**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 8 of the provisional agenda
Programme of work for the biennium 2019-2020

Proposal for a work item for biennium 2019-2020: digitalization and GHS hazard communication

Submitted by the International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.) and Responsible Packaging Management of Southern Africa (RPMASA)

Background

1.   New ways of purchasing goods (including hazardous chemicals) are creating challenges, and opportunities in the way hazard information can be communicated. Increasing access to the internet, smartphone and tablet use is facilitating a move towards online purchasing. As a result, on-line commerce is flourishing with forecasted double-digits growth for the years to come.

2.   On-line purchase may be done either via handheld devices such as smartphones and tablets or with personal computers. This variety of channels might create issues in the way the hazard information can be displayed as the typical amount of information requested by a GHS label can be easily displayed on a desktop computer screen, whereas, mobile devices can only accommodate reduced information.

3.   This creates challenges in terms of which information could be communicated digitally before an online purchase (e.g. which information should be displayed first and in which order etc.). Currently, there are no guidelines on the way hazardous information should be communicated and/or displayed digitally.

4.   Digitalization offers substantial opportunities in terms of an improved hazard communication for consumers and workers: e.g., language and adaptable font size to the user needs/preferences; customized search options for key words could allow a swift identification of the key information (e.g. presence of any, or a specific sensitizing substance/s). Information such as safe use instructions could also be easily accommodated digitally.

5.   Annex contains existing examples on how industry provides information on hazardous chemicals to users in a digital format; together with potential use of QR codes, this provide opportunities to expand and improve digital communications.

Discussion

6.   The increasing use of digital technologies and on-line purchases create new challenges in the way the information on hazardous products is provided to the general public. It is considered opportune to explore how GHS hazard communication can be conveyed in a consistent and effective way also via digital means (e.g. through development of guidelines, best practices etc.)

7.   Consumer research, (see informal document INF.5[1], 34th session) has shown that the current regulatory implementation of the GHS labelling of chemicals may not be fully effective at conveying safe use and hazard information to the general public. Consumers experience the labels as overloaded and unattractive, and text is often too small to read. In addition, consumers frequently find the content too technical and difficult to understand, hence miss the crucial safety warnings.

8.   A.I.S.E and RPMASA believe that the growing use of digitalization in developed as well as developing regions could greatly improve the effectiveness of hazard and safe use communication to consumers and workers. Adoption of a tiered approach would allow the physical label on the product packaging to be dedicated to the most relevant and critical elements, while more technical aspects of the GHS label could be provided on-line.

Proposal

9.   At its thirty-fifth meeting the Sub-Committee discussed how to address the use of new digital technologies such as electronic labels and QR codes (Informal working group on labelling of small packaging). The Chair of the Sub-Committee invited the expert from China to provide a document on this issue for the next session. A.I.S.E. & RPMASA would like to contribute to this important topic via the following proposal.

10.   In order to tackle these challenges and the opportunities in a systematic way, it is proposed to include a new work item for biennium 2019-2020 to explore how GHS hazard communication can be conveyed in a consistent and effective way via digital means.

11.   This activity could be carried out by the Informal Working Group on "Hazard communication: labelling of small packaging". The following draft Terms of Reference are proposed:

- Based on the fast-growing digitalization of society, it is considered appropriate to conduct a review of the existing digital means of communication that could be used to convey GHS hazard information. This should include development of guidelines on how to best provide this information digitally.

- Consideration should be given on how to differentiate between which GHS hazard elements are critical to place on the package label, versus elements that are less critical (although they may be relevant to all, or some users) therefore do not need be directly visible each time the product is used, or at the point of purchase.

- It will also be important to consider and explore backup solutions for users who are unable to connect to digital (Internet) information.

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[1]   Please refer to https://www.unece.org/fileadmin/DAM/trans/doc/2017/dgac10c4/UN-SCEGHS-34-INF05e.pdf

12.   A number of Sub-Committee members and Non-Governmental Organizations expressed a general support in principle of addressing these issues within a working group and participating in its activities.

13.   The Sub-Committee is invited to consider the inclusion of the above proposals and draft Terms of Reference in the program of work for the next biennium.

Annex

Existing examples on how industry provides/could provide information on chemicals to users in a digital format:

(1) Ingredient information

The EU Detergents Regulation (EC) No 648/2004 requires that manufacturers make available on a website an ingredient data sheet for each product, containing the names of all ingredients (using international nomenclature). The website address, from which this list of ingredients can be obtained, shall be given on the packaging. Typically, these websites allow the consumer to retrieve information for the product of interest via a selection or a search tool based on the country, product form, and brand name. Subsequently the consumer is presented with a shortlist of products (brands / variants) from which to select the actual product. This approach has been implemented in practice for over a decade and it has proven to be practicable and effective.

(2) Regulatory requirements

Current South African Regulations include those for Transport, Road Traffic Act Chapter VIII, Dept of Labour - Hazardous Chemical Substances Regulations, Dept of Health - Hazardous Substances Act and the Dept of Trade and Industry - Consumer Protection Act (right to know) as well as the Promotion of Access to Information Act (right to know). All have a requirement for labelling of dangerous substances and hazardous materials - to prevent harm to persons and the environment - that as a minimum shall have the Product name, the Manufacturers name and 24hour emergency contact number, together with the nature of the hazard and any emergency actions. All carry penalties for non-compliance, but none currently prescribe use of the internet. Several of the pieces of legislation are currently under revision to include GHS compliance. This may provide an opportunity to include use of digital methods in line with global guidelines.

(3) SmartLabel

In the context of "Right to Know", SmartLabel was recently introduced in the United States and Canada as a tool that gives consumers a way to digitally access more detailed product information than can fit on a label. It covers a wide range of products (e.g. food, beverage, household care, personal care). Consumers can access it by searching www.smartlabel.org; by visiting a participating company's or brand's website; by scanning an on-pack code; or via an app. Currently there are more than 40 companies and hundreds of brands using SmartLabel on tens of thousands of products.

(4) Safe use and sustainability guidance

Since 2008, the EU Detergent and maintenance products industry has made available to EU consumers the www.cleanright.eu portal; this one provides consumer-focused information, in all EU languages, about several safety and sustainability aspects: safe use practice, meaning of the regulatory information on the labels, tips for sustainable consumption, function of detergent ingredients etc. (refresh of the site is scheduled for early 2019).