

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

REPORT OF THE CORRESPONDENCE GROUP ON LABELLING

The Chair provided background on the work done to date and invited the CEFIC representative to describe the proposal he had submitted to the Working Group. This was followed by a discussion about the group's views on developing guidance or modifying the GHS text in 1.4.10. Ultimately, the group concluded that guidance will be done first in conjunction with additional examples. Then the Working Group will review 1.4.10 to see what needs to be incorporated into the GHS text itself.

Each of the areas the Working Group was formed to address were then discussed. Many opinions were expressed regarding the issue of size and placement. In particular, comments were provided regarding the size of pictograms used to convey hazards in the transport sector vs. those that only address hazards in other sectors. There was general agreement that the transport sector needs to have pictograms of a certain size in order to be seen from a distance in the event of emergency response. Views on aspects related to the size of GHS pictograms for other sectors were more diverse.

Members agreed that we lack a clear understanding of terminology as used in different sectors and that this should be addressed in the work. There was also some agreement that the second area of work – distinction between transport and other sector pictograms – has already been addressed to some extent and may not need much work by the group.

With regard to the third issue on precedence of hazards, there was general consensus that we would not be attempting to harmonize the transport precedence to a precedence for other hazardous effects. The purpose for transport is to identify the most important hazard class in terms of emergency response. In the other sectors the purpose is to avoid having too much information when there are multiple effects but not to be so limiting as transport.

The Working Group agreed on a way forward for the work. By August 15, members will send to the Chair any additional written comments or suggestions. She will use this information to begin drafting guidance for these areas. Meanwhile, ICCA will be collecting additional examples of labels that address various packaging or package situations, and will circulate these to the Working Group by September 1.

The Working Group will then review both the examples and the draft guidance to begin refining what will be provided in the guidance document for these issues. The goal is to have an informal paper available 4-10 weeks before the December meeting that will include the work completed by the group for consideration by the SCE at that time. A formal paper will be available next July after further work, and will include any recommended changes to 1.4.10.

The chair anticipates that most of the work will be done by e-mail, but retains the possibility of teleconferences as appropriate. In addition, a meeting on the margins of the December meeting may also be helpful to the progress of the work.
