

CLP ANNEX VIII

Guidance on ICG Naming

Version 1.0 – 16 December 2020

During November 2020 Commission Delegated Regulation 2020/1677¹ was published. It replaced Annex VIII to the Classification Labelling and Packaging Regulation (CLP) and aims to improve the workability of Annex VIII by introducing solutions, which if used, are intended to:

- reduce the administrative burden on submitters of harmonised poison centre notifications,
- without detriment to the information received by Appointed Bodies and Poison Centres.

Interchangeable Component Group and naming requirements:

Part B, Section 3.5. of Regulation 2020/1677 provides that mixture components that are used interchangeably may be grouped in a (single) submission. This is possible using an interchangeable component group (ICG) provided that certain criteria are fulfilled. Assuming these criteria can be fulfilled, Part B, Section 3.5.1. of Regulation 2020/1677 requires that:

“An interchangeable component group shall be given a name which corresponds to the technical function(s) of the grouped components for which they were incorporated in the mixture.”

ICG naming recommendations:

During the development of this regulation, several Poison Centres requested that ICGs be named in a “meaningful” way to aid clinicians in their response to an accidental chemical exposure. In other words, the name of an ICG should indicate the chemistry represented by that ICG.

A.I.S.E. supports the work of Appointed Bodies and Poison Control Centres and agrees that ICG names should fulfil legal requirements and aid emergency response. Therefore, A.I.S.E. recommends that an ICG name should describe both its technical function and the type of chemistry in use. Furthermore, A.I.S.E. advises that ICGs are named in a consistent two-stage manner, according to the following convention²:

Technical function: Identification of chemistry (summary information)

Summary information may also be provided in parentheses as an optional third stage of an ICG name. This third stage would further aid clinical response by providing a short description of ICG chemistry e.g. *“Solvent: alcoholic (mainly ethanol and isopropyl alcohol, not methanol)”* or additional information for toxicological advice such as free monomer content of polymer ICGs or quantification of impurities identified as Substances of Very High Concern (SVHCs) if present below classification thresholds. Such an approach will ensure that legal obligations are fulfilled, whilst providing additional support to poison control centre clinicians.

In order to support A.I.S.E. membership to apply these recommendations, a non-exhaustive list of sample ICG names, using to the above format, has been provided in Annex I to this document.

¹ [Commission Delegated Regulation 2020/1677 – Official Journal of the European Union](#)

² In the October 2020 version of the Poison Centre Notification form, ECHA has provided a technical solution to identify a mixture component as ICG (i.e. a discrete submission type for the ICG and on a tick box to flag when creating the mixture composition). Consequently, there is no need to discretely identify an ICG as such using its name.

Annex I: (non-exhaustive) list of sample ICG names

Name Stage 1: Technical Function:	Name Stage 2: Identification of chemistry:
Bleaching agent	Chlorine based bleaching agent
	Oxygen based bleaching agent
Enzyme	Protease Enzyme
	Non-Protease Enzyme
Oil	Essential Oils
	Fatty Oils
	Mineral Oils
	Silicon Oils
Polymer	Cellulose derived polymers
	Polycarboxylates polymers
	Polyethylene glycol/terephthalic acid/glycol copolymers
	Polyethylene glycols polymers
	Polyethylene terephthalates polymers
	Polyvinyl alcohol polymers
	Polyvinylpyridine-N-oxides polymers
	Polyvinylpyrrolidone polymers
Vinylpyrrolidone/vinylimidazole copolymers	
pH regulator	Acidity regulator – pH ≥ 7
	Alkalinity regulator – pH ≤ 7
Anti-foaming agent	Silicone oils
Anti-freezing agent	Alcohols
	Diols
	Triols
	Alcohols, diols and triols
Chelating agent	Aminopolycarboxylates
Colouring agents	Non-water-soluble pigments
	Water soluble colourants
Corrosion inhibitors	Benzothiazoles
	Dithiophosphates
Optical brighteners	Stilbenes and biphenyls
Polishing agent	Organo-mineral compounds
Sensory repellent	Bittering agent
Texturing agent	Microcrystalline cellulose
Viscosity modifiers	Cellulose derivatives
Solvent	Alcoholic
	Aliphatic hydrocarbon
	Aromatic hydrocarbon
	Halogenated hydrocarbon
Stabilising Agent	antioxidants
	chelating agents
Surfactant	Anionic surfactants
	Amphoteric surfactants
	Cationic surfactants (excluding esterquats)
	Esterquats
	Non-ionic surfactants
	Soap