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Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(Fifth session, 7-9 July 2003, agenda item 2)

First Report of the Inter-sessional Working Group on Labelling

Comments by CEFIC dated 12/05/2003

Further to my e-mail of 23rd April containing a Thought Starter on Labelling Provisions, there has apparently been some confusion as to what may constitute an overall label for printing purposes and what constitutes a GHS label. Please find attached a PowerPoint slide illustrating the point that I was intending to convey in the Thought Starter paper. The paragraph references are to the paragraphs in the GHS Document and not the Thought Starter. The slide is purely for illustrative purposes and is not intended to convey any indication as to possible label layouts, content, sizes or anything else. This is to make the point that people should not confuse what they perceive to be a label (the printing feedstock) with being the GHS label itself. The borders I have put around the different blocks of text are not necessarily part of the overall label layout and are simply to visually indicate areas which contain blocks of text serving different purposes (illustrative only). I have put a dotted line between the transport pictograms/proper shipping name and the GHS label. This is to indicate that the Transport pictograms, whilst being in close proximity to, or adjacent to the GHS label, can be either printed onto the printing feedstock, or may have been lithographed onto the packaging itself.

<<GHS Labelling.ppt>>

In addition I have prepared another paper in which I have tried to provide indicative background information for consideration of the Thought Starter on approximate areas available for labelling on packagings of different capacities, and other information.

<<Labelling Background Information.doc>>

Best Regards

Bill Machin

Labelling Background Information.doc

Labelling

Following on from the previous Thought Starter and explanatory text that I submitted on 23rd April, below I have tried to provide background information against which the Thought Starter paper could be considered. The following packaging dimensions are based on cylindrical packagings used by the company that I previously worked for. The dimensions are indicative only and intended as a guide, as there are many other packagings available on the market of the same nominal capacities, but with differing shapes and overall dimensions. The dimensions quoted are the gross packaging dimensions, and the usable space on which labelling could be affixed are likely to be smaller than these. As explained in the previous explanatory note, a diamond shape pictogram requires label space of twice the area of the diamond, for example a transport diamond of side 10 cm x 10 cm will require a label space of 14.14 cm wide by 14.14 cm high. It needs to be borne in mind that the area available on the packaging has to be used for a variety of informational purposes, e.g.;

- Supply Labelling
- Transport labelling

- Other information requirements, e.g. use instructions, GHS supplemental information
- Commercial Information, e.g. product name, company branding.

For those not familiar with the requirements for transport labelling, I have tried to provide a rudimentary guide as to their requirements.

Area available on packaging for labelling and other information provision

Packaging Capacity	Diameter (cm)	Circumference (cm)	Height (cm)	Area (cm^2)
200 Litre	57.5	180	88.0	15,900
25 Litre	27.5	86	46.7	4,000
10 Litre	29.4	92	25.0	2300
5 Litre	17.1	53	23.6	1250
2½ Litre	15.5	48	15.0	700
1 Litre	11.5	36	11.5	400
500 ml	9.2	29	9.9	280
250 ml	7.5	23	7.4	170
125 ml	6.2	19	5.8	110

Transport Labelling

The following is only a brief and basic guide to the transport requirements for labelling and are not comprehensive. The regulations for the transport of dangerous goods set standards of performance that packagings must comply with for the transport of such goods, and these are related to the nature of the hazard and the severity of the hazard. Packagings have to be tested and certified as meeting these performance standards, and are known as UN Certified Packagings.

There are in essence two different types of packaging methods that concern us as shown in Annex VI of the GHS document, single stand alone packagings, and packagings that are themselves packed into outer cartons. There are derogations from the requirements for the use of UN Certified Packagings for transport known as the Limited Quantity provisions. These permit the transport of small non-UN Certified packagings, e.g. ≤ 5 litre packagings of low danger flammable liquids, in cartons where the number of packagings in the carton and the mass of the carton is within specified limits. The cartons have to meet certain performance requirements but do not need to be certified.

Transport labelling requires a pictogram (known in transport as a label) and the "Proper Shipping Name" (known in transport as a mark), the latter in some respects is the equivalent of the chemical name but contains further information. The pictogram and Proper Shipping Name have to appear on the outermost packaging that is used for transport, i.e. they do not require them on inner packagings that are packed into outer packagings. There is a duty of care requirement concerning the information being durable and legible, but for sea transport performance standards are set.

Transport labelling considerations

In considering labelling we need to consider the life cycle of packagings and how and where they will be used. It is commonly assumed that all small packagings such as those used for consumer products are overpacked into cartons. This is not necessarily the case, especially now with pressures on manufacturers to be more environmentally friendly and reduce the volume of packaging waste. The following example is from my personal experience in industry and concerns products that are sold into a market which is essentially of a consumer nature.

We manufactured a range of paint products, mainly liquid dangerous goods, which were packaged in packagings of capacity from 25 litres mainly down to 250 mls, but some were of smaller capacity. These were manufactured centrally in the UK and then transported to a limited number of European distribution

depots that covered all of the EU, and some of the non-EU countries to the East. All packagings down to 250 ml capacity were UN certified packagings that did not need to be packed into cartons. The packagings were made up into unitised loads (palletised) off the production line and then shrink or stretch wrapped onto the pallets. Adequate measures were taken in the construction of the unitised loads to ensure their safety and stability in transit. These unitised loads then went from the production centre to each of the European distribution centres. At these distribution centres the pallets were broken down and for customer orders the packagings were overpacked into cartons (e.g. 10 tins of white, 5 tins each of red, blue, green and yellow) for onward delivery to the customers. This illustrates that different transport labelling requirements would apply during the different parts of the distribution chain, i.e. labelling of the packages in the first part above, and labelling of the cartons in the second part.

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