

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 4 (b) of the provisional agenda

Hazard communication issues:

Labelling of small packagings

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**Transmitted by the European Chemical Industry Council (CEFIC) on
behalf of the informal correspondence group**

Introduction

1. At its 26th session the Sub-Committee noted that the informal correspondence group intended to develop a second example addressing other labelling issues than the first one and their possible solutions.

Development of a new example

2. The following proposed example is provided to the Sub-Committee for information at this stage.

3. The proposed example is to be reviewed by the informal correspondence group on labelling of small packaging at its meeting scheduled for Thursday 3rd July 2014 from 12:30 to 13:40 in Room S4.

Example:

Multilayer booklet format/foldout label

(i) Mixture:

Disinfecting/cleaning solution

(ii) Use:

Professional use

(iii) Packaging description and size

Plastic container of 750 ml with spray trigger

[graphic representation of plastic container with actual dimensions to be inserted]

(iv) Labelling problems encountered

The disinfecting/cleaning solution is required to carry a large number of GHS label elements (three hazard pictograms, three hazard statements and numerous precautionary statements). In addition to the GHS label elements, this mixture is also required to carry other regulatory information associated with its use as a disinfectant.

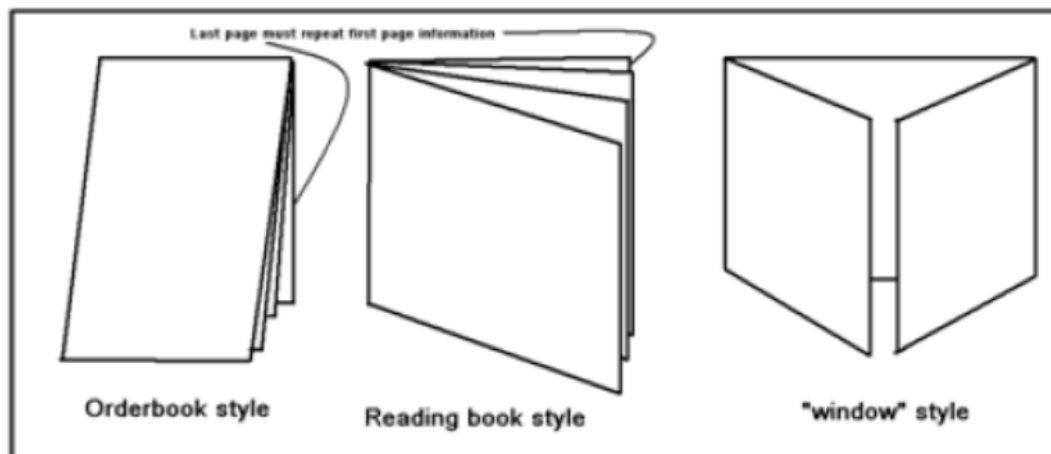
As the mixture is sold in a country with three official languages, the GHS label text elements together with the disinfectant regulatory information and directions for use have to appear on the product label in all three languages. Taking into account the size and shape of the packaging, it is not possible to fit the entire label (that is, GHS label elements, disinfectant regulatory information and directions for use) on the container.

(v) Possible options to address labelling problems encountered

Issue	Potential options	Comments
<p>Not possible to put all applicable GHS label elements together with the required disinfectant regulatory information and directions for use (in the required official languages) on the immediate container (i.e. the plastic bottle) due to its size and shape</p>	<p>Provide label elements in a fold-out label securely attached to the plastic bottle</p>	<p>Possible practical solution – fold-out label must be securely attached to the container and remain so during foreseeable conditions and period of use</p> <p>Provisions for fold-out labels e.g. what label elements must go on the front page and what elements could appear on the internal fold-out page(s)?</p> <p>Minimum size of pictograms or text to ensure the readability of the information?</p> <p>Layout of the pictograms – can they be contiguous or do they have to be separate?</p>
	<p>Provide label elements on a tie-on tag</p>	<p>Not practical as tie-on tag would need to be very large to accommodate all required labelling in the 3 official languages even with printing on both sides of the tag. Large tag may impede use of the product.</p> <p>Could possibly attach a fold-out label to the tie-on tag but no guarantee the tag would remain attached to the container – may impede user during application thus could possibly be removed.</p> <p>General principles require all applicable label elements to appear on immediate container where possible; also some label elements on the immediate container may need to be accessible to users throughout life of product. Would therefore also need to include minimum label elements on immediate container just in case the tie-on tag is removed by the user.</p>
	<p>Provide label elements on an outer packaging</p>	<p>Not an option – product is not supplied in outer packaging</p>
	<p>Increase the size of the container so that a larger label can be affixed</p>	<p>Increasing the size of the container is not practical from the intended use perspective</p>

(vi) **Proposed/suggested solution**

Multilayer booklet format/foldout label which is securely affixed to the immediate container (i.e. the fold-out label is attached so that it remains affixed during the foreseeable conditions and period of use). The fold-out label is produced in such a way that the front part cannot be detached from the remainder of the label,



Information to be provided on the front page of the fold-out label and on the last page which is directly affixed to the immediate container: Should contain at least the trade name, hazard pictograms, supplier identification. The full product identifier and other elements such as signal word and hazard statements could possibly be included on the front page/last page if space/legibility considerations allow.

The other labelling information (i.e. those GHS label elements not appearing on the front page and other supplemental information), if needed, could be split over several internal pages, e.g.

1. Page inside: Full product identifier including hazardous ingredients as applicable, signal word and hazard statements
2. Page inside: Precautionary statements
3. Page inside: additional information e.g. supplemental labelling, labelling elements required by other regulatory systems (e.g. biocides/pesticides), and directions for use.

As the product is sold in a country with more than one official language, the labelling information in the fold-out label would be provided in all required languages.

It is recognized that some regulatory systems (e.g. pesticides) may have specific requirements for the application of labels using a multilayer or booklet style format. Where this is the case, labelling would be undertaken in accordance with the competent authority's requirements.

[Example artwork illustrating the use of the multilayer booklet format/foldout label will be provided].