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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

Seventh session, 14-16 July 2004
Item 3 (c) of the provisional agenda

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Labelling

Labelling of small packagings

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. Chapter 1.4 of the GHS, in section 1.4.10, details the procedures for preparing labels in the GHS. Paragraph 1.4.10.5.3 lays out the information required on a GHS label, and paragraph 1.4.10.5.4 details the arrangements for presenting the GHS label elements.

The issue

2. It is not possible to comply with these requirements in the case of small packagings due to the very limited area available to provide the required information.

Proposal

3. CEFIC is putting forward some principles for consideration in determining the labelling requirements for such small packagings, rather than making substantive proposals at this stage. Our guiding principle in elaborating this document has been;

- (i) Comprehensibility and legibility of the information (see section 1.4.4 of the GHS);
- (ii) The needs of the target audiences (see section 1.4.3 of the GHS).

4. CEFIC recognizes that such small packagings will invariably be aggregated and packaged in larger packagings, e.g. for transport or storage, where more detailed information can be provided on such outer packagings. We have concentrated on the provision of comprehensible information at the point of

use. CEFIC seeks the views of the Expert Members of the Sub-Committee on the principles we are proposing and is prepared to return with a more detailed formal proposal, e.g. for the amendment of section 1.4.10 if considered appropriate.

Proposal for the elaboration of principles for the labelling of small or very small packagings of dangerous substances or mixtures

5. Considerations

- Dangerous substances and mixtures will be classified for their physico-chemical, health and environmental hazards.
- Many products are supplied in small packagings and as a result, it is not possible to place all mandatory information on a label without sacrificing legibility, due to size constraints.
- The potential for harm posed by such products is lowered because of the small quantities involved.
- The workplace user is trained to act upon information contained in a safety data sheet.
- The workplace user can understand the meaning of hazard pictograms.
- The consumer will not have access to a safety data sheet.

6. Only a limited range of pictograms are likely to be comprehensible to the consumer.

- GHS labels may require more pictograms than under some current systems.
- The use of unnecessarily large packagings to permit provision of full label information is inconsistent with proper use of resources and the protection of the environment. In certain circumstances it can compromise product quality or application, and may be deceptive to the purchaser.
- Labels on some small packagings may be inconsistent with the proper use of the product.
- Any system of reduced labelling requirements must be simple to understand and apply in order to ensure safe use.

Regulatory Background

7. The supplier of a substance or mixture will have to evaluate the hazards in order to arrive at a classification according to the rules laid down in the GHS. Classification will result in the allocation of label elements such as the signal word, pictograms, hazard statements and precautionary statements. Products classified as hazardous will usually attract a number of these label elements. In those cases where the packaging is of sufficient size, then this information can usually be shown using pictograms and typeface of such dimensions that they are easily legible. In those cases where the packaging is small then it will often be impossible either to show label elements of sufficient size or to include all required label elements. In these circumstances safety is best assured by maintaining legibility rather than attempting to include everything. In many, but not all cases, small packagings will be packed in one or more layers of outer packaging and reduced labelling of the inner packaging does not preclude fuller labelling on outer packaging layers.

Examples of current practice

8. The EU Dangerous Substances and Dangerous Preparations Directives go some way towards recognizing the difficulties of labelling small packagings. Packagings which contain 125ml or less can have reduced labelling in that S phrases can be omitted from the label and many R phrases can also be omitted dependent upon the classification. Furthermore, if a packaging is of such a size that the potential for harm is very low then the Directives allow Member States the discretion of permitting the product to be unlabelled or labelled in some other way.

9. The US Code of Federal Regulations also recognises that small packagings can have simplified labelling in certain circumstances without compromising safety. This is laid down in the Federal Hazardous Substances Act. In this case, the rules are usually product specific and the relaxations are different in each case, so for example, laboratory chemicals can show the hazard information on an adjacent label panel and stain removers containing methanol are exempt in certain circumstances if the package contains less than 4.5ml.

Proposal for principles for reduced labelling requirements for dangerous substances and mixtures supplied in small packagings

10. It is proposed that a small packaging be defined as a packaging with a nominal capacity of 125ml/gm or less and which has a single external surface area which is insufficient to permit all the label elements to be shown legibly. An adjacent label panel is frequently not possible due to technical constraints during intended use. Even when reduced labelling is applied to small inner packagings, full labelling shall however still be applied to an outer layer(s) of that product's packaging of sufficient size for that purpose.

11. Taking into account the differences in training between the workplace user and the consumer we propose different solutions for the two groups. It is recognised that the potential for harm posed by the contents of a packaging close to the 125ml/gm upper limit could be very different from the potential for harm posed by the contents of a much smaller packaging, so within the small packaging definition we propose 2 categories:

- Category 1 covering packagings of 125ml/gm or less; and
- Category 2 covering very small packagings substantially smaller than 125 ml/gm.

12. Tag labels or other means of labelling small packagings shall also be allowed. This shall also apply if the packaging is of such a shape that a fully adherent label cannot be applied.

Category 1: Packagings

13. In the case of packagings of this size it may not be possible to satisfactorily apply all label elements. This is already recognised in many mature labelling systems where reduced labelling is currently permitted. The amount of information required will be dependent on the hazard and in order to ensure the system is easy to apply, it is proposed that the level of information will be dictated by the hazard symbol to be allocated following classification, as shown in Table 1. Only precautionary statements relating to prevention will need to be shown on the label for consumer products, although the complete label content should appear on any outer packaging of sufficient size, accompanying leaflet (consumer use) or SDS (workplace use).

Consumer use products

14. Consumers use dangerous substances and mixtures for domestic, hobby or gardening purposes. They are likely to comprehend some hazard pictograms such as flammable or the skull and crossbones but for some classification end points, they also need safety advice in order to handle and use hazardous products in a proper manner. The label may be the only hazard communication that the consumer receives. Taking the small quantity into account, we therefore propose the label requirements shown in Table 1.

Workplace products

15. The professional user will be more familiar with and trained to work with hazardous substances and mixtures. He should have access to the information in a safety data sheet and be familiar with the whole range of hazard pictograms. We therefore propose that the pictogram shall form the main hazard communication tool as set out in Table 1.

Table 1: Minimum information to appear on label for small packaging ^(a)

Symbol allocated from classification	Hazardous component (if trade named)	Symbol	Signal word	Hazard Statement ^(b)	Preventative Precautionary Statements
Flammable		YES	NO	NO	NO ^(d)
Flame over circle		YES	NO	NO ²	NO ^(d)
Exploding bomb		YES	NO	NO ²	NO ^{(d) 3}
Corrosion	YES	YES	NO	NO ²	NO ^{(d) 3}
Gas cylinder		YES	NO	NO ²	NO ^(d)
Skull and crossbones	YES	YES	NO	NO ²	NO ^{(d) 3}
Exclamation mark	^(c)	YES ¹	NO	NO ²	NO ^(d)
Environment		YES ¹	NO	NO	NO ^(d)
Serious Health hazard	YES	YES	NO	NO ²	NO ^{(d) 3}

Key to symbols:

- (a) Complete label content shall where possible be provided on an accompanying leaflet, or on the outer product packaging if they cannot be applied to the label
- (b) Hazard statement to be included if no pictogram required for workplace products.
- (c) Substances causing sensitisation must be identified in all cases. Substances harmful by inhalation, skin absorption, or ingestion must be identified for consumer products.
- (d) A Precautionary statement 'Read SDS before use' must be included on the label for workplace products.
- ¹ Not required for consumer products.
- ² Hazard statement to be given for consumer products.
- ³ Precautionary statements should be provided on an accompanying leaflet, or on the outer packaging of consumer products if they cannot be applied to the label. In this case, all applicable precautionary statements should be provided where this is practical.

In addition, the product identifier and supplier identification shall appear on the label.

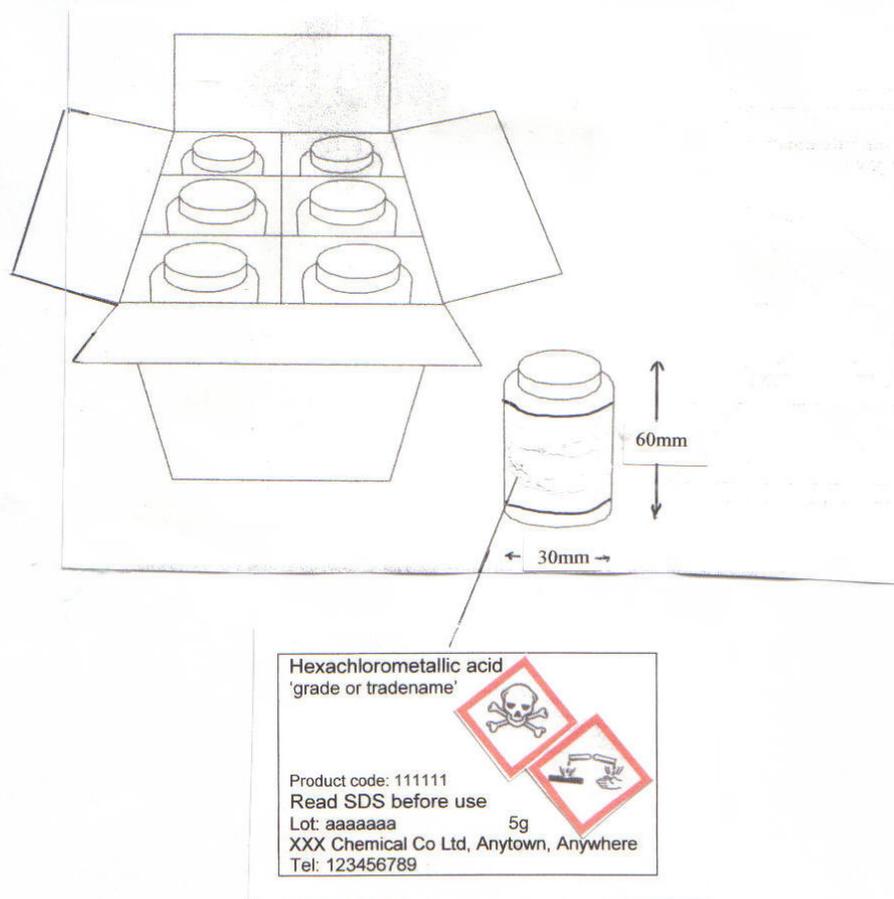
Category 2: Very small packagings

16. Where the packaging is so small that the potential for the product in the packaging to cause harm to the environment or to persons handling the product and others is judged to be negligible, then the packaging may be unlabelled or labelled in some other appropriate way, although the use of hazard pictograms different from those provided for in the GHS is not permitted. All label information shall still be provided in an SDS or accompanying leaflet where these need to be provided. A record of any assessment that the potential for harm is negligible shall be kept by the person responsible for placing the product on the market.

17. Some examples follow. These are based on real products but the names have been amended:

Example A: Combination packaging for a small package

Outer Packaging: Box with a corrosive transport label.
Inner Packaging: Glass bottle with reduced GHS labelling.



Example B: Small pack supplied in two or more layers of packaging.

Intermediate/Outer Packaging: Box with reduced labelling

Inner packaging: Unlabelled glass ampoules.

