

# Information on the sale of Chemicals—

## EU Requirements

Regulation (EC) No 1907/2006 (the “EU REACH and CLP

REACH

REACH is Regulation”) applies to the European regulation on sale of chemicals and their safe use in the EU. It deals with the Registration, Evaluation, Authorisation and Restriction of Chemical substances. Under the EU REACH Regulation, manufactures/manufacturers and importers are generally required to collect information on the properties of chemical substances present in their products, which could be subject to registration, authorisation, restrictions or information provision requirements. In addition, distributors can also be subject to REACH restrictions and information provision requirements.

In addition to the EU REACH Regulation, products sold in the EU that contain relevant chemicals may also be subject to the Regulation for Classification, Labelling and Packaging of Substances and Mixtures (“EU CLP Regulation”). The CLP Regulation incorporates the classification criteria and labelling rules for hazardous chemical substances and mixtures agreed at United Nations level, the so-called Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The GHS pictograms can be found [here](#).

There are certain other mandatory labelling requirements that you must ensure you comply with, including for example, labelling the hazardous substances with the supplier’s name, address and telephone number.

It is your responsibility to comply with the EU REACH Regulation and the EU CLP Regulation. You must also comply with other national requirements in relevant countries.

Please see below for further information about EU requirements.

## UK Requirements

Regulations for the sale and safe use of chemicals

From 1 January 2021, an amended version of the REACH Regulation apply to chemicals as a result of the REACH etc. (Amendment etc.) (EU Exit) Regulations 2019/758 (the “UK Regulation on Chemicals”). Different rules apply to goods you sell in: (1) Great Britain (England, Scotland and Wales); and (2) Northern Ireland. We have noted below where there are relevant changes in the requirements from 1 January 2021.

Classification, Labelling and Packaging requirements

From 1 January 2021, an amended version of the EU CLP Regulation apply as a result of the Chemicals (Health and Safety) and Genetically Modified Organisms (Contained Use) (Amendment etc.) (EU Exit) Regulations 2019/720 (the “UK CLP Regime”). We have noted below where there will be relevant changes in the requirements from 1 January 2021.

There are certain other mandatory labelling requirements that you must ensure you comply with, including for example, labelling the hazardous substances with the supplier’s name, address and telephone number.

REACH.–It is your responsibility to comply with the UK requirements if you sell products containing relevant chemicals in the UK. If you also sell products containing relevant chemicals on Amazon EU website(s), then you must also comply with the EU Reach Regulation the EU CLP and with other national requirements in the relevant countries.

Please see below for further information about UK requirements.

This material is for informational purposes only. It is and you should not intended take it as a substitute for legal advice. We encourage you to consult your legal counsel if you have questions for any concerns about the laws and regulations concerning your product. This material only reflects the position at the date of writing and requirements across the EU and in the UK may change. You should refer to current UK Brexit guidance about your products (see below) to learn more about changes that may affect you from 1 January 2021.

## I. EU Requirements

### EU REACH Regulations

#### General information

REACH applies to all chemical substances and mixtures manufactured in or imported into the EEA (European Economic Area: all the member states of the EU plus Norway, Iceland and Liechtenstein) ~~as well as~~, including articles containing certain dangerous or hazardous chemical substances or mixtures.

*Authorisation (Annex XIV):* Particularly hazardous chemical substances cannot be used in the EEA unless they have been authorised for that particular use. These chemical substances are listed in Annex XIV of the EU REACH Regulation. They are also added to REACH’s Annex XIV Authorisation List, which is available on the European Chemicals Agency (ECHA) website (see Additional Information below).

*Restriction (Annex XVII):* Use of certain hazardous chemical substances is restricted, including limits or banning the manufacture, ~~placing on the market~~ sale or use in the EEA. This includes restrictions for use as a substance, in mixtures and articles. A complete list of restrictions ~~as listed~~ can be found in REACH’s Annex XVII of the EU REACH Regulation and is available on the European Chemicals Agency (ECHA) website: (see Additional Information below).

*Registration:* Manufacturers and importers are generally responsible for the registration of the substances they manufacture or import above a certain threshold (1000 kg per year). The registration includes collecting information on the properties and uses of the substance to be registered.

*Provision of Information:* Manufacturers, importers and distributors are all generally responsible for communicating information about hazardous products up and down the supply chain in certain situations, which may include the provision of a Safety Data Sheet (SDS) for certain hazardous substances and mixtures.

Any presence of a “candidate list” substance (also known as a Substance of Very High Concern (SVHC)) in an article in a concentration above 0.1% by weight must be actively communicated to the downstream user of the product. The communication must include safe use information for the article, with as a minimum, the name of the particular SVHC. Where the recipient of the article is a final consumer, this safe use information only needs to be provided upon request (within 45 days and free of charge).

It is your responsibility to provide accurate and complete product information about REACH-regulated products. If your products are regulated under [the EU REACH Regulation](#), you must verify that your products are eligible for sale in the EEA and ~~please~~ provide us with the most up-to-date SDS.

### Professional Use Only Chemicals

Amazon does not allow the sale of professional use only chemicals. Please check with the manufacturer/SDS or product label to see if your product is professional use only. In the event that chemicals for professional use only are received at an Amazon Fulfilment Centre (FC), Amazon may, at your cost and without compensation, dispose of the units.

### REACH: Additional Information

~~We strongly encourage you to visit the following sites for more information on REACH.~~

- ~~• UK REACH Helpdesk,  
All EU National helpdesks for REACH Regulations,~~

### ~~European Chemicals Agency (ECHA) on REACH, CLP~~

~~In addition to REACH, the Regulation for Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation) may apply to your products. The CLP Regulation incorporates the classification criteria and labelling rules for hazardous chemical substances and mixtures agreed at United Nations level, the so-called Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The GHS pictograms can be found.~~

~~There are certain other mandatory labelling requirements that you must ensure you comply with, including for example, labelling the hazardous substances with the supplier's name, address and telephone number.~~

~~Note: It is your responsibility to comply with CLP Regulation. This material is for informational purposes only. It is not intended as legal advice. We encourage you to consult your legal counsel if you have questions about the laws and regulations concerning your product.~~

### Application

The EU CLP Regulation applies to all substances and mixtures imported, manufactured, or placed on the market within the EEA, unless otherwise exempted. Examples of products regulated under CLP are paints, detergents, glues, spray paints and pesticides.

There are certain exemptions from to the EU CLP Regulation for the following materials ~~in their finished state only~~:

~~Articles (including products with non-accessible hazardous chemical substances and mixtures, such as, batteries) are in the below forms, provided they are in a finished state and intended for the final user:~~

- Food and feeding stuffs
- Cosmetics
- Medical devices (human)
- Medicinal products (human and veterinary)

You may use substances or mixtures to produce things that have a special shape, surface or design. When the special shape, surface or design determines the function to a greater degree than the chemical composition, these are called “articles” under the legislation. Examples of articles are: bicycles, guitars, batteries, T-shirts, and CDs. The EU CLP Regulation does not apply to most articles (except: (1) explosive articles (as described in section 2.1 of Annex I); or (2) where the substances contained in the article need to be registered or notified under Articles 7 or 9 of the EU Reach Regulation).

To determine if your product is regulated under CLP we recommend you take the following steps:

- Contact the manufacturer and ask if the product is regulated under the CLP.
- Check the Safety Data Sheet (SDS) (previously also known as Material Safety Data Sheet (MSDS)) or the label of the product to determine if there are CLP classifications on it. If you do not have an SDS for the product, the manufacturer or your supplier should have the document available.

### Chemicals Prohibited from Amazon Fulfilment Centres (FC)

~~You must not ship any products to Amazon that are prohibited from entering an FC. Amazon may at your cost and without compensation to you, dispose of any such units. Note that products classified, labelled and packed in accordance with outdated legislation (such as the Dangerous Preparations Directive and Dangerous Substances Directive) cannot be accepted at Amazon FCs.~~

~~Products which bear any of the following CLP hazard (H) or precautionary (P) statements are prohibited from entering an Amazon FC. You must not ship any products to Amazon that are prohibited from entering an FC. Amazon may at your cost and without compensation to you, dispose of any such units. Note that products classified, labelled and packed in accordance with outdated legislation (such as the Dangerous Preparations Directive and Dangerous Substances Directive) cannot be accepted at Amazon FCs.~~

Products which bear any of the following CLP hazard (H) or precautionary (P) statements are prohibited from entering an Amazon FC:

- EUH001 Explosive when dry
- EUH006 Explosive with or without contact with air
- EUH014 Reacts violently with water
- EUH018 In use may form flammable/explosive vapour-air mixture
- EUH019 May form explosive peroxides
- EUH029 Contact with water liberates toxic gas
- EUH031 Contact with acids liberates toxic gas
- EUH032 Contact with acids liberates very toxic gas
- EUH044 Risk of explosion if heated under confinement
- EUH059 Hazardous to the ozone layer
- H200 Unstable explosive
- H201 Explosive; mass explosion hazard
- H202 Explosive; severe projection hazard
- H203 Explosive; fire, blast or projection hazard
- H240 Heating may cause an explosion
- H241 Heating may cause a fire or explosion
- H250 Catches fire spontaneously if exposed to air
- H251 Self-heating; may catch fire
- H252 Self-heating in large quantities; may catch fire
- H260 In contact with water releases flammable gases which may ignite spontaneously
- H261 In contact with water releases flammable gas
- H300 Fatal if swallowed
- H301 Toxic if swallowed
- H304 May be fatal if swallowed and enters airways
- H310 Fatal in contact with skin
- H311 Toxic in contact with skin
- H330 Fatal if inhaled
- H331 Toxic if inhaled
- H340 May cause genetic defects
- H341 Suspected of causing genetic defects

- H350 May cause cancer
- H351 Suspected of causing cancer
- H360 May damage fertility or the unborn child
- H361 Suspected of damaging fertility or the unborn child
- H362 May cause harm to breastfed children
- H370 Causes damage to organs
- H371 May cause damage to organs
- H372 Causes damage to organs through prolonged or repeated exposure
- H373 May cause damage to organs through prolonged or repeated exposure
- P222 Do not allow contact with air
- P223 Keep away from any possible contact with water, because of violent reaction and possible flash fire
- P230 Keep wetted with (insert manufacturer specification)
- P231 Handle under inert gas
- P406 Store in a corrosive resistant (insert manufacturer specification) container with a resistant inner liner
- P407 Maintain air gap between stacks/pallets

#### Special Packaging Rules

It is your responsibility to comply with the special packaging rules in the [EU CLP Regulation](#) for tactile warnings and child-resistant fastenings for all applicable products. [An overview](#) of the different hazards that [trigger](#) child-resistant fastenings or tactile warnings for chemical substances and mixtures is provided by the [EU's ECHA](#) here.

#### CLP Product Labelling

It is your responsibility to ensure that your CLP-regulated products are labelled appropriately (including the relevant hazard (H) statements, precautionary (P) statements and/or pictograms) and that all such product information is available on the label in the official language of the Member State(s) where you offer your product for sale or supply.

#### Product Listings

It is your responsibility to provide accurate and complete product information, including applicable warning messages as required by the CLP regulation. In order to add applicable warnings to your product listings, you should do the following:

- Determine if the [EU CLP Regulation](#) based on ~~(EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures, or simply CLP~~, applies to your product. This may be verified by contacting the manufacturer or checking the product labelling.

- If your products are regulated under [the EU CLP Regulation](#), verify that your products are eligible for sale on Amazon and, if you want to list them, provide us with the most updated SDS when setting up a new item.
- ~~Please also provide us with high-quality pictures of your product clearly showing all applicable warnings. Please also provide us with high-quality pictures of your product clearly showing all applicable warnings.~~

### **CLP: Additional Information**

We strongly encourage you to [visit/review](#) the following [sites/guidance](#) for more information on ~~CLP~~.

~~Information on the~~ sale of chemicals ~~–in the EU~~.

- [All EU National helpdesks for REACH and CLP Regulations:](https://echa.europa.eu/support/helpdesks)  
<https://echa.europa.eu/support/helpdesks>
- [European Chemicals Agency \(ECHA\) on REACH:](https://echa.europa.eu/regulations/reach/understanding-reach)  
<https://echa.europa.eu/regulations/reach/understanding-reach>

## **II. UK Requirements**

### **UK Regulations on Chemicals**

#### General information

REACH applies to all chemical substances and mixtures manufactured in or imported into the UK, but the provisions apply differently to Great Britain (England, Scotland and Wales, “GB”) and Northern Ireland, including articles containing certain dangerous or hazardous chemical substances or mixtures. You can read more about the position in Northern Ireland (“NI”) below.

*Authorisation:* Particularly hazardous chemical substances cannot be used in GB unless they have been authorised for that particular use. These chemical substances are listed in Annex XIV of the EU REACH Regulation and UK Regulation on Chemicals.

*Restriction:* Use of certain hazardous chemical substances is restricted, including limits or banning the manufacture, sale or use in GB. This includes restrictions for use as a substance, in mixtures

and articles. A complete list of restrictions can be found in Annex XVII of the EU REACH Regulation and UK Regulation on Chemicals.

Registration: Manufacturers and importers are generally responsible for the registration of the substances they manufacture or import above a certain threshold (1000 kg per year). The registration includes collecting information on the properties and uses of the substance to be registered. From 1 January 2021, manufacturers and importers are required to register new chemicals with the Health and Safety Executive.

Provision of Information: Manufacturers, importers and distributors are all generally responsible for communicating information about hazardous products up and down the supply chain in certain situations, which may include the provision of a Safety Data Sheet (SDS) for certain hazardous substances and mixtures.

Any presence of a “candidate list” substance (also known as a Substance of Very High Concern (SVHC)) in an article in a concentration above 0.1% by weight must be actively communicated to the downstream user of the product. The communication must include safe use information for the article, with as a minimum, the name of the particular SVHC. Where the recipient of the article is a final consumer, this safe use information only needs to be provided upon request (within 45 days and free of charge).

It is your responsibility to provide accurate and complete product information about REACH-regulated products. If your products are regulated under the UK Regulation on Chemicals (after that date), you must verify that your products are eligible for sale in the UK and provide us with the most up-to-date SDS.

### Professional Use Only Chemicals

Amazon does not allow the sale of professional use only chemicals. Please check with the manufacturer/SDS or product label to see if your product is professional use only. In the event that chemicals for professional use only are received at an Amazon Fulfilment Centre (FC), Amazon may, at your cost and without compensation, dispose of the units.

### UK CLP Regime

#### Application

The EU CLP Regulation and the UK CLP Regime apply to all substances and mixtures imported, manufactured, or sold in the UK, unless otherwise exempted. Examples of products regulated under CLP are paints, detergents, glues, spray paints and pesticides. The provisions apply differently to: (1) Great Britain (England, Scotland and Wales, “GB”) and (2) Northern Ireland. You can read more about the position in Northern Ireland (“NI”) below.

Exemptions from GB requirements include where substances and mixtures are in the below forms, provided they are in a finished state and intended for the final user:

- [Food and feeding stuffs](#)
- [Cosmetics](#)
- [Medical devices \(human\)](#)
- [Medicinal products \(human and veterinary\)](#)

[You may use substances or mixtures to produce things that have a special shape, surface or design. When the special shape, surface or design determines the function to a greater degree than the chemical composition, these are called “articles” under the legislation. Examples of articles are: bicycles, guitars, batteries, T-shirts, and CDs. The EU CLP Regulation or the UK CLP Regime do not apply to most articles \(except: \(1\) explosive articles \(as described in section 2.1 of Annex I\); or \(2\) where the substances contained in the article need to be registered or notified under Articles 7 or 9 of the EU Reach Regulation / UK Regulation on Chemicals\).](#)

[To determine if your product is regulated under CLP we recommend you take the following steps:](#)

- [Contact the manufacturer and ask if the product is regulated under the CLP.](#)
- [Check the Safety Data Sheet \(SDS\) \(previously also known as Material Safety Data Sheet \(MSDS\)\) or the label of the product to determine if there are CLP classifications on it. If you do not have an SDS for the product, the manufacturer or your supplier should have the document available.](#)

#### [Chemicals Prohibited from Amazon Fulfilment Centres \(FC\)](#)

[You must not ship any products to Amazon that are prohibited from entering an FC. Amazon may at your cost and without compensation to you, dispose of any such units. Note that products classified, labelled and packed in accordance with outdated legislation \(such as the Dangerous Preparations Directive and Dangerous Substances Directive\) cannot be accepted at Amazon FCs.](#)

[Products which bear any of the following CLP hazard \(H\) or precautionary \(P\) statements are prohibited from entering an Amazon FC:](#)

[EUH001 Explosive when dry](#)

[EUH006 Explosive with or without contact with air](#)

[EUH014 Reacts violently with water](#)

[EUH018 In use may form flammable/explosive vapour-air mixture](#)

[EUH019 May form explosive peroxides](#)

[EUH029 Contact with water liberates toxic gas](#)

[EUH031 Contact with acids liberates toxic gas](#)

[EUH032 Contact with acids liberates very toxic gas](#)

[EUH044 Risk of explosion if heated under confinement](#)

[EUH059 Hazardous to the ozone layer](#)

[H200 Unstable explosive](#)

[H201 Explosive; mass explosion hazard](#)

<u>H202</u>	<u>Explosive; severe projection hazard</u>
<u>H203</u>	<u>Explosive; fire, blast or projection hazard</u>
<u>H240</u>	<u>Heating may cause an explosion</u>
<u>H241</u>	<u>Heating may cause a fire or explosion</u>
<u>H250</u>	<u>Catches fire spontaneously if exposed to air</u>
<u>H251</u>	<u>Self-heating; may catch fire</u>
<u>H252</u>	<u>Self-heating in large quantities; may catch fire</u>
<u>H260</u>	<u>In contact with water releases flammable gases which may ignite spontaneously</u>
<u>H261</u>	<u>In contact with water releases flammable gas</u>
<u>H300</u>	<u>Fatal if swallowed</u>
<u>H301</u>	<u>Toxic if swallowed</u>
<u>H304</u>	<u>May be fatal if swallowed and enters airways</u>
<u>H310</u>	<u>Fatal in contact with skin</u>
<u>H311</u>	<u>Toxic in contact with skin</u>
<u>H330</u>	<u>Fatal if inhaled</u>
<u>H331</u>	<u>Toxic if inhaled</u>
<u>H340</u>	<u>May cause genetic defects</u>
<u>H341</u>	<u>Suspected of causing genetic defects</u>
<u>H350</u>	<u>May cause cancer</u>
<u>H351</u>	<u>Suspected of causing cancer</u>
<u>H360</u>	<u>May damage fertility or the unborn child</u>
<u>H361</u>	<u>Suspected of damaging fertility or the unborn child</u>
<u>H362</u>	<u>May cause harm to breastfed children</u>
<u>H370</u>	<u>Causes damage to organs</u>
<u>H371</u>	<u>May cause damage to organs</u>
<u>H372</u>	<u>Causes damage to organs through prolonged or repeated exposure</u>
<u>H373</u>	<u>May cause damage to organs through prolonged or repeated exposure</u>
<u>P222</u>	<u>Do not allow contact with air</u>
<u>P223</u>	<u>Keep away from any possible contact with water, because of violent reaction and possible flash fire</u>
<u>P230</u>	<u>Keep wetted with (insert manufacturer specification)</u>
<u>P231</u>	<u>Handle under inert gas</u>
<u>P406</u>	<u>Store in a corrosive resistant (insert manufacturer specification) container with a resistant inner liner</u>
<u>P407</u>	<u>Maintain air gap between stacks/pallets</u>

### Special Packaging Rules

It is your responsibility to comply with the special packaging rules in the EU CLP Regulation and UK CLP Regime for tactile warnings and child-resistant fastenings for all applicable products. Overviews of the different hazards that require child-resistant fastenings or tactile warnings for chemical substances and mixtures is provided by the UK's [HSE](#) and the EU's [ECHA](#).

### CLP Product Labelling

It is your responsibility to ensure that your CLP-regulated products are labelled appropriately (including the relevant hazard (H) statements, precautionary (P) statements and/or pictograms) and that all such product information is available on the label in English.

### Product Listings

It is your responsibility to provide accurate and complete product information, including applicable warning messages as required by the CLP regulation. In order to add applicable warnings to your product listings, you should do the following:

- Determine if the UK CLP Regime applies to your product. This may be verified by contacting the manufacturer or checking the product labelling.
- If your products are regulated under the EU or UK regimes, verify that your products are eligible for sale on Amazon and, if you want to list them, provide us with the most updated SDS when setting up a new item.
- Please also provide us with high-quality pictures of your product clearly showing all applicable warnings.

### Northern Ireland

Please note that different rules apply in NI from 1 January 2021 as a result of the Northern Ireland Protocol. In particular:

- You should ensure that products meet applicable EU REACH and CLP requirements.
- You should ensure that ECHA has been notified, as required by EU REACH and CLP.
- Northern Ireland businesses that are currently downstream users or distributors may have obligations in relation to chemicals traded from GB to NI.
- Northern Ireland businesses may also have obligations to notify GB authorities if placing highly regulated goods on the GB market.
- “Qualifying Northern Ireland goods” will be able to be sold in GB under unfettered access rights. The UK Government is issuing guidance on how this will work.

### BREXIT: UK Government Guidance

The UK Government has released guidance on the sale of chemicals in the UK from 1 January 2021, including on REACH and CLP (as well as Biocides, Prior Informed Consent and Pesticides or Plant Protection Products).

We encourage you to review this guidance (linked below), alongside any other specific UK Government Guidance that applies to your product. You should consult your legal counsel if you have questions about how the laws and regulations apply to your products from 1 January 2021.

- <https://www.hse.gov.uk/brexit/chemicals-brexit-guidance.htm>
- <https://www.hse.gov.uk/brexit/reach-guidance.htm>
- <https://www.hse.gov.uk/brexit/clp.htm>
- <https://www.hse.gov.uk/brexit/clp-ni.htm>

### **Additional Information**

We strongly encourage you to review the following guidance for more information on the sale of chemicals in the UK.

You can visit the [UK REACH Helpdesk](#) and review UK Government guidance for more information on REACH and CLP, including the following websites:

- <https://www.gov.uk/guidance/how-to-comply-with-reach-chemical-regulations>
- <https://www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm>

We also encourage you to visit the [Business Companion website](#), which contains guidance on UK product compliance rules:

- <https://www.businesscompanion.info/en/get-started>