

PROPOSED IMPLEMENTATION TIMELINE

GHS implementation varies by region of the world. Implementation is underway in Asia Pacific already, with Canada, Europe and the US impending roll outs (see graphic below). In Europe, effective December 1, 2010, substances will have to be classified and labeled according to CLP. Formulations or mixtures will need to be classified according to CLP by June 1, 2015. As a formulator of products (mixtures) Ecolab's products need to be classified and labeled according to CLP no later than June 1, 2015.



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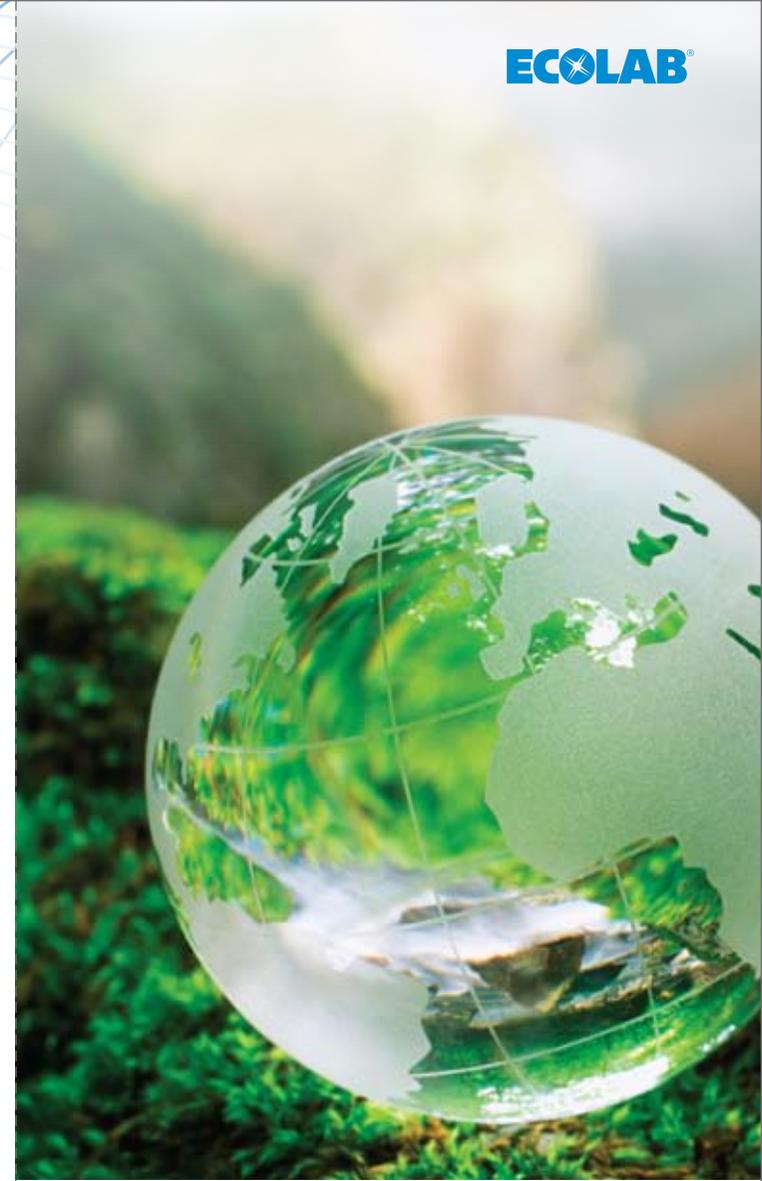
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GLOBAL HARMONIZATION SYSTEM – EUROPE CLASSIFICATION LABELING & PACKAGING REGULATION

WHAT ARE GHS & CLP?

GHS was adopted in 1992 by the U.N. Conference on the Environment and Development to ensure the safe use, transport and disposal of chemicals and to drive greater consistency in product labeling related to physical, health and environmental hazards of chemicals. It was also developed to lower barriers to trade that result due to the variety of labeling requirements found around the world. Each country may decide when to adopt GHS and how to integrate it into its current regulations.

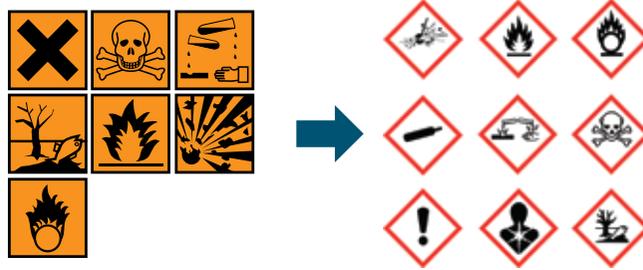
In Europe, GHS is called Classification, Labeling and Packaging (CLP) Regulation – also referred to as CLP – is a new European Union (EU) system for the classification, labeling and packaging of chemical substances and mixtures. CLP aims to protect users from the hazards of chemical substances and mixtures and is based on the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

As a manufacturer in compliance with CLP, Ecolab must establish the hazards of its formulations before they are made available to customers. If a product contains hazardous substances, it must be appropriately classified and labeled so that our customers are instructed on how to safely handle the end product.

ABOUT ECOLAB

Ecolab is the global leader in cleaning, sanitizing, food safety and infection prevention products and services. Ecolab delivers comprehensive programs and services to foodservice, food and beverage processing, healthcare, and hospitality markets in more than 160 countries. Hazard communication has been part of our long-term sustainability approach and product line, thus Ecolab supports the GHS and CLP goals. Ecolab is committed to supporting its customers worldwide and is proactively evaluating all products against the CLP criteria.

SYMBOL CHANGES



CLP QUESTIONS AND ANSWERS

Q: Will Ecolab's product packaging change?

Due to CLP, some of Ecolab's product packaging may change. In addition, labels on the packaging will change to illustrate new CLP classifications.

Q: What does the end user need to know regarding the new CLP labels and Safety Data Sheets (SDS)?

The CLP classification information is displayed in Section 2 of the SDS. The signal word, classifications, applicable pictograms and precautionary statements required under CLP will, from now on, be available in this section.

Q: Will CLP result in reformulation of Ecolab products?

To ensure that our customers have the safest products, we may reformulate some of our products as a result of CLP Regulation. If our products are reformulated, we will inform our customers of the change. We will work to ensure that the performance of our products does not change.

Q: If products are reformulated will there be any need for special training and training ads? If so, who will need to do it and how should it be done?

As part of our ongoing commitment to our customers, Ecolab will provide updated training materials that include product pictures, definitions and an assurance that the products' hazards have not changed, if indeed they have not.

Q: If Ecolab products are reclassified due to CLP, will they be more dangerous?

No, the product's safety profiles have not changed.

Q: When using Ecolab products after CLP is in effect, will my employees need to wear Personal Protection Equipment (PPE)?

Under the new CLP classification system guidelines there may be recommendations for the use of PPE where previously there were none.

Q: In the past, have your products been safe for my employees' use?

Yes, and we will continue to formulate our products with safety in mind. With CLP, the rules for classification of substances and mixtures are explicit. Even for the same product, a classification may be different or more stringent compared to prior classifications.

Q: As a result of CLP, is there any special need or arrangement for handling, transportation and storage of chemical products?

The rules for transportation are not changing with the implementation of CLP. Current regulations still apply. As with CLP, transportation regulations are implemented by country legislation (and international requirements for ocean transportation). The same is true of handling and storage requirements.

If you have any questions or need any assistance, your Ecolab Territory Manager will be glad to support you. Please address product-related CLP questions to clp@ecolab.com.