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**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 ISSUES

Labelling of very small packagings

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

At the seventh session of the Sub-Committee, CEFIC submitted document ST/SG/AC.10/C.4/2004/4 concerning the labelling of very small packagings. CEFIC was subsequently requested to prepare a Detailed Review Document (DRD) on current provisions in existing systems for the labelling of very small packagings in order to identify common elements, and then to report findings back to the Sub-Committee. This was done and the replies were summarised and provided as an annex to document UN/SCEGHS/10/INF.8. A further executive summary accompanies this document (see Annex 1).

Background

Chemicals are of necessity supplied in a huge variety of package sizes. While labelling for the workplace or consumer under the GHS is mainly straightforward for large and moderately sized packages, this is not always the case for certain very small packages. Often, these contain quite hazardous materials and all the information required cannot always be applied to the package surface if legibility and other factors are taken into account.

The GHS recognises that informational needs may differ from sector to sector. This proposal deals solely with issues that might be encountered by the consumer or in the workplace. It is recognized that the regulatory provisions for the transport of dangerous goods contain “Limited quantity provisions” for the transport of small packagings, usually as combination packagings, rather than as single packagings. This proposal is not intended to apply to the transport sector, and only deals with the pack as seen by the consumer or in the workplace.

Discussion

Consistent with the ethos of the GHS, it is considered desirable to try to establish consistent guidelines for the labelling of very small packagings. The main considerations that need to be considered when labelling very small packs are:

- (a) It is not always possible to place all mandatory information on a small label without sacrificing legibility, due to size constraints;
- (b) The likelihood of injury posed by such products is lowered because of the small quantities involved;
- (c) The workplace user is trained to act upon information contained in a safety data sheet;
- (d) GHS labels may require more pictograms than under some current systems;
- (e) The use of unnecessarily large packagings to permit provision of full label information is inconsistent with proper use of resources and the protection of the environment. In certain circumstances it can compromise product quality or application, and may be deceptive to the purchaser;
- (f) Labels on some very small packagings may be inconsistent with the proper use of the product;
- (g) Any system of small package labelling requirements must be simple to understand and apply in order to ensure safe use;

Proposal for additions to the GHS text

1. It is proposed to add a new paragraph 1.4.10.1.2 as follows:

“1.4.10.1.2 Guidance on labelling of very small packagings is contained in Annex 7.”

Consequential amendment: Current text under 1.4.10.1 (introductory sentence and subparagraphs (a) to (j)) becomes new paragraph 1.4.10.1.1.

2. It is proposed to add the following text to Annex 7.

“A7.1 GUIDANCE ON THE LABELLING OF VERY SMALL PACKAGINGS

A7.1.1 Introduction

A7.1.1.1 Labelling rules shall follow the requirements of 1.4.10 except when the primary packaging is of such a size that it is not possible for all label elements to be applied to the label without a loss of legibility. What constitutes a very small packaging will vary depending upon the shape of the container and the amount of label information needed. In

circumstances where all the required labelling elements cannot be legibly provided on such a small packaging, the amount of information applied to the label can be reduced. Multi-language labels may be permitted, provided they are legible.

A7.1.1.2 The use of small package labelling is without prejudice to the implicit requirements to retain data and the need to review labels and safety data sheets.

A7.1.1.3 Some products, such as pesticides, are regulated by competent authorities with specific legislation laying down requirements for label content. The guidance outlined in this annex is without prejudice to the specific regulatory requirements of any authority.

A7.1.2 Determination of label information

A7.1.2.1 When it is not possible for all label elements to be applied to the label on a very small packaging without a loss of legibility, then as many label elements as possible shall be applied. They shall have the following order of precedence:

1. Product identifier
2. Supplier identification
3. GHS Hazard pictograms
4. Hazard statements
5. Signal words
6. Precautionary statements

A7.1.2.2 If the label cannot accommodate all label elements then elements 1 to 5 should be included. If these cannot all be accommodated, then elements 1 to 4 should appear and so on. Where possible, elements 1 to 3 should remain as a minimum.

A7.1.2.3 The use of small package labelling on the primary packaging does not allow similar reduced labelling on any other layers where larger labels can be accommodated. Each layer of packaging that is required to be labelled shall bear a label that is consistent with 1.4.10 or commensurate with its size.

A7.1.2.4 The legibility of small package labelling must fulfil the condition of normal reading. Written information and pictograms need to be easily read under normal light conditions and without any special devices such as a magnifying glass. Contrast in colour between written information and label background should not hamper legibility.

A7.1.3 Workplace labelling

A7.1.3.1 Where very small packagings are intended solely for use in the workplace, and reduced labelling has been applied, the supplier should include a label statement "See SDS before use" after the product identifier.

A7.1.4 Consumer labelling

A7.1.4.1 If practicable, full labelling should be applied to at least one layer of packaging. If the packaging is an awkward shape or so small that it is technically impossible to attach a label, the label shall be firmly attached in some other appropriate manner, so that it remains with the primary packaging during the life of the substance/mixture. Where the full label appears on secondary packaging (e.g. a box, or blister pack) a statement that the safety instructions should be kept for the life of the product should be included. To accommodate multiple language labelling, suitable fold out labels may be permitted.

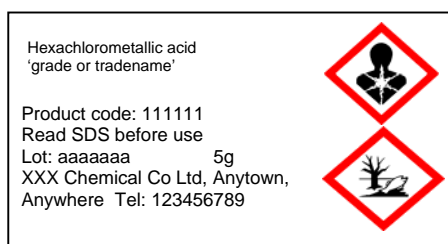
A7.1.5 Exemptions from labelling

A7.1.5.1 Where it can be demonstrated that certain products in very small packagings, in the form in which they are supplied, do not present any likelihood of injury to man or the environment, then labelling requirements shall not apply.

A7.1.6 Examples of small package labels

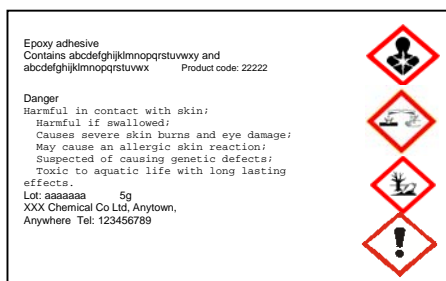
Example 1: Label for a small glass bottle using small package labelling.

Maximum label area available if fully adherent: 60 mm × 32 mm

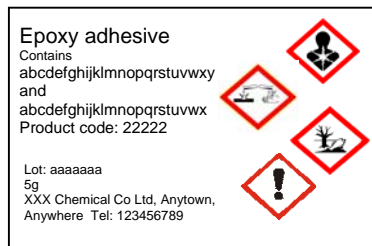


Example 2: An epoxy adhesive where label elements 1 to 5 have been applied, but where the text might be deemed to be illegible due to small size.

Label area available: 33 mm × 48 mm



The label for the product above made more legible by showing only label elements 1 to 3.



Example 3: Label for a 0.2 ml plastic ampoule showing only the product identifier and label statement

Label area available: 20 mm × 7.5 mm

Special test reagent
See SDS before

“

Consequential amendments:

Amend the title of Annex 7 to read: “Guidance on labelling of very small packagings and examples of arrangements of the GHS label elements”

Renumber current title “EXAMPLES OF ARRANGEMENTS OF THE GHS LABEL ELEMENTS” as new section A7.2.

Annex

Executive summary of current practice

This is an executive summary of all the responses received from the questionnaire distributed in 2005 at the request of the Sub-Committee on GHS at its seventh session:

- (a) The problems of labelling small packagings are recognised by most jurisdictions;
- (b) There is a mixture of specific legislation and guidance on how to deal with the problem;
- (c) Small packagings have a number of definitions and can range from 100 to 500ml. Sometimes formal authorisation for small package labelling is required;
- (d) Some jurisdictions do not specify a particular size but rely on the practicality of labelling;
- (e) Some jurisdictions have lower cut-off below which it is not necessary to label at all in some circumstances;
- (f) Many jurisdictions have requirements to retain the information used in coming to a labelling decision;
- (g) The product identifier is nearly always required when small package labelling is employed;
- (h) The supplier identifier is usually required;
- (i) One of the following elements, or equivalent, is usually necessary. Signal words or hazard symbols, or hazard statements;
- (j) Many jurisdictions have some requirements, such as minimum font or symbol size, to ensure legibility;
- (k) Labels generally have to be firmly attached to the package;
- (l) In general, there are no provisions to relieve single use packages from labelling requirements;
- (m) Some jurisdictions make a distinction between workplace and consumer labelling in relation to small packagings;
