



**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, 9-11 December 2020

Item 3 (i) of the provisional agenda

**Classification criteria and related hazard communication:
other issues****Workplace labelling (clarification of 1.4.10.5.5.1): additional
options****Note by the secretariat*****Addendum****Background**

1. During the informal consultations held in July in preparation for the December session, several delegations provided comments on the proposed options 1 and 2 in document ST/SG/AC.10/C.4/2020/6 as well as on the intended meaning of “labelled with the main components” in 1.4.10.5.5.1.
2. Several experts were of the opinion that the “main component” in the context of labelling of temporary containers described in 1.4.10.5.5.1 should be the product identifier (i.e.: the name or identifier of the substance or of the ingredients of the mixture being decanted that contributed to the identified hazard(s)).
3. It was recognized however that it could also be understood as referring to the components of the label, i.e. the label elements as defined in Chapter 1.2 and section 1.4.10.5.2 in Chapter 1.4, and in this respect, several experts expressed support for option 1. It was pointed out, that should this interpretation be retained by the Sub-Committee, it should be clarified whether “main” covers only the standardized label elements or the standardized and non-standardized label elements (see 1.4.6.2);
4. One expert suggested, in addition, to replace “label components” by “label elements” in paragraph 1.4.4.3.
5. To take account of the comments received, the secretariat was invited to include the following options 3 (a) and 3 (b) as an alternative to options 1 and 2 in document ST/SG/AC.10/C.4/2020/6 for consideration by the Sub-Committee.

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2.

6. The proposal hereafter also includes the suggested amendment to paragraph 1.4.4.3.

Proposal

5. Amend the last sentence of the third paragraph under 1.4.10.5.5.1 as follows (new text is shown in **bold**; deleted text is ~~striketrough~~):

Option 3 (a):

“Decanted chemicals intended for immediate use could be labelled with the main ~~components~~ **ingredients** and directly refer the user to the supplier label information and SDS.”.

Option 3 (b):

“Decanted chemicals intended for immediate use could be labelled with the ~~components~~ **product identifier** and directly refer the user to the supplier label information and SDS.”.

6. In 1.4.4.3 replace (twice) “label components” with “label elements”.
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