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|  | United Nations | ST/SG/AC.10/C.4/2020/6 | |
| _unlogo | **Secretariat** | | Distr.: General  2 April 2020  Original: English |

**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**

**Thirty-ninth session**

Geneva, 8-10 July 2020

Item 2 (i) of the provisional agenda

**Classification criteria and related hazard communication:  
other issues**

Workplace labelling: clarification of 1.4.10.5.5.1

Note by the secretariat[[1]](#footnote-2)\*

Introduction

1. According to 1.4.10.5.5.1, chemicals falling within the scope of the GHS should carry the GHS label at the point where they are supplied to the workplace, and the GHS label or label elements should be maintained on the supplied container and used in workplace containers.

2. It is however recognised that in many situations it may be impractical to produce a complete GHS label and attach it to the workplace container, due for example to container size limitations or lack of access to a process container. This is the case for instance of chemicals that need to be transferred from supplier containers into smaller containers, storage vessels, piping or process reaction systems or temporary containers.

3. For decanted chemicals, the last sentence of the third paragraph under 1.4.10.5.5.1, states: “Decanted chemicals intended for immediate use could be labelled with the main components and directly refer the user to the supplier label information and SDS”. The secretariat received a question on the interpretation of “main components” in that context, as it could be understood as referring to the main components of the label or to the main components (i.e. ingredients) of a mixture.

4. Should it be confirmed that “main components” in the context of 1.4.10.5.5.1 refer to the main components of the label, the secretariat would like to invite the Sub-Committee to also clarify whether the “main components of the label” in that sentence are meant to be only the harmonized label elements (as defined in Chapter 1.2 and 1.4.6.2) or whether other non-harmonized label elements such as precautionary statements or supplemental information are also addressed.

5. Following the clarifications provided, the Sub-Committee may wish to consider the options below.

Proposal

Option 1

6. In the last sentence of the third paragraph under 1.4.10.5.5.1, replace “could be labelled with the main components” with “could be labelled with the main label elements”.

Option 2

7. In the last sentence of the third paragraph under 1.4.10.5.5.1, replace “could be labelled with the main components” with “could be labelled with the main label components”.

1. \* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2. [↑](#footnote-ref-2)