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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****Twenty-fourth session**

Geneva, 12 – 14 December 2012

Item 3 of the provisional agenda

**Hazard communication issues****Proposal for the inclusion of transport pictograms in  
Section 14 of a Safety Data Sheet (SDS) in Annex 4 of the  
GHS****Transmitted by the expert from Ireland<sup>1</sup>****Introduction**

1. The expert from Ireland notes that the GHS currently provides for the possibility to include a GHS pictogram in Section 2 of the SDS, whereas there is no such provision for the inclusion of a transport pictogram in Section 14.
2. In contrast, the GHS requires that when a transport pictogram appears on a label, a GHS pictogram for the same hazard should not appear.
3. As a result of this, workers, transporters or emergency responders may only see the transport pictogram on the label whereas in the accompanying SDS for the same chemical they may only see the GHS pictogram in Section 2 and no transport pictogram in Section 14 of the SDS, which may cause some confusion.
4. With this proposal we aim to ensure consistency in hazard communication, whereby both the label and the SDS contain consistent pictograms, graphical representations or descriptions of the same hazards for the same chemical, as appropriate.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

5. We note that many SDS providers already include transport pictograms in Section 14 of the SDS, so with this proposal, we hope that more SDS providers will include the transport pictograms, where appropriate and thereby improve consistency in hazard communication between the hazard label and the SDS.

6. The expert from Ireland welcomes views of the Sub-Committee on whether this proposal is acceptable for inclusion in the next revised edition of the GHS.

## Proposal

7. To include the following new sub-paragraph under A4.3.14 (Section 14: Transport Information)

**“A4.3.14.[X] *Transport pictograms***

Transport pictograms [label or mark] may be provided as a graphical reproduction of the symbols in black and white or the name of the symbol, e.g. “skull and crossbones” or “dead fish and tree”.”

## Rationale

8. Section 1.4.10.5.1 of the GHS requires the inclusion of a transport pictogram instead of a GHS pictogram for the same hazard on a combined supply and transport label, as follows:

*“Where a UN Model Regulations on the Transport of Dangerous Goods pictogram appears on a label, a GHS pictogram for the same hazard should not appear. The GHS pictograms not required for the transport of dangerous goods should not be displayed on freight containers, road vehicles or railway wagons/tanks.”*

9. Section A4.3.2.2.2 of the GHS allows for the possibility to include a GHS pictogram in Section 2 of a SDS, as follows:

*“Pictograms (or hazard symbols) may be provided as a graphical reproduction of the symbols in black and white or the name of the symbol, e.g. “flame”, skull and crossbones”.*

10. This proposal simply replicates this same provision from Section 2 of a SDS to allow for the inclusion of a transport pictogram in Section 14 of a SDS in order to attain consistency in the hazard communication elements for supply and transport displayed on a label and in a SDS.

11. The terms “label” and “mark” have been included in square brackets in order to clarify that in the context of transport, the “dead fish and tree” pictogram is a “mark” whereas the other transport pictograms are “labels”. This additional text is optional.