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

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Item 2 (i) of the provisional agenda
Classification criteria and related hazard communication:
other issues

Workplace labelling: clarification of 1.4.10.5.5.1

Note by the secretariat*

Introduction

1. According to 1.4.10.5.5.1, chemicals falling within the scope of the GHS should carry
the GHS label at the point where they are supplied to the workplace, and the GHS label or
label elements should be maintained on the supplied container and used in workplace
containers.

2. It is however recognised that in many situations it may be impractical to produce a
complete GHS label and attach it to the workplace container, due for example to container
size limitations or lack of access to a process container. This is the case for instance of
chemicals that need to be transferred from supplier containers into smaller containers, storage
vessels, piping or process reaction systems or temporary containers.

3. For decanted chemicals, the last sentence of the third paragraph under 1.4.10.5.5.1,
states: “Decanted chemicals intended for immediate use could be labelled with the main
components and directly refer the user to the supplier label information and SDS”. The
secretariat received a question on the interpretation of “main components” in that context, as
it could be understood as referring to the main components of the label or to the main
components (i.e. ingredients) of a mixture.

4. Should it be confirmed that “main components” in the context of 1.4.10.5.5.1 refer to
the main components of the label, the secretariat would like to invite the Sub-Committee to
also clarify whether the “main components of the label” in that sentence are meant to be only
the harmonized label elements (as defined in Chapter 1.2 and 1.4.6.2) or whether other non-
harmonized label elements such as precautionary statements or supplemental information are
also addressed.

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2.
5. Following the clarifications provided, the Sub-Committee may wish to consider the options below.

Proposal

Option 1

6. In the last sentence of the third paragraph under 1.4.10.5.5.1, replace “could be labelled with the main components” with “could be labelled with the main label elements”.

Option 2

7. In the last sentence of the third paragraph under 1.4.10.5.5.1, replace “could be labelled with the main components” with “could be labelled with the main label components”.