

EU Household Compliance Review

Product	Lemon & Vinegar multi-surface cleaner · 750 ml spray
Brand	Ormelle Home
Target market	Ireland, then the Netherlands
Documents received	Front + back label artwork v2 (PDF), product SDS v1.3, raw material SDSs, fragrance technical sheet, list of planned claims
Reference	BF-REV-HH-0207
Reviewed by	Justine Teruel, formulator and regulatory consultant

Conclusion : Do not print as is. The label does not match the SDS on the signal word, the pictogram is too small and the UFI is missing. Once these 3 points are fixed, the label can go to print; the 'to fix' points must be handled before the product goes on sale.

3

blocking

5

to fix

2

to watch

9

compliant points

Blocking: prevents market placement or exposes to withdrawal. To fix: non-compliance to solve before sale. To watch: step to plan or point to document.

1. Artwork received, annotated

Each number refers to the finding with the same number. Dashed frame: particular missing from the artwork.

FRONT

ORMELLE HOME

Multi-surface cleaner

Lemon & Vinegar · spray

Non-toxic

Eco-friendly

4



2

DANGER

1

750 ml e

BACK

Directions: spray, wipe with a damp cloth. Rinse surfaces in contact with food.

DANGER

1

 Causes serious eye irritation.

P101 · P102 · P264 · P280 · P305+P351+P338 · P337+P313 · P362 · P501

8

EUH208 missing

5

Detergent composition missing

7

UFI missing

3

www.ormelle-home.ie

6

ingredient page missing

9

English only

10

2. Findings and fixes

#	Item	Finding	Reference	Priority	Proposed fix
1	Signal word	'Danger' is printed while the SDS (section 2) classifies the mixture Eye Irrit. 2, H319, whose signal word is 'Warning'.	CLP (EC) 1272/2008, Art. 20 and Annex I, 3.3	Blocking	Replace 'Danger' with 'Warning' on both faces, then keep SDS and label aligned at every formula change.
2	GHS07 pictogram	12 × 12 mm pictogram. For packaging above 0.5 l and up to 3 l, the minimum is 23 × 23 mm.	CLP, Annex I, 1.2.1, Table 1.3	Blocking	Enlarge to at least 23 × 23 mm, with the full red frame.
3	UFI	No UFI code although the mixture is classified for a health hazard.	CLP, Art. 25(7) and Annex VIII	Blocking	Generate the UFI, print it near the precautionary statements ('UFI: XXXX-XXXX-XXXX-XXXX') and submit the PCN notification before market placement.
4	Claims	'Non-toxic' and 'Eco-friendly' on the front.	CLP, Art. 25(4)	To fix	Remove: these statements are banned on a classified mixture. Use a verifiable, substantiated fact instead (for example the bottle's origin).
5	EUH208	Limonene at 0.3% (skin sensitizer): the EUH208 statement is missing.	CLP, Annex II, 2.8	To fix	Add on the back: 'Contains d-limonene. May produce an allergic reaction.'
6	Supplier	Only the website appears. No postal address or phone number.	CLP, Art. 17(1) (a)	To fix	Add the name, full address and telephone number.
7	Detergent composition	No statement of surfactants or perfume.	Reg. (EC) 648/2004, Annex VII A	To fix	Add for example: 'Contains: less than 5%: anionic surfactants, non-ionic surfactants; perfume, limonene' (levels to match the formula).

8	Precautionary statements	8 P statements printed; no more than 6 is recommended unless needed.	CLP, Art. 28(3)	To watch	Reduce, for example: P101, P102, P280, P305+P351+P338, P337+P313.
9	Online ingredient list	No web page planned for the full ingredient list.	Reg. (EC) 648/2004, Annex VII D	To fix	Create the page and print its address on the label.
10	Languages	Label in English only; sales planned in the Netherlands.	CLP, Art. 17(2) (languages of the Member State)	To watch	Provide Dutch label elements, or one label per country.

3. SDS / label consistency

Item	SDS v1.3	Label v2	Status
Classification	Eye Irrit. 2, H319	H319	Compliant
Signal word	Warning	Danger	Blocking
Pictogram	GHS07	GHS07, 12 × 12 mm	Blocking
EUH208 (limonene)	Listed in section 2.2	Missing	To fix
UFI	To add in section 1.1	Missing	Blocking
Supplier	Complete (section 1.3)	Website only	To fix

The SDS itself is consistent with the raw material SDSs; only the UFI has to be added once generated.

Action plan

1. Before print: points 1, 2 and 3 (signal word, pictogram size, UFI).
2. Before sale: points 4 to 7 and 9, then the PCN notification with the same UFI.
3. Before the Netherlands: translate the label elements (point 10).
4. At every formula change: check that classification, SDS, UFI and label stay aligned.

Already compliant

Mixture classification, H319 hazard statement, content and e symbol, directions for use, product identifier, food-contact surface precaution, overall legibility, no biocidal claim ('antibacterial', 'disinfectant'), SDS in 16 sections.

Scope of the review

This review covers the label, the SDS and the claims based on the documents received. It does not include the PCN notification, full SDS authoring or the assessment of a biocidal claim. One round of questions is included within 15 days of delivery.

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