

15 November 2021

RE: HCPA Additional Comments on the Public Consultation on the Targeted Revision of the Regulation on Classification, Labelling and Packaging of Substances and Mixtures

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to provide comments to the European Commission during the public consultation on the Targeted Revision of the Regulation on Classification, Labelling and Packaging of Substances and Mixtures² (CLP). HCPA is a U.S. based trade association representing the consumer and commercial products industry and we submit these comments in support of A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products.

The labelling of consumer products is essential to protecting those that use these products, those around the use of these products, and the environment. But for consumers to be able to understand the labels on products, they need to be simple. With the access consumers have to information online, HCPA supports providing the critical information that consumers need for the safe use of a product on the label and provide all other information through digital formats online so that consumers have access to all information.

The digitalization of information can offer many benefits to consumers, including improved readability, translations in the reader's primary language, increased font size for legibility, and increased access for certain groups. Digital solutions can also help provide more context and further explanation to the information on the label, as well as provide additional resources.

If there are any questions concerning our submission, please do not hesitate to contact me at ngeorges@thehcpa.org.

Respectfully Submitted,



Nicholas B. Georges
Senior Vice President, Scientific & International Affairs
Household & Commercial Products Association

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

² Information on the initiative can be found at https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12975-Revision-of-EU-legislation-on-hazard-classification-labelling-and-packaging-of-chemicals_en