

**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

Transmitted by the United States of America (Lead Country)

1. At its fourth session in December 2002, the SCEGHS decided to set up a Work Group on Labelling. The lead country for this work is the United States of America (USA). The USA had submitted a paper at the fourth session that suggested revisions to 1.4.10 of the GHS document on labeling procedures (ST/SG/AC.10/C.4/2002/22). During the course of the discussion of the paper, the Subcommittee accepted a number of suggested revisions, but indicated that other suggestions required more deliberation. Thus the Subcommittee deferred the rest of the work to the new biennium, and established a work group to pursue the discussion.
2. The Subcommittee adopted the following terms of reference for the work group:

The objective of the work group is to develop additional guidance for the GHS to clarify labelling provisions and achieve more consistent implementation of the GHS for all sectors. The work group will describe the rationale and provide enhanced examples to address at least the following concerns:

 - Size and placement of the GHS pictograms;
 - Specific provisions as appropriate to promote a clear distinction between label elements for transport and those for other sectors; and
 - Precedence of hazards in the application of the GHS pictograms.

In undertaking this work, the needs of each sector should be taken into account and treated consistently.
3. The countries and organizations that volunteered to be members of the work group were contacted by e-mail, and invited to submit proposals to address the issues noted in the terms of reference for the group. A proposal was received from the CEFIC representative, as well as a comment from a Japanese industry representative. Subsequently, the US circulated to members of the group an e-mail from a US industry representative responding to the proposal from CEFIC, as well as comments from ACC, the US industry chemical group. All of these submissions have been circulated to the full work group.
4. These were the only contributions received from members of the work group. No real dialogue has been established, and no comments, proposals, or responses have been received from the governments represented. Therefore, it appears that no real progress has been made in meeting the terms of reference for the group.
5. The opportunity to meet during the Sub-committee's meeting should be helpful in further delineating proposals and options, and developing a work plan to move this issue forward during this biennium. One option would be to identify those issues in the original US paper that were not adopted at the December 2002 meeting, and discuss them or options to them in more detail. Another option would be

to have additional proposals from work group members to address the issues specified in the terms of reference.

6. There are two issues that are clearly of primary concern at present. One is whether the transport pictogram can appear on the same “label” as the GHS pictogram, or rather be adjacent to it. The other is whether size can be used as a means to differentiate between the transport and GHS pictograms, i.e., can the GHS pictograms be a smaller size than the transport pictograms, and what degree of differentiation is necessary or appropriate. These two issues should at a minimum be discussed during the meeting of the work at the Sub-committee meeting.
7. The members of the work group are invited to raise other issues of concern, as well as to provide options to address those issues already raised.