

UN/SCEGHS/6/INF.7

**Sub-Committee of Experts
on the Globally Harmonized System of Classification
and Labelling of Chemical
(Sixth session, 10-12 December 2003)**

REPORT OF THE MEETING OF THE LABELLING GROUP

held on Tuesday 9 December 2003

1. The Correspondence Group on Labelling met prior to the Sub-Committee session to discuss its work. During the time between Sub-Committee meetings, industry representatives had developed example labels as promised at the July meeting. There was also industry input on labelling guidance. However, broader input on possible guidance was not exchanged, and thus it was not clear what the Group as a whole wanted to achieve in this activity.
2. The Chair provided draft guidance to address the issue that was discussed to the greatest extent, i.e. the relationship of transport related pictograms to other GHS information on a single packaging. The Correspondence Group discussed the draft at length, and it was modified to reflect concerns expressed. The agreed text is as follows :
 - *Where transport and other GHS information appear on a single packaging (e.g. a 200 liter drum), consideration must be given to ensuring the label elements are placed in a manner that addresses the needs of the different sectors.*
 - *Transport pictograms must convey information immediately in an emergency situation. They must be able to be seen from a distance, as well as in conditions that are smoky or otherwise partially obscure the package.*
 - *The transport-related pictograms are distinct in appearance from pictograms intended solely for non-transport purposes which helps to distinguish them.*
 - *The transport pictograms may be placed on a separate panel of a GHS label to distinguish them from the other information or may be placed adjacent to the other GHS information on the packaging.*
 - *The pictograms may be distinguished by adjusting their size. Generally speaking, the size of the non-transport pictograms should be proportional to the size of the text of the other label elements. This would generally be smaller than the transport-related pictograms, but such size adjustments should not affect the clarity or comprehensibility of the non-transport pictograms.*
3. The Correspondence Group also discussed where this text should be incorporated. It could be in 1.4.10 of the GHS document. However it appears that it may be more appropriate to put it into Annex 6, which already provides examples of placement of information in various situations. It was the consensus of the Group that the industry

example used during its discussion should appear with the text. It displays the label information in 3 adjacent panels, and all agreed it is an acceptable presentation.

4. The Correspondence Group has not decided where the text and example should finally be placed. There has also been a suggestion that a separate labelling guidance document could be prepared using not only this information but also other information already in the GHS document and its annexes. This could be a companion document to the Safety Data Sheet (SDS) guidance document. The full Sub-Committee should address these suggestions.
5. The Correspondence Group then discussed whether additional guidance should be developed to address other labelling issues. Combination packaging was one suggested area. However, the Group did not agree and it would appear that the guidance provided on single packaging may be the complete contribution it is prepared to address. If the Sub-Committee decides to prepare a separate labelling guidance document, the Correspondence Group could continue its deliberations to propose contents for such a document.
6. It was also expressed that we should gain some experience in implementation of the GHS before deciding what additional guidance may be needed. As countries that have not been involved in developing the GHS implement it, we should be able to get input from them as well as to address this issue from a different perspective.
