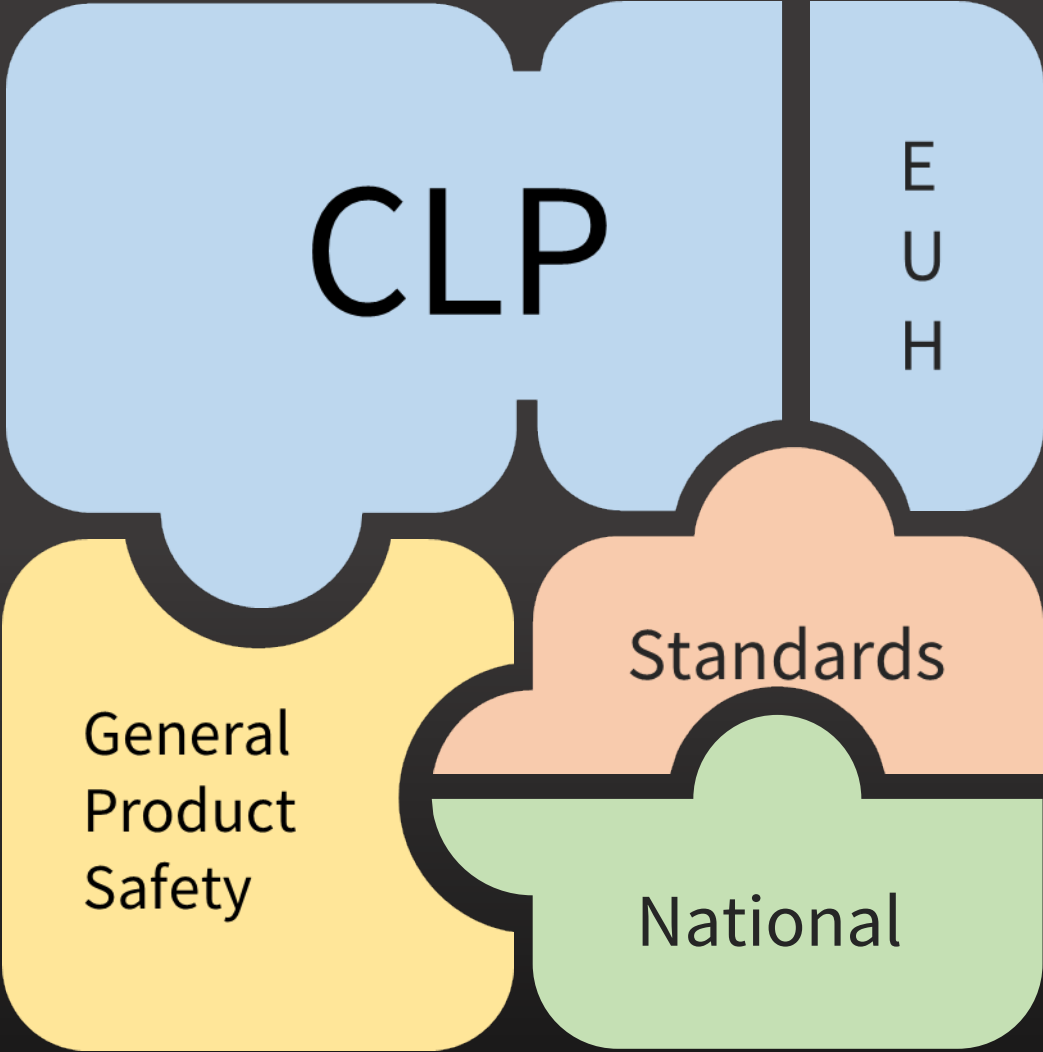
Example label



General overview



General overview



scented candle / Duftkerze / bougie parfumée Summer Night

UFI: 4JT2-JH63-5W50-U0K3



DE

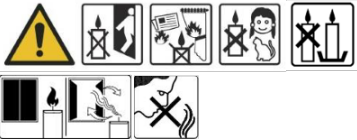
Achtung
Enthält: LINALOOL, CITRONELLOL, LINALYL ACETATE
Kann allergische Hautreaktionen verursachen. Schädlich für Wasserorganismen, mit langfristiger Wirkung.
Ist ärztlicher Rat erforderlich, Verpackung oder Kennzeichnungsetikett bereithalten. Darf nicht in die Hände von Kindern gelangen. BEI BERÜHRUNG MIT DER HAUT: Mit viel Wasser waschen. Bei Hautreizung oder -ausschlag: Ärztlichen Rat einholen/ärztliche Hilfe hinzuziehen. Inhalt nicht mit dem Hausmüll entsorgen und gemäß den regionalen/nationalen Vorschriften der Entsorgung zuführen.

EN

Warning
Contains: LINALOOL, CITRONELLOL, LINALYL ACETATE
May cause an allergic skin reaction. Harmful to aquatic life with long lasting effects.
If medical advice is needed, have product container or label at hand. Keep out of reach of children. If skin irritation or rash occurs: Get medical advice/attention. IF ON SKIN: Wash with plenty of water. Do not discard content with household waste and forward for disposal according to regional/national guidelines.

FR

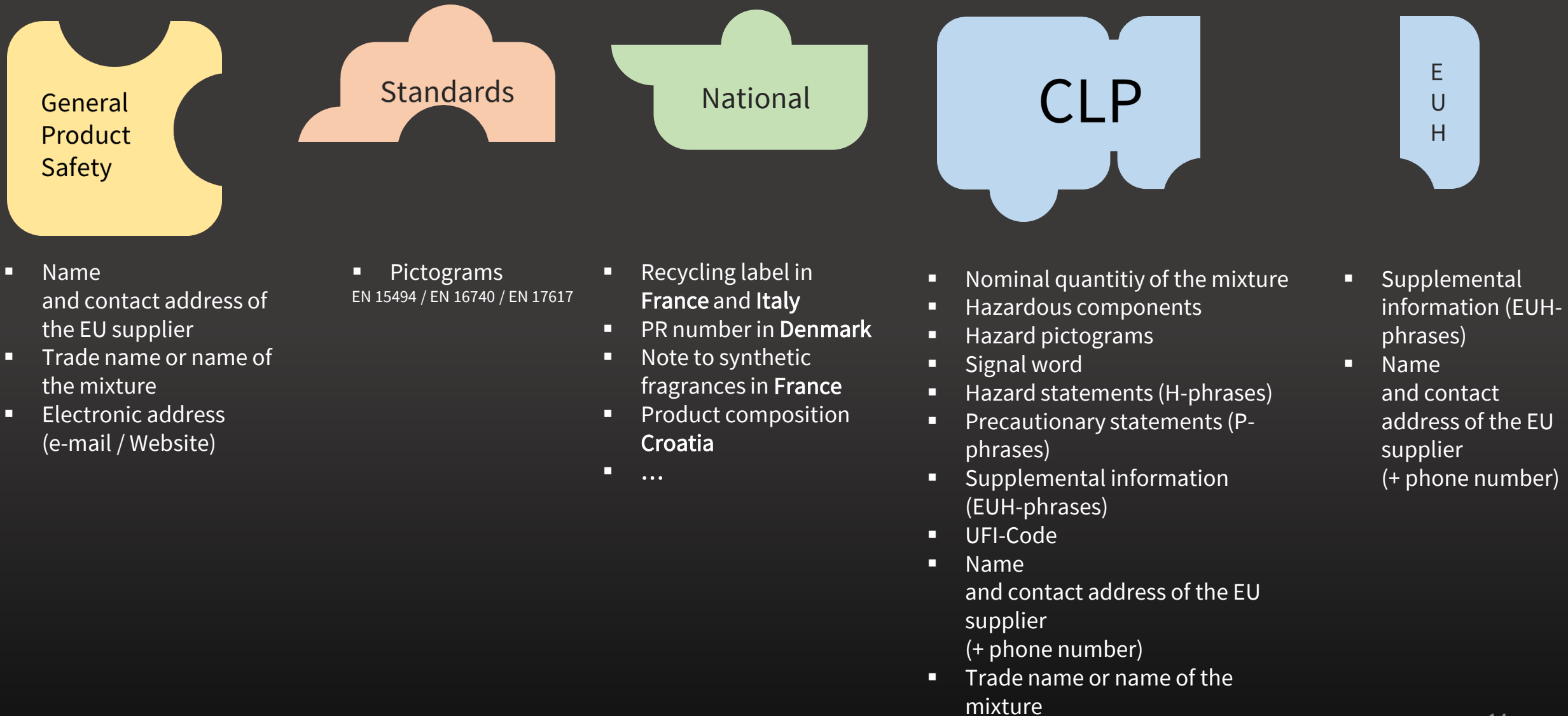
Attention
Contient: LINALOOL, CITRONELLOL, LINALYL ACETATE
Peut provoquer une allergie cutanée. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme.
En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette. Tenir hors de portée des enfants. EN CAS DE CONTACT AVEC LA PEAU: Laver abondamment à l'eau. En cas d'irritation ou d'éruption cutanée: Consulter un médecin. Ne pas jeter le contenu avec les ordures ménagères et les éliminer conformément à la réglementation régionale/nationale en vigueur.



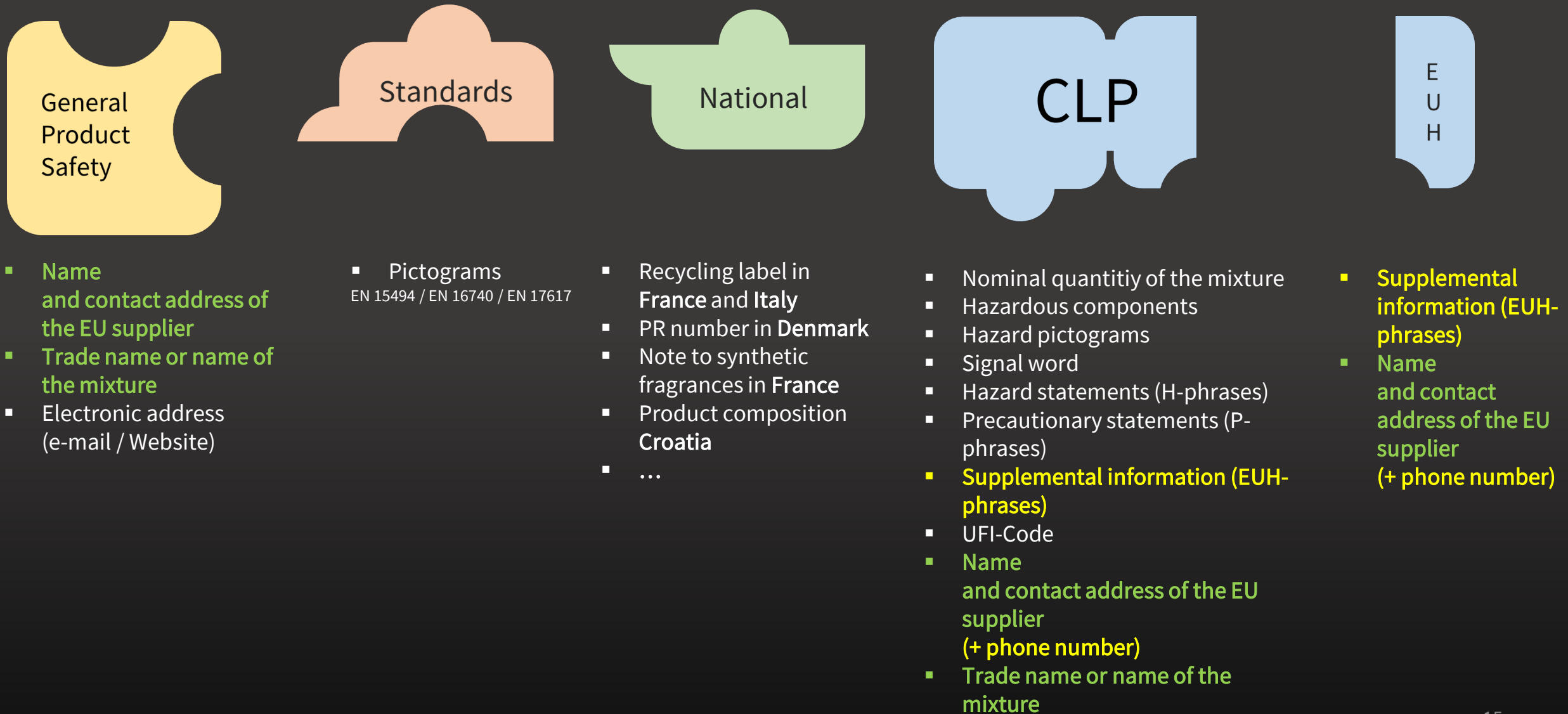
140 g

Der Vertrieb - Am Tor 1, D.12345 Musterstadt - Tel.: 0123-987456
www.dervertrieb.de • info@dervertrieb.de

General overview

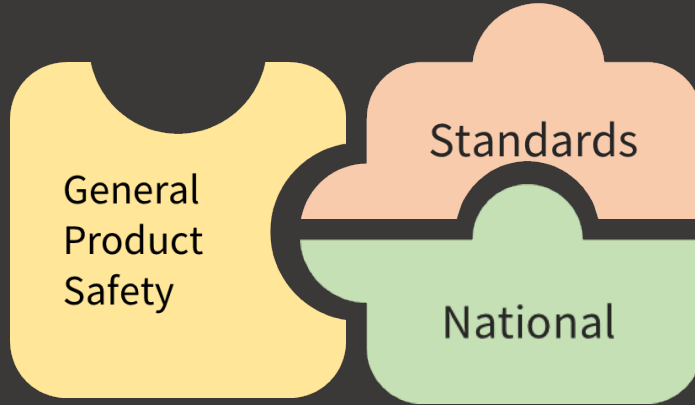


General overview



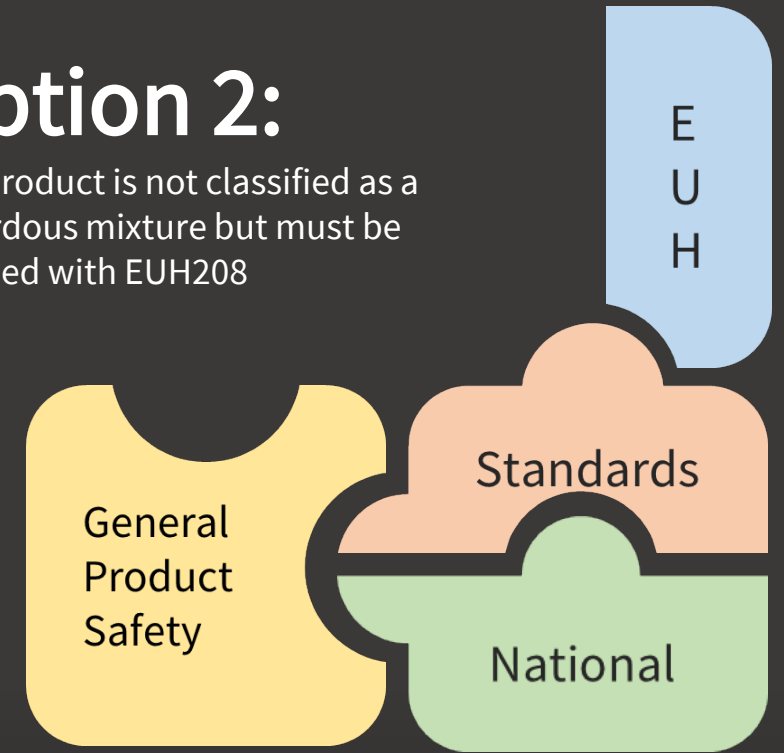
Option 1:

The product is not classified as a hazardous mixture



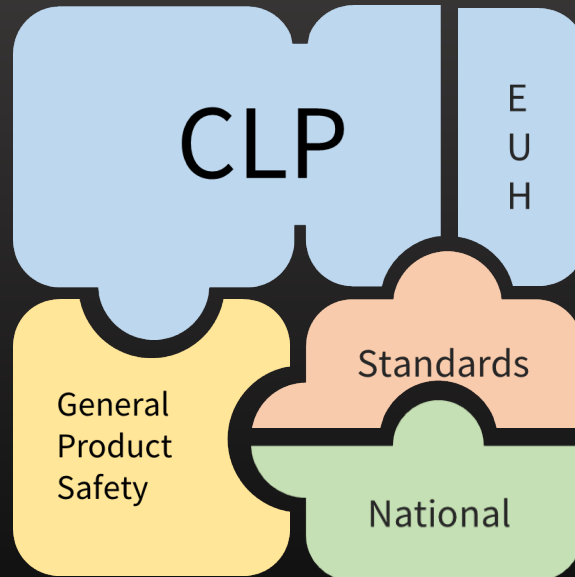
Option 2:

The product is not classified as a hazardous mixture but must be labelled with EUH208



Option 3:

The product is classified as a hazardous mixture





02

Content and Attachment

General Product Safety

Standards

CLP

Comparison of Attachment by
type of candle

Content and Attachment

General Product Safety (Regulation (EU) 2023/988)

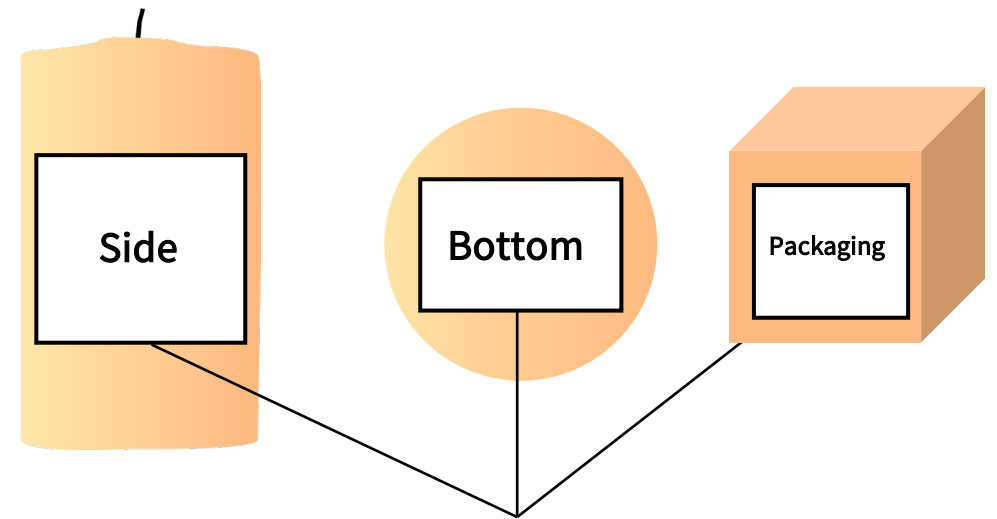
General
Product
Safety

Content

- Name and contact address of the manufacturer, the importer or the responsible person (EU-address)
- Unique marking for identification of the product (e.g. product name, type, batch or serial number, GTIN)
- Electronic address (e-mail and Website)

Where to attach?

That information shall be **placed on the product** or, where that is not possible, on its **packaging** or in a document accompanying the product.



scented candle / Duftkerze / bougie parfumée Summer Night

Der Vertrieb - Am Tor 1, D.12345 Musterstadt -
www.dervertrieb.de • info@dervertrieb.de

Content and Attachment Standards

Standards

Content

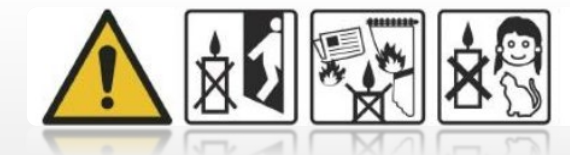
Outdoor candles

- EN 17617 Outdoor candles - Product safety labels



Indoor candles

- EN 15494 Candles - Product safety labels



Scented indoor candles

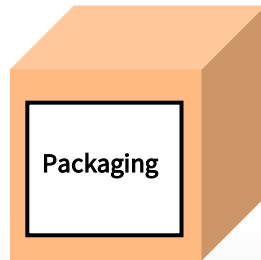
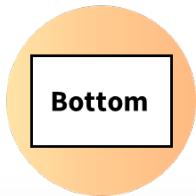
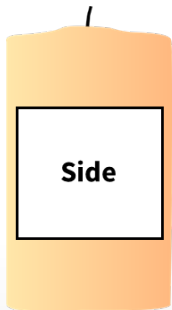
- EN 16740 Emission safety of combustible



Content and Attachment Standards



Where to attach?



At the product or the packaging.

How to attach?

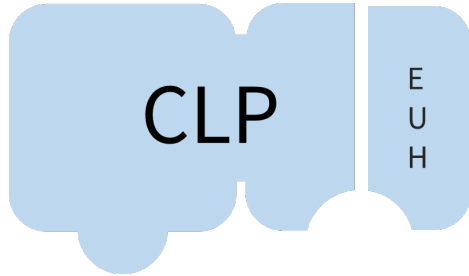
Pictograms have to be easily readable and at least **5mm** high.

Yellow Triangle could be yellow or b/w.

Mandatory pictograms have to be added according to risk assessment.

Content and Attachment

CLP – Design specifications

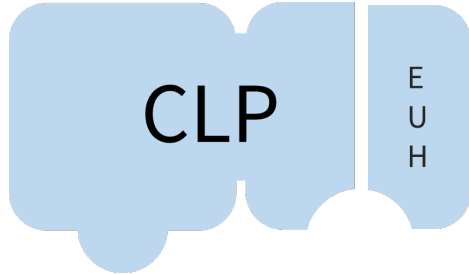


Content

- Trade name or name of the mixture
- Name and contact address of the EU supplier (incl. phone number)
- Nominal quantity
- Hazardous components
- Hazard pictograms
- Signal word
- Hazard statements (H-phrases)
- Precautionary statements (P-phrases)
- Supplemental information (EUH-phrases)
- UFI-Code

Content and Attachment

CLP – Design specifications

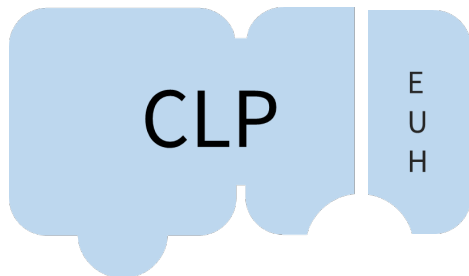


How to attach?

- Labels shall be **firmly affixed** to one or more surfaces of the **packaging** immediately containing the substance or mixture and shall be **readable horizontally** when the package is set down normally.
- The label shall be written in the official **language(s)** of the Member State(s) where the substance or mixture is placed on the market.
- The hazard pictograms, signal word, hazard statements and precautionary statements shall be **grouped together** on the label **by language**. The supplemental information shall be located with the other label elements.

Content and Attachment


CLP – Design specifications



New CLP-labelling rules

How to attach?

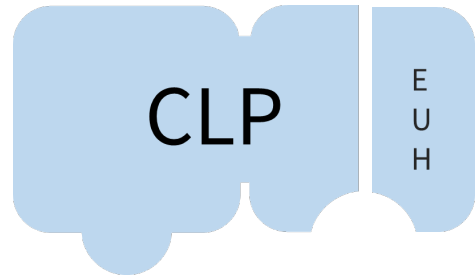
- Text black and background white
- Line spacing $\geq 120\%$ of the font size
- a single font, easy to read and without serifs
- Spacing between letters must ensure good legibility
- Minimum font sizes depending on the capacity of the packaging

Line spacing = $\frac{\text{ABC}}{\text{ABC}}$  **120%**

The diagram illustrates the line spacing calculation. It shows the text 'ABC' on two lines. A vertical double-headed arrow indicates the height of the text block. A red bracket below the text indicates the 100% baseline spacing. A green bracket above the text indicates the 120% required spacing.

Content and Attachment

CLP – Design specifications

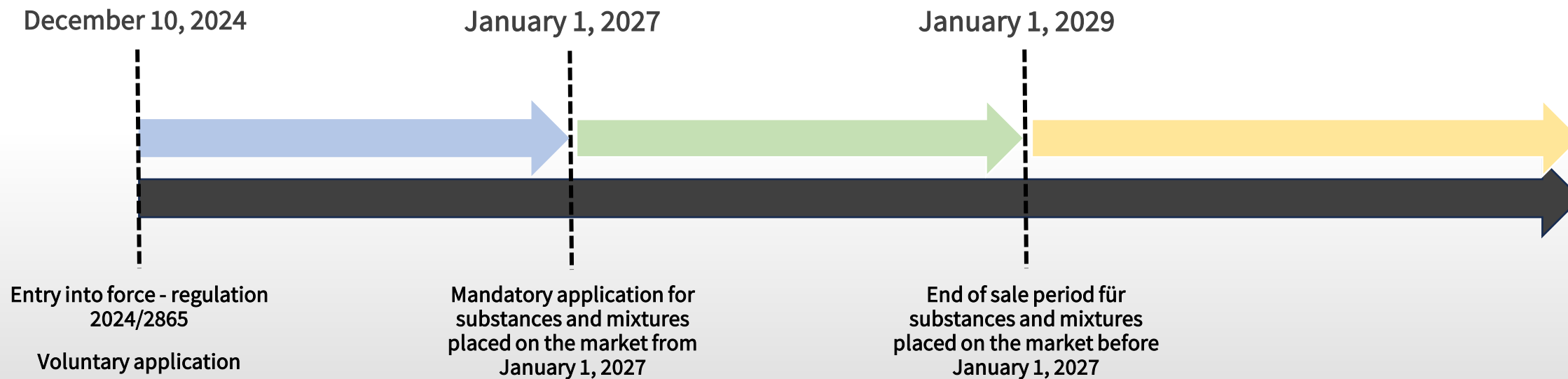
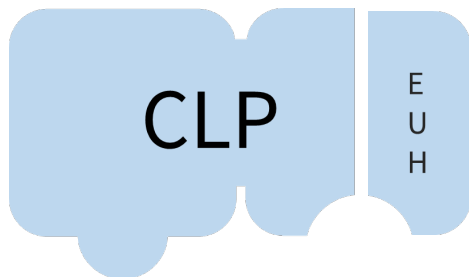


Capacity




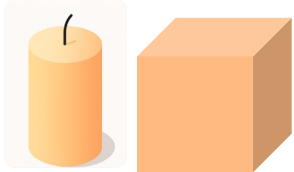
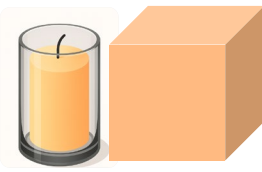
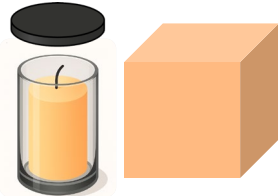
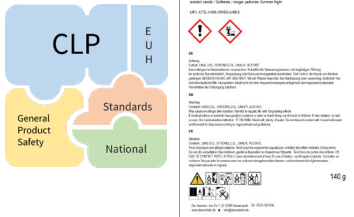




























Capacity	New	without changes	
	Font size (x-height in mm)	Label	Pictogram
≤ 0,5 l	1,2	if possible at least 52 x 74 mm	if possible 16 x 16 mm otherwise 10 x 10 mm
> 0,5 l ≤ 3 l	1,4		
> 3 l bis ≤ 50 l	1,8	at least 74 x 105 mm	23 x 23 mm
> 50 l bis ≤ 500 l	2,0	at least 105 x 148 mm	32 x 32 mm
> 500 l		at least 148 x 210 mm	46 x 46 mm

Content and Attachment

CLP – Design specifications

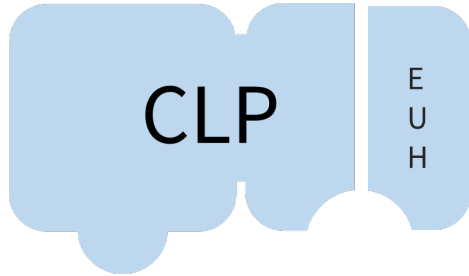


Overview of label attachment

							
CLP (dangerous or EUH)							
GPS + Standards							
Candle (bottom)							
Candle (side)							
Glass (bottom)							
Glass (side)	X			X			
Packaging (bottom)	X	X	X				
Packaging (side)	X	X	X				

Content and Attachment

CLP – Design specifications



Label attachment

How to attach?

- Not possible to sell it if classified as dangerous or labelled with EUH208!

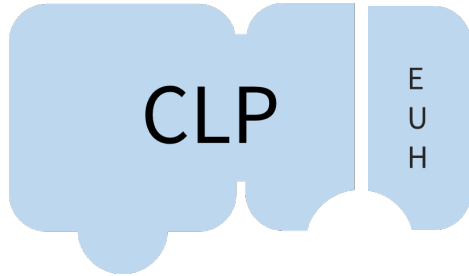


- Label at side or bottom of candle.



Content and Attachment

CLP – Design specifications



Label attachment

How to attach?

- Not possible to sell it if classified as dangerous or labelled with EUH208!

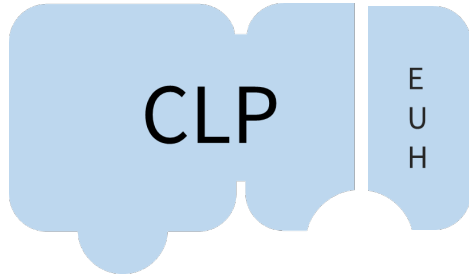


- Label at side or bottom of glas (if candle is fixed in glas).
- If candle and glas are sold as two separable units, glas and candle should be labelled at side or bottom.



Content and Attachment

CLP – Design specifications



Label attachment

How to attach?



- Label at side or bottom of glas (if candle is fixed in glas).
- If candle and glas are sold as two separable units, glas and candle should be labelled at side or bottom.

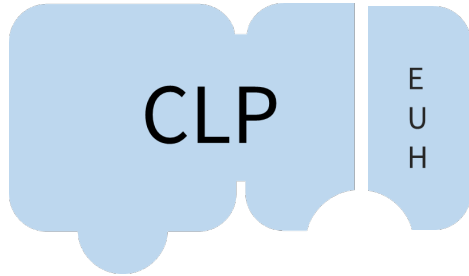


- CLP / EUH label must be at the side of the glas.



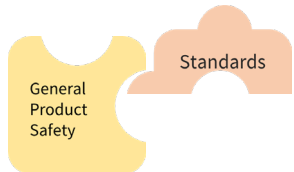
Content and Attachment

CLP – Design specifications



Label attachement

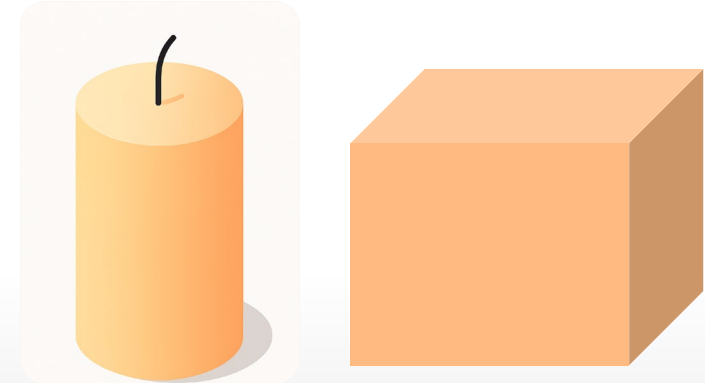
How to attach?



- Label at side or bottom of candle and at side or bottom of packaging

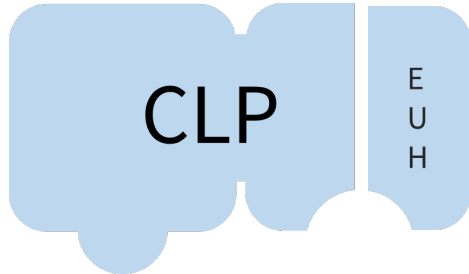


- CLP / EUH label must be at the side of the packaging.



Content and Attachment

CLP – Design specifications



Label attachement

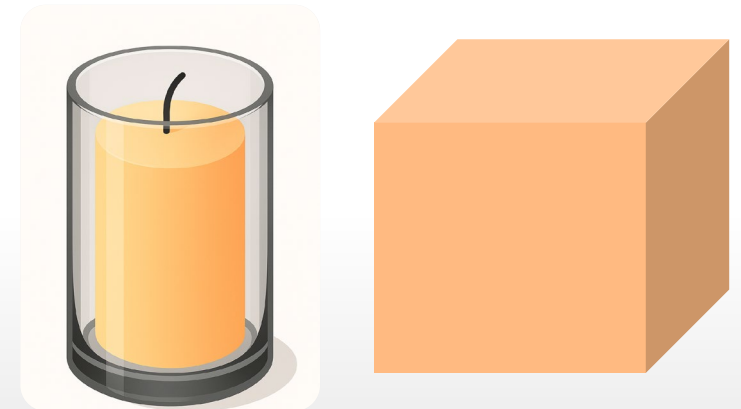
How to attach?



- Label at side or bottom of glas (if candle is fixed in glas) and at side or bottom of packaging
- If candle and glas are sold as two separable units, glas and candle should be labelled at side or bottom

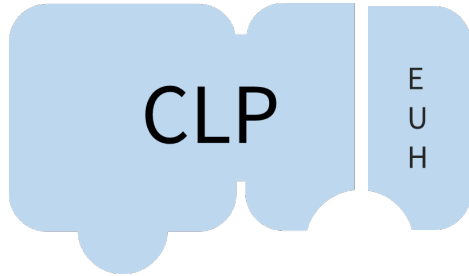


- CLP / EUH label must be at the side of the packaging.



Content and Attachment

CLP – Design specifications



Label attachement

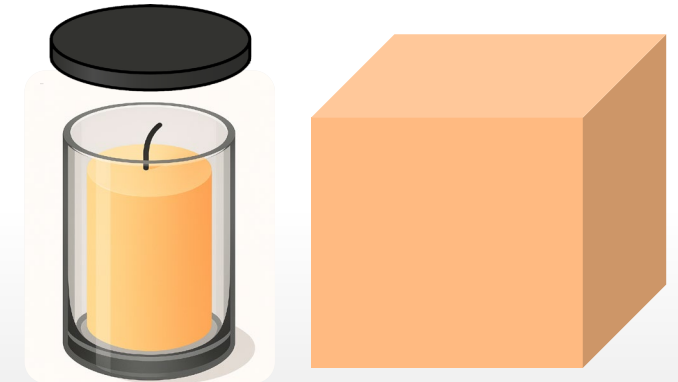
How to attach?



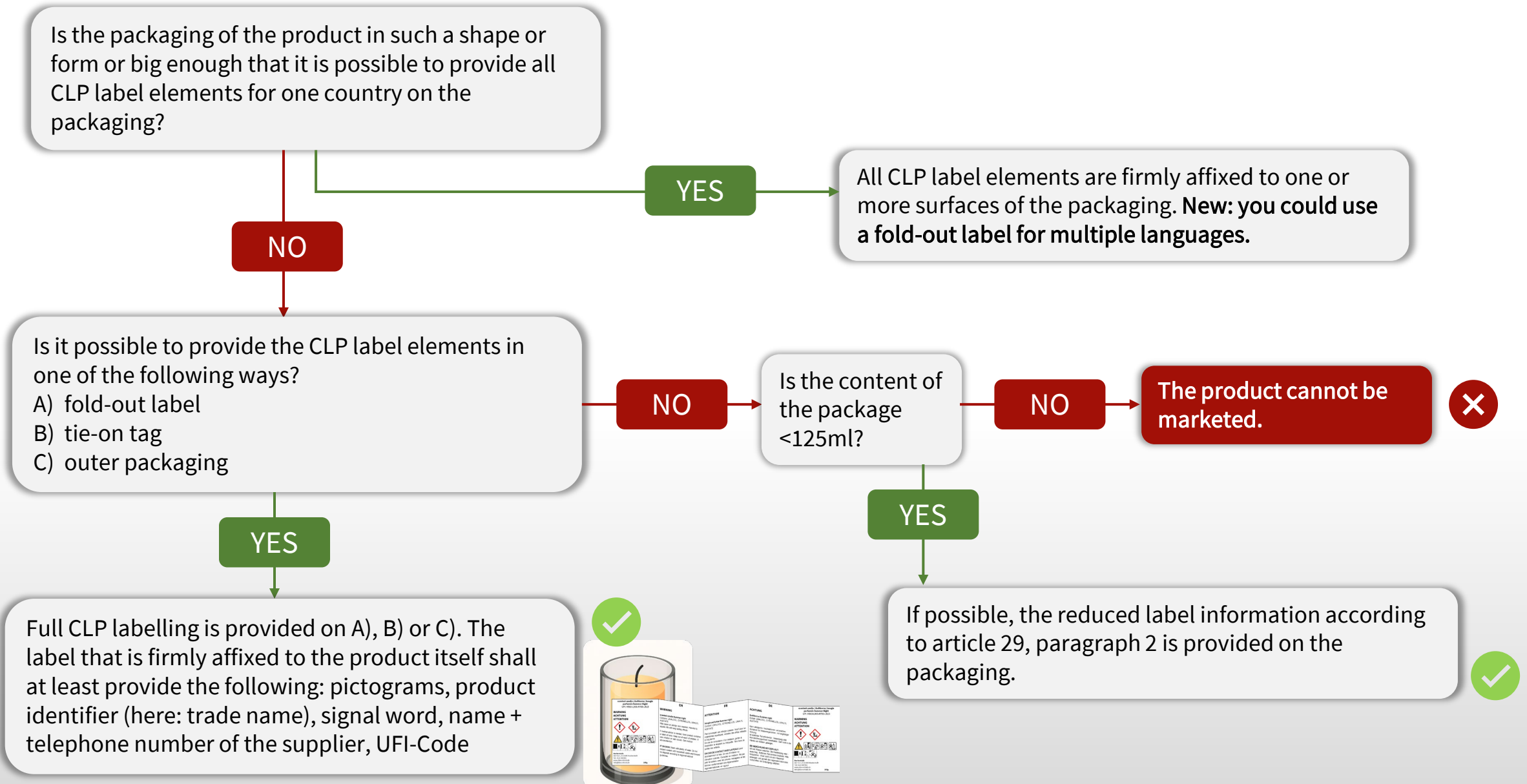
- Label at side or bottom of glas (if candle is fixed in glas) and at side or bottom of packaging
- If candle and glas are sold as two separable units, glas and candle should be labelled at side or bottom



- CLP / EUH label must be at the side of the packaging and at side of glas.



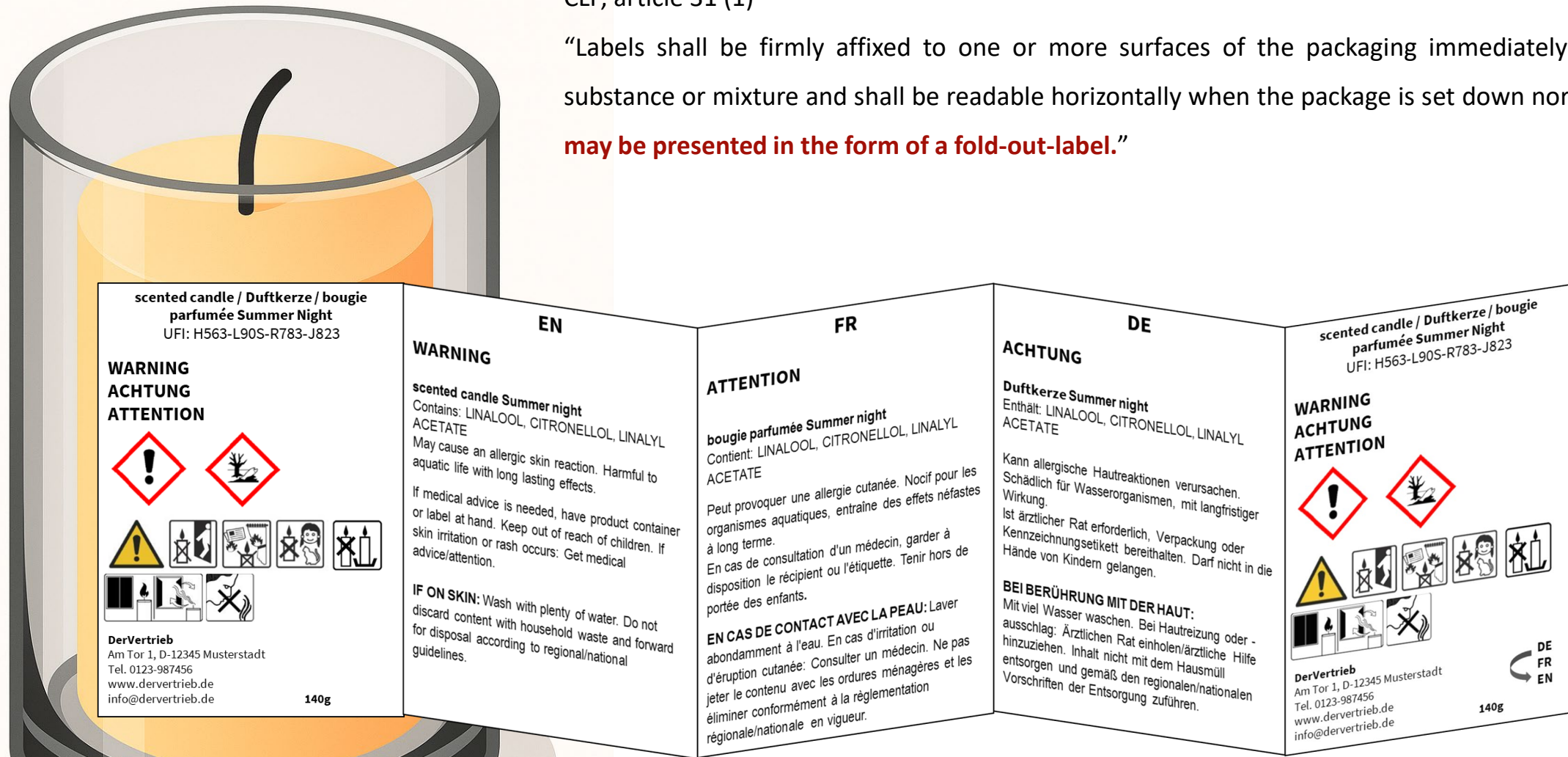
Can a product use reduced CLP-labelling?



The new fold-out label and how to use it

CLP, article 31 (1)

“Labels shall be firmly affixed to one or more surfaces of the packaging immediately containing the substance or mixture and shall be readable horizontally when the package is set down normally. **The label may be presented in the form of a fold-out-label.**”





03

Further Changes in CLP

Further Changes in CLP

Responsible Person

The Regulation clarifies that substances or mixtures may only be placed on the market if a supplier established in the Union complies with the requirements of the CLP Regulation and is accordingly identified as the **responsible person** on the label.

Further Changes in CLP

New hazard categories

With regulation (EU) 2023/707 new hazard categories for **endocrine disruptors** and **PBT / vPvB substances** are established.

For mixtures the new classifications have to be used from 01.05.2026.

Further Changes in CLP

Update Product Label

In case of a change regarding the classification or labelling of a mixture, which results in the addition of a new hazard class or in a more severe classification, or which requires a new EUH 208, the supplier of that mixture shall ensure that the label is updated without undue delay and no later than **6 months** after the results of the new evaluation.

Where a change regarding the classification or labelling of a substance or a mixture is required other than that referred to in paragraph 1, the supplier of that substance or that mixture shall ensure that the label is updated without undue delay and no later than **18 months** after the results of the new evaluation.

This shall not apply where a change regarding the classification and labelling of a substance or a mixture was triggered by a harmonized classification. In such cases, the supplier shall ensure that the label is updated by the date set out in the respective delegated act.

Further Changes in CLP

Advertisement

Any advertisement for a mixture classified as hazardous or that has to be labelled with EUH208 shall indicate the **hazard pictograms**, **signal word**, **hazard statements** and supplemental **EUH-statements**. Any advertisement for sale of mixtures to the general public shall, in addition, indicate “Always follow the information on the product label”.

Any advertisement for a mixture classified as hazardous shall not contain statements like non-toxic, non-harmful, non-polluting, ecological, ...

Hazard pictograms and signal word may be omitted where the advertisement is non-visual.

Further Changes in CLP

Distance sales offers

When substances or mixtures are placed on the market through **distance sales**, the offer shall clearly and visibly indicate the **label elements referred to in CLP, article 17** (Trade name or name of the mixture / Name and contact address of the EU supplier (+ phone number) / nominal quantity / Hazardous components / Hazard pictograms / Signal word / Hazard statements (H-phrases) / Precautionary statements (P-phrases) / Supplemental information (EUH-phrases) / UFI-Code)

All online sales will require a supplier to ensure that a substance or a mixture placed on the EU market through distance sales meets the requirements of CLP, in particular on classification, labelling and packaging. The objective is to ensure a high level of protection of human health and environment, including by facilitating the enforcement of the legislative requirements.



Time for your Questions