

## **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**

**20 June 2011**

**Twenty-first session**

Geneva, 27–29 June 2011

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**

#### **Introduction**

1. As it was considered premature to develop actual guidance on the application of the general principles for the labelling of small packagings, it was suggested by the correspondence group to develop illustrative examples showing how the principles described in paragraph 1.4.10.5.4.4 of the GHS may be applied.
2. Such illustrative examples could be included in the GHS either as a non prescriptive, non exhaustive new Annex (similar format to Annex 7) giving examples of arrangements of the GHS label elements on small packagings, or as a sub-section of Annex 7.

#### **Development of examples of labelling of small packagings**

3. Since the 20th session, the members of the correspondence group were invited to comment a few examples illustrating potential application of the general principles for the labelling of small packagings.
4. The comments received showed the difficulty to start developing such examples without agreeing on a few prerequisites which is best done in a face to face meeting.
5. The enclosed examples try to take into account most of these comments. It is hoped they will help the members of the correspondence group, during their meeting planned during the 21st session, to agree on a way forward, in particular:
  - (a) Is it needed to decide on rules like precedence rules,...?
  - (b) Structure/format of the examples
  - (c) Other...

## Examples of labelling of small packagings

Example 1: Box containing ampoules

Example 2: Test-kits

Example 3: 25 ml bottle n-hexane with outer packaging.

Example 4: Cleaning pen with blister

Example 5: Cleaning pads in dispenser box

**Reminder**: para. 1.4.10.5.4.4 of GHS: 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.”

## Example 1: Box containing ampoules

### Classification:

Blahzenic acid is classified as:  
 Acute Toxicity Oral Cat 2  
 Acute Toxicity Dermal Cat 1  
 Acute Toxicity Inhalation Cat 2  
 Skin Corrosion Cat 1B.

The following applicable label elements are specified in GHS Annex 3:



DANGER

H300+H310+H330; H314

Fatal if swallowed, in contact with skin or if inhaled; Causes severe skin burns and eye damage

Prevention

P264; P270; P262; P280; P260; P271; P284

Wash...thoroughly after handling; Do not eat drink or smoke when using this product; Do not get in eyes, on skin or on clothing; Wear protective gloves/protective clothing/eye protection/face protection; Do not breath fume/vapours; Use only outdoors or in a well-ventilated area; Wear respiratory protection.

Response

P301+P310; P321; P330; P302+P350; P310; P322; P361; P363; P304+P340; P320; P301+P330+P331; P303+P361+P353; P305+P351+P338

If swallowed: Immediately call a poison center or doctor/physician; Rinse mouth; Specific treatment (see ... on this label); If on skin: Gently wash with plenty of soap and water; ; Immediately call a poison center or doctor/physician; Specific measures (see ... on this label); Remove/Take off immediately all contaminated clothing; Wash contaminated clothing before reuse; If inhaled: Remove victim to fresh air and keep at rest in a position comfortable for breathing; Specific treatment is urgent (see ... on this label); If swallowed: Rinse mouth. Do not induce vomiting; If on skin (or hair): Remove/Take off all contaminated clothing. Rinse skin with water/shower; If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Storage

P405; P403+P233

Store locked up; Store in a well-ventilated place; Keep container tightly closed.

Disposal

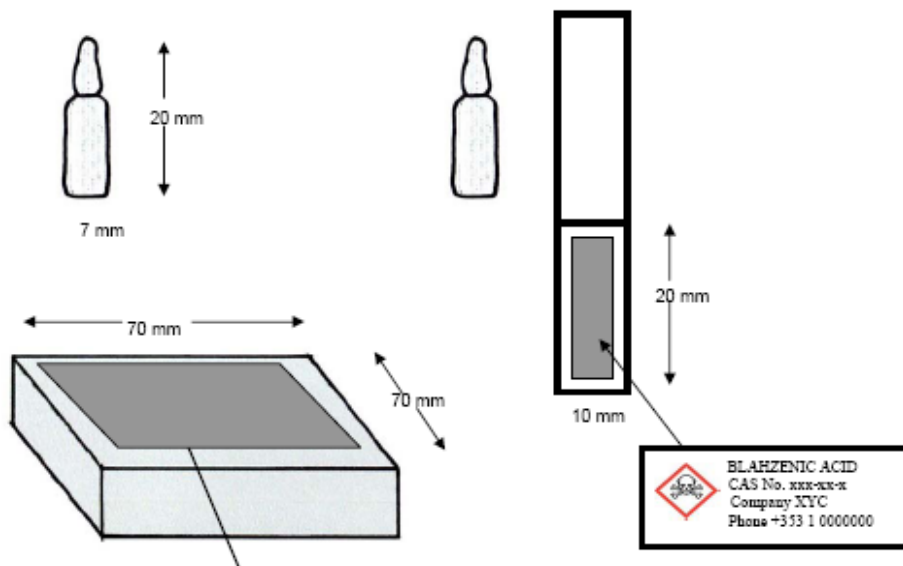
P501: Dispose of contents/container to...

**Packaging:**

Intermediate/Outer Packaging: Box containing 5 ampoules - 4900 mm<sup>2</sup> surface area available for the supply label

Inner Packaging: 0.5 ml Glass ampoule – unlabelled but sealed in plastic bag with end tag for label

Substance for professional use only – not supplied to general public; not a volatile liquid; not sprayed



	<p>BLAHZENIC ACID CAS No. xxx-xx-x                  DANGER                  Fatal if swallowed, in contact with skin or if inhaled                  Causes severe skin burns and eye damage                  Wear protective gloves /clothing and eye/face protection.                  IF ON SKIN (or hair): Remove / take off immediately all contaminated clothing. Rinse skin with water / shower.                  IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.                  Immediately call a POISON Center or doctor/physician.                  IF SWALLOWED: Rinse mouth. Do not induce vomiting. Immediately call a POISON Center or doctor/physician.                  IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.                  Immediately call a POISON Center or doctor/physician.                  Wash contaminated clothing before reuse.                  Wash hands thoroughly after handling.                  Do not eat, drink or smoke when using this product.                  Store locked up                  Dispose of contents/container to a hazardous waste disposal site                  Company XYZ, Alphabet Street, Sometown, Any country, Code ABCD Phone: + 353 1 0000000</p>

## Example 2: Test-kits

“COD-Cell-Test” are systems for photometric analysis – only for industrial use – consist of a styro-foam box and glass ampoules.

Each test-kit contains 25 glass ampoules each filled with 3.5 ml of the same mixture.

(total volume: 87,5 ml)

The mixture contains among others sulphuric acid and mercury(II)-sulfate.

**Its classification leads to the following full labelling:**



Danger

H290; H301+H311+H331; H314, H373

May be corrosive to metals, Toxic if swallowed, in contact with skin or if inhaled. May cause damage to organs through prolonged or repeated exposure. Causes severe skin burns and eye damage.

P234; P264; P270; P262; P280; P260; P271; P284

Keep only in original container. Wash...thoroughly after handling. Do not eat drink or smoke when using this product. Use only outdoors or in a well ventilated area. Do not get in eyes, on skin or on clothing. Do not breath fume/vapour. Wear protective gloves/protective clothing/eye protection/face protection. Wear respiratory protection.

P390; P301+P310; P321; ~~P330~~; P302+P350; P310; P322; ~~P361~~; P363; P304+P340; ~~P320~~; P301+P330+P331; P303+P361+P353; P305+P351+P338

Adsorb spillage to prevent material-damage. If swallowed: Immediately call a poison center or doctor/physician. Rinse mouth. If on skin: Gently wash with plenty of soap and water. Immediately call a poison center or doctor/physician. Wash contaminated clothing before use again. Specific treatment (see on this label). If inhaled: Remove victim to fresh air and keep at rest in a position comfortable for breathing. If swallowed: Rinse mouth. Do not induce vomiting. If on skin (or hair): Remove/Take off all contaminated clothing. Rinse skin with water/shower. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P406; P405; P403+P233

Store in a corrosive resistant container with a resistant inner liner. Store locked up. Store in a well ventilated place. Keep container tightly closed.

P501

Dispose of contents/container to...

**(26 recommended precautionary statements !)**

The labels of the ampoules are resistant transparent foils (the label production is more or less a manual processing) with a maximum size of 4x5mm.

The label size for the box is 80 x 140 mm.



### Example 3: 25 ml bottle n-hexane with outer packaging.

The full labelling of the substance is the following:



Danger

H225; H304; H361; H373; H315; H336; H411

Highly flammable liquid and vapour. May be fatal if swallowed and enters airways. Suspected of damaging fertility or the unborn child. May cause damage to organs. Causes skin irritation. May cause drowsiness or dizziness. Toxic to aquatic life with long lasting effects.

P210; P233; P240; P241; P242; P243; P280; P201; P202; ~~P284~~; P260; P264; ~~P261~~; P271; P273

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Keep away from Heat...No smoking. Keep container tightly closed. Ground/bond container and receiving equipment. Use explosion-proof electrical/ventilating/lighting.../equipment. Use only non sparking tools. Take precautionary measurements against static discharge. Wear protective gloves/protective clothing/ eye protection / face protection. Do not breathe dust/fume/gas/mist/vapours/spray. Wash... thoroughly after handling. Use only outdoors or in a well-ventilated place. Avoid release to the environment.

P303+P361+P353; P370+P378; P301+P310; P331; P308+P313; ~~P314~~; ~~P302+P352~~; P321; P332+P313; P362; P304+P340; P312; P391

If in skin (or hair): Remove/take off immediately all contaminated clothing; Rinse skin with water/shower. In case of fire: Evacuate area. If swallowed: immediately call a poison canter or doctor/physician. Do not induce vomiting. If exposed or concerned: get medical advice/attention. Specific treatment (see on this label) If skin irritation occurs: get medical advice/attention. Take off contaminated clothing and wash before reuse. If inhaled: remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a poison center or doctot/physician if you feel unwell. Collect spillage

P403+P235; P405; ~~P403~~+P233

Store in a well ventilated place. Keep container tightly closed. Keep cool. Store locked up.

P501

Dispose of contents/Container to...

#### (32 recommended precautionary statements !)

It is impossible that all labelling elements appear neither on the bottle nor on the outer packaging.

One reason is to have not enough space on these small labels. But far more seriously, it is to have the same information on ampoules for using in a closed apparatus as well as for the same mixture in large or very large quantities for filling, packaging, handling or further processing.

There is a risk and likelihood that a user will ignore the information, because it is always the same information, irrespective of whether it is sensible or not. It is in comprehensible that the same protective measures have to be taken into account regardless the concentration, the use and volume.

To ensure to alert the user to the most potential hazards of the substance/mixture in dependence on the use/application and amount all **appropriate** label elements should appear on a label.

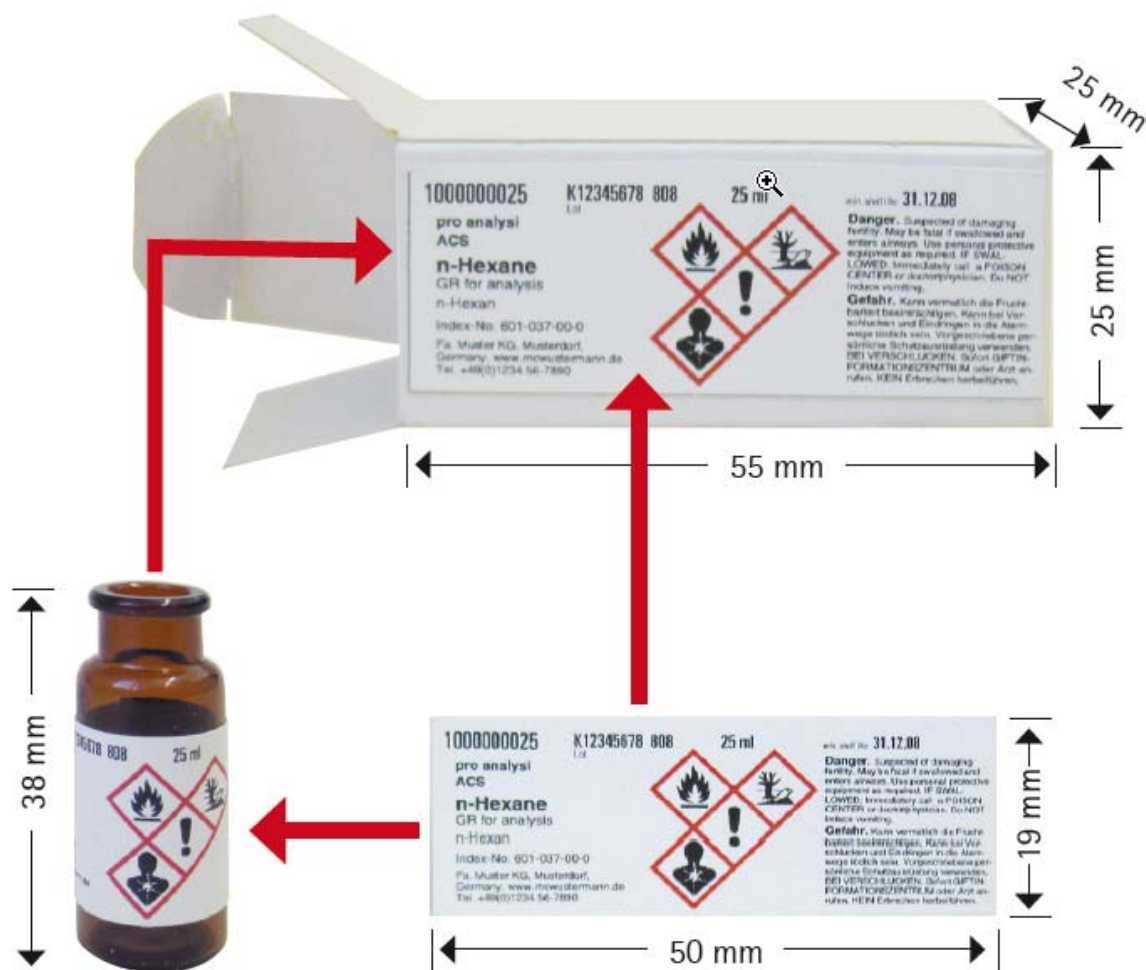
**Proposed solution:**

Bottle containing 25 ml n-hexane: pictograms; signal word; most appropriate hazard and precautionary statements

Outer packaging: pictograms, signal-word, most appropriate hazard- and precautionary statements.

To ensure that a user receives all information of a substance or mixture regardless the volume or application a SDS always has to be provided with information of the classification/labelling of the chemical (product specific).

P201 (Obtain special instructions before use [, see SDS]) is added to the label





## Example 4: Cleaning pen with blister

**Classification and labelling** of the liquid contained in the cleaning pen:

**Signal Word:** WARNING!

**Symbols:** Flame; Exclamation mark ; Environment

**GHS Classification-Physical:** Flammable Liquid: Category 3.

**GHS Classif-Environmental:** Acute Aquatic Toxicity: Category 1.

Chronic Aquatic Toxicity: Category 1.

**GHS Classification-Health:** Acute Toxicity (oral): Category 5.

Serious Eye Damage/Irritation: Category 2B.

Skin Corrosion/Irritation: Category 3.

Skin Sensitizer: Category 1.

With the following H- and P-Statements:

**Hazard Statements-Physical:** Flammable liquid and vapor.

**Hazard Statements-Environmental:**

Very toxic to aquatic life with long lasting effects.

**Hazard Statements-Health:**

May be harmful if swallowed.

Causes eye irritation.

Causes mild skin irritation.

May cause an allergic skin reaction.

**Precautionary Statements-General:**

Keep out of reach of children.

**Precautionary Statements-Prevention:**

Keep away from heat/sparks/open flames/hot surfaces. - No smoking.

Ground/bond container and receiving equipment.

Use only non-sparking tools.

Take precautionary measures against static discharge.

Keep container tightly closed.

Use explosion-proof electrical/ventilating/lighting/equipment.

Avoid breathing dust/fume/gas/mist/vapours/spray.

Wear protective gloves and eye/face protection.

Wash thoroughly after handling.

Contaminated work clothing should not be allowed out of the workplace.

Avoid release to the environment.

**Precautionary Statements-Response:**

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

If eye irritation persists: Get medical advice/attention.

IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.

If skin irritation or rash occurs: Get medical advice/attention.

Wash contaminated clothing before reuse.

Call a POISON CENTER or doctor/physician if you feel unwell.

In case of fire use a carbon dioxide or dry chemical extinguisher for extinction.

Collect spillage.

**Precautionary Statements-Storage:**

Store in a well-ventilated place. Keep cool.

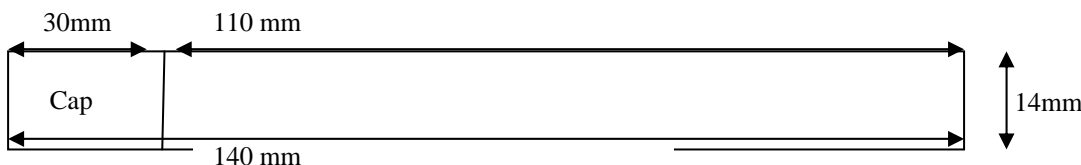
**Precautionary Statements-Disposal:**

Dispose of contents/container in accordance with applicable local/regional/national/international regulations.

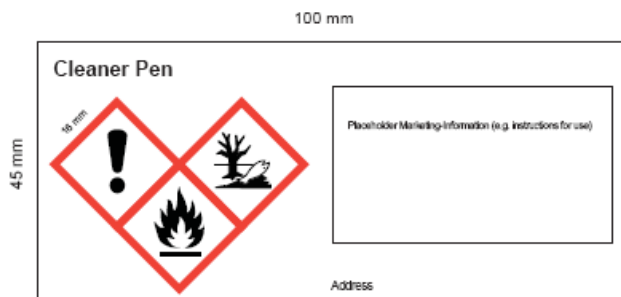
The cleaning pen has the following dimensions: 140mm x 14mm. It looks like a normal round marker, but is filled with a liquid to remove adhesive, label and sticker residue and marker graffiti. The liquid in the pen is not soaked into a solid; it is clear liquid, which is applied via a wick.

**Packaging and proposed solution:**

Pen:



The label for the pen is wrapped around the pen and contains also information for the correct application of the cleaning pen:



will be stuck around the pen

Fontsize 6 pt

The label contains the following information:

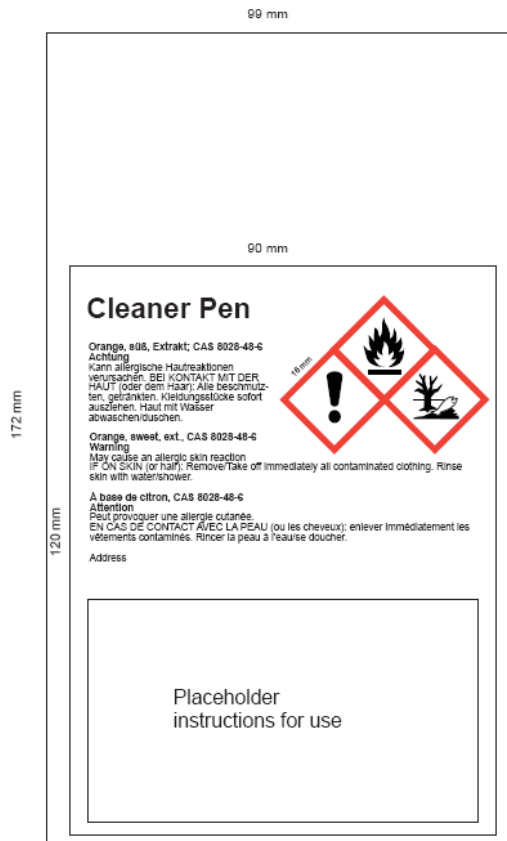
- pictograms (size of 16 x 16 mm)
- product identification (trade name)
- address and telephone number of the supplier
- instructions for proper use

**Blister:**

The pen is sold in a blister of the following size 99 x 172 mm. It holds a reduced set of hazard information in 3 languages (as required for some countries in Europe):

- product identifier (trade name), including hazardous ingredient
- pictograms (size 16 x 16 mm)
- signal word
- H-statements for sensitising hazard
- P-statements for sensitising hazard
- Address and telephone number of supplier
- Instructions for use

**Blister**



Fontsize 6 pt

## Example 5: Cleaning pads in dispenser box

**Classification and labelling** of the liquid:

**Signal Word:** Danger!

**Symbols:** Flame ; Exclamation mark

**GHS Classification-Physical:** Flammable. Liquid. Category 2

**GHS Classification-Health:** Eye Irritation. 2

STOT Single Exposure 3

With the following H- and P-Statements:

**Hazard Statements-Physical:** H225 Highly flammable liquid and vapour

**Hazard Statements-Health:** H336: May cause drowsiness or dizziness

H319: Causes serious eye irritation.

**Precautionary Statements-General:** Keep out of reach of children.

**Precautionary Statements-Prevention:**

P210 Keep away from heat/ sparks/open flames/hot surfaces. — No smoking

P233 Keep container tightly closed.

P240 Ground/bond container and receiving equipment

P241 Use explosion-proof electrical/ventilating/lighting equipment.

P242 Use only non-sparking tools

P243 Take precautionary measures against static discharge.

P261 Avoid breathing dust/fume/ gas/mist/vapours/spray.

P261 Avoid breathing dust/fume/ gas/mist/vapours/spray.

P264 Wash hands thoroughly after handling.

P271 Use only outdoors or in a well-ventilated area.

P271 Use only outdoors or in a well-ventilated area.

P280 Wear protective gloves/protective clothing/eye protection/ face protection.

**Precautionary Statements-Response:**

P303 + P361 + P353 IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.

P304 + P340 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

P304 + P340 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P312 Call a POISON CENTER or doctor/physician if you feel unwell.

P312 Call a POISON CENTER or doctor/physician if you feel unwell.

P337 + P313 If eye irritation persists: Get medical advice/attention.

P370 + P378 In case of fire: Use carbon dioxide for extinction.

**Precautionary Statements-Storage:**

P403 + P233 Store in a well-ventilated place. Keep container tightly closed.

P403 + P235 Store in a well-ventilated place. Keep cool.

P405 Store locked up.

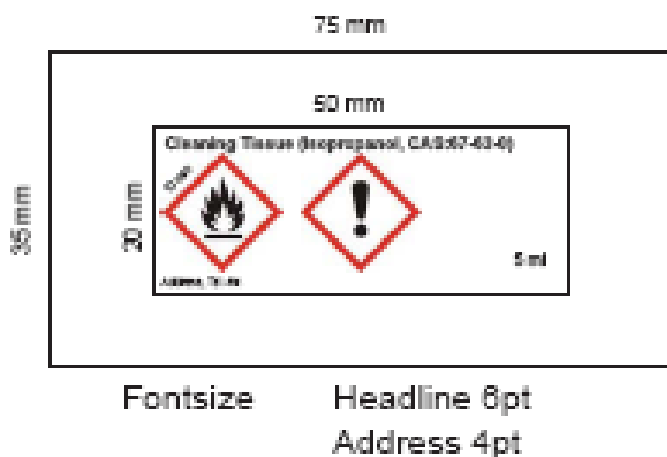
**Precautionary Statements-Disposal:**

P501 Dispose of contents/container in accordance with applicable local/regional/national/international regulations.

**Packaging and proposed solution:**

500 cleaning pads are contained in one dispenser box. The cleaning pads are in a sealed bag / package and contain a cloth which is soaked with cleaning liquid.

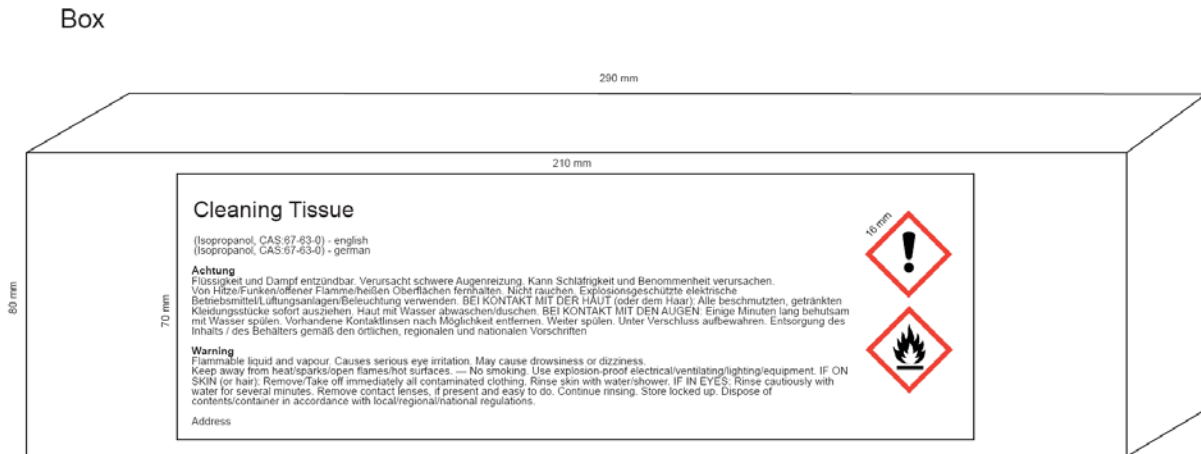
The dimensions of each cleaning bag are 35 x 75 mm

**Bag**

They are labelled with

- The product identification (trade name and hazardous ingredient)
- Pictograms (10 x 10mm)
- Address and telephone number of the supplier
- Net quantity of the package

They are packaged into a box (80 x 290 mm), from which they can be taken one by one. The size of the label is 70 x 210 mm. The product is labelled in at least 2 languages.



Fontsize 8 pt

The box is labelled with the complete hazard information according to GHS:

- Product identification (trade name, hazardous ingredient)
- Pictograms (16 x 16 mm)
- Signal word
- H-statements
- P-statements
- Address and telephone number of the supplier