

UN/SCEGHS/5/INF.17/Add.3

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(Fifth session, 7-9 July 2003,
agenda item 2)

First Report of the Inter-sessional Working Group on Labelling

Comments by industry (RHODIA)

Dear Work Group Members:

Attached is an e-mail I received from a US industry colleague that comments on issues raised by Bill Machin in his thought starter (**see INF 17/Add.1**). Other responses and comments are welcome to further the dialogue on the labeling issues. Please "reply all" when responding so all work group members will have the benefit of your thoughts.

Best regards,

Jennifer

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Message from "Edminster, Donna" <Donna.Edminster@us.rhodia.com> on Wed, 30 Apr 2003 16:57:37 -0400 -----

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Subject: Display of Transport and GHS pictograms

Jennifer:

I am writing on behalf of Rhodia Inc. regarding a recent communication that was forwarded to us via the Dangerous Goods Advisory Council. This communication concerned a proposal regarding the appearance and position of the transport pictogram versus the GHS elements on a GHS label. It also included a copy of an e-mail from Mr. Bill Machin of CEFIC elaborating further upon this proposal. I was extremely concerned in reading Mr. Machin's e-mail to find that he was advocating the position that the transport pictogram would be required to be separate from the GHS label. The basis for his reasoning was the assumption that the cost

of the required stock necessary to comply with transport performance requirements would be prohibitive and impractical to shippers if combining the GHS and transport pictograms on a single label.

While Mr. Machin's argument may have merit for some shippers, if you were to survey the field of US shippers today, you would see that a large number of them routinely combine RTK information with transport information on the same label. In terms of economics, when using a labeling system that standardizes on one size of label stock; that has the capability of printing the required pictograms; and that can pull the required RTK and shipping information directly from your internal systems and combine them on one label; and which is utilized by every plant within your corporation, resulting in volume discounts from label vendors, then the argument regarding prohibitive cost and impracticality just doesn't hold up. In fact, from a practical point of view, the ability to print a single label with all the required elements present on it is vastly preferable to the need to print more than one label for a single package. It reduces handling of the package on the part of plant personnel; cuts down on the cost of materials used in the process (printers; ribbons; inks; label stock to name a few) and promotes compliance with applicable regulations. Not to mention the fact that it just looks much neater and cleaner.

Rhodia currently uses such a system in both US and Canadian plant locations. The occurrence of problems with shipments has been reduced drastically since it's implementation approximately 4+ years ago. For that reason, we strongly support the position that display of the transport pictogram on the same piece of label stock as appears the GHS elements be permitted. Rather than mandating separation, the GHS text should allow the option to display the transport pictogram either on or adjacent to the GHS label.

Mr. Machin also discussed the issue of the size of the GHS pictograms. It has been suggested that there be imposed a maximum size of 2" (50.8 mm) on a side for these pictograms. This would be approximately 1/2 the size of a transport pictogram, and yet would still allow the capability to differentiate between the two based on size alone. A pictogram that is 2" on a side measures approximately 3" from point to point when in a diamond configuration. This would seem more than large enough for practical use. Remember, the GHS pictograms will never be appearing on really large packaging like freight containers, tank trucks, tank cars or ISO tanks. In general, the pictograms would be appearing on small portable tanks, IBCs, drums and smaller packaging. Given that an IBC runs, on average, about 4'H x 4'W x 4'L, the face panel is only 4 ft. square. However, since the large majority in service are rigid plastic in steel cages, they only come with a panel of approximately say 30" long by 20" high on which to affix product labels and placards. Within this usable space for labeling purposes, a 3" high pictogram would be visible from at least 5 to 10 feet away if not further. While this size restriction is a suggestion only, we believe it is a necessary step to allow the transport community the ability to differentiate between the two, and thereby reduce potential errors regarding enforcement, storage, segregation and handling.

I appreciate the opportunity to offer these comments to you regarding GHS label elements. I realize that this proposal is only a starting point, but felt it was necessary to get a US industry position in front of the workgroup for their consideration. I would be more than glad to discuss this issue further with you should you have any questions regarding my comments.

Regards,

Donna

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