

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

12 November 2018

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Thirty-sixth session

Geneva, 5-7 December 2018

Item 4 (a) of the provisional agenda

Hazard communication:

labelling of small packagings

Preparation of the work programme for biennium 2019- 2020

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

Background

1. The work of the informal working group on labelling of small packagings has led to the addition of examples 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. During the thirty-fifth session, the informal working group discussed possible next steps for the work on labelling of small packaging and the preparation of the work programme for the next biennium.
3. The need to develop additional examples was considered. It was previously suggested to address the issue of packagings that provide users with measured quantities. However, no concrete contributions were made to further develop it.
4. Delegations wishing to develop additional examples for labelling of small packagings were invited to send proposals in writing to the Chair of the informal working group for inclusion in a proposal of program of work for the next biennium.
5. Another suggestion was made to address the use of new technologies such as electronic labels and QR codes.
6. It was considered that, although this might be particularly relevant for small packagings, the use of these new technologies would potentially cover a wider scope.

Proposal

7. It is proposed that, during biennium 2019-2020, the informal working group on small labelling, considers how new technologies, i.e; digitalization, may be used in order to supplement the information given on the [physical] label.

8. As these new technologies may also be used to avoid overloading labels of packagings that are not always considered as “small”, in order to convey safe use and hazard information to users, it is suggested to extend the scope of the group to [practical] labelling issues.

9. It is proposed that, during biennium 2019-2020, the group reviews the existing digital means of communication that could be used to convey GHS hazard information. This could include development of guidelines on how to best provide this information digitally.

10. Consideration could also be given on how to differentiate between elements of which presence on the physical on-pack label is essential, versus elements that are relevant to all or some users but that need not be directly visible each time the product is used, or at the point of purchase.

11. It appears also important to consider and explore solutions for users who are unable to connect to digital (Internet) information.

12. The members of the informal working group that will meet December 6th, during the plenary, are invited to consider this proposal and, should they wish to do so, to make other suggestions for the work programme (i.e. development of new examples).
