**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**　　　　　　　　**2 December 2014**

Twenty–eighth session
Geneva, 10 – 12 (morning) December 2014
Item 3 (b) of the provisional agenda
Hazard communication issues:
Labelling of small packagings

Labelling of small packagings

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

Introduction

1.　　At its 27th session the Sub-Committee noted that the informal correspondence group had agreed to discuss a second example addressing other labelling issues than those of the first one (document ST/SG/AC.10/C.4/2014/22) and their possible solutions.

Development of an example for multilingual fold-out labels

2.　　The example presented during the 27th session (document INF.16) has been developed further based on the discussion of the informal correspondence group.

3.　　The enclosed revised example is proposed for discussion by the informal correspondence group during the 28th session of the Sub-Committee.

4.　　As it is unlikely that the informal group completes the development of this example at this session, the Sub-Committee is invited to keep the item "labelling of small packagings" on its programme of work for the biennium 2015-2016. If this is agreed by the Sub-Committee, and pending the outcome of the meeting of the informal working group that will take place during this session, the informal working group may also wish to propose developing additional examples during the next biennium, like for instance, those addressing labelling of kits.
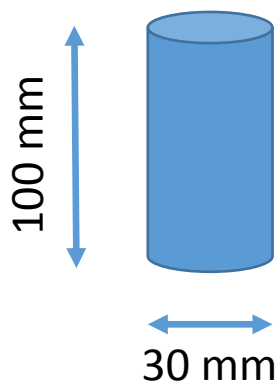
Example:

Multilayer booklet format/foldout label

(i) **Mixture and use:**

Solution for professional use

(ii) **Packaging description and size**

Metal container of 100 ml.

100 mm

30 mm

(iii) **Labelling problems encountered**

The mixture is required to carry a large number of GHS label elements (three hazard pictograms, three hazard statements and numerous precautionary statements).
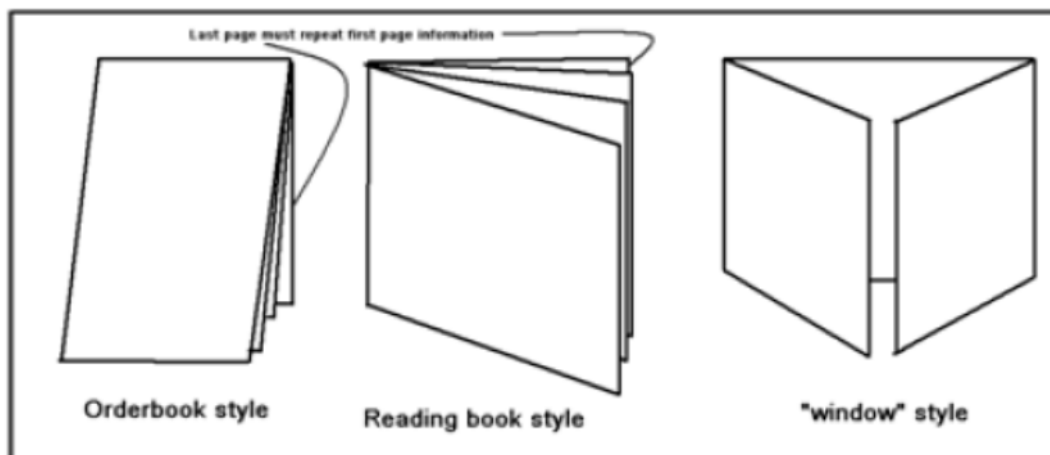
As the mixture is sold in a country with three official languages, the GHS label text elements together with the directions for use have to appear on the product label in all three languages. Taking into account the size and shape of the packaging, it is not possible to fit the entire label on the container.

(iv)   Possible options to address labelling problems encountered

Issue	Potential options	Comments
Not possible to put all applicable GHS label elements together with the directions for use (in the required official languages) on the immediate container due to its size and shape	Provide label elements in a fold-out label securely attached to the plastic bottle	Possible practical solution – fold-out label must be securely attached to the container and remain so during foreseeable conditions and period of use Provisions for fold-out labels e.g. what label elements must go on the front page and what elements could appear on the internal fold-out page(s)? Minimum size of pictograms or text to ensure the readability of the information? Layout of the pictograms – can they be contiguous or do they have to be separate?
	Provide label elements on a tie-on tag	Not practical as tie-on tag would need to be very large to accommodate all required labelling in the 3 official languages even with printing on both sides of the tag. Large tag may impede use of the product. Could possibly attach a fold-out label to the tie-on tag but no guarantee the tag would remain attached to the container – may impede user during application thus could possibly be removed. General principles require all applicable label elements to appear on immediate container where possible; also some label elements on the immediate container may need to be accessible to users throughout life of product. Would therefore also need to include minimum label elements on immediate container just in case the tie-on tag is removed by the user.
	Provide label elements on an outer packaging	Not an option – product is not supplied in outer packaging
	Increase the size of the container so that a larger label can be affixed	Increasing the size of the container is not practical from the intended use perspective

(v) Proposed/suggested solution

Multilayer booklet format/foldout label which is securely affixed to the immediate container (i.e. the fold-out label is attached so that it remains affixed during the foreseeable conditions and period of use). The fold-out label is produced in such a way that the front part cannot be detached from the remainder of the label.

Last page must repeat first page information

Orderbook style   Reading book style   "window" style

The information is structured as follows:

Front page: Information to be provided on the front page of the multilayer label should contain at least:
- Product name,
- Hazard pictogram(s)
- [Nominal quantity (in case the product is made available to the general public)]
- Supplier identification (name, address and telephone number of the company)
- Sentence indicating in which languages the full information is available inside. This sentence will be translated in each of the required languages on a label. The sentence could be the same as proposed for the first example:
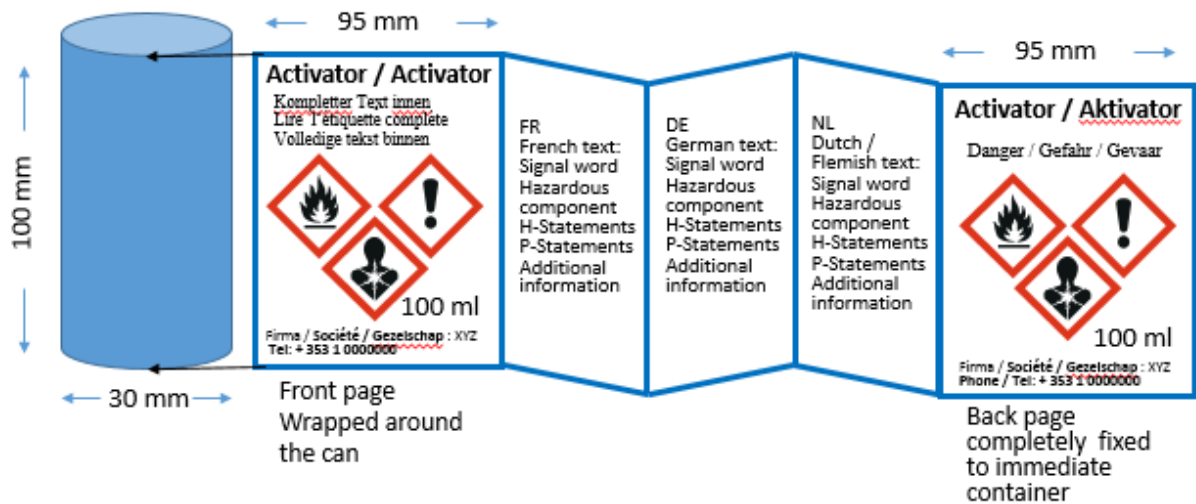   "Read full text inside".

Pages inside: Full product identifier including hazardous ingredients as applicable, signal word and hazard statements, precautionary statements, and directions for use.

As the product is sold in a country with more than one official language, the labelling information in the fold-out label would be provided in all required languages.

Back page (affixed to the immediate container):

- Product name,
- Hazard pictogram(s)
- Signal word
- [Nominal quantity (in case the product is made available to the general public)]
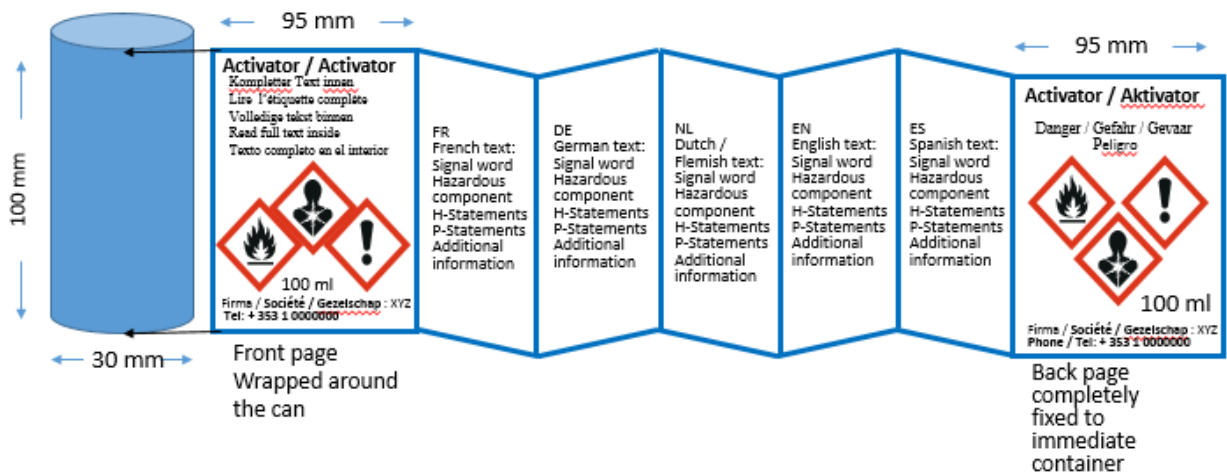- Supplier identification (name, address and telephone number of the company)

It is recognized that some regulatory systems (e.g. pesticides) may have specific requirements for the application of labels using a multilayer or booklet style format. Where this is the case, labelling would be undertaken in accordance with the competent authority's requirements.

Fold-out label with 3 official languages:

The above lay-out should also be allowed for additional languages, e.g. English and Spanish. The layout would then be:

Fold-out label with 5 languages (3 official languages and 2 additional languages):

The texts on the inside pages can also be distributed on more than one page, if the space is not sufficient. It is better to spread the text on more than one page than to have smaller letters. The text blocks should have indicators of the language to make it easier for the reader to identify the correct language.