

Request for use of an Alternative Chemical Name

Manufacturers, importers and downstream users who wish to produce or import a mixture – e.g. paints, cleaning agents or dish washer detergents – and place it on the European market, are obliged according to REACH and the CLP Regulation to inform a user of any relevant hazardous ingredient in the mixture by disclosing its chemical identity.

If disclosing this information on the label of the product or in the safety data sheet puts the confidential nature of the business at risk, companies can submit a request to ECHA or to Member State Competent Authorities asking for permission to use an alternative chemical name (CLP Regulation, Article 24).

1. How to choose an alternative chemical name

When deriving an alternative name, it is recommended to consult the “Lexicon guide” (Annex VI, Part B of the Dangerous Preparations Directive (DPD)). The proposed alternative should identify the main functional group of the substance, or an alternative designation.





2. How to prepare a request for use of an alternative chemical name in a mixture

If a mixture is classified, labelled and packaged according to the Dangerous Preparations Directive (Article 15 and Annex VI), the request has to follow the provisions laid out in the DPD, and will have to be submitted to an EU Member State Competent Authority in one of the countries where the mixture is being placed on the market.

If the Member State Competent Authority authorises the request before 1 June 2015, the alternative chemical name may be used in the mixture after this date.

If a mixture is classified, labelled and packaged according to the CLP Regulation, the request has to follow the provisions laid out in this regulation, and be submitted to ECHA only.

3. How to submit your request for use of an alternative chemical name in a mixture

If the CLP regulation applies to the mixture, manufacturers, importers and downstream users will have to create an account in REACH-IT and submit their request electronically using IUCLID available on ECHA's webpage.

Once submitted, the request will undergo a virus check and a Business Rule check to ensure that it is suitable for further processing. However, the Business Rule check does not provide any information on the completion of the dossier.

ECHA will invoice the requester if the Business Rule check has been successful. The Agency will process the request upon payment received and inform the requester upon its decision within six weeks (CLP Regulation, Article 24(3)).

4. What are the fees when requesting an alternative chemical name?

Manufacturers, importers and downstream users are subject to paying a fee when requesting an alternative chemical name for their mixture if it is labelled and packaged according to the CLP Regulation.

In general the fee depends on the size of the company and the number of mixtures in a request. The fee range payable to ECHA is laid out in EU Regulation No 440/2010 (21 May 2010) and pursuant to EC Regulation No 1272/2008.

Further reading

- Data Submission Manual part 14 – How to Prepare and Submit a Request for Use of an Alternative Chemical Name for a Substance in a Mixture using IUCLID 5
- Guidance on the Application of the CLP Criteria
- FAQ on Classification and Labelling
- Q&A on Classification and Labelling
- CLP Regulation
- Dangerous Preparations Directive