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**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

Labelling of very small packagings

Transmitted by the European Chemical Industry Council (CEFIC) ^{*/}

Background

1. At the fourteenth session of the Sub-Committee, CEFIC submitted document ST/SG/AC.10/C.4/2007/12 detailing some of the issues needing to be addressed regarding the labelling of small packagings and requesting some direction on how to proceed from the Sub-Committee.
2. Building on the very useful discussions both in plenary and a breakout meeting during the fourteenth session, the correspondence group has continued to develop possible approaches to address issues related to the labelling of small packagings, with a goal of submitting a proposal in this biennium.
3. This paper provides a progress report on discussions since the fourteenth session.

^{*/} In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).

Next steps

4. The correspondence group recognises that, given the increasing number of countries moving into the implementation phase, the target is to provide some guidance on the labelling of small packagings in the GHS during this biennium.

5. In order to achieve this, the correspondence group would welcome feedback from the Sub-Committee with a view to reaching agreement on:

- (i) General principles for the labelling of small packagings to be added to Annex 7; and
- (ii) Additional definitions to be added to Chapter 1.2.

6. The correspondence group will review the feedback from the Sub-Committee and bring forward a formal proposal to the Sub-Committee for consideration at the sixteenth session.

7. The correspondence group would appreciate more active participation by more members of the Sub-Committee and invites all Sub-Committee members to participate in its next meeting*.

Progress report

Guidance on the labelling of small packagings

8. 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.

9. The correspondence group has reviewed possible options for general principles to be included in the GHS text. Comments were received by email. There was general consensus among the members participating in a conference call on 20th March 2008 that the general principles that should underpin labelling of small packagings are:

- (a) All the required GHS label elements should appear on the immediate container (i.e. the primary packaging) of a hazardous substance or mixture where possible;
- (b) Where it is impossible to put all the required 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*:

* Note by the secretariat: After consultation of members of the group, Salle VIII of the Palais des Nations has been previously booked for a meeting that would take place on Wednesday 9th July 2008 from 10.00 to 11.30.

- (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 language to comply with competent authority official language requirements.
- (c) Where the volume of a hazardous substance or mixture is so low (e.g. a few millilitres – volume to be determined) and the supplier has data demonstrating, and/or the competent authority has determined, that there is no likelihood of harm to man and/or the environment, then the label elements may be omitted from the immediate container for certain hazard classes/categories [to be defined].
- (d) Competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories [to be defined] where the volume of the substance or mixture is below a certain amount (volume to be determined; [options include 100 or 125 ml]).

10. There was also discussion between the members participating in the 20th March 2008 conference call on whether the general principles for the labelling of small packagings should also cover:

- (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.

11. Further work is needed on these issues. However, early indications of possible new text covering labelling of small packagings in Annex 7 of the GHS are given in the annex to this paper.

Packaging definitions

12. During various discussions on the labelling of small packagings issue, it became apparent that some packaging terms meant different things to different people. It was noted that the definition of containment and packaging had been considered by the Sub-Committee as per ST/SG/AC.4/2006/10 (Secretariat) and the July 2006 meeting report.

13. The correspondence group has reviewed the need for various packaging definitions to be included in Chapter 1.2. While some participants stressed the need to keep the terminology as simple as possible and questioned the need for new terms and definitions, others suggested that a number of additional terms and definitions might improve clarity. There was consensus on the need to review any proposed new GHS definitions in light of existing definitions in the TDG to ensure that they are consistent and/or do not create unnecessary confusion.

14. The following packaging definitions have been suggested by CEFIC for further consideration by the correspondence group and the Sub-Committee:

Receptacle: Containment vessel for receiving and holding hazardous substances, mixtures or articles, including any means of closing.

Container : See “receptacle”

Package: The complete product of the packing operation, consisting of the packaging and its contents prepared for transport or storage.

Packaging: a receptacle and any other components or materials necessary for the receptacle to perform its containment function.

Intermediate packaging: packaging placed between inner packagings, or articles, and an outer packaging.

Primary packaging: the receptacle containing the hazardous substance or hazardous mixture.

Secondary packaging: any intermediate and/or outer packaging.

Inner packaging: a packaging for which an outer packaging is required for transport and storage.

Outer packaging: the outer protection of a composite or combination packaging together with any absorbent materials, cushioning and any other components necessary to contain and protect receptacles or inner packagings.

Combination packaging: a combination of packagings, consisting of one or more inner packagings secured in an outer packaging.

Annex

Possible text covering guidance for the labelling of small packagings in Annex 7 of the GHS could include *inter alia*:

“A7.1 GUIDANCE ON THE LABELLING OF SMALL PACKAGINGS

A7.1.1 General principles

A7.1.1.1 “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.”

A7.1.1.2 A GHS label should be prepared in accordance with the provisions of 1.4.10. The full GHS hazard information should always be provided on the immediate container wherever possible, having regard to clarity of the label and legibility of the text.

A7.1.1.3 However, there are situations where a combination of the following factors means it is impossible to accommodate the full GHS hazard information on a conventional “stick-on” or printed label on the immediate container itself:

- (a) The shape, form or size of the immediate container; and
- (b) The number of required pictograms, hazard and precautionary statements and other label elements; and
- (c) Specific requirements of competent authorities for label information to be available in more than one language.

A7.1.1.4 In the circumstances in A7.1.1.3, the full hazard information required on the immediate container may be provided:

- (a) In fold-out labels; or
- (b) On tie-on tags; or
- (c) On an outer and/or intermediate packaging; or
- (d) On a blister; or
- (e) On an ‘in-package’ leaflet; or
- (f) For professional users, in an appropriate electronic format such as a Radio frequency identification (RFID) that is part of the packaging, provided all users have full and ready access to the necessary means to access the full hazard information.

A7.1.1.5 Where the alternative means in A7.1.1.4 are used, the immediate container should have a label bearing as a minimum the name and telephone number of the supplier of the substance or mixture, the product identifier, and the relevant pictogram[s] reflecting the classification of the substance or mixture.

A7.1.1.6 Where the volume of a hazardous substance or mixture is so small [e.g. ≤ 10 ml] that the supplier can demonstrate that there is no likelihood of harm to man and/or the environment arising from some or all of the hazard classes/categories in which the substance or mixture is classified, the hazard information for those classes/categories may be omitted from the label.

However, the label elements for the following classes/categories should always be provided [To be defined, but could, for example, include CMR and sensitizing properties].

A7.1.1.7 In addition to A7.1.1.3 to A7.1.1.6 above, competent authorities may specify derogations allowing suppliers to reduce the information required on the immediate container where the volume of the substance or mixture is below x ml for the following hazard classes/categories:

- (a) [Volume of container to be defined, [e.g. 100 or 125 ml]]
 - (b) [Hazard classes and categories to be defined, together with the label information that can be omitted in each case.]”
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