 Regulatory Policy Committee	Opinion	
Impact Assessment (IA)	Updating labelling requirements in the Aerosol Dispensers Regulations (EU Directive 2013/10/EU)	
Lead Department/Agency	Department for Business, Innovation and Skills	
Stage	Consultation	
IA Number	BIS EUD001	
Origin	European	
Expected date of implementation (and SNR number)	March 2014 (SNR7)	
Date submitted to RPC	3/12/2013	
RPC opinion date and reference	29/1/2014	RPC13-BIS-1969
Overall assessment	GREEN	
RPC comments <p>The IA is fit for purpose. The costs and benefits have been adequately assessed for this stage of policy development.</p>		
Background (extracted from IA) <p>What is the problem under consideration? Why is government intervention necessary?</p> <p><i>Aerosol dispensers must carry labels to inform consumers of the hazards they present during use and storage. Mandatory labelling requirements are set out in the Aerosol Dispensers Directive 1975 and implemented in the UK by the Aerosol Dispensers (Safety) Regulations 2009. The current labelling requirements of the directive are now out of date as they refer to standards in other directives which are due to be replaced and revoked by 1 June 2015. The Aerosols Directive has been updated to refer to the new labelling provisions and it is necessary therefore to amend the labelling requirements references in the UK regulations accordingly.</i></p> <p>What are the policy objectives and the intended effects?</p> <p><i>The objective is to align the labelling requirements in the aerosol dispensers regulations with modern international practice as set out in the new labelling requirements for aerosols brought in by EC Regulation 1272/2008 on the classification, labelling and packaging of substances and mixtures. This will ensure that aerosol dispensers carry the correct safety information to protect consumers better.</i></p>		
<p>Identification of costs and benefits, and the impacts on business, civil society organisations, the public sector and individuals, and reflection of these in the choice of options</p> <p>The proposal is to implement an EU directive changing details of the warning labels that businesses are required to put on aerosol dispensers. The IA states that the UK regulations reflect the directive and there would be no burdens or costs to UK businesses over and above those necessary to meet the requirements of the directive. There would be a small cost to some businesses that would be required to adjust their labelling cycles to comply with the new regulations. These transitional costs - in 2014 and 2015 – are estimated to have a net present value of £4.9 million.</p>		

There would be no ongoing costs as the new labelling requirements are no more burdensome than those which currently exist. The main benefits are to consumers, from simplified labelling.

Comments on the robustness of the small & micro-business assessment (SaMBA)

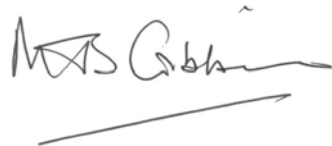
The proposals are European in origin and so a SaMBA is not applicable.

Comments on the robustness of the One-in, Two-out (OITO) assessment

The IA indicates that the proposals are out of scope of OITO. As the proposals are of European origin and there is no evidence that the increase in regulation would go beyond minimum requirements, or of a failure to take available derogations which would reduce the costs to business, they are out of scope of OITO in accordance with paragraph 1.9.8. ii of the Better Regulation Framework Manual (July 2103).

To support balanced reporting of overall EU burdens in the Statement of New Regulation, the final stage IA should include an estimated EANCBS figure for RPC validation.

Signed

A handwritten signature in black ink, appearing to read "Michael Gibbons", with a long horizontal line underneath it.

Michael Gibbons, Chairman