

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 (d) of the provisional agenda

Hazard communication: other issues

Amendments to Annex 7, examples 1 - 7

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(UNITAR)

Introduction

1. At the thirty-third session, the proposal of UNITAR (UN/SCEGHS/33/INF.9) to amend Annex 7, example 7 was discussed and was welcomed with recommendations for further amendments, also with respect to other examples in annex 7.
2. This informal paper proposes amendments to annex 7, examples 1-7 on combination and single packagings, to improve consistency with requirements and recommendations of the GHS text (specific references are to the 7th revision), particularly as it relates to using the examples for capacity building activities.

Issues

3. Stakeholders rely on the GHS text in order to provide clear and consistent guidance to those responsible for implementing the GHS. Furthermore, the text is as an integral tool and point of ultimate reference for training and capacity building.
4. As capacity building is an integral part of the GHS, and one of the functions of the Sub-Committee is “to promote understanding and use of the GHS and to encourage feedback”, UNITAR would like to propose that the Annex 7 is amended to ensure that the examples better presents the requirements of the GHS and the spirit of other recommendations. These revised examples would serve as more consistent examples of where to place GHS information.

Proposal

5. The proposal for amending the examples covers the following issues, and should be read in conjunction with the annex to this document, with the proposed changes incorporated:
 - (a) In the header of each example the correct classification, i.e. Hazard class and Category of the product/chemical is given.
 - (b) In examples 1 to 3, the word “warning” is removed in the line Inner label; thus, it reads: “Inner packaging: Plastic bottle with GHS hazard label”. The term “hazard warning label” is not defined and not common.
 - (c) In order to make the examples more illustrative, the respective hazard statements are given and in addition one applicable precautionary statement for each hazard type with a reference for further P statements in Annex 3,

Section 3. This would be an additional piece for “promoting the understanding and use of the GHS”.

- (d) In examples 2 and 5 the type of STOT is given, i.e. Single exposure in example 2 and Repeated exposure in example 5, to make it clear.
- (e) In reviewing the seventh revised edition, UNITAR noticed that example 4 contains an exclamation mark, but no pertaining hazard given. This is acknowledged as a mistake and thus is to be removed as a corrigendum, as opposed to an amendment. Ultimately, the pictogram exclamation mark should be removed. This would complement document UN/SCEGHS/34/INF.11 on Corrections to the seventh revised edition of the GHS.
- (f) At the end of the Notes to examples 4 and 5 an addition is proposed: “(see Example 7)”
- (g) Example 7:
 - (i) In the additions to the proposed introduction under (e) the following text is added: “Whereas some regulatory authorities require a size of the pictogram ‘sufficiently wide to be clearly visible’, others prescribe a minimum size or certain relation of the pictogram size to the size of the whole label.
 - (ii) At the end of the introduction the following section: “This example does not intend to cover all specific requirements which have been included in national legislation with the implementation of the GHS nor all possible additional information. It reflects rather the required basic GHS information as described in paragraph 1.4.10.5.2.

First panel:

- “Code” and “Product name” are substituted by the name “Flamtoxin”
- With respect to the suggestion that the chemical identities of ingredients contributing to acute toxicity should be included in the label, the item “**Contains XXX**” is added. (see paragraph 1.4.10.5.2 (d) (ii))
- Emergency phone number was removed, since in the GHS it is only a requirement for SDSs

Second panel:

- The statement “Read label before use” was moved up in order to fulfil its intended purpose
- P102 - Keep out of ~~the~~ reach of children” was removed, since the product is not for consumer use (a 200 l drum; s. Annex 3, Table A3.2.1)
- The size of the GHS pictograms has been slightly increased in order to emphasize its eye-catching function, thus, taking the original proposal of UNITAR and concerns expressed during the discussion of proposal 5(e) in INF 9 for increasing the GHS pictogram size.
- The arrangement of the label element was structured to reflect the requirements in 1.4.10.5.4.1 in the order: Pictograms, Hazard statements and precautionary statements.
- P260 was adapted to applicable conditions, by removing the slash terms with dust/fume/gas to read as “Do not breathe mist, vapour, spray”
- P280 was adapted to “Wear protective gloves, protective clothing, and eye protection.”
- P370 + P378: The dots were substituted to read now as “In case of fire: Use dry powder to extinguish”
- The word FIRST AID was removed, since it is not a type of P statement according to Annex 3, A3.2.2.1 and not necessary.

- P312 – Specified by deleting POISON CENTER in order to read “Call a doctor if you feel unwell”

Third panel:

Removal of (Universal Product Code (UPC))

Annex

Revised examples 1 to 7 in Annex 7

Note: Example 8 remains unchanged

“Annex 7

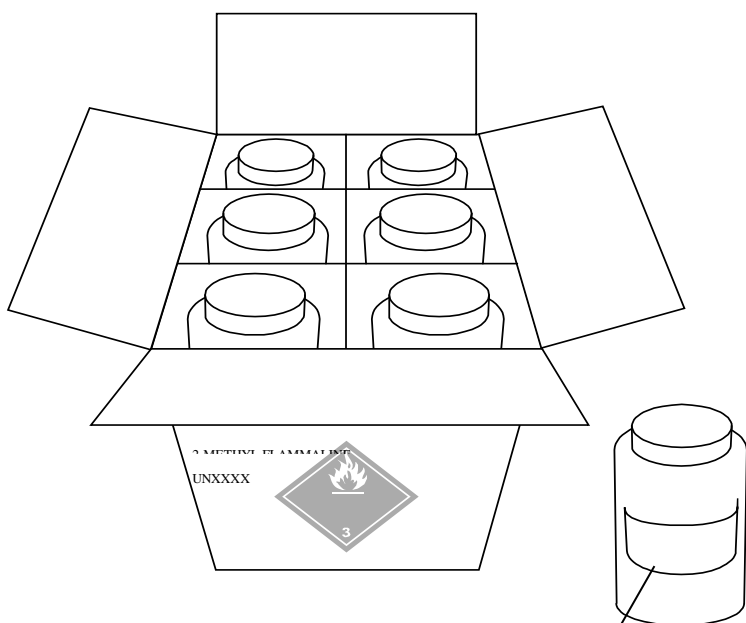
EXAMPLES OF ARRANGEMENTS OF THE GHS LABEL ELEMENTS


The following examples are provided for illustrative purposes and are subject to further discussion and consideration by the GHS Sub-Committee.

Example 1: Combination packaging for a chemical classified in Flammable liquids Category 2 ~~flammable liquid~~

Outer Packaging: Box with a flammable liquid transport label*

Inner Packaging: Plastic bottle with GHS hazard ~~warning~~ label**



2-METHYL FLAMMALINE	Product identifier (see 1.4.10.5.2 (d))
	SIGNAL WORD: <u>Danger</u> (see 1.4.10.5.2 (a))
Hazard statements: <u>Highly flammable liquid and vapour</u> (see 1.4.10.5.2 (b))	
Precautionary statements: <u>Keep away from heat, hot surfaces, sparks, open flames, and other ignition sources. No smoking</u> (see 1.4.10.5.2 (c)) and for further applicable P statements Annex 3 Section 3)	
Additional information as required by the competent authority as appropriate.	
Supplier identification (see 1.4.10.5.2 (e))	

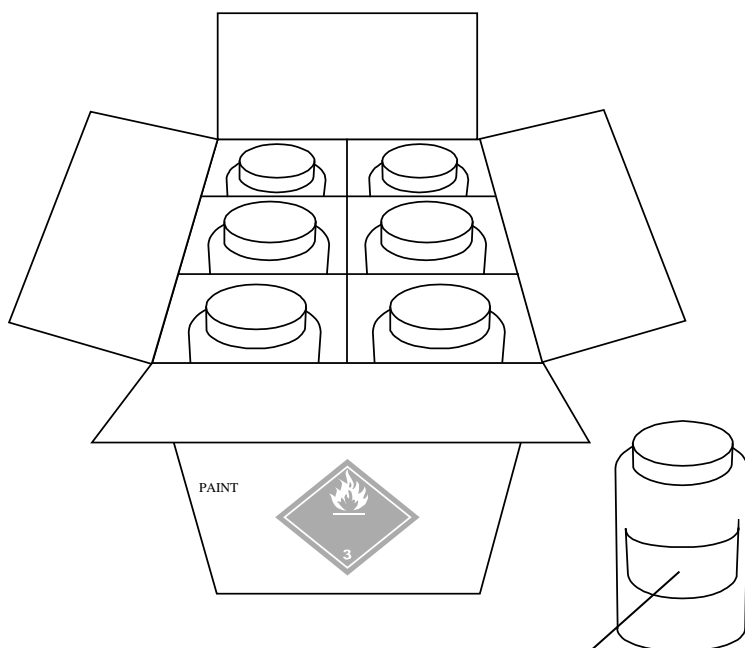
* Only the UN transport markings and labels are required for outer packagings.

** A flammable liquid pictogram as specified in the “UN Recommendations on the Transport of Dangerous Goods, Model Regulations” may be used in place of the GHS pictogram shown on the inner packaging label.

Example 2: Combination packaging for a chemical classified in flammable liquids Category 1-specific2 and in Specific target organ toxicant and toxicity - Single exposure Category 2 flammable liquid 2

Outer Packaging: Box with a flammable liquid transport label*

Inner Packaging: Plastic bottle with GHS hazard warning label**



**PAINT (FLAMMALINE,
LEAD CHROMOMIUM)**

Product identifier

(see 1.4.10.5.2 (d))



**



SIGNAL WORD: **Danger** (see 1.4.10.5.2 (a))

Hazard statements: **Highly flammable liquid and vapour.**
May cause damage to organs. (see 1.4.10.5.2 (b))

Precautionary statements: **Keep container tightly closed. Do not breathe mist, vapours, spray.** (see 1.4.10.5.2 (c)) and for further applicable P statements Annex 3 Section 3)

Additional information as required by the competent authority as appropriate.

Supplier identification (see 1.4.10.5.2 (e))

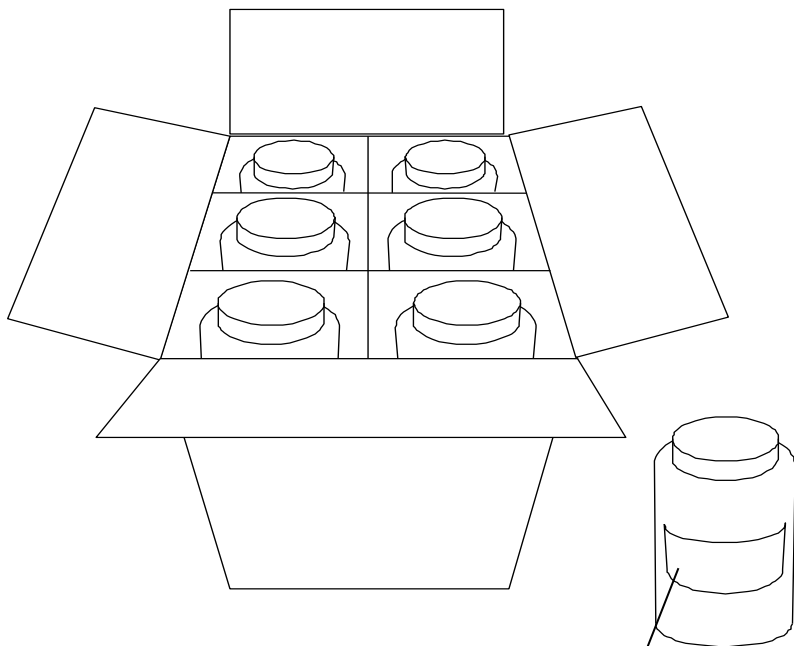
* Only the UN transport markings and labels are required for outer packagings.


** A flammable liquid pictogram as specified in the UN Recommendations on the Transport of Dangerous Goods, Model Regulations may be used in place of the GHS pictogram shown on the inner packaging label.

Example 3: Combination packaging for a chemical classified in Skin irritation Category 2 ~~skin irritant~~ and in Eye irritation Category 2A ~~eye irritant~~

Outer Packaging: Box with no label required for transport*

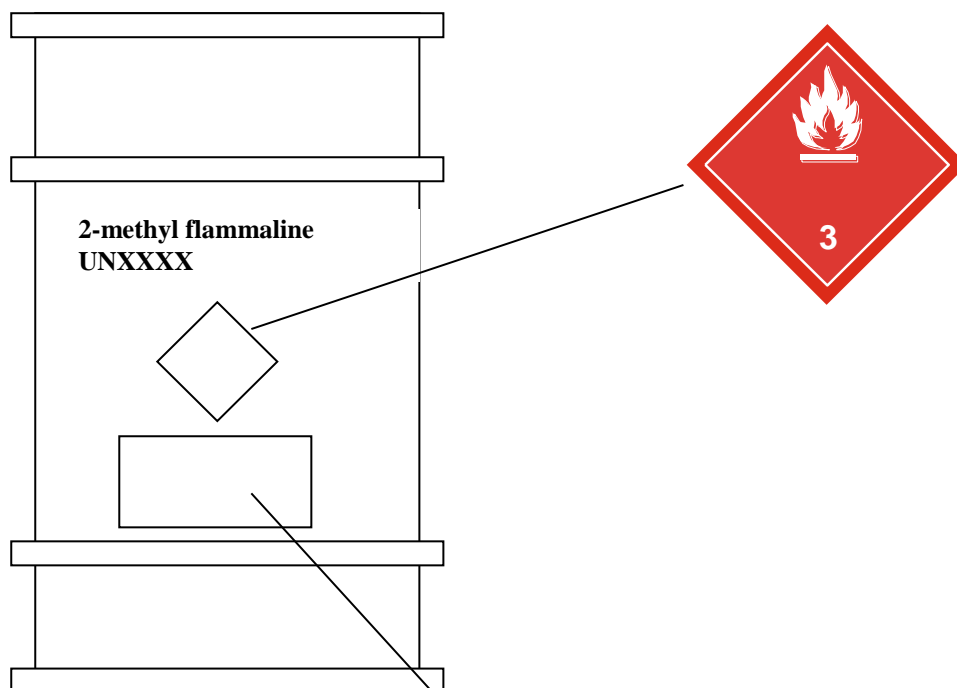
Inner Packaging: Plastic bottle with GHS hazard ~~warning~~ label



BLAHZENE SOLUTION	Product identifier (see 1.4.10.5.2 (d))
	SIGNAL WORD: <u>Warning</u> (see 1.4.10.5.2 (a))
	Hazard statements: <u>Causes skin and serious eye irritation</u> (see 1.4.10.5.2 (b)); <u>Annex 3, A3.3.2.3</u>)
	Precautionary statements: <u>Wear protective gloves, eye and face protection</u> (see 1.4.10.5.2 (c)) <u>and for further applicable P statements Annex 3 Section 3</u>)
Additional information as required by the competent authority as appropriate.	
Supplier identification (see 1.4.10.5.2 (e))	

* Some competent authorities may require a GHS label on the outer packaging in the absence of a transport label.

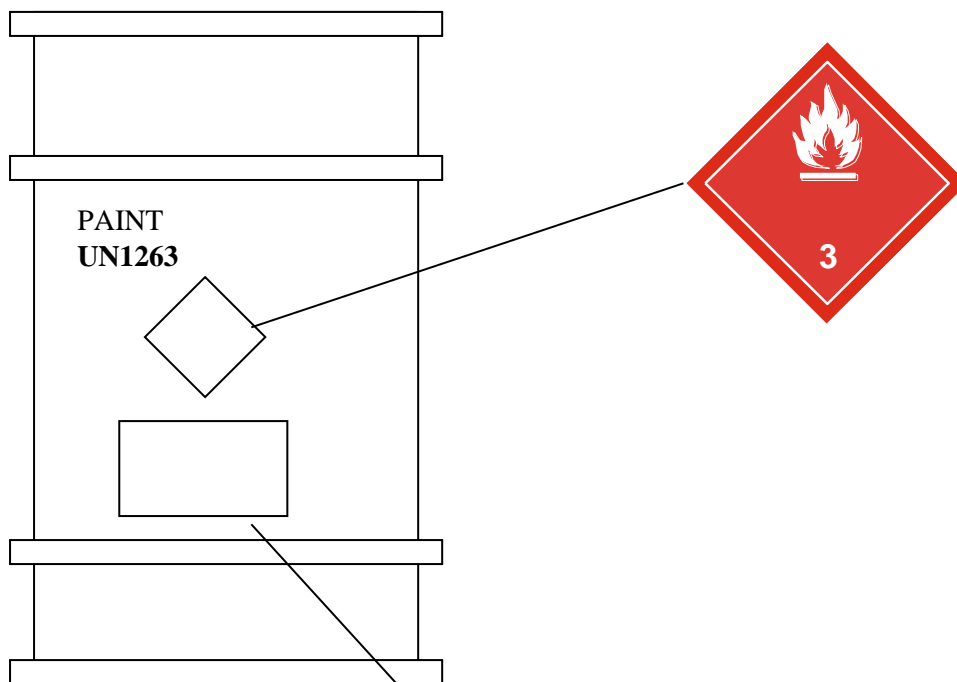
Example 4: Single packaging –(200 l drum) for a chemical classified in Flammable liquids Category 2 flammable liquid



2-METHYL FLAMMALINE	Product identifier (see 1.4.10.5.2 (d))
	SIGNAL WORD: <u>Danger</u> (see 1.4.10.5.2 (a))
	Hazard statements: <u>Highly flammable liquid and vapour</u> (see 1.4.10.5.2 (b))
	Precautionary statements: <u>Use carbon dioxide to extinguish</u> (see 1.4.10.5.2 (c)) <u>and for further applicable P statements Annex 3 Section 3)</u>
	Additional information as required by the competent authority as appropriate.
	Supplier identification (see 1.4.10.5.2 (e))

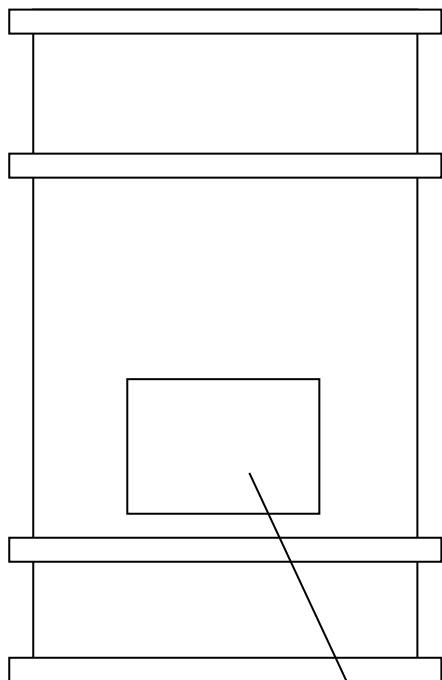
Note: The GHS label and the flammable liquid pictogram and markings required by the “UN Recommendations on the Transport of Dangerous Goods, Model Regulations” may also be presented in a combined format (see Example 7).


Example 5: Single packaging for a Category 1 specific chemical classified in Flammable liquid Category 2 and Specific target organ toxicant and toxicity - Repeated exposure Category 2 flammable



<p>PAINT (METHYL FLAMMALINE, LEAD CHROMOMIUM</p>	<p>Product identifier (see 1.4.10.5.2 (d))</p>
	<p>SIGNAL WORD: <u>Danger</u> (see 1.4.10.5.2 (a))</p> <p>Hazard statements: <u>Highly flammable liquid and vapour. Causes damage to organs through prolonged or repeated exposure</u> (see 1.4.10.5.2 (b))</p>
<p>Precautionary statements: <u>Use non-sparking tools. Wash hands thoroughly after handling</u> (see 1.4.10.5.2 (c)) <u>and for further applicable P statements Annex 3 Section 3)</u></p>	
<p>Additional information as required by the competent authority as appropriate.</p>	
<p>Supplier identification (see 1.4.10.5.2 (e))</p>	

Note: The GHS label and the flammable liquid pictogram and markings required by the “UN Recommendations on the Transport of Dangerous Goods, Model Regulations” may also be presented in a combined format. (see Example 7)

Example 6: Single packaging for a Category 2 skin irritant and Category 2A eye irritant

BLAHZENE SOLUTION	Product identifier (see 1.4.10.5.2 (d))
	SIGNAL WORD: <u>Warning</u> (see 1.4.10.5.2 (a))
Hazard statements: <u>Causes skin and serious eye irritation</u> (see 1.4.10.5.2 (b))	
Precautionary statements: <u>Wear protective gloves and eye protection</u> (see 1.4.10.5.2 (c)) <u>and for further applicable P statements Annex 3 Section 3)</u>)	
Additional information as required by the competent authority as appropriate.	
Supplier identification (see 1.4.10.5.2 (e))	

Example 7: Additional guidance when transport and other GHS information appear on single packagings

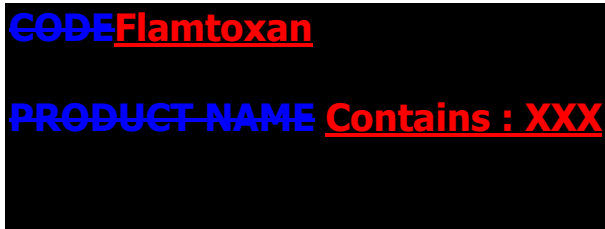
- (a) Where transport and other GHS information appear on a single packaging (e.g. a 200 l drum), consideration must be given to ensure that the label elements are placed in a manner that addresses the needs of the different sectors;
- (b) Transport pictograms must convey information immediately in an emergency situation. They must be able to be seen from a distance, as well as in conditions that are smoky or otherwise partially obscure the package;
- (c) The transport-related pictograms are distinct in appearance from pictograms intended solely for non-transport purposes which helps to distinguish them;
- (d) The transport pictograms may be placed on a separate panel of a GHS label to distinguish them from the other information or may be placed adjacent to the other GHS information on the packaging;
- (e) The pictograms may be distinguished by adjusting their size. Generally speaking, the size of the non-transport pictograms should be proportional to the size of the text of the other label elements. This would generally be smaller than the transport-related pictograms, but such size adjustments should not affect the clarity or comprehensibility of the non-transport pictograms. Whereas some regulatory authorities require a size of the pictogram “sufficiently wide to be clearly visible”, others prescribe a minimum size or certain relation of the pictogram size to the size of the whole label;
- (f) This example does not intend to cover all specific requirements which have been included in national legislations with the implementation of the GHS nor all possible additional information. It reflects the required basic GHS information as described in paragraph 1.4.10.5.2

The following is an example of how such a label may appear:

Single packaging using 3 adjacent panels to convey multiple hazards.

Product A mixture classified as: (a) Category 2 Flammable liquid; Category 2, (b) Acute toxicity- Inhalation Category Acute 4 (by inhalation); and (c) Category 2 Specific target organ toxicant following repeated toxicity - Repeated exposure. Category 2

Read label before use



COMPANY NAME

Danger
Keep out of the reach of children.
Read label before use.

UN Number
Proper shipping name

Street Address
City, State, Postal Code, Country
Phone Number
Emergency Phone Number

DIRECTIONS FOR USE: XXXX
XXXXXXXXXXXXXXXXXXXX _____
XXXXXXXXXXXXXXXXXXXX _____
XXXXXXXXXXXXXXXXXXXX _____

Highly flammable liquid and vapour.
Harmful if inhaled.
May cause liver and kidney damage through prolonged or repeated exposure.

[Universal Product Code (UPC)]

Fill weight: XXXX Lot Number: XXXX
Gross weight: XXXX Fill Date: XXXX
Expiration Date: XXXX

Keep container tightly closed.
Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
Use only outdoors or in a well-ventilated area.
Do not breathe dust/fume/gas/mist/_ vapours/_ spray.
Wear protective gloves, protective clothing/ and eye protection/face protection/hearing protection/...
Ground and bond container and receiving equipment.
In case of fire: Use [as specified] dry powder to extinguish.

FIRST AID

IF INHALED: Remove person to fresh air and keep comfortable for breathing.
Call a POISON CENTER/doctor if you feel unwell.
Store in a well-ventilated place. Keep cool

