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## Use of trivial names for active substances in biocidal product label

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For some active substances, the full chemical name can be too complex for the convenient use in science, commerce and official regulations. Therefore, often a common / trivial name is used to provide a short, distinctive, easily pronounced name for this substance.

A common name should be understood as a name freely available for common use in identifying a chemical substance. A common name can replace the systematic name, as it is stated in article 18 of CLP Regulation: “where the name in the IUPAC nomenclature exceeds 100 characters, one of the other names (usual name, trade name, abbreviation) referred to in section 2.1.2 of Annex VI to Regulation (EC) No 1907/2006 may be used provided that the notification in accordance with Article 40 includes both the name set out in the IUPAC Nomenclature and the other name used”.

However, there are MS concern as systematic names can be important in immediate decisions, e.g., in cases of intoxication, and common names might not be connected to important information on the substance. The systematic name as well as the common name should be linked in Annex VI of the CLP regulation.



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The objective is to be able establish principles at biocide legislation level to include common names of active substances on biocidal product labels with a complex name exceeding 100 words.

However, as the principles available in ISO standards and related documents are more general ones, they might not cover all substances and the nomenclature of substances can also differ between legislations (e.g., Chrysanthemum extract vs pyrethrins). The main characteristics of common names are, precisely, that they not derive from any rule, rather than the common practice or their frequent use.

MSs agreed to the following conclusions:

- Common names should be decided at the approval of the active substance.
- Common names should appear in the Implementing Regulation approving the substance and in the ECHA webpage (e.g., Infocard).
- A clear link between the systematic name and the common name should be publicly available and also be linked in Annex VI of the CLP Regulation.
- Common names should be decided case by case with the acceptance of the industry and competent authorities.

## Sources

*CA-March22-Doc.7.10 – Use of active substance trivial name*

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