

## VdMi position paper on the simplification and digitalisation of chemical labels

The EU's digital strategy<sup>1</sup> is one of the six priorities set by the EU Commission. By 2024, various measures are to be taken to simplify the transition to the digital age for people and companies, while at the same time supporting the goals set, such as climate neutrality by 2050. Therefore, there are also overlaps with other priorities e.g. the Green Deal<sup>2</sup>.

The initiative for the simplification and digitalisation of labelling requirements<sup>3</sup> proposes various amendments to the CLP Regulation, the Detergents Regulation and the Fertilising Products Regulation. The aim is to strengthen the communication of essential information through simplification in order to reduce the impact of hazardous chemicals on humans and the environment, and to enable new communication channels e.g. digital labels.

VdMi basically supports the use of digital labels, as they offer many options for providing the user with important information in a targeted and uncomplicated manner. However, some aspects must be taken into account, especially in the area of very small packagings, in order to really achieve a simplification and not just produce additional effort for the manufacturers.

VdMi has been committed to the possibility of digital labels for several years. For products in the field of artists' and school colours, it has long been a challenge to accommodate all the necessary labelling elements on small-scale products. Via VdMi and other European associations, the necessity of digitising hazard information for chemical products was introduced to the responsible committee<sup>4</sup> at GHS level already in 2019. The initiative at EU level is therefore welcomed, but a European solution developed here would also have to be incorporated into the GHS.

Digitally stored labelling texts can be updated promptly. Any changes that become necessary due to legal requirements or changes in recipes or raw materials can be incorporated quickly and easily. In this way, consumers always have up-to-date labelling information at their disposal and added value is achieved for hazard communication.

In addition, a digital solution has the advantage that all information on the label could be available in additional languages. Especially when labelling very small packagings, it is imperative that as much relevant information as possible can be stored digitally and no longer has to be on the physical label.

VdMi favours the use of a QR code<sup>5</sup> that leads to the hazard information on the manufacturer's or product manager's website. Further information, e.g. on applications, should be optional on the digital label.

It should be borne in mind that a digital label is intended to simplify the process of labelling, warning and informing. There is often no physical space for an additional digital label that only repeats the information already displayed, especially with very small packagings. Applying a digital label would unnecessarily take up space, which is needed for the display of essential information.

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<sup>1</sup> see also [A Europe fit for the digital age](#).

<sup>2</sup> see also [EU Green Deal](#).

<sup>3</sup> see also [Initiative simplification and digitalisation of labelling requirements](#).

<sup>4</sup> Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UN SCEGHS)

<sup>5</sup> Registered trademark of Denso Wave Incorporated.

**Therefore, VdMi promotes:**

- Introduction of the possibility of a digital label at GHS and EU level
- Benefit from the advantages of digital labels
  - Easy updating of relevant data
  - Provision of additional, legally non-mandatory information, e.g. additional languages
- Improvement of (hazard) communication by reducing the information to essential (warning) notices on the sales product
  - Relief, especially in the field of small packagings
- No additional overloading of very small packagings due to redundancies
  - Optimal use of the limited available space

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The Verband der Mineralfarbenindustrie e. V. represents German manufacturers of inorganic (e.g. titanium dioxide, iron oxides), organic and metallic pigments, fillers (e.g. silica), carbon black, ceramic and glass colours, food colorants, artists' and school paints, masterbatches and products for applied photocatalysis.

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