The Aerosol Dispensers Directive

Labelling Requirements
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This document is for guidance only; all regulations that are applicable to the labelling of aerosol dispensers should be checked to ensure that labels are fully compliant.

Background & Scope

This document outlines the labelling requirements for aerosols under the Aerosol Dispensers Directive (ADD), Directive 75/324/EEC (consolidated version as of August 2017). The ADD was originally adopted in 1975 and has been amended four times, with the latest amendment published in November 2016 (Directive 2016/2037/EU).

In the UK, the ADD has been fully implemented by the Aerosol Dispensers Regulations 2009 (SI 2009 No. 2824). The most recent amendment to the regulations - SI 2014 No. 1130 - implements Directive 2013/10/EU which aligned the labelling of aerosols with Regulation (EC) No 1272/2008 of the European Parliament and of the Council on the classification, labelling and packaging of substances and mixtures (The CLP Regulation, consolidated version as of August 2017).

The Aerosol Dispensers Directive

Under Article 2 of the ADD, an 'aerosol dispenser' is defined as follows:

- Non-reusable container made of glass, metal or plastic
- Contains a gas compressed, liquefied or dissolved under pressure
- May or may not contain a liquid, paste or powder
- Fitted with a release device which allows the contents to be ejected as solid or liquid particles in suspension in a gas, as a foam, paste or powder or in a liquid state

The ADD applies to all aerosol dispensers, with the following exceptions:

- Metals cans which are either <50 mL or >1000 mL
- Protected glass and plastic cans which are either <50 mL or >220 mL
- Unprotected glass and plastic cans which are either <50 mL or >150 mL
Note: If an aerosol dispenser is exempt from ADD due to its size, but falls under the scope of the CLP regulation, then the aerosol dispenser must be labelled for flammability in accordance with Section 2.3 of CLP.

• The name and address, or trade mark of the person marketing the aerosol dispenser
• Batch code
• The net contents by weight and by volume (note the derogation in Directive 2007/45/EC, covered below)
• The details covered in 2.2 of the Annex to the ADD (covered below)
• The ‘inverted epsilon’ (3) symbol (covered below)
• Additional operating precautions alerting to specific dangers of the product and clear instructions for safe use.

Under ADD, if the above particulars cannot be put on the aerosol dispenser due to its small size (maximum capacity of 150 ml or less), then they must appear on a label attached to the dispenser.

Interaction of ADD with CLP (2.2 of the Annex to ADD)

Under CLP, aerosols are divided into three categories (Section 2.3 of Annex I):

• Extremely Flammable Aerosols (Category 1)
• Flammable Aerosols (Category 2), and
• Non-Flammable Aerosols (Category 3).

In brief, the classification of an aerosol into one of the three categories is based on its components, its chemical heat of combustion and, if applicable, the results of the foam test (for foam aerosols) or the ignition distance test and enclosed spray test (for spray aerosols).

All aerosols must be labelled with the following hazard and precautionary statements, as given in CLP:

• (H229) Pressurised container: May burst if heated.
• (P210) Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
• (P251) Do not pierce or burn, even after use.
• (P410 + P412) Protect from sunlight. Do not expose to temperatures exceeding 50 °C/122 °F.

For consumer products, the following precautionary statement is also required:

• (P102) Keep out of reach of children.
Further to those outlined above, there are additional hazard and precautionary statements required for those aerosols classified into Category 1 and 2.

- Category 1: (H222) Extremely flammable aerosol
- Category 2: (H223) Flammable aerosol

**The following precautionary statement must also appear on the label in both cases:**

- (P211) Do not spray on an open flame or other ignition source.

In addition to the hazard and precautionary statements defined above, a Signal Word of ‘Warning’ or ‘Danger’ is required depending on the Category, as well as a hazard pictogram for Categories 1 and 2. An outline of the mandatory label elements for each category is given in Table 1.

If the aerosol dispenser contains flammable components (as defined in ADD) but the aerosol is not classified as Flammable (Category 2) or Extremely Flammable (Category 1), then the quantity of flammable material in the dispenser must be shown clearly on the label in the form of the following:

- $X\%$ by mass of the contents are flammable

Depending on their contents, aerosols may also fall within the scope of other hazard classes under CLP e.g. health hazards. In these cases, the aerosol dispenser must also be labelled with the applicable label elements for the additional hazard classes. An exception to this labelling requirement is made if the product is classified as an aspiration hazard, in which case substances and mixtures need not be labelled in accordance with Section 3.10.4 of CLP when placed on the market in aerosol dispensers.

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**Table 1. Label elements for Aerosol Categories 1 – 3**

* Consumer products only
The compliance mark
To denote compliance with the ADD, the ‘inverted epsilon’ symbol must be affixed to aerosol dispensers by the person responsible for the marketing of the product, and is a requirement for marketing in Europe. Although there is no design set out in the ADD, BAMA (The British Aerosol Manufacturers’ Association) recommends using the following symbol:

Weights and Measures
Under ADD, the contents are required to be declared in weight and volume. However, Directive 2007/45/EC on nominal quantities for pre-packed goods (implemented in the UK by SI 2009 No. 663) grants a derogation such that aerosol dispensers need not be marked with the nominal weight of their contents (Article 4(2), Directive 2007/45/EC). Directive 2007/45/EC also requires the nominal total capacity (brimful capacity) of the container to be marked on the label, normally boxed as shown below:

Voluntary and special labelling
In addition to statutory labelling, some products may require extra warning or usage instructions to ensure that users are fully aware of risks.

It is recommended by BAMA that for products placed on the market in the UK, the ‘Solvent Abuse Can Kill Instantly’ (‘SACKI’) badge warning is affixed to the label, using the dimensions detailed in Table 2. The ‘SACKI’ badge should be accompanied with the following phrase:
Use only as directed.

Where packages meet the requirements of Directive 76/211/EEC (consolidated version as of August 2017) on the making up by weight or by volume of certain pre-packaged products (implemented in the UK by SI 2006 No. 659), and have a nominal quantity between 5 g/5 mL and 10 kg/10 L, then the ‘e-mark’ can be applied:

The ‘e-mark’ has specific dimensions, and must be:
• At least 3 mm high
• In the same field of vision as the nominal quantity marking
• Indelible, easily legible and visible in normal conditions of presentation
There are also a number of BAMA recommendations in place for phrases to be included on the labels of a variety of product types entering the UK market, including:

**Body sprays:**
- Aerosols should be held at least 15 cm from the body when spraying

**De-icers:**
- Not to be used inside vehicles

**Oven cleaners:**
- Before use of the aerosol, electric cookers should be isolated by switching off the supply
- Ensure that the pilot light of gas cookers has been extinguished before cleaning and is re-lit afterwards
- Users are advised to protect the floor as necessary

**For oven cleaners with flammable properties (in addition to the above):**
- The oven needs to be ventilated after wiping off the product and before re-lighting the pilot light

**For consumer aerosols, to promote the recycling of empty dispensers the following phrase is recommended for inclusion on the label:**
- Please recycle – when empty

### Table 2. Dimensions of SACKI badge warning

<table>
<thead>
<tr>
<th>Aerosol fill volume</th>
<th>Width (cm)</th>
<th>Height (cm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>≤ 200 mL</td>
<td>1.3</td>
<td>1.0</td>
</tr>
<tr>
<td>&gt; 200 mL</td>
<td>1.66</td>
<td>1.28</td>
</tr>
</tbody>
</table>

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