

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**

22 June 2015

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Geneva, 29 June – 1 July 2015

Item 3 (a) of the provisional agenda

Hazard communication issues: labelling of small packagings

Labelling of small packagings

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

Introduction

1. After the first example illustrating some of the general principles applicable to the labelling of small packagings, adopted by the Sub-Committee during its 28th session for inclusion in Annex 7 of the GHS, the informal correspondence group proposed a second example for the 29th session (document ST/SG/AC.10/C.4/2015/7).
2. A third example addressing principally the requirements for sets or kits is currently being developed.

Development of an example for sets or kits

3. A third example is proposed, with a preliminary layout, to be examined by the informal correspondence group during the 29th session to acquaint the group with the issues surrounding sets or kits.
4. A set or kit is a combination package, which includes two or more individual packages or single compartments with different components.
5. Sets or kits are subject to the provisions of the GHS, if an individual package contains at least one hazardous substance, a hazardous mixture or a hazardous article.
6. A complete labelling of the single package can be omitted, if it can be assured that the single packages can't be removed from the combined package
7. Single containers and single packages have to be named in such a way that an identification of the content is given clearly. The identification shall be reiterated on the outer package label, or a package leaflet which includes, at least, the labelling of the related component.

Example 1:

Standard analytical kit

Product and use:

Activator for professional use

Packaging description and size



Glass container with 2.5 ml capacity

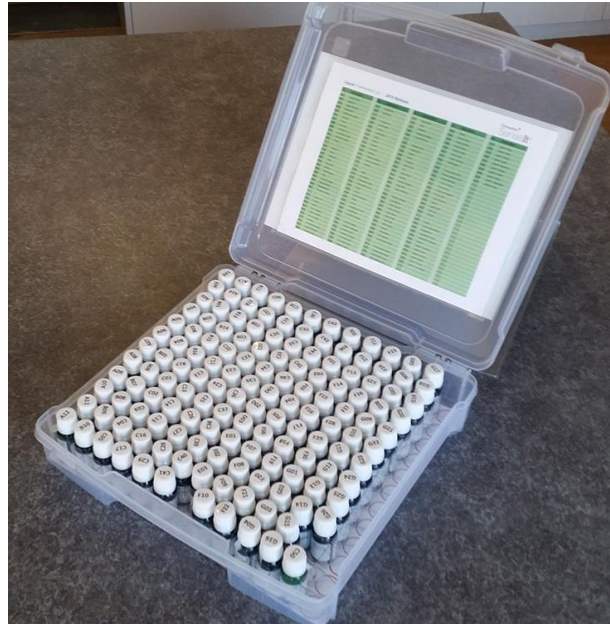
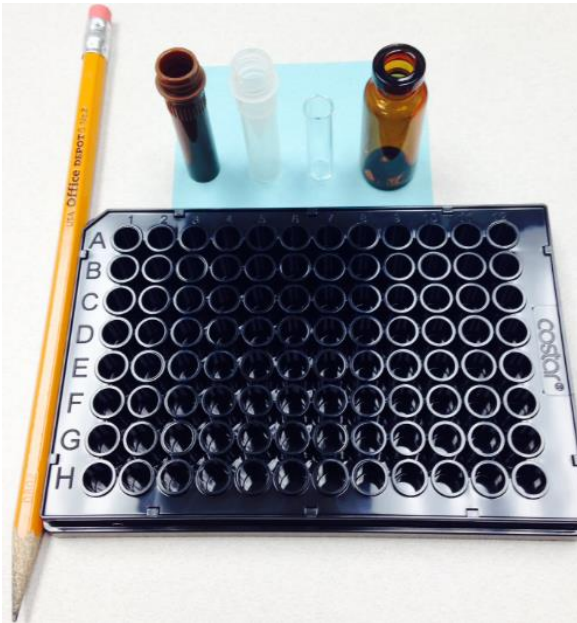


Plastic container with 7ml capacity

Example 2:

Test reagent kit

Outer kit package holding approximately 130 inner packagings, each containing a different substance or mixture




Labelling problems encountered


8. The products/kits contain lot of different single substances or mixtures which are required to carry a large number of different GHS label elements (multiple pictograms, hazard statements and numerous precautionary statements).
9. In both examples the inner packagings are too small to display full labelling information. In each case the outer package needs to display and clearly identify the labelling information for all of the individual inner packagings contained within it.

Proposed/suggested solution

Option 1 for kits with up to 5 inners

Inner Packages each contain the following information specific to the contents of each container:		
	Pictograms	
	Signal Word	
	Identifier	
	Company Name and Telephone #	
	Full labeling information on outer packaging	
Outer Kit Package with 3 different inner packages		
		
	Danger	
Bottle # and H-statement	100816/1	Harmful if swallowed. Toxic in contact with skin. Causes severe skin burns and eye damage. May cause respiratory irritation. Harmful to aquatic life with long lasting effects.
	100816/2	Causes serious eye irritation. Suspected of causing cancer.
	100816/3	May be corrosive to metals. Causes skin irritation. May cause an allergic skin reaction. Causes serious eye irritation. Suspected of causing cancer. May cause damage to organs through prolonged or repeated exposure.
Precautionary Statements		Avoid release to the environment.....If exposed or if you feel unwell: immediately call a POISON CENTRE or doctor/physician. (All applicable statements printed in paragraph form
		Company name, address and telephone number
		Commercial information

Option 2 for kits with more than 5 inners

Inner Packages each contain the following information specific to the contents of each container:		
	Pictograms	
	Signal Word	
	Identifier	
	Company Name and Telephone #	
	Full labeling information on outer packaging	
Outer Kit Package that holds approximately 130 different inners, each containing a different product		
		
	Danger	
Bottle # and H-statement	Harmful if swallowed	100816/1
	Toxic in contact with skin	100816/1
	Causes severe skin burns and eye damage	100816/1
	May cause respiratory irritation	100816/1
	Harmful to aquatic life with long lasting effects	100816/1
	May be corrosive to metals	100816/2, 100816/3
	Causes skin irritation	100816/2, 100816/3
	May cause an allergic skin reaction	100816/2, 100816/3
	Causes serious eye irritation	100816/2, 100816/3
	Suspected of causing cancer	100816/2, 100816/3
	May cause damage to organs through prolonged or repeated expos	100816/3
Precautionary Statements	Avoid release to the environment.....If exposed or if you feel unwell: immediately call a POISON CENTRE or doctor/physician. (All applicable statements printed in paragraph form)	
	Company name, address and telephone number	
	Commercial information	

