



THE ADHESIVE EXPERTS.

## PRIVATE LABEL DESIGN GUIDE

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CHECKLIST FOR CREATING LEGALLY COMPLIANT  
LABELS FOR PRIVATE LABEL PRODUCTS



In this guide you will find all the latest information that is important for the legally compliant creation of private labels. Please note: If you customise your print data yourself and deliver it to us, we will not carry out any conformity checks and accept no liability for correctness. As the distributor, you are solely responsible for the design of the labels and bear the full risk for any necessary changes to labels that have already been printed. Please do not hesitate to contact us if you have any questions. Our employees from the graphics department will advise you on all topics relating to private labels and will also support you with the design on request within the framework of our current hourly rates.

Thank you for your excellent co-operation!  
Your GLUETEC-Team

## 1. Requirements according to the CLP Regulation

On 10 December 2024, amendments to the CLP Regulation came into force that directly affect all labels of chemical products and entail mandatory adjustments to the design of existing labels. This affects all GLUETEC products, products with private labels and blank products with transport labels. Essentially, this involves new rules for the following points

- Text colour, font, font size and line spacing of the hazard texts
- Hazard symbols
- Folding labels

### 1.1 Transition periods

- GLUETEC may continue to process and use labels that have already been printed until the end of 2026. These products may still be sold in stores until 2028.
- New labels for new products must already comply with the current CLP standard.

We therefore expressly recommend that you adhere to the new requirements with immediate effect when reprinting.

### 1.2 Official information and sources

You can also find detailed information on this topic online here:

- Regulation EU 2024/2865:  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R2865>
- ECHA guidance: <https://echa.europa.eu/guidance-documents/guidance-on-clp>

## 2. Specifications in detail

### 2.1 Minimum dimensions: Pictograms and font sizes

- Depending on the capacity of the product, certain specifications apply as to the minimum size of the labelling label itself, the font of the hazard texts and the pictograms (hazard symbols).
- The size of the pictogram and the minimum font size of the hazard texts are linked (see CLP Regulation, Annex I, section 1.2). The minimum font size is measured by the height of the small x in millimetres.
- The pictograms must be at the top and have an edge length of at least 10 mm (preferably 16 mm). Pictograms can be downloaded free of charge here, for example: <https://unece.org/transport/dangerous-goods/ghs-pictograms>

Volume of your private label	Dimensions of the identification label (in millimetres) for the information required by Article 17	Dimension of each pictogram (in millimetres)	Examples for the pictogram size	Minimum font size (Height of the small x in millimetres)
up to 0,5 l	if possible, at least 52 x 74	Edge lengths not less than 10 x 10 if possible, at least 16 x 16		1,2
over 0,5 l up to a maximum of 3 l				1,4
over 3 l up to a maximum of 50 l	at least 74 x 105	at least 23 x 23		1,8

ABCx   
1,2 mm

— x-Height 1,2 mm, corresponds to Arial 6,6 pt

ABCx   
1,4 mm

— x-Height 1,4 mm, corresponds to Arial 7,7 pt

Readability and font size of nominal filling volumes for finished packaging:

Font size of the nominal filling volumes:

5 up to 50 ml	2 mm
over 50 up to 200 ml	3 mm
over 200 up to 1.000 ml	4 mm
over 1.000 ml	6 mm

8 pt.  
12 pt.  
16 pt.  
24 pt.

Font size on group packaging

up to 50 ml	3 mm
50 ml and over 50 ml	6 mm

12 pt.  
24 pt.

## 2.2 Rules for hazard texts and writings

The following points are mandatory for the security texts:

- Use a single font that is easy to read and sans serif.
- The spacing between the letters must be such that the selected font is easy to read.
- The signal word (usually „Danger“ or „Warning“) must be written in BOLD and placed directly next to the hazard symbols
- The security text must be printed as black text on a white background.
- The space between two lines must be at least 120% of the font size.
- The minimum font size is measured on the small x and depends on the capacity of the product container (see table).
- All hazard texts, H-phrases and P-phrases as well as EUH-phrases, if applicable, must be listed on all labels in unchanged order
- For containers with a content of less than or equal to 125 ml, the small container rule can be applied, which can be found under point 15 in the safety data sheet. If a product does not have this point, all sentences of point 2.2 must be included in the safety data sheet.
- Duplicate phrases only need to be listed once. Example: The phrase „P102 Keep out of the reach of children“ is already included in the EUH202 text and therefore does not need to be printed elsewhere.
- The information text for labels on the safety data sheet to be found under point 2.2 „Special labelling“ must also be printed on the label.
- For two-component products, the respective pictograms and texts of both components must be listed separately for each component.
- The UFI code must also be assigned to each component individually. The UFI code registered by us can be found on the safety data sheet under point 1.1.



## 3. Creation of the labels

To optimise the implementation of your private label product, we always provide you with the relevant layout information, our corresponding label and the safety and technical data sheets.

Please refer to our safety data sheets for the respective labelling. These can be found on our homepage in the download area: <https://gluete-group.com/en/infocenter/downloads/data-sheets/>

### 3.1 General labelling

Your labelling labels must be firmly attached to one or more surfaces of the packaging directly containing your substance or mixture (see CLP Regulation Article 31). They must be horizontally legible when the packaging is put down normally.

### 3.2 Special features Wrap and fold labels

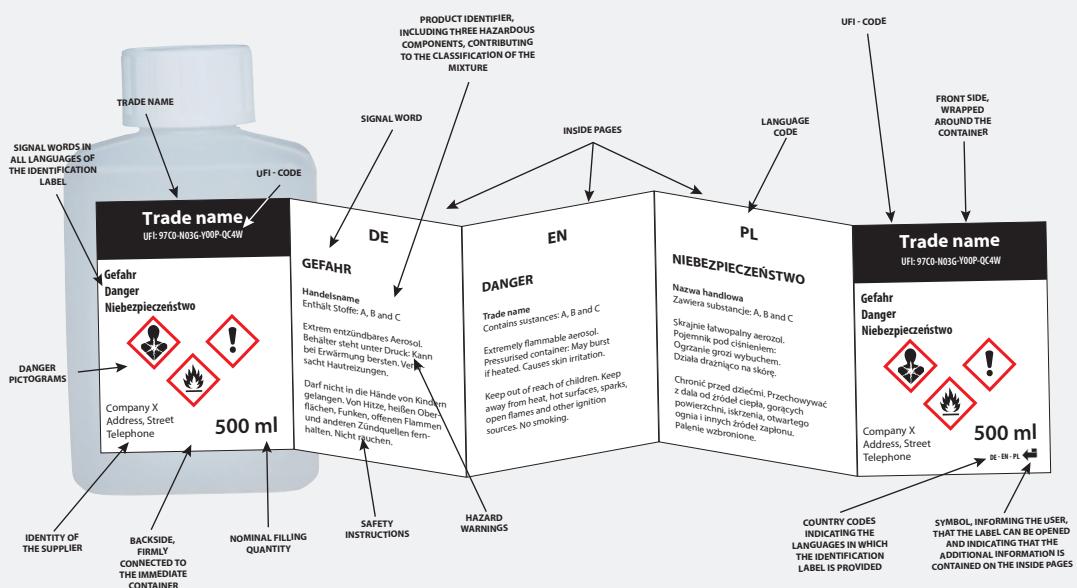
The EU Commission has relaxed the requirements for wrap-around and folded labels. The original regulations on the language on the front have been revised. It is now possible to create a universal label with any language on the front and the remaining languages on the inside. Hazard labelling and safety texts must be placed on the first and last page. This makes it easier to use the same label for different countries (see CLP Regulation Annex 1.2.1.6).

#### Front side

- Name, address and telephone number of the supplier (in accordance with CLP Regulation Article 17 (1) a)
- Nominal quantity of the substance or mixture in the packaging (according to CLP Regulation Article 17 (1) b)
- Product identifiers in all languages (in accordance with CLP Regulation 17 (1) c)
- Hazard pictograms in all languages (in accordance with CLP Regulation Article 17 (1) d)
- Signal words in all languages (according to CLP Regulation Article 17 (1) e)
- UFI code must be directly visible on the front panel
- A reference to the full safety information on the inside of the fold-out label in all languages of the label, or a symbol that alerts the user that the label can be opened and that additional information can be found on the inside pages
- An abbreviation of the language (country code or language code) for all languages used on the inside pages.

#### Inside pages

- One section for each language mentioned on the title page e.g. one language per page
- Without hazard pictograms and supplier labelling
- An abbreviation of the language (country code or language code) as a heading on the respective inside page
- Full labelling information (in accordance with CLP Regulation Article 17 (1)), including additional information.



#### Backsides

- The reverse side is the side that is glued directly to the packaging.
- The reverse side is identical to the front side, but without the reference to unfolding the folding label and without the associated language abbreviations.

### 3.3 Labels for aerosol cans

#### General

According to Article 8, Section e) of the „Aerosol Directive“ 75/324/EC, the net weight and the net volume of the contents must be indicated on the labelling of each aerosol packaging (spray can). Furthermore, the total capacity in millilitres must also be stated.

The total capacity corresponds to the edge-full volume of an open aerosol container filled with water. An inverted epsilon - 3 - confirms that the aerosol dispenser complies with Directive 75/324/EC.



The volume indication (e.g. „600 ml“) and the characters must be placed „in the same field of vision“, preferably next to each other:

**Contains: 400 ml    520|3|e**

#### Special regulations UK

Separate rules may apply for Great Britain, see:

<https://www.gov.uk/government/publications/aerosol-dispensers-regulations-2009>

**UK  
CA**

Further information on the UKCA logo (UK Conformity Assessed) can be found here: [https://en.wikipedia.org/wiki/UKCA\\_marking](https://en.wikipedia.org/wiki/UKCA_marking)

### 3.4 Recycling code

There is currently no obligation in Germany to affix recycling symbols to labels and packaging. However, we have already decided to include the relevant recycling symbols on the labels. Different regulations and laws apply depending on the country in which you sell your products. You are responsible for carrying out the necessary research and labelling your products yourself.

If you want to sell the product to France or Italy, different recycling regulations apply there, you can find more information here:

<https://deutsche-recycling.com/blog/triman-logo-in-france/>

The French Triman logo means that a product is recyclable, is collected separately and is subject to extended producer responsibility. The Triman logo must be affixed to the product or its packaging.

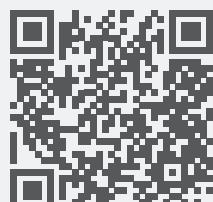


### 4. Example label - correct labeling

Label WIKO Superglue Aktivator 1000 ml



We would be happy to advise you:



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