

## 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

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Geneva, 29 June – 1 July 2009  
Item 3 of the provisional agenda

### HAZARD COMMUNICATION ISSUES

#### Labelling of small packagings

Transmitted by the European Chemical Industry Council (CEFIC)  
on behalf of the informal correspondence group

#### **Background**

1. The programme of work for the biennium 2009-2010 includes the following item:  
Labelling of small packagings (including work on packagings terminology/definitions)
  - (a) Development of guidance on the application of the general principles for the labelling of small packagings;
  - (b) Review of the current terminology/definitions of means of containment and study of the needs of the different sectors and the cost-benefit impact of any proposed change.
  
2. Development of guidance on labelling of small packagings  
The issues previously agreed to be considered include:
  - (a) Which label elements must stay on the immediate container and which ones can be provided elsewhere.
  - (b) Precedence of hazard classes/categories.
  - (c) Distinction between workplace chemicals and consumer chemicals given the difference in target audience and level of training.

(d) Electronic format as an alternative or additional medium for hazard communication.

3. Document UN/SCEGHS/10/INF.8 offered an overview of the existing practices. It may need some updating by the members of the inter-sessional group in order to be used as a starting “toolbox” of options/practices.

4. It is proposed to hold a meeting of the group during the session to define priorities and agree on a workplan allocating tasks among members and setting a timetable.

5. Packaging terminology/definitions

6. Working document ST/SG/AC.10/C.4/2006/10 (Definitions of means of containment) identified the various packaging terms used in the GHS and noted that such terms were not defined in GHS Chapter 1.2. A recent review based on ST/SG/AC.10/C.4/2006/10 indicates that no new packaging terms have been added to the GHS. It is also understood that there have been no changes/additions to the Transport of Dangerous Goods Regulation (TDG) with respect to packaging terms/definitions.

7. The attached table (annex II) lists the various packaging terms currently used in the GHS together with the definition from the TDG where appropriate. The inter-sessional correspondence group is planning to review the existing TDG packaging definitions and assess the benefits of introducing such definitions in the GHS with a view to improving consistency/clarity. The correspondence group is also planning to assess the need to develop definitions for those packaging terms used in the GHS but not defined in the TDG.

## ANNEX I

## GHS text adopted during the sixteenth session

## 1.4.10.5.4.4 Labelling of small packagings

The general principles that should underpin labelling of small packagings are:

- (a) All the applicable GHS label elements should appear on the immediate container of a hazardous substance or mixture where possible;
- (b) Where it is impossible to put all the applicable label elements on the immediate container itself, other methods of providing the full hazard information should be used in accordance with the definition of “Label” in the GHS. Factors influencing this include *inter alia*:
  - (i) the shape, form or size of the immediate container;
  - (ii) the number of label elements to be included, particularly where the substance or mixture meets the classification criteria for multiple hazard classes;
  - (iii) the need for label elements to appear in more than one official language.
- (c) Where the volume of a hazardous substance or mixture is so low and the supplier has data demonstrating, and the competent authority has determined, that there is no likelihood of harm to human health and/or the environment, then the label elements may be omitted from the immediate container;
- (d) Competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories where the volume of the substance or mixture is below a certain amount;
- (e) Some labelling elements on the immediate container may need to be accessible throughout the life of the product, e.g. for continuous use by workers or consumers.”

## ANNEX II

Review of packaging terms used in the GHS 2<sup>nd</sup> revised edition

Packaging term	Where used in the GHS	TDG definition
<i>Container</i>	Chapter 1.2 (definition of “supplemental label information”); 1.4.3.6; 1.4.10.5.5.1; 3.10.1.6.4; Annex 3 (Table A3.2.1 – precautionary statements P101, P233, P234, P240, P251, P404, P406, P501; A3.3.3.3); Annex 4 (A4.3.5.3, A4.3.10.1.2, A4.3.13.1.1, A4.3.13.1.2); Annex 6 (A6.5.8.2);	<p><b>Container</b> (ADR/RID/ADN): an article of transport equipment (lift van or other similar structure) of a permanent character and accordingly strong enough to be suitable for repeated use; specially designed to facilitate the carriage of goods, by one or more means of transport, without breakage of load; fitted with devices permitting its ready stowage and handling, particularly when being transloaded from one means of transport to another; so designed as to be easy to fill and empty.</p> <p><i>Comment: This definition is consistent with relevant ISO standards and the Convention on Safe Containers – CSC; see additionally definition of freight-container in 1.2.1; the term container in the TDG provisions does not include packagings, IBC’s and Large Packagings as mentioned below</i></p>
<i>Immediate container</i>	Chapter 1.2 (definition of “label”);	<p><i>Comment: This may be the inner packaging of a combination packaging but also something smaller inside an inner packaging; it may also be the single packaging for a substance or mixture.</i></p>
<i>Drum</i>	Annex 7, examples 4 and 7;	<p><b>Drum</b>: a flat-ended or convex-ended cylindrical packaging made of metal, fibreboard, plastics, plywood or other suitable materials. This definition also includes packagings of other shapes e.g. round taper-necked packagings, or pail-shaped packagings. Wooden barrels or jerricans are not covered by this definition;</p> <p><i>Comment: further packaging terms like jerricans, boxes can be found in chapter 6.1 of the TDG Model Regulation</i></p>
<i>Gas cylinders</i>	1.4.10.4.2.2;	<p><i>Comment: cylinders and other pressure receptacles for gases are defined in 1.2.1 of the TDG Model Regulations; pressure receptacle is the overall-term comprising cylinders, tubes, pressure drums, closed</i></p>

		<i>cryogenic receptacles, bundles of cylinders and Multiple-Element-Gas-Containers containing such elements</i>
<i>Package</i>	1.4.3.6; 1.4.10.4.2.3; 1.4.10.5.2 (d)(i); 1.5.1.2; 2.1.2.1 (d) and Figure 2.1.2/Figure 2.1.3; 2.8.2.1(e), 2.8.2.2 (b) and (g); 2.8.2.3 and decision logic 2.8; 2.11.2.1 (b) and (c) and Table 2.11.1; 2.15.2.2 (b) (g), 2.15.2.3 and decision logic 2.15; Annex 2, A2.11; Annex 7, example 7;	<b>Package:</b> the complete product of the packing operation, consisting of the packaging and its contents prepared for transport;
<i>Packaging(s)</i>	1.4.10.4.2.2; 1.4.10.5.4.1; Chapter 1.5, Table 1.5.2 (para. 13); Annex 4, A4.3.7.2 (d)(iv);	<b>Packaging:</b> a receptacle and any other components or materials necessary for the receptacle to perform its containment function;
		<i>Comment: Intermediate Bulk Containers (IBC), Large Packagings, Bulk-Containers and Overpacks are further defined terms in the TDG provisions which may be deemed to be addressed in the GHS by terms like packaging or package</i>
<i>Combination packaging</i>	Annex 7: example 1, example 2, example 3;	<b>Combination packaging:</b> a combination of packagings for transport purposes, consisting of one or more inner packagings secured in an outer packaging in accordance with 4.1.1.5 of the UN Model Regulations;
<i>Outside packaging</i>	Chapter 1.2 (definition of label);	<i>Comment: The term “overpack” in the TDG provisions may have a similar meaning</i>
<i>Outer packaging</i>	Annex 7: example 1, example 2, example 3;	<b>Outer packaging:</b> the outer protection of a composite or combination packaging together with any absorbent materials, cushioning and any other components necessary to contain and protect inner receptacles or inner packagings;
<i>Inner packaging</i>	Annex 7: example 1, example 2, example 3;	<b>Inner packaging:</b> a packaging for which an outer packaging is required for transport;
<i>Single packaging</i>	Annex 7: example 4, example 5, example 6, example 7	<i>Comment: Although this term is not defined in 1.2.1 of the TDG Model Regulation, it is used in the packing instructions, see 4.1.4.1 P001 and other packing instructions, types of single packagings can be found in 6.1.2.7 in the orange book</i>
<i>Receptacle</i>	2.3.1 (definition of “aerosol”; 2.5.1 (definition of “gases under pressure”);	<b>Receptacle:</b> a containment vessel for receiving and holding substances or

		articles, including any means of closing; <i>Comment: Aerosols are covered in TDG as Aerosol dispensers as they are regarded as a dangerous article rather than a receptacle for gas(es) or mixtures.</i>
<i>Tank</i>	1.4.3.6; 1.4.10.5.1 ('railway wagons/tanks'), 4.1.2.7 ('ships tanks') and footnote 2 to A4.3.6.3.1(a) ('capture tank');	<b>Tank</b> ( <i>UN Model Regulations</i> ): a portable tank, including a tank container, a road tank vehicle, a rail tank wagon or a receptacle to contain solids, liquids, or gases, having a capacity of not less than 450 litres when used for the transport of gases; <b>Tank</b> (under ADR/RID/ADN): a shell, including its service and structural equipment. When used alone, the term tank means a tank-container, portable tank, tank-wagon, demountable tank or fixed tank as defined in Chapter 1.2 of the ADR/RID/ADN, including tanks forming elements of battery-vehicles, battery-wagons or MEGCs;
<i>Vessel</i>	1.4.10.5.5.1 ('process and reaction vessels') and A4.3.7.2 (d) (ii) ('storage vessels');	<b>Vessel</b> : any seagoing vessel or inland waterway craft used for carrying cargo.