

UN/SCEGHS/5/INF.17/Add.4

**Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals**
(Fifth session, 7-9 July 2003,
agenda item 2)

First Report of the Inter-sessional Working Group on Labelling

Comments by ACC

Consolidated Comments to UN SCE GHS Intersessional Working Group on Labeling

Topic	Comment/Question	Response
General	Additional information required by ‘Competent Authority’ should not undermine the uniformity/standardization that GHS hopes to accomplish	Recommend: Minimize additional information that must be included on the product label. Require that it be included on the SDS
	GHS Purple book does not provide the unsophisticated user with enough information to develop compliant labels (e.g., definitions, examples, etc.)	Recommend: UN SCE GHS – Intersessional Working Group should develop guidance documentation to assist the unsophisticated user in developing labels that meet the GHS requirements
Placement of pictograms	The placement of GHS and transportation pictograms when presented in a combined format is unclear (footnotes Annex 1).	Recommend: Provide an example of the transportation pictograms being located outside of the ‘GHS label’, but on the same label stock
Size of Pictograms	GHS label pictograms should be differentiated from transportation labels via size	Recommend: Size of pictograms should not be overly prescriptive. Guidance should allow for the GHS pictograms to be smaller than the transport labels to avoid confusion in transportation emergencies, yet large enough to convey the hazards of the substance/mixture
Suitability for Computer Generated Labels	Overly prescriptive label formats are difficult for computer labeling programs. The cost of replacing the systems would be significant	Recommend: That language should allow for flexibility to accommodate computer generated labels/formats
	Managing stocks for every combination of GHS pictograms is burdensome	Recommend: Allow for “empty” GHS pictogram borders to be used (similar to the current EU regulations)
Official Translations	Without official translations many phrases may be developed to convey the Statements of Hazard	Recommend: Official translations should be developed for Statements of Hazard