

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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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. These examples provide helpful illustrations of what modifications to the GHS label elements could be acceptable on small packaging. Such examples could be included in the GHS either as a sub-section of Annex 7 or as a new Annex (with a similar format to Annex 7).

Development of examples of labelling of small packagings

3. Examples illustrating potential application of the general principles for the labelling of small packagings were proposed in informal document UN/SCEGHS/21/INF.14.
4. Comments were expressed on the presentation of these examples. More detail on the thought process used to derive them was considered necessary as well as a clearer/harmonised presentation.

5. A template was thus derived, including the following items:
 - (a) Substance/mixture
 - (b) Use
 - (c) Classification (Hazard classes and categories)
 - (d) Full labelling information
 - (e) Packaging description and size
 - (f) Statement of concerns
 - (g) Proposed solution
 - (i) Immediate container (description, thought process, illustration)
 - (ii) Outside packaging¹ (description, illustration)
6. The examples were reorganised according to this common template.
7. It is hoped they will help the members of the correspondence group to agree on a way forward.

Examples of labelling of small packagings

Example 1: Cardboard box containing 5 ampoules

Example 2: Styrofoam box filled with 25 glass ampoules

Example 3: Cleaning pen with blister

Example 4: Cleaning pads in dispenser box

Example 5: Box containing ampoules and reagents

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

¹ The wording « outside packaging » here does not have the same meaning than in Transport of Dangerous Goods regulations.

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:

SUBSTANCE: Cardboard box containing 5 ampoules of blazhenic acid

USE: Laboratory reagent – professional use

CLASSIFICATION:

Acute Toxicity Oral Cat 2

Acute Toxicity Dermal Cat 1

Acute Toxicity Inhalation Cat 2

Skin Corrosion Cat 1B

FULL LABELLING INFORMATION:

Pictograms:



Signal word : Danger

Hazard statements:

H300+H310+H330 Fatal if swallowed, in contact with skin or if inhaled

H314 Causes severe skin burns and eye damage

Precautionary statements (GHS Annex 3, Section 3):

Prevention:

P264 Wash...thoroughly after handling

P270 Do not eat, drink or smoke when using this product

P262 Do not get in eyes, on skin or on clothing

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

P260 Do not breathe dust/fume/gas/mist/vapours/spray

P271 Use only outdoors or in a well-ventilated area

P284 Wear respiratory protection

Response:

P301+P310 IF SWALLOWED: Immediately call a POISON CENTER / doctor/...

P321 Specific treatment (see ... on this label)

P330 Rinse mouth;

P302+P352 IF ON SKIN: Gently wash with plenty of water /...

P310 Immediately call a POISON CENTER/doctor/...;

P361+ P364 Take off immediately all contaminated clothing and wash it before reuse.

P363 Wash contaminated clothing before reuse

P304+P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing

P320 Specific treatment is urgent (see ... on this label)

P301+P330+P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting;

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

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

Storage:

P405 Store locked up

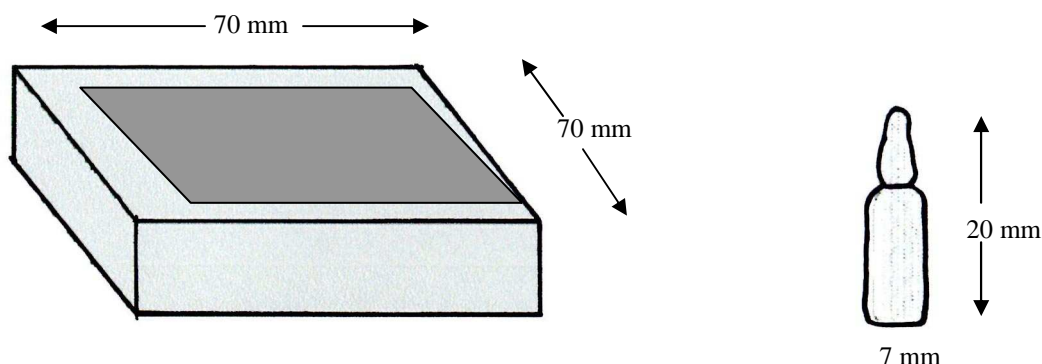
P403+P233 Store in a well-ventilated place; Keep container tightly closed.

Disposal:

P501 Dispose of contents/container to...

PACKAGING DESCRIPTION AND SIZE:

Cardboard box containing 5 glass ampoules. Each ampoule contains 0.5 grams blazhenic acid



STATEMENT OF CONCERNS:

It is impossible to put all applicable GHS label elements on the immediate container (i.e. the glass ampoule) due to its size and shape.

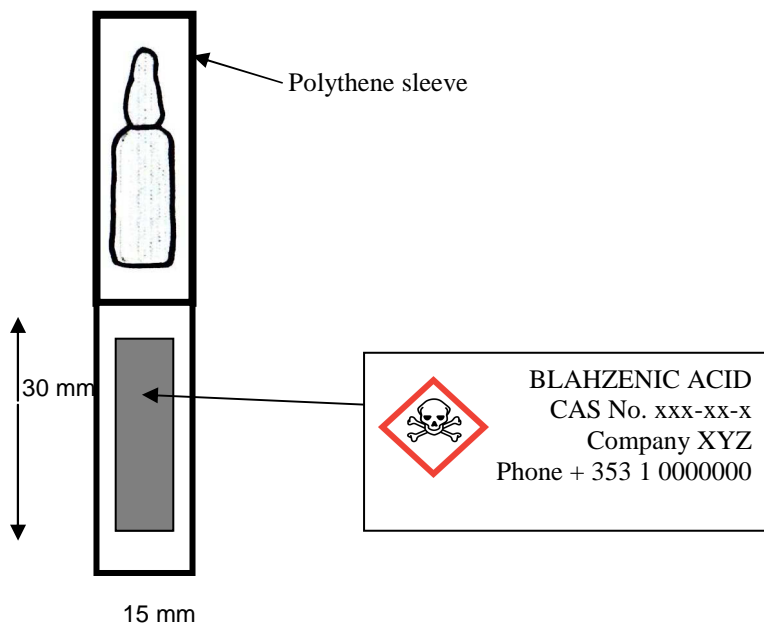
The working solution of this reagent is prepared by removing the top of the ampoule and placing the bottom half (containing the substance) in the required amount of deionized water. Consequently, labels cannot be applied to the actual ampoules as they could contaminate the working solution which may affect subsequent reactions.

The area available on the outer cardboard box is large enough to carry a legible version of the required GHS label elements in a single language. Legibility could be impacted if more than one official language is required in the country where the substance is placed on the market. The legibility concerns arising from having to label in more than one language would also apply to any labelling for the glass ampoule.

PROPOSED SOLUTION – based on GHS para. 1.4.10.5.4.4 (b – e):

Immediate container

1. The GHS definition of 'Label' indicates that the required label elements can be "affixed to, printed on, or attached to the immediate container of a hazardous product". As it is not possible to print on the ampoule or attach a label, the proposed solution would be to seal the unlabelled ampoule in a polythene sleeve with an end tag for a label. The ampoule is not removed from the polythene sleeve until the point of intended use, i.e. preparation of the working solution.

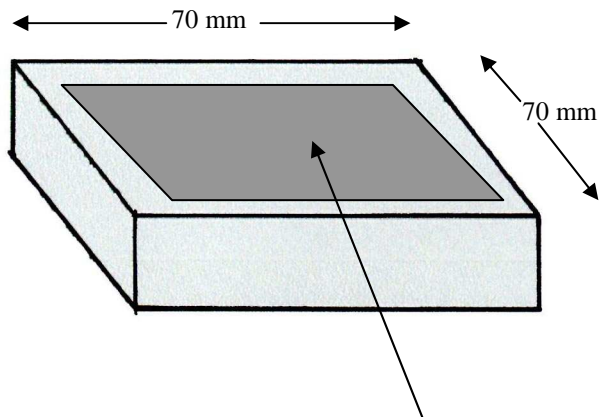


2. The area available for a label on the end tag is not sufficient to include all required label elements. The proposed solution would be to include the hazard pictograms, product identifier and name plus telephone number of the supplier. All required label elements will appear on the outside packaging. This would ensure that the user is aware of the substance identity, its hazards and the name/contact details of the supplier.

3. Blahzenic acid is required to carry the skull and crossbones and corrosion pictograms. The area available for a label on the end tag means that it is difficult to include two readable pictograms without impacting on the legibility of the other label text. Taking into account the small amount of substance in each ampoule, the proposed solution would be to adopt a similar approach to that in the UN Model Regulations on precedence of hazard characteristics. Blahzenic acid would be classified as Class 6.1 Packing Group I Dermal and Class 8 Packing Group II. UN Model Regulations table 2.0.3.3 indicates that Class 6.1 Packing Group I Dermal takes precedence over Class 8 Packing Group II Solid. Accordingly, it is proposed that only the skull and crossbones pictogram would appear on the end tag label. Both hazard pictograms would appear on the outside packaging.

Outside packaging

1. Taking into account use/application, the number of precautionary statements required on the label may be reduced by excluding redundant/similar statements.



	<p>BLAHZENIC ACID CAS No. xxx-xx-xx</p>
	<p>DANGER</p> <p>Fatal if swallowed, in contact with skin or if inhaled Causes severe skin burns and eye damage</p> <p>Wear protective gloves /clothing and eye/face protection. IF ON SKIN (or hair): 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. IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. Immediately call a POISON CENTER/ doctor/.... IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER /doctor/.... 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</p>
<p>Company XYZ, Alphabet Street, Sometown, Any country, Code ABCD Phone: + 353 1 0000000</p>	

2. Where the country of sale has more than one official language, it may not be possible to produce a legible label for the outside packaging. In this instance (and to avoid using larger packaging), the proposed solution would be to use a fold out label. The hazard pictograms, signal word, hazard statements (in the required official languages) and supplier details would appear on the front label whilst the precautionary statements and other supplemental information would appear in the fold out part. The fold out label would be produced in a way such that the front part could not be detached from the other part of the label or the outside packaging.

Example 2:

The following example has an outer packaging for transport. For that reason no transport requirements have been taken into account.

MIXTURE: Styrofoam box filled with 25 glass ampoules.

USE: Reagent-Kit for water analysis – industrial use

COMPOSITION (hazardous ingredients): sulfuric acid / mercury(II)-sulfate

CLASSIFICATION (hazard classes and categories):

Corrosive to metals Cat 1

Acute toxicity Cat 3 (dermal, oral, inhalation)

Skin corrosion Cat 1A

STOT Repeated exposure Cat 2

Chronic aquatic toxicity Cat 3

FULL LABELLING INFORMATION:



Pictogram:

Signal word: Danger

Hazard Statements:

H290: May be corrosive to metals

H301+H311+H331: Toxic if swallowed, in contact with skin or if inhaled

H314: Causes severe skin burns and eye damage

H373: May cause damage to organs through prolonged or repeated exposure

H412: Harmful to aquatic life with long lasting effects

Precautionary statements (Annex 3, Section 3):

Prevention:

P264: Wash...thoroughly after handling

P270: Do not eat drink or smoke when using this product

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

P260: Do not breath fume/vapour

P271: Use only outdoors or in a well ventilated area

P273: Avoid release to the environment

Response:

P390: Adsorb spillage to prevent material-damage

P321: Specific treatment (see ... on this label)

P330: Rinse mouth

P302+P352: IF ON SKIN: wash with plenty of water/...

P310: Immediately call a POISON CENTER/doctor/...

P311: Call a POISON CENTER/doctor/...

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

P301+P310 IF SWALLOWED: Immediately call a poison center/ doctor/...

P314: Get medical advice/attention if you feel unwell.

P361 + P364: Take off immediately all contaminated clothing and wash it before reuse.

P363: Wash contaminated clothing before reuse

P304+P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing

P301+P330+P331 IF SWALLOWED: Rinse mouth. Do not induce vomiting

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

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

Storage:

P406: Store in a corrosive resistant container with a resistant inner liner

P405: Store locked up

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

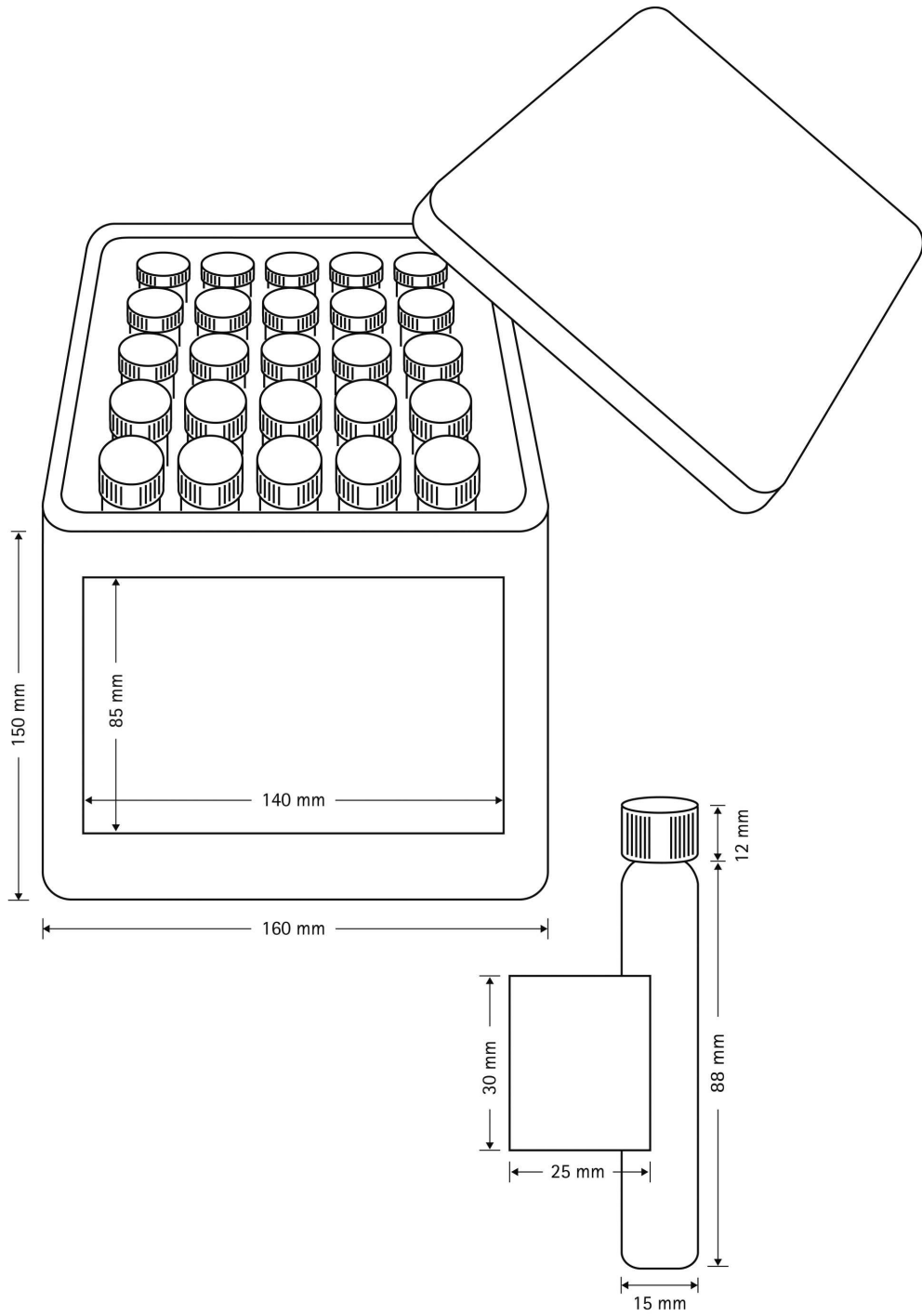
Disposal:

P501: Dispose of contents/container to...

PACKAGING DESCRIPTION AND SIZE:

Styrofoam box containing 25 glass ampoules. Each ampoule is filled with 3.5 ml of the same mixture.

(total volume: 87,5 ml)



STATEMENT OF CONCERNS

The legibility will be affected and the risk that the user is ignoring important information increases. Because it is impossible that all labelling elements clearly arranged and on a readable way appear neither on the ampoules nor on the outer packaging. Even more complicated for global trade is due to missing space, that multilingual labels are also impossible.

One reason is to have not enough space on these small labels, it on the outside packaging such as on the immediate container. But far more seriously, it is to have the same information on ampoules for using in a closed apparatus by trained personal, 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. For this mixture with various hazards we should use 25 recommended precautionary statements. Many of them, in particular for response give similar information, and the user doesn't know which advice he should follow, 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.

PROPOSED SOLUTION – based on para 1.4.10.5.4.4 (b – e)

1) The shape form and size of the styro-foam-box (outside packaging) does not allow to put all applicable label elements on it. To ensure to alert the user to the most potential/severe hazards of the substance/mixture and to inform about very important measures to minimize or prevent adverse effects in dependence on the use/application and amount the following approach would be recommended:

Redundant/similar precautionary statements might not appear on a label (the most conservative approach with respect to concentration, volume and use) should be taken:

P260: Do not breath fume/vapour

~~P261: Avoid breathing dust/fume/gas/mist/vapours/spray~~

~~P271: Use only outdoors or in a well ventilated area~~

~~P330: Rinse mouth~~

P301+P330+P331 IF SWALLOWED: Rinse mouth. Do not induce vomiting

~~P310: Immediately call a POISON CENTER/ doctor/...~~

~~P311: Call a POISON CENTER/ doctor/...~~

~~P312: Call a POISON CENTER/ doctor/.../ if you feel unwell~~

P301+P310 IF SWALLOWED: Immediately call a poison center/ doctor/...

P314: : Get medical advice/attention if you feel unwell.

(Maybe a combination of these two sentences would be possible)

~~P302+P352: IF ON SKIN: wash with plenty of water/...~~

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

~~P361+ P364 : Take off immediately all contaminated clothingand wash it before reuse.~~

Precautionary Statements which are covered through work place protection/operating instructions might not appear on the label. Also the SDS provides general information and guidance for handling and storage disposal considerations:

P260: Do not breath fume/vapour

P264: Wash...thoroughly after handling

P270: Do not eat drink or smoke when using this product

P390: Adsorb spillage to prevent material-damage

P363: Wash contaminated clothing before reuse

P406: Store in a corrosive resistant container with a resistant inner liner

P405: Store locked up

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

P501: Dispose of contents/container to...

(P321: no useful information)

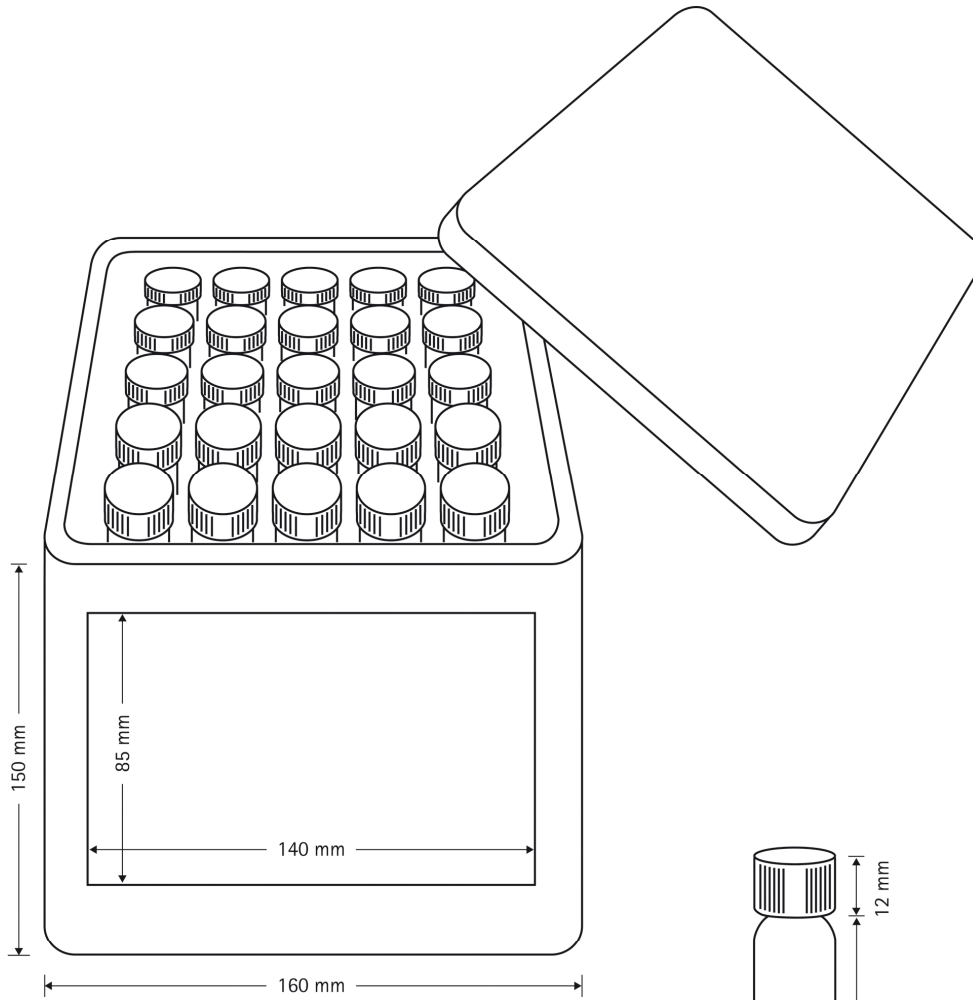
Recommended P-Statements:

- ✓ P280: Wear protective gloves/protective clothing/eye protection/face protection
- ✓ P273: Avoid release to the environment
- ~~✓ (P301+P310 IF SWALLOWED: Immediately call a POISON CENTER/ doctor/...)~~
- ✓ P301+P330+P331+P310 IF SWALLOWED: Rinse mouth. Do not induce vomiting – *immediately call a POISON CENTER/ doctor/...*
- ✓ P304+P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing
- ✓ P303+P361+P353 IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower
- ✓ P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

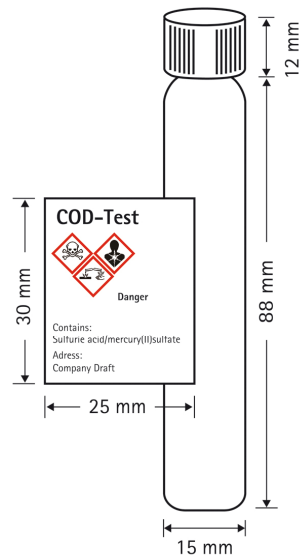
2) The shape form and size of the ampoule (immediate container) does not allow to put all applicable label elements on it.

The ampoule with the dimensions of 15x100 mm should contain at least the following labeling elements:

- ✓ all pictograms (size 100 mm x 100 mm)
- ✓ Signal word
- ✓ Hazardous components



<p>COD-Test</p> <p>Danger</p> <p>May be corrosive to metals Toxic if swallowed, in contact with skin or if inhaled Causes severe skin burns and eye damage May cause damage to organs through prolonged or repeated exposure Harmful to aquatic life with long lasting effects</p>	<p>Contains: Sulfuric acid mercury(II)sulfate</p> <p><i>Wear protective gloves/protective clothing/eye protection/face protection</i> <i>Avoid release to the environment</i> IF SWALLOWED: Rinse mouth. Do not induce vomiting – immediately call a POISON CENTRE or doctor/physician 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 immediately all contaminated clothing. Rinse skin with water/shower Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.</p> <p style="text-align: right;">Address: Company Draft</p>
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Example 3:

SUBSTANCE/MIXTURE: Cleaning pen in blister

USE: Consumer product to remove adhesive, label and sticker residue and marker graffiti. The cleaning fluid is in a pen, so that it can be easily applied and there is no need for direct contact to the cleaning fluid.

CLASSIFICATION

GHS Classification-Physical: Flammable Liquid: Category 3.

GHS Classification-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.

FULL LABELLING INFORMATION

Signalword

WARNING

Pictograms



Hazard statements

Hazard Statements-Physical:

H226 Flammable liquid and vapor.

Hazard Statements-Environmental:

H410 Very toxic to aquatic life with long lasting effects.

Hazard Statements-Health:

H303 May be harmful if swallowed.

H320 Causes eye irritation.

H316 Causes mild skin irritation.

H317 May cause an allergic skin reaction.

Precautionary statements

Precautionary Statements-General:

P102 Keep out of reach of children.

Precautionary Statements-Prevention:

- P210 Keep away from heat/sparks/open flames/hot surfaces. - No smoking.
- P240 Ground/bond container and receiving equipment.
- P242 Use only non-sparking tools.
- P243 Take precautionary measures against static discharge.
- P233 Keep container tightly closed.
- P241 Use explosion-proof electrical/ventilating/lighting/equipment.
- P261 Avoid breathing dust/fume/gas/mist/vapours/spray.
- P280 Wear protective gloves and eye/face protection.
- P264 Wash thoroughly after handling.
- P272 Contaminated work clothing should not be allowed out of the workplace.
- P273 Avoid release to the environment.

Precautionary Statements-Response:

- P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
- P337 + P313 If eye irritation persists: Get medical advice/attention.
- P303+P361+P353 IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.
- P302 + P352 IF ON SKIN: Wash with plenty of water/...
- P333+P313 If skin irritation or rash occurs: Get medical advice/attention.
- P363 Wash contaminated clothing before reuse.
- P312 Call a POISON CENTER/ doctor/... if you feel unwell.
- P370+P378 In case of fire use a carbon dioxide or dry chemical extinguisher for extinction.
- P391 Collect spillage.

Precautionary Statements-Storage:

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

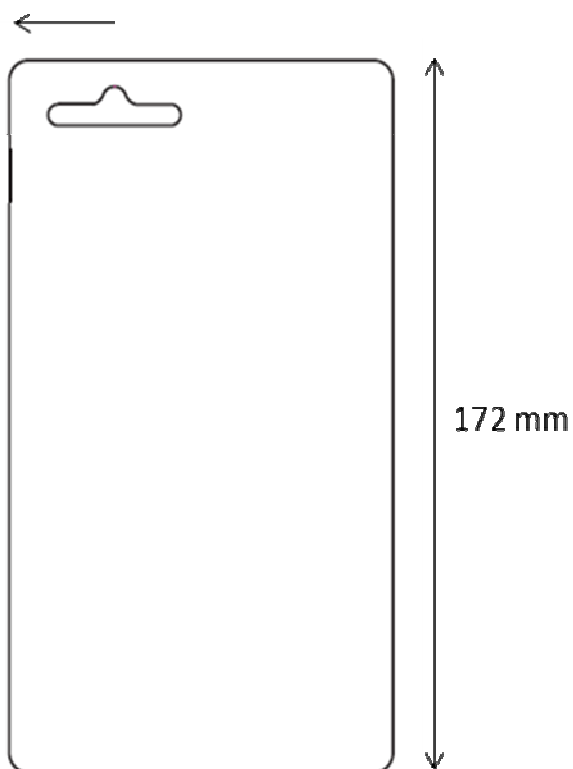
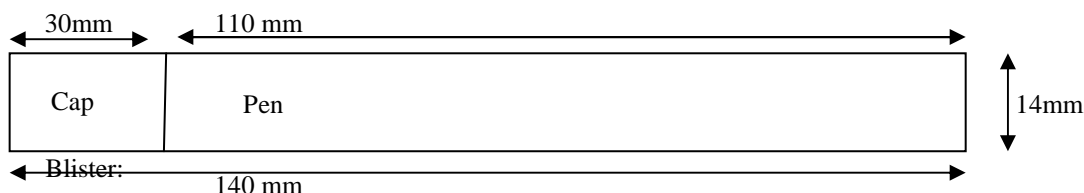
Precautionary Statements-Disposal:

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

PACKAGING DESCRIPTION AND SIZE

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 residue and marker graffiti. The liquid in the pen is a clear solution, which is applied via a wick. The pen contains 0,01 litre of liquid (=8,2 g). Each pen is packed in a blister and 12 blisters are packaged in a fibreboard box for transport. In the retail shop the pen is sold only with the blister as outer package. The label is wrapped around the pen and contains instructions on use as well as GHS labelling information. The label has the following dimensions: 45 mm x 100 mm.

Pen:



STATEMENT OF CONCERNS

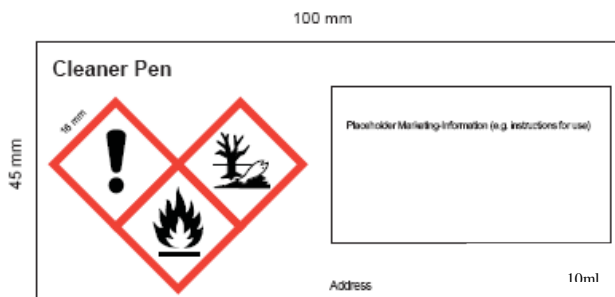
On the label on the immediate container (= pen) there is not enough space to add all information required according to chapter 1.4.10.5 of GHS, even if the text would be in a very small size. Only the pictograms need nearly 1/3 of the complete label size, because 3 pictograms are required. In addition, as this is a consumer product, instructions for the correct use need to be given on the pen-label itself.

On the blister, there is more space, but up to 3 languages are required for some countries in Europe, so that there is still not enough space to provide all label elements.

PROPOSED SOLUTION

-Immediate container

- The label elements should be reduced to give an indication of the hazards. Therefore according to chapter 1.4.10.5.4.4.(d) on the immediate container the following label elements and information should be displayed:
 - pictograms (size of 16 x 16 mm)
 - product identification (=> Cleaner Pen)
 - address and telephone number of the supplier
 - net volume
 - instructions for proper use
- Illustration



will be stuck around the pen

Fontsize 6 pt

-Outside packaging

- The space is still not sufficient to display all label elements. Therefore, based on the approval of the competent authority, only the most important label elements should be displayed in the correct languages. More information would require reducing the size of the text and this would make it unreadable. Consumer products require detailed instructions for use, which must be included on the label in conjunction with the GHS hazard information. In order to accommodate all the requisite information, label elements may need to be omitted from the label. Therefore, according to paragraph 1.4.10.5.4.4.(d) the following label elements and information should be displayed on the blister:
 - product identifier (=> Cleaner Pen), including hazardous ingredient
 - pictograms (size 16 x 16 mm)
 - signal word (font size 10 pt, bigger than text of H- and P-Statements)
 - H-statements for sensitising hazard
 - P-statements for sensitising hazard
 - Address and telephone number of supplier
 - Net volume
 - Instructions for use

o Illustration

Blister



Fontsize 6 pt

Example 4:

SUBSTANCE/MIXTURE: Cleaning pads in dispenser box

USE: The product is a non hazardous cleaning tissue, which is soaked with a cleaning fluid to clean screens, glasses or other surfaces. The amount of liquid soaked in the wipe is < 10 ml. There is no free liquid.

CLASSIFICATION

Hazard classes and categories of the cleaning fluid:

GHS Classification-Physical: Flammable Liquid Category 2

GHS Classification-Health: Eye Irritation. 2

STOT Single Exposure 3

FULL LABELLING INFORMATION

- Signal word Danger
- Pictograms



- Hazard 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

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.

P264 Wash hands thoroughly after handling.

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): Take off immediately all contaminated clothing. Rinse skin with water/shower.

P304 + P340 IF INHALED: Remove person to fresh air and keep 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/ doctor/... 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.

P235 Keep cool.

P405 Store locked up.

Precautionary Statements-Disposal:

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

PACKAGING DESCRIPTION AND SIZE

The cleaning tissue is sealed in a multilayer pad, consisting of paper and plastic material. The dimensions are: 35 x 75 mm. 500 cleaning pads are packed in one dispenser box. The dispenser box offers the possibility to take out the cleaning bags one by one.

STATEMENT OF CONCERNS

The immediate container is very small, so that only the pictograms, the product identifier and the address and telephone number of the supplier can be displayed. The pictograms cannot be reduced any further without the risk that the symbols become unidentifiable. The immediate container should contain less language specific information. These labels should be small enough to allow users to tear the package without ripping the label itself. There is the possibility to provide the label elements completely on the outer package. The outer package is a dispenser box, so it is present, when the product is used (the product is normally taken from the dispenser box one by one), which means also the labeling information is always present, when using the product.

PROPOSED SOLUTION

-Immediate container

- The label size required that label elements are omitted based on the approval of the competent authority on the immediate container according to para. 1.4.10.5.4.4 (d) of GHS. As the pictograms are a good tool to provide the hazard information, they should be as large as possible and to achieve this, no signal word, H-or P-statements should be on the immediate container. The address and telephone number of the supplier can be in a small text font, because it is repeated on

the outer package, which is the dispenser for the cleaning pads and therefore available through the lifetime of the product.

- Illustration

Bag



Fontsize

Headline 8pt

Address 4pt

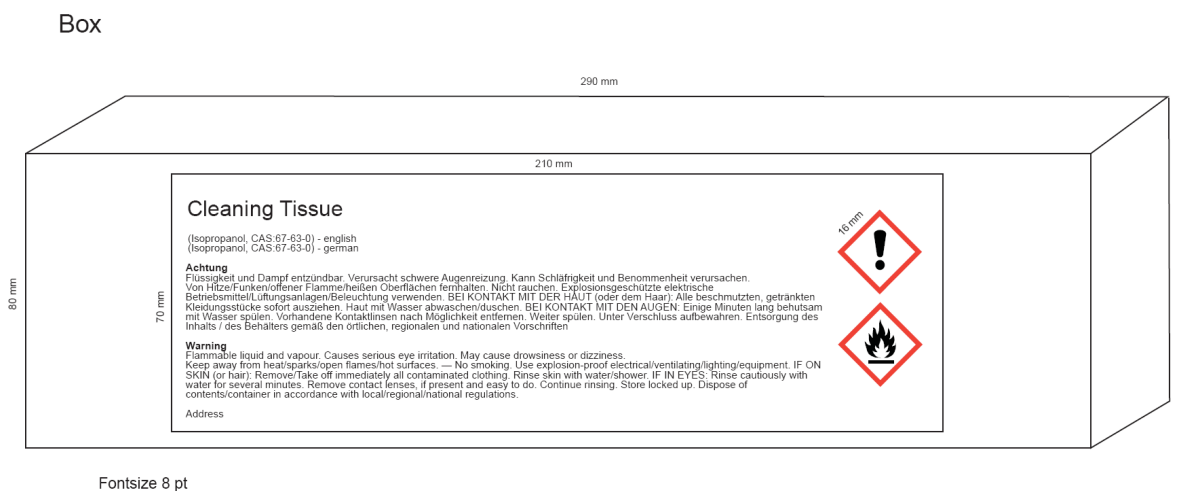
-Outside packaging

o Description

- On the outer package the full information can be displayed, although the number of P-Statements should be reduced to 6, to avoid too long texts, which wouldn't be read by the consumer. In addition the reduction of the number of P-Statements allows focusing on the most important information. Another benefit is, that more than one language can be applied (which in some countries is a legal requirement). So the following information is displayed:

- Pictograms (16 x 16 mm)
- Signal word (10pt)
- H-statements (8pt)
- P-statements (8pt)
- Address and telephone number of the supplier (6pt)

o Illustration



Example 5:

SUBSTANCE/MIXTURE: Box containing ampoules and reagent

A test box can contain (depending on the test parameter) pre-filled glass ampoules and reagent bottles. The example is the cuvette test for the parameter Organic acids.






USE

Cuvette tests are pre-portioned, ready to use reagents for water analysis. Cuvette test come in a fully equipped box and can be used immediately. Together with photometers and accessories, cuvette tests form a comprehensive and accurate measuring system.

CLASSIFICATION

Component	Hazard class	Hazard class & Category code
Cuvette	Acute toxicity	Acute Tox. 4
Solution A	Skin corrosion / irritation	Skin Irrit. 2
	Serious eye damage/ eye irritation	Eye Irrit. 2
Solution B	Skin corrosion / irritation	Skin Irrit. 2
	Skin sensitization	Skin Sens. 1
	Serious eye damage/ eye irritation	Eye Irrit. 2
	Carcinogenicity	Carc. 2
	Hazardous to the aquatic environment	Aquatic acute 1
Solution C	Skin corrosion / irritation	Skin Corr. 1A
Solution D	Skin corrosion / irritation	Skin Irrit. 2
	Serious eye damage/ eye irritation	Eye Dam. 1

FULL LABELING INFORMATION

<i>Component</i>	<i>Signal word</i>	<i>Pictogram</i>	<i>Hazard statements</i>	<i>Precautionary statements</i>
Cuvette	Warning		(302) Toxic if swallowed	(280) Wear protective gloves/protective clothing/eye protection/face protection. (302+312) IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell.
Solution A	Warning		(315) Causes skin irritation. (319) Causes serious eye irritation.	(280) Wear protective gloves/protective clothing/eye protection/face protection. (302+352) IF ON SKIN: Wash with plenty of soap and water. (305+351+338) IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. (313) Get medical advice/attention.
Solution B	Warning		(315) Causes skin irritation. (317) May cause an allergic skin reaction. (319) Causes serious eye irritation. (351) Suspected of causing cancer. (400) Very toxic to aquatic life.	(273) Avoid release to the environment. (280) Wear protective gloves/protective clothing/eye protection/face protection. (302+352) IF ON SKIN: Wash with plenty of soap and water. (305+351+338) IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. (308+313) IF exposed or concerned: Get medical advice/attention.
Solution C	Danger		(314) Causes severe skin burns and eye damage.	(280) Wear protective gloves/protective clothing/eye protection/face protection. (303+361+353) IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower. (305+351+338) IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. (314) Get medical advice/attention if you feel unwell.
Solution D	Warning		(315) Causes skin irritation. (318) Causes serious eye damage.	(280) Wear protective gloves/protective clothing/eye protection/face protection. (302+352) IF ON SKIN: Wash with plenty of soap and water. (305+351+338) IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. (313) Get medical advice/attention.

PACKAGING DESCRIPTION AND SIZE

Packaging description:

One test box of Organic acids Cuvette test contains:

- 25 cuvettes with 0,4ml solution each
- 1 bottle solution A with 11ml
- 1 bottle solution B with 11ml
- 1 bottle solution C with 11ml
- 1 bottle solution D with 55ml



Sizes :

<i>Component</i>	<i>Height</i>	<i>Length</i>	<i>Width</i>	<i>Diameter</i>
Cuvettes	88 mm	-	-	13,3 mm
Bottles A-C (small)	55 mm	31 mm	31 mm	-
Bottle D (big)	97 mm	31 mm	31 mm	-
Cardboard box	118 mm	177 mm	88 mm	-

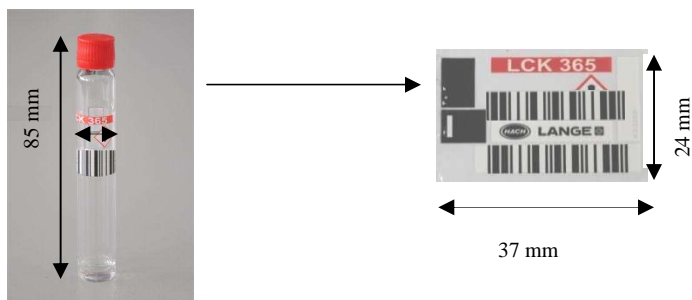
STATEMENT OF CONCERNS

The test kits are made for an easy way of analysis with a reduced amount of chemistry in comparison to the norm method. Because of this, the reagent container are very small and it is not possible to fulfill the complete requirements concerning the hazardous labeling. Additionally the documentation has to be multilingual.

The boxes are closed, when they were delivered, so that the complete information is on the box in several languages with an acceptable legibility. Multilingual labeling on the component label is nearly not possible. The pictogram is the important hazardous information, visible and non-lingual. The immediate container is not visible to the customer.

PROPOSED SOLUTION

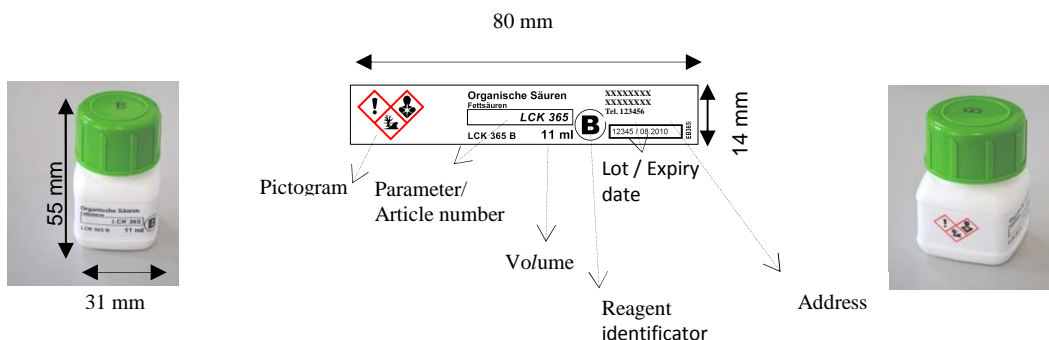
Cuvette:



13 mm

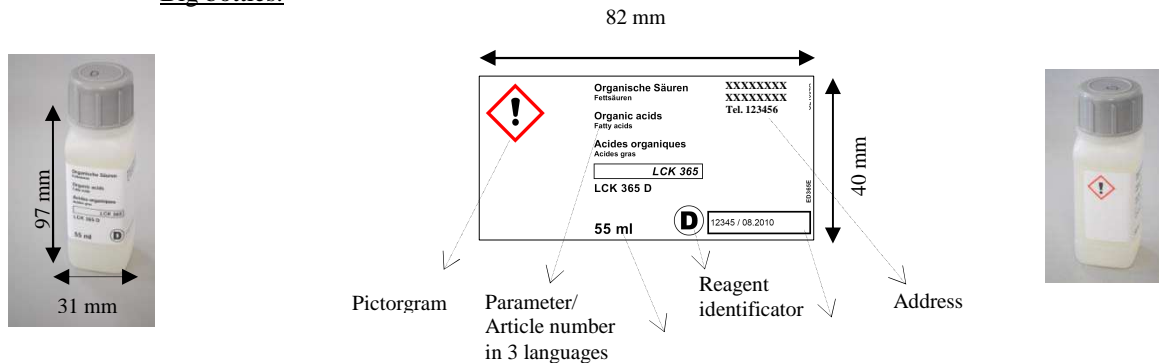
Due to analysis needs, only the upper part of the cuvette can be used for labeling. The lower part of the cuvette has to be free for the measurement. Therefore the cuvette label only contains the pictogram. There is space for maximal three pictograms and identifier. Other labeling elements are not possible because of the size and the needed multilingual languages (1.4.10.5.4.4. (b))

Small bottles:



Due to the small size of the bottle, this is the possible way to put the minimum needed information on the label. There is space for maximal five pictograms. Other labeling elements are not possible because of the size and the needed multilingual languages (1.4.10.5.4.4. (b))

Big bottles:



Due to the small size of the bottle, this is the possible way to put the minimum needed information on the label. There is space for maximal five pictograms. Other labeling elements are not possible because of the size and the needed multilingual languages (1.4.10.5.4.4. (b))

Cuvette test box:

The test boxes are a combination of outer and inner packaging:



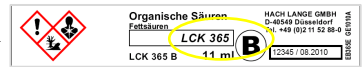
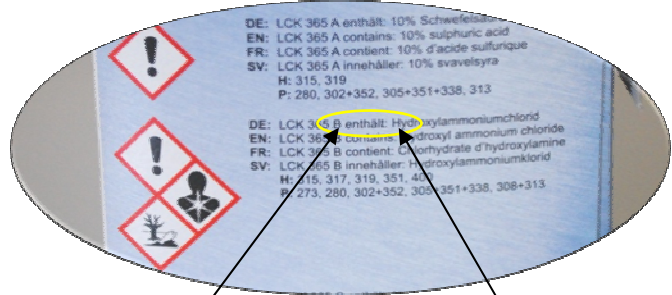
Because of the small sizes, the single components (inner packaging) have a minimum labeling.

The cardboard box is the outer packaging of the test kit. The single reagent components are in a clear relationship to the outer packaging (cardboard box). The identification is given via the reagent identifier, which is printed on the single reagent and recoverable on the box.

The single kit components are not saleable without the test kit, only in combination with a test kit.

Therefore the outer packaging (cardboard box) contains the complete hazardous labelling for the test kit, if possible in different languages.

At the left and right side of the cardboard box are the component related information listed in extended version and in multi-languages, like the pictograms, reagent identifier, hazardous product identifier, H- and P-codes.



On the backside of the cardboard box is the summary of all H- and P-codes and sentences, used on the both sides of the box, in the main languages:

