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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

Twenty-seventh session
Geneva, 2 – 4 July 2014
Item 4 (b) of the provisional agenda
Hazard communication issues: labelling of small packagings

Labelling of small packagings

Transmitted by the expert from the European Chemical Industry Council (CEFIC) on behalf of the correspondence group[1]

1. During its twenty-sixth session, the Sub-Committee agreed in principle with the example proposed in informal document INF.17, illustrating some of the general principles applicable to the labelling of small packagings described in paragraph 1.4.10.5.4.4 of the GHS.

2. It was suggested to take into account the few comments received i.e. on the possible format for such an example and to submit a formal document for consideration during the next session.

3. The enclosed example is proposed for inclusion in the GHS (annex 7 or another more suitable part).

4. The text in the annex to this document contains background information on the options considered by the correspondence group. It is not meant to be included in the GHS.

[1] In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/40, para. 14, and ST/SG/AC.10/C.4/48, Annex IV, item 2(a)).

Proposed example

Small immediate container in an outside packaging which can display the entire information required on the label

Immediate container that cannot be labelled based on shape/size and restrictions relating to the method of use: Cardboard box containing 5 ampoules

(i) Substance:

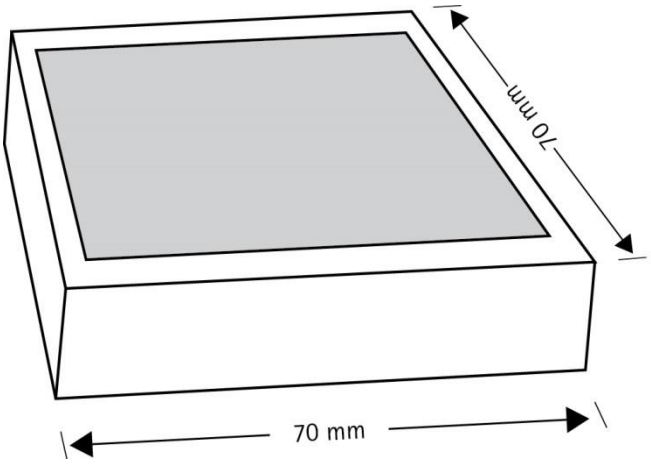
Blahzenic acid

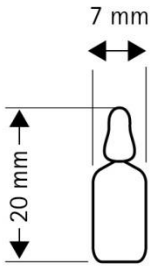
(ii) Use:

Laboratory reagent – professional use

(iii) Packaging description and size

Cardboard box containing 5 glass ampoules. Each ampoule contains 0.5 grams blahzenic acid





(iv) Labelling problems encountered

The working solution of this reagent is prepared by removing the top of the ampoule and placing the bottom half (containing the substance) in the required amount of deionized water. Consequently, labels cannot be applied to the actual ampoules as they may contaminate the working solution, which may affect subsequent reactions. It is impossible to put all applicable GHS label elements on the immediate container (i.e. the glass ampoule) due to its size and shape.

The area available on the outer cardboard box is large enough to carry a legible version of the required GHS label elements in a single language. Legibility is reduced if labelling in more than one official language is required. Legibility is also a concern in any labelling for the glass ampoule.

(v) Proposed/suggested solution

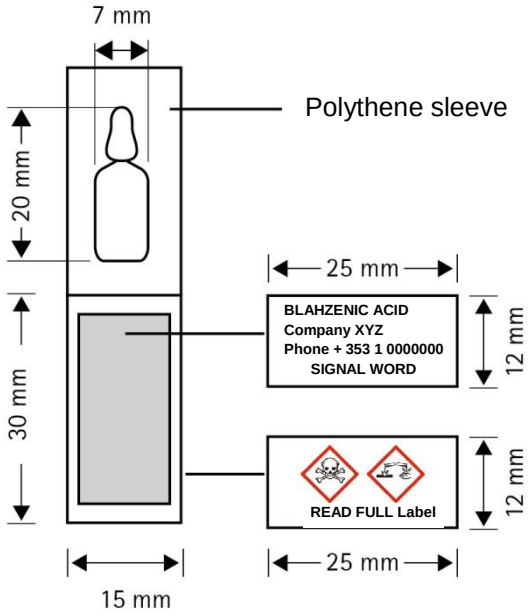
Immediate container

The unlabelled glass ampoule is sealed in a polythene sleeve with an end tag for a label – the ampoule is not removed from the polythene sleeve until the point of intended use, i.e. preparation of the working solution. The area available for a label on the end tag is not sufficient to include all the required label elements. The proposed labelling includes at least:

- The product identifier (substance name), signal word and name plus telephone number of the supplier on one side of the end tag;
- The hazard pictograms on the other side of the end tag.

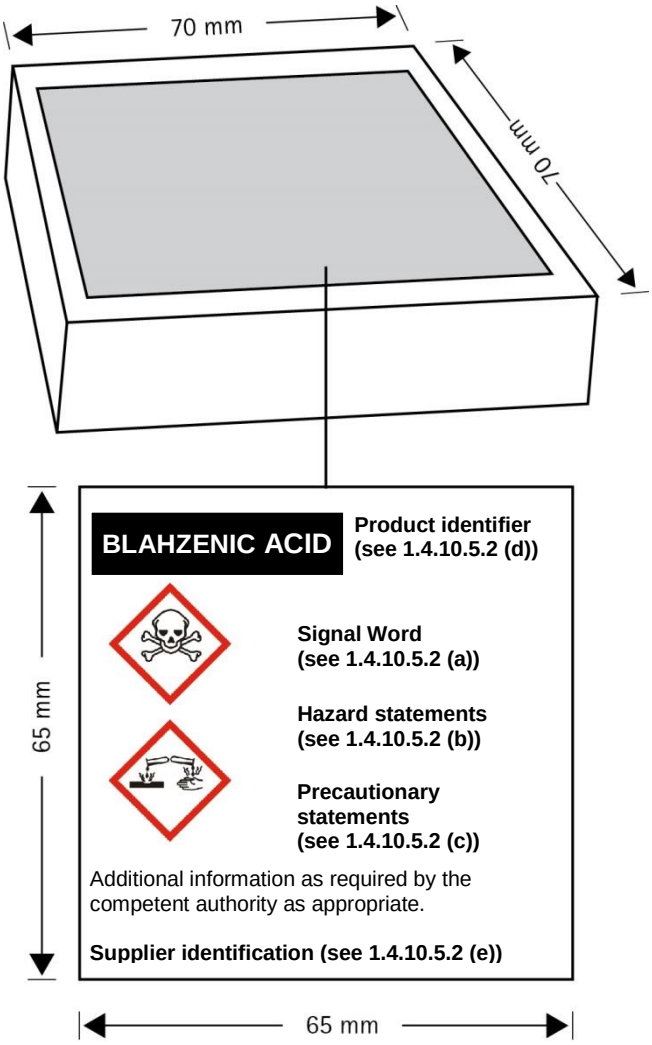
This ensures that the user is aware of the substance identity (enables identification of the associated substance Safety Data Sheet (SDS), its hazards (indicates that the substance is hazardous and needs to be handled/stored appropriately) and the name/contact details of the supplier (if needed in an emergency situation). The signal word and the pictogram are not on the same side in order to ensure the presence of safety information on both sides of the end tag.

All required label elements (including hazard and precautionary statements) would appear on the outside packaging.



The label above is attached to one side of the end tag and the label below is attached to the reverse side.

Outside packaging



Annex

Background information on the possible options that were considered prior to the adoption of the solution described in the example

GHS definition of "Label" (GHS chapter 1.2):

"Label means an appropriate group of written, printed or graphic elements concerning a hazardous product, selected as relevant to the target sector(s), that is affixed to, printed on, or attached to the immediate container of a hazardous product, or to the outside packaging of a hazardous product."

General principles that should underpin labelling of small packaging (GHS chapter 1.4, paragraph 1.4.10.5.4.4):

(a) All the applicable GHS label elements should appear on the immediate container of a hazardous substance or mixture where possible;

(b) Where it is impossible to put all the applicable label elements on the immediate container itself, other methods of providing the full hazard information should be used in accordance with the definition of "Label" in the GHS. Factors influencing this include *inter alia*

(i) The shape, form or size of the immediate container;

(ii) The number of label elements to be included, particularly where the substance or mixture meets the classification criteria for multiple hazard classes;

(iii) The need for label elements to appear in more than one official language.

(c) Where the volume of a hazardous substance or mixture is so low and the supplier has data demonstrating, and the competent authority has determined, that there is no likelihood of harm to human health and/or the environment, then the label elements may be omitted from the immediate container;

(d) Competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories where the volume of the substance or mixture is below a certain amount;

(e) Some labelling elements on the immediate container may need to be accessible throughout the life of the product, e.g. for continuous use by workers or consumers.

Issue	Potential options	Comments
Label cannot be applied directly to or printed on the immediate container (i.e. the glass ampoule) as it may contaminate the working solution, which may affect subsequent reactions	Provide label elements in a fold-out label	Not practical as fold-out label cannot be directly affixed to the glass ampoule (to avoid potential contamination of the working solution)
	Provide label elements on a tie-on tag	Not practical as tie-on tag cannot be directly affixed to the glass ampoule (to avoid potential contamination of the working solution)
	Provide label elements on an outer packaging	Not acceptable to only provide label elements on outer packaging - general principles requires 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
Not possible to put all applicable GHS label elements on the immediate container (i.e. the glass ampoule) due to its size and shape	Seal the unlabelled ampoule in a polythene sleeve with an end tag for a label - ampoule is not removed from the polythene sleeve until the point of intended use, i.e. preparation of the working solution.	
	Print label text directly on both sides of the entire polythene sleeve.	Total surface area available on polythene sleeve is not sufficient to include full label text meeting legibility requirements but could carry minimum label text (e.g. at least hazard pictograms, product identifier and name/telephone/of the supplier). Legibility issues (difficult to read text printed on both sides of a transparent sleeve) and production issues (sleeve would need to be pre-printed and line speeds may need to be slowed down to ensure that complete version of label text appears with each ampoule. Using opaque sleeves may address readability issue.
Area available for a label on polythene sleeve end tag is not sufficient to include all required label elements	Label on the polythene sleeve end tag (using both sides of the end tag if needed) should contain at least hazard pictograms, product identifier and name/telephone of the supplier; all required label elements should	Could use both sides of the end tag if needed Increasing the size of the end tag is not practical (i.e. need to avoid using larger packaging) Language requirements (e.g. country

Issue	Potential options	Comments
	appear on the outside packaging	where product is placed on the market has more than one official language) may limit amount of labelling information that can be fitted on the end tag Identified concerns: - minimum label elements required on a label where it is impossible to include a full label even by using fold-out labels - minimum size of pictograms or text to ensure the readability of the information - layout of the pictograms (contiguous or separate) - possibility of a simple generic symbol or precedence of hazard pictograms
	Affix a fold-out label to the polythene sleeve end tag	Identified concerns: 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)
	Affix a fold-out label to the entire surface of the polythene sleeve	Production issues – unable to affix label after ampoule inserted in sleeve (to avoid damaging the ampoule).
All required label elements appear on the outside packaging. However, it may not be possible to produce a legible label for the outside packaging where the country in which the product is used has more than one official language,	If labelling is required in more than one official language, a fold-out label could be securely attached to the outer cardboard box	Avoids using larger packaging (sustainability) Identified concerns: 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) For example, the hazard pictograms, signal word, hazard statements (in the required official languages) and supplier details appear on the front of the folded label whilst the precautionary statements and other supplemental information appear in the fold-out part. The fold-out label is produced in a way such that the front part cannot be detached from the reminder of the label or the outside packaging.