

# Candles, Wax Melts & Reed Diffusers

## Consumer Protection – Information



# Candles

- a cylinder or block of wax or tallow with a central wick which is lit to produce light as it burns.
- are considered to be 'mixtures' on a carrier (the wick).
- are primarily made up of waxes which are in themselves non-hazardous. However, they usually contain additives for fragrance and colour, some of which may be hazardous / if present at a high enough concentration.
- “One or more combustible wicks supported by a material that constitutes a fuel, which is solid or semisolid at room temperature (20°C to 27°C) with the main function of sustaining a light-producing flame, including any coatings on and articles or substances in the fuel” (EN 15493)

# Wax Melts

Essentially - wax melts are scented chunks of wax that release fragrance when heated. Unlike candles, wax melts don't have a wick so need to be heated in a wax burner. Additionally, wax melts do not evaporate so you can simply reheat them until the fragrance goes.



# Reed Diffusers

Reeds are inserted into a glass bottle or glass jar of scented diffuser oil, the reeds soak up the scent and emit the aroma. They disperse scent into the air naturally.



# Legislation

- The General Product Safety Regulations 2005 (GPSR)
- Classification, Labelling and Packaging Regulation (CLP) - EC 1272/2008
- Regulation (Registration, Evaluation and Authorisation of Chemical Substances - EC 1907/2006) REACH
- GB REACH & GB CLP - may apply

# European Standards

## Indoor Candles:-

- BS EN 15494:2019 - Candles - Product Safety Labels
- BS EN 15493:2019 - Candles - Specification for Fire Safety
- BS EN 15426:2018 - Candles - Specification for Sooting Behaviour

## Outdoor Candles:-

- BS EN 17617:2021 - Outdoor Candles - Product Safety Labels
- BS EN 17616:2021 - Outdoor Candles - Specification for Fire Safety

# The General Product Safety Regulations 2005

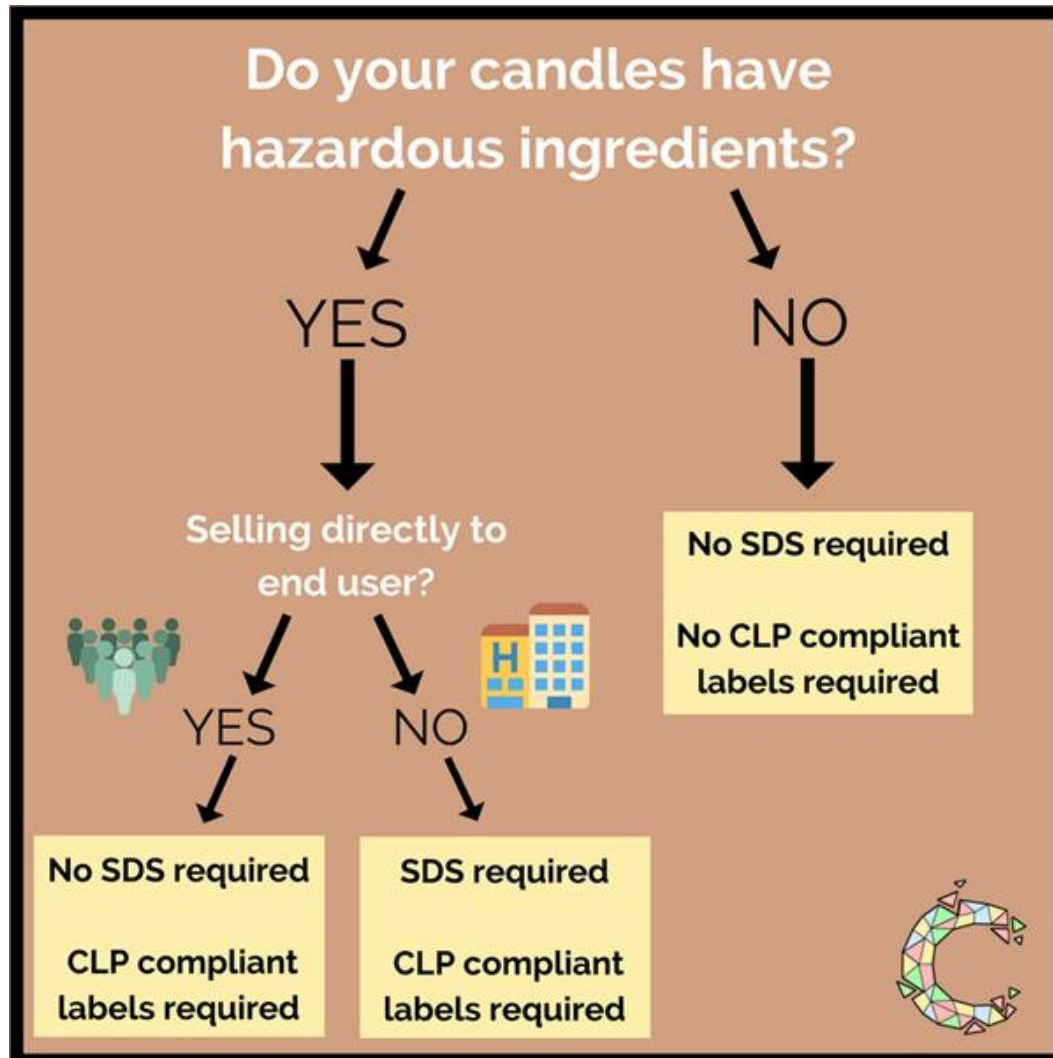
- The GPSR requires products to be “safe”.
- “.....does not present any risk or only the minimum risks compatible with the product’s use, considered to be acceptable and consistent with a high level of protection for the safety and health of persons....”
- The GPSR places the onus on manufacturers and distributors to ensure the safety of products.
- Primarily this should be done using risk assessments.

# CLP (Classification, Labelling and Packaging Regulation)

- Applies to “substances and mixtures”
- Includes products such as: Scented Candles, Wax Melts and Reed Diffusers.
- Each product with a classified ingredient should have a CLP label. Labels are not interchangeable between products and each “mixture” will need its own tailored CLP label.
- However, if the candle is not classified (i.e. it DOESN'T contain any ingredients that are classified as hazardous) then there is no requirement for it to be labelled in accordance with CLP.



# Do Your Candles Have Hazardous Ingredients?



# CLP (Classification, Labelling and Packaging Regulation)

## General rules for the application of labels

- Labels must be fixed to one or more surfaces of the packaging containing the substance or mixture and must be readable horizontally when the package is set down normally.
- The hazard pictogram must stand out clearly. They must be at least 1cm<sup>2</sup> in size. They must be a square on a point i.e. diamond shaped and show a black image on a white background, with a red frame.
- The label elements shall be clearly and indelibly marked.

# **CLP (Classification, Labelling and Packaging Regulation)**

## **Label Elements (as referred to in Article 17(1))**

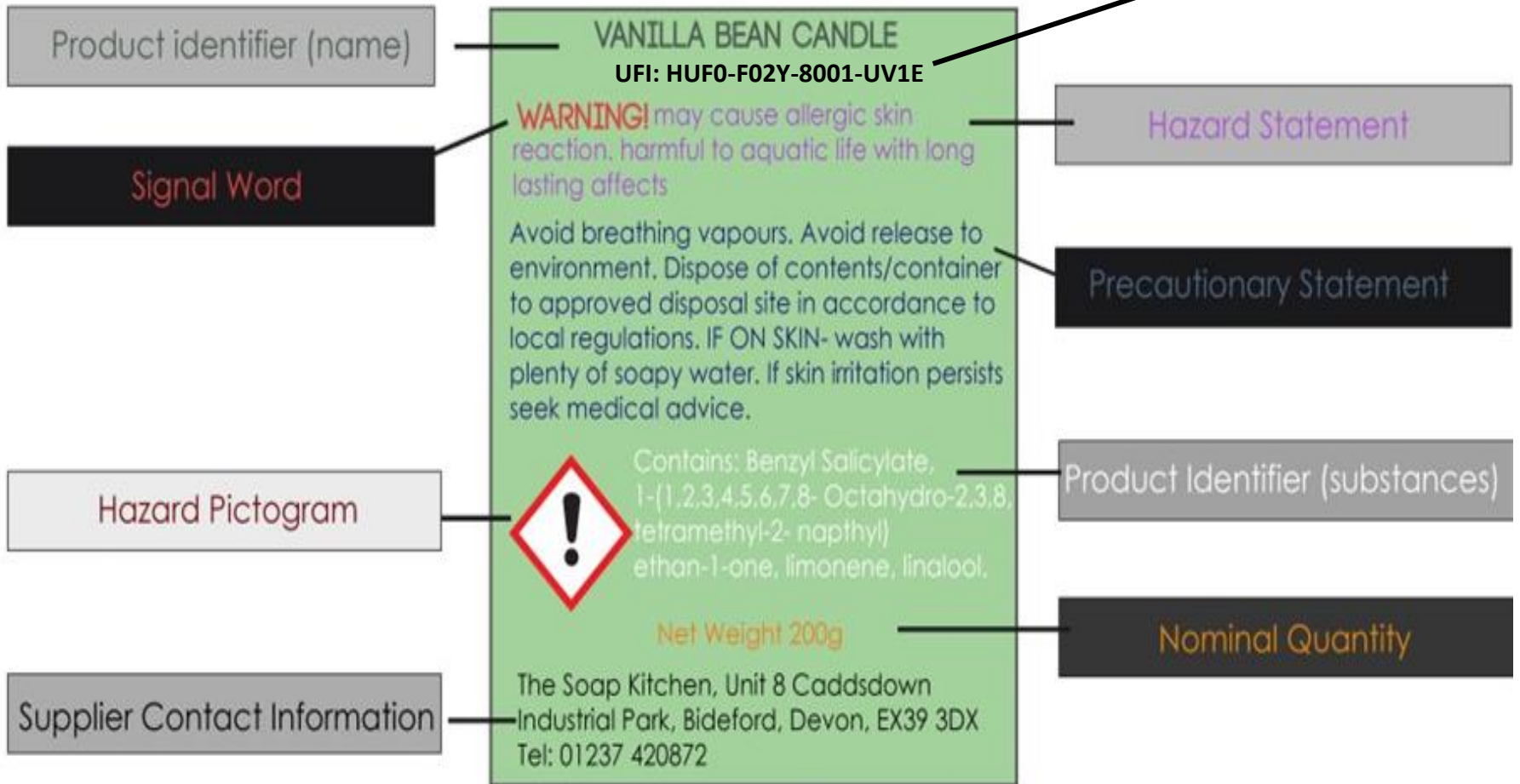
- the name, address and telephone number of the supplier
- the nominal quantity (unless this quantity is specified elsewhere on the package)
- Product Identifiers
- Hazard pictograms
- Signal words (e.g. 'Danger' or 'Warning')
- Where applicable, hazard statements, the appropriate precautionary statements, and a section for supplemental information
- UFI - Unique Formulation Identifier

# Unique Formulation Identifier (UFI)

- EU CLP Regulation Article 45 & Annex VIII
- January 2021, chemical-containing products with hazards to have a UFI
- The acronym 'UFI' must be in capital letters then a colon and be followed by a 16-character alphanumeric code.  
(e.g. 'UFI: HUF0-F02Y-8001-UV1E')
- The UFI codes can be generated by visiting the ECHA Poisons Centre website:  
<https://poisoncentres.echa.europa.eu/ufi-generator>
- Notification must be sent to the National Poisons Information Services - Birmingham

# CLP (Classification, Labelling and Packaging Regulation)

Unique Formulation Identifier (UFI)



# CLP (Classification, Labelling and Packaging Regulation)

## Hazard Pictograms

	<b>Exploding bomb</b> <i>(for explosion or reactivity hazards)</i>		<b>Flame</b> <i>(for fire hazards)</i>		<b>Flame over circle</b> <i>(for oxidizing hazards)</i>
	<b>Gas cylinder</b> <i>(for gases under pressure)</i>		<b>Corrosion</b> <i>(for corrosive damage to metals as well as skin, eyes)</i>		<b>Skull and crossbones</b> <i>(can cause death or toxicity with short exposure to small amounts)</i>
	<b>Health hazard</b> <i>(may cause or suspected of causing serious health effects)</i>		<b>Exclamation mark</b> <i>(may cause less serious health effects or damage the ozone layer*)</i>		<b>Environment*</b> <i>(may cause damage to the aquatic environment)</i>

# CLP (Classification, Labelling and Packaging Regulation)

## Hazard Statement Examples:

- May cause an allergic skin reaction.
- Harmful to aquatic life with long lasting effects.
- Causes serious eye irritation.

The hazard statements must be those specified in CLP, alternative wording is not allowed.

# CLP (Classification, Labelling and Packaging Regulation)

## Precautionary Statements

Instructions that advise the customer how to avoid or minimise the hazards that may be caused by the hazardous mixture.

### Examples:

- IF ON SKIN: Wash with plenty of soap and water.
- Avoid release to the environment.
- Wash hands and other contacted skin thoroughly after handling.

The precautionary statements must be those specified in CLP, alternative wording is not allowed.



# Candle Safety Labels

**BS EN 15494:2019** (Indoor) and **BS EN 17617:2021** (Outdoor)

“Product Safety Labels” specifies the format, content and layout of candle product safety labels.

They should consist of the following 3 components:-

1. General Warning Sign 

2. **Mandatory** safety information

3. Optional supplementary safety information



# Mandatory supplementary safety information

Under the standard these safety messages are mandatory in all cases



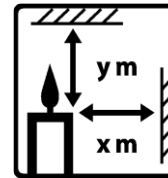
Keep away from children and pets.



Never leave a burning candle unattended.



Keep away from things that can catch fire.  
(Indoor Candles)



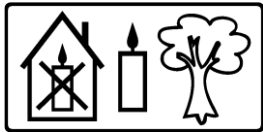
Keep a distance of min  $x$  m beside and  $y$  m above to things that can catch fire.  
(Outdoor candles)

$x$  and  $y$  represent the minimum safety distance to things that can catch fire beside ( $x$ ) and above ( $y$ ) the candle & are specified by the manufacturer based on maximum flame height & other characteristics of the candle

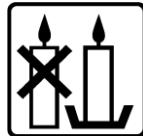
- Any supplementary safety information, symbols and text shall be placed in close proximity to the general warning sign.
- The messages may be given using the pictograms/text/both.

# Mandatory supplementary safety information (continued)

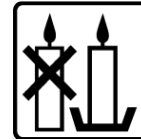
Depending on the candle type these mandatory symbols may also be required:-



For outdoor use only.



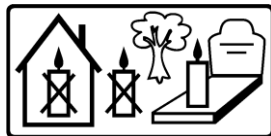
Use a heat resistant candleholder.  
(Indoor candles)



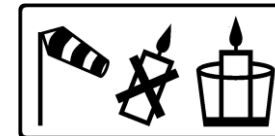
Use a heat resistant base.  
(Outdoor candles)



Use in a suitable bowl filled with water.  
(Floating candles)



Only use at cemeteries outdoors.  
(Specific for grave lights)

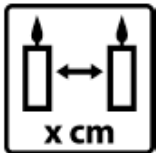


Candle gets lighter during burning, protect from strong wind by using a suitable holder.  
(Specific for container candles that do not comply with the wind resistance requirement of EN 17616:2021, 4.1.2)

# Optional supplementary safety information

There is additional safety information which is not mandatory but should be selected for each product based on dedicated risk analysis for each specific candle type.

These symbols/texts are applicable to **both** indoor and outdoor candles.



Keep candles at least x cm apart.



Trim wick to x cm.  
(x represents the maximum length of the wick and is defined by you)



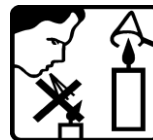
Keep wax pool clear of matches and debris.



Never use liquids to extinguish.



Place candle upright.



Snuff out the flame.  
Do not blow it out.



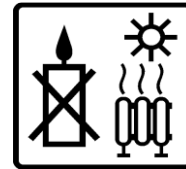
Do not move a burning candle.

# Optional supplementary safety information (continued)

These supplementary safety information symbols or texts symbols are applicable to:- Indoor Candles BS EN 15494:2019



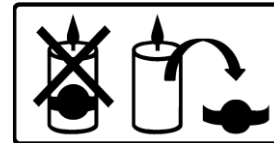
Do not burn in a draught.



Do not place near a heat source.



Trim edge if higher than x cm.  
(x represents the maximum height of the edge and is defined by you)



Remove packaging before use.

These supplementary safety information symbols or texts symbols are applicable to:- Outdoor Candles BS EN 17617:2021



Do not use on a balcony or veranda.



Do not burn in rain or snow.



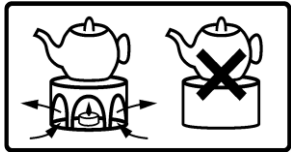
Avoid direct inhalation of any smoke.



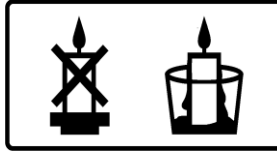
Do not touch, may be hot.

# Additional optional supplementary safety information

There are additional optional safety requirements specific to product category such as tea lights, votive candles, container candles and candles not appropriate to use in a warming unit, e.g. scented tea lights.



Only use in holders  
and warming stoves  
with sufficient ventilation  
(Tea lights)



This candle liquefies,  
use a suitable container.  
(Votive candles)



Do not touch,  
may be hot.  
(Container candles)



Do not burn in a warming unit.  
(Candles not appropriate to  
use in a warming unit,  
e.g. scented tea lights)



Use in a suitable lantern.  
Specific for grave lights without lid

# Additional optional supplementary safety information (continued)

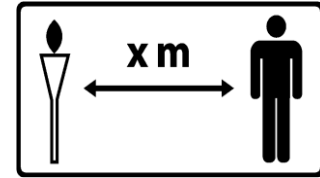
Specific for garden torches:-



Ensure a firm stand.



Do not touch a burning garden torch.


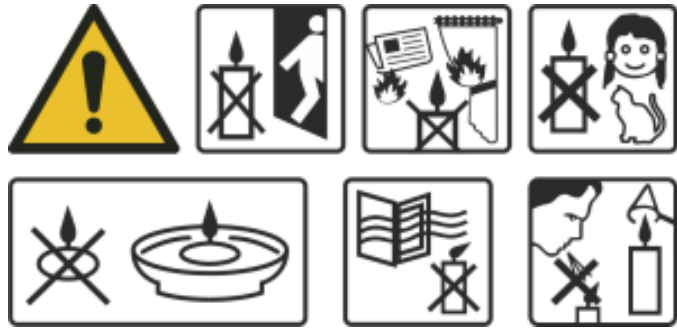


Keep a minimum distance of  $x$  m to the garden torch.

$x$  represents the minimum safety distance to persons and is specified by the manufacturer.

# BS EN 15494:2019 - Indoor Candles - Product Safety Labels

Examples of product safety labels layout on candle safety for Indoor candles



Never leave a burning candle unattended.  
Keep away from things that can catch fire.  
Keep away from children and pets.  
Use a heat resistant candleholder.







# Candles - Specification for Fire Safety

(BS EN 15493:2019 indoor) and (BS EN 17616:2021 outdoor)

These standards specify the requirements and test methods for the fire safety of candles intended to be burned.

- **Stability** - Freestanding candles, container candles and candles that are sold together with a holder or other accessories shall not tip over when tested on a slope of  $(10 \pm 0,2)^\circ$  from level.
- **Secondary ignition** - No secondary ignition shall occur for more than 10 s, when the candle is burning.

# Candles - Specification for Fire Safety

(BS EN 15493:2019 indoor) and (BS EN 17616:2021 outdoor)

The indoor standard also covers:-

## Flame height

- The flame height for all candle types, except tea lights, shall not exceed 75 mm. The flame height for tea lights shall not exceed 30 mm.

## Self-extinguishing

- To prevent the ignition of the surface underneath, freestanding candles marketed as self-extinguishing shall self-extinguish at the end of the burning time. The candles shall neither burn a paper placed underneath nor cause any scorch marks on it during the whole burning test.
- To prevent the ignition or cracking of a supporting holder, non-freestanding candles marketed as self-extinguishing shall self-extinguish at a residual height of  $\geq 12\text{mm}$  in case of candles with a diameter of  $\leq 14\text{mm}$  and at a residual height of  $\geq 18\text{mm}$  in case of other candles.

## Afterglow / re-ignition

- after extinguishing the candle shall not spontaneously re-light.
- The wick shall not continue to glow or smoke for an average time of more than 30 seconds after extinguishing.

# Candles - Specification for Fire Safety

(BS EN 15493:2019 indoor) and (BS EN 17616:2021 outdoor)

*The outdoor standard also covers:*

## Garden Torches

- set up and stability and no secondary ignition. Also no burning or smouldering material shall fall from garden torches and the garden torch shall neither burn paper placed underneath nor cause any scorch marks on it during the whole burning test.

## Floating candles

- no spontaneous re-lighting after extinguishing.

Further detail on the test methods, etc. are given in the standards, copy available at <https://bsol.bsigroup.com/>

# Specification for Sooting Behaviour

## BS EN 15426:2018 - Indoor Candles

This specifies the requirements and the test method for evaluating the sooting behaviour of burning indoor candles.

- It is applicable to single-wick indoor candles up to a diameter of 100mm.
- For each candle design, three samples are selected, which are representative of the finished product intended to be sold.

Soot is the solid, carbon enriched particles, which is produced when the base material is incompletely burned in the flame and which are subsequently released into the atmosphere and the soot index is the index number for the evaluation of the sooting behaviour of candles which is the average soot index per hour from three tests (samples) and this shall be less than 1.0/h.



# Technical File

Under GPSR you should keep files of essential information relating to each product. This information should be kept for at least 10 years and should include:

- a description & formula for each product;
- raw material purchase records
- finished product sales records
- risk assessments
- Safety Data Sheets (SDS)
- labelling/packaging details
- UFI details
- safety testing plan including sample results
- traceability documents
- customer complaints
- recall procedures

# Safety testing

Smaller producers may need to submit product samples to external laboratory for testing.

Safety testing is scalable.

Records and test house certificates of safety testing should form part of the filed technical documentation.

Safety Testing should be carried out:-

- Before releasing a new product on to the market
- periodic random sample safety testing for products you already have on the market.

Safety testing is required to demonstrate due diligence, if an incident occurs, or a breach is identified.

# Traceability

## Producers:-

- Need to be able to demonstrate their products comply with regulations and meet safety requirements before placing them on the market.
- Should mark their products with a product reference (code or name) and/or its production batch to ease traceability.
- Should keep production and supply records for each batch of product to be able to trace unsafe products back to its source.
- There is no “line of sight” requirement for the batch code.

## Distributors:-

- Also required to keep and provide documentation necessary to trace the origin of products which can be used to trace an unsafe product back to its source.



# Unsafe Products & Product Recalls

Under General Product Safety Regulations (GPSR) you:-

- Are required to have sufficient “measures” in place to, if necessary, effect a product recall;
- Should be aware of your legal notification, risk assessment and recall obligations before an event occurs;
- Should prepare a recall procedure for your technical file. This will allow for a faster response time when an incident occurs.
- Should review all customer feedback and complaints.

Guidance to assist with putting together a product safety incident plan (PSIP) can be found in PAS 7100 Code of Practice on Consumer Product Safety Related Recalls.

# Misleading Statements and Omissions

If a manufacturer is making any claims as to the efficiency of the fragrance, burn time or any other marketing claim, they must ensure it can be factually backed up and does not omit material information or mislead the consumer.

# Imitation Foods

Candles and wax melts which could be mistakenly eaten by children or present a choking hazard would be subject to the Food Imitations Safety Regulations 1989. Examples would be those with the same shape or smell as fruit, sweets or cakes.



These Regulations prohibit the marketing; import and manufacture of products that look like foodstuffs but that are not in fact edible.



**“NOT FOOD, DO NOT EAT”**



**Any Questions**