

UN/SCETDG/18/INF.20

INFORMATION PAPER (Transmitted by the Chairman)

SUMMARY REPORT ON THE 5th MEETING OF THE ILO WORKING GROUP FOR THE HARMONIZATION OF CHEMICAL HAZARD COMMUNICATION

The meeting took place at the ILO Headquarters (Geneva) from 22 to 25 May 2000.

After the approval of the Agenda, of the report of the previous meeting, and of the Step 1 Detailed Review Document, the Step 2 Document (Towards Harmonization of Hazard Communication) was discussed, with reference to:

- Part A: general principles
- Part B: label harmonization
- Part C: safety data sheet harmonization.

General Principles

It was confirmed that cosmetics would not require labelling when used as a consumer product but would require labelling in other settings such as the workplace.

CTIF re-emphasised the need for information about physical state, hazard level and, for acute toxicity, the route of exposure for emergency responders.

The ILO Secretariat would arrange a workplan for the project team on comprehensibility, when a consultant will be identified.

On the problem of how suppliers should respond to new and significant information, particularly where this had led to reclassification, some concern was expressed about how this approach could be applied in circumstances where a chemical was subject to regulatory classifications such as the Dangerous Goods list used in the UN RTDG. There was some discussion of what was meant by 'new and significant information' and how systems currently responded to developments. There was no consensus identified for removing options at this stage but a clear indication that further elaboration of the meaning of 'new and significant' information was required in addition to discussion of any practical problems concerning regulatory classifications.

On Confidential Business Information it was believed that further work should be undertaken to explore whether and how the issues could be resolved.

Labelling

Symbols

There was consensus for using 3 symbol groups to cover flammability, reactivity and explosivity. The flame, flame over circle and exploding bomb were identified as possibilities for use. However it was noted that the use of the flame over circle was required for transport but concerns comprehensibility remained about its use for consumers. The extent to which it would be used in consumer products could be further examined

Metal corrosion would be grouped with the health corrosion hazards and be allocated a corrosion symbol which had yet to be determined, although the possibility of a separate symbol for metal corrosion was also discussed. There were currently 4 different symbols used for corrosivity and further discussion to identify which should be used would be required.

Skull and crossbones should be used for acute toxicity (hazard levels 1-3): they could be used more widely than for the hazard levels 1-3 for acute toxicity, although there were some reservations as to the impact on the UN RTDG.

Divided opinions were expressed on the merit of using eye-catching symbols such as the St Andrew's Cross, Stylised 'T' and ISO exclamation mark to convey a general hazard alert

Divided opinions were expressed whether for carcinogens, mutagens and reproductive toxicity, a symbol should be used at all, or for hazard levels 1A and 1B only.

Agreement was expressed for using a symbol to identify respiratory and skin sensitisers.

For ecotoxicity, some participants preferred the warning about effects on the aquatic environment conveyed by the fish in water symbol; others felt this could be misleading and cause comprehensibility problems; there was also some concern expressed about the implications for IMO if this symbol was not selected.

Signal Words

There was considerable discussion about the purpose of using signal words and how they could be used in the GHS.

There was some support for restricting the use of signal words to instances when symbols may not be used.

There was some doubt expressed as to whether this could be harmonised and the implications of this should be explored further.

Product identifiers for substances

There was some concern to introduce sufficient flexibility to address specific target audience requirements. It was accepted that a clear decision-logic would be required to determine when and which product identifiers should be used.

Product identifiers for mixtures

Concern was highlighted on the necessity of ensuring there was sufficient flexibility in the system to accommodate different target audience requirements for information. However, it was not felt appropriate to leave this entirely to labeller discretion. It was noted that whilst the trade name would always be on the label it was not clear that it should be used as a product identifier in the same way as a chemical, common or other specialised term.

Multiple Hazards

Options had been identified for two discrete areas – a general precedence of hazard and how this might be applied to the label. During the discussion it became clear that the application of the precedence was required for the number of and order in which symbols should appear, and additionally for the order in which other information such as hazard statements should appear.

On the options identifying a hierarchy, there was a divergence of opinion as to whether hazard levels should have an influence. It was noted that in transport the hierarchy applies to the classification process and acute toxicity can precede flammability in some cases. In addition it was noted that the precedence might be used to determine what information should appear on small labels. It was agreed that the issues should be explored further with the implications for harmonisation of labelling clearly established.

Colour

In transport the use of colour to convey specific hazard warnings was well established and divergences would require considerable training effort. There was wide support for retaining the existing use of colour for transport but less support for using these colours for the supply of chemicals to other target audiences

Background Patterns

The issues concerning the use of background patterns were identified as being inextricably linked to the use of colour. Background patterns were used in transport together with colour to convey specific hazard warning information. There was no support for using background patterns in supply. However, emergency responders were concerned to continue discussion on the use of a background pattern to identify physical state.

Physical State

The options developed by CTIF for conveying physical state should be considered further as options for background patterns.

Pictogram Frame

There was a consensus for developing a uniform shape for the pictogram frame. It was agreed to leave the options for other shapes open at this stage.

Small containers

Opinion was divided on the merits of developing harmonised arrangements for small containers (generally transported in outer packagings). Some participants believed there were implications for harmonisation where modified labelling led to a reduction in the information provided on the labels of small containers.

Bulk packages

As with small containers there were some differences of opinion on the merits of specifying requirements for bulk packaging. It was noted that in transport dealt routinely with bulk packages which were specifically defined according to the type of container e.g. IBC. In many of these situations placards were used. In other use-settings such arrangements were less common and there was no consensus in favour of developing harmonised arrangements for placarding.

(Material) Safety Data Sheets

It was agreed on the ISO format with 16 headings

Next Meeting

Next meeting would be in week commencing the 30 October 2000 in Rome. The 15 September 2000 is the closing date for receipt of papers for the meeting.
