

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals

Fifteenth session,
Geneva, 9-11 July 2008
Item 3 of the provisional agenda

HAZARD COMMUNICATION ISSUES

Comments on document ST/SG/AC.10/C.4/2008/7: Labelling of very small packagings

Transmitted by the expert from Canada

A. Comments on the section on packaging definitions

1. In July 2006 the Secretariat submitted document ST/SG/AC.10/C.4/2006/10 to initiate discussions on the need for definitions of containment and consistency of terminology with the TDG Model Regulations. The meeting report indicated that experts were invited to study the question and to submit information as appropriate. Some of these definitions, as written, are specific to transport. Since this is currently under consideration by the Sub-Committee, the list of definitions should be addressed in that forum and not in the study on small packagings.

2. Label is defined in Chapter 1.2 of the GHS:

“**Label** means an appropriate group of written, printed or graphic information elements concerning a hazardous product, selected as relevant to the target sector(s), that is affixed to, printed on, or attached to the immediate container of a hazardous product, or to the outside packaging of a hazardous product.”

3. The definitions for immediate container and outside packaging require clarification, as they are referenced in the definition of Label.

4. Suggestion:

Immediate container: the vessel which holds the hazardous substance

Outside packaging: packaging, together with any necessary component, which hold the immediate container

Annex 7 of the GHS should be amended to reflect the terminology used in the definition of label.

B. Comments on guidance on the labelling of small packagings

5. Canada interprets the definition of label as follows:

Label consists of the printing on the display area or surface of the immediate container, and may also include the printing on the outside packaging, as well as hang tags, fold-outs, sleeves, etc. which accompany the product.

6. General principles

- (a) all the required GHS label elements should appear on the immediate container of a hazardous substance or mixture where possible;
- (b) where all the required labelling elements cannot be legibly provided on such a small packaging, a subset of the required information may be on the immediate container, with the provision that the full label information is included elsewhere e.g. on any subsequent layer of packaging;
- (c) competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories; and
- (d) some labelling of the immediate container needs to be accessible through the life of the product.

7. The question remains as to which label elements should be on the immediate container and which can be provided elsewhere.

8. The minimum requirements for labelling the immediate container should take into consideration the level of protection needed, the different target audience and their expected level of training.

9. With this in mind, Canada supports a separation of requirements for workplace chemicals and consumer chemicals as an overarching principle. The precedence of hazard classes/categories for each would differ.

10. In addition, consideration may also be given to specific types of products, for example:

- (a) laboratory supplies and laboratory samples may not require as detailed labelling, since they will be handled by trained individuals
- (b) quick skin bonding adhesives may have separate labelling elements

11. Finally, electronic format may be used to supplement hazard communication, but not used as an alternative.

C. Comments on the annex

12. Until the previous guidance is solidified, it is premature to decide on the wording of A7.1.

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