



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

Forty-fourth session

Geneva, 10-12 July 2023

Item 2 (j) of the provisional agenda

Work on the Globally Harmonized System of Classification and Labelling of Chemicals: Practical labelling issues

Revision of examples 1 to 7 in annex 7

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

Background

1. As capacity building is an integral part of the Globally Harmonized System of Classification (GHS) and one of the functions of the Sub-Committee is “to promote understanding and use of the GHS and to encourage feedback”, the United Nations Institute for Training and Research (UNITAR) proposed to amend annex 7 to ensure that the examples better illustrate the requirements of the GHS.
2. Stakeholders rely on the GHS text to provide clear and consistent guidance to those responsible for implementing it. Furthermore, the text is an integral tool and point of ultimate reference for training and capacity building.
3. At its thirty-fifth session, the Sub-Committee examined a proposal by UNITAR in order to revise examples 1 to 7 in annex 7 of the GHS (see informal document INF.12 (thirty-fifth session)) but felt at that time that more discussion was needed on how to update them.
4. At the thirty-sixth session, the review and update of examples 1 to 7 in annex 7 was added to the work programme of the informal working group on practical labelling issues for the biennium 2019-2020.
5. The issue was briefly addressed again at the thirty-eighth session and the Sub-Committee agreed that, during the period 2021-2022, the informal working group should:
 - (a) work on updating the examples in annex 7 while keeping their layout and deleting explicit chemical names, and
 - (b) consider the generation and inclusion of explicit labelling examples as guidance to be published on the GHS guidance webpage, as it is already done

* A/77/6 (Sect. 20), table 20.6.



for the “Examples on the application of GHS criteria” developed by the working group on practical classification issues.

6. In a teleconference on 4 November 2022 the informal working group agreed on the following principles, during the discussion of a thought starter by UNITAR:
- (a) Explicit chemical names should be deleted and only “product identifier” for GHS labels and “UN number” and “proper shipping name” should be used when referring to labelling in accordance with transport of dangerous goods regulations;
 - (b) Examples need to stay general to cover different purposes (e.g. do not include font size specifications for text, references to national or regional GHS implementing regulations or limit the number of recommended precautionary statements among those recommended in annex 3 sections 2 and 3 of the GHS);
 - (c) Introduce a reference to 1.4.10.4 in examples 4 and 5 when referring to transport pictograms (commonly referred to as “labels” in transport regulations). This would address users to chapter 1.4 where all the explanations about different components of a GHS label can be found;
 - (d) GHS-pictograms should be generally smaller in size compared to transport labels;
 - (e) Development of additional examples of GHS labelling with all applicable label elements to be published as guidance on the GHS guidance webpage.

Proposal

7. The Sub-Committee is invited to consider the amendments to annex 7 of the GHS (examples 1 to 7) as proposed by the informal working group in the annex to this document. The proposed changes to examples 1 and 7 are shown in informal document INF.4.
8. The Sub-Committee is also invited to agree on the proposal by the informal working group to work on the development of additional examples of GHS labelling for publication as guidance on the GHS guidance webpage (see informal document INF.32, forty-third session).

Annex

Proposed amendments to annex 7 of the GHS (examples 1 to 7)

Annex 7, introductory sentence

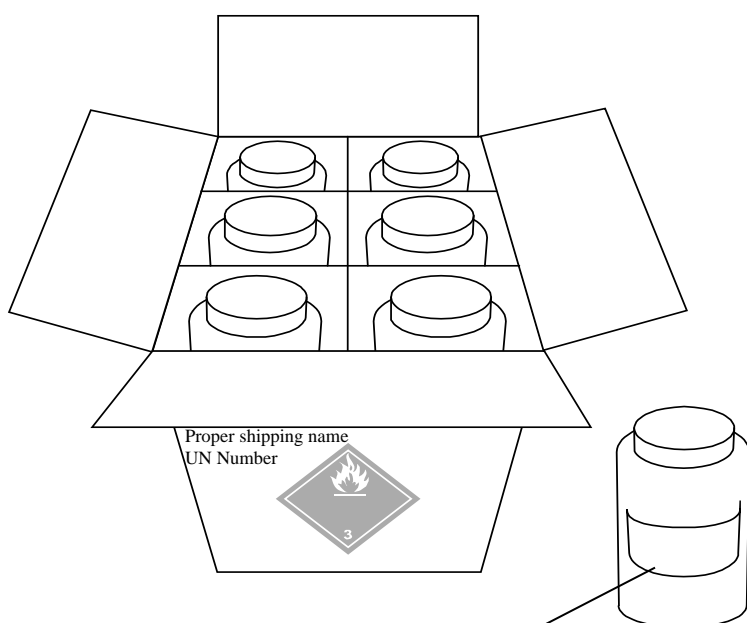
Amend to read as follows: “The following examples are provided for illustrative purposes by arranging the GHS label elements in accordance with sections 1.4.10.4 and 1.4.10.5 and are subject to further discussion and consideration by the GHS Subcommittee.

Example 1 Replace with the following:

“Example 1: Combination packaging for a chemical with the classification: Flammable liquid, Category 2

Outer packaging: Box with a flammable liquid transport label*

Inner packaging: Plastic bottle with GHS label



Product identifier (see 1.4.10.5.2 (d))

SIGNAL WORD (see 1.4.10.5.2 (a))

Hazard statements (see 1.4.10.5.2 (b))

Precautionary statements (see 1.4.10.5.2 (c) and annex 3 sections 2 and 3)

Supplemental information as allowed or required by the competent authority as appropriate (see 1.4.10.5.4.2).

Supplier identification (see 1.4.10.5.2 (e))

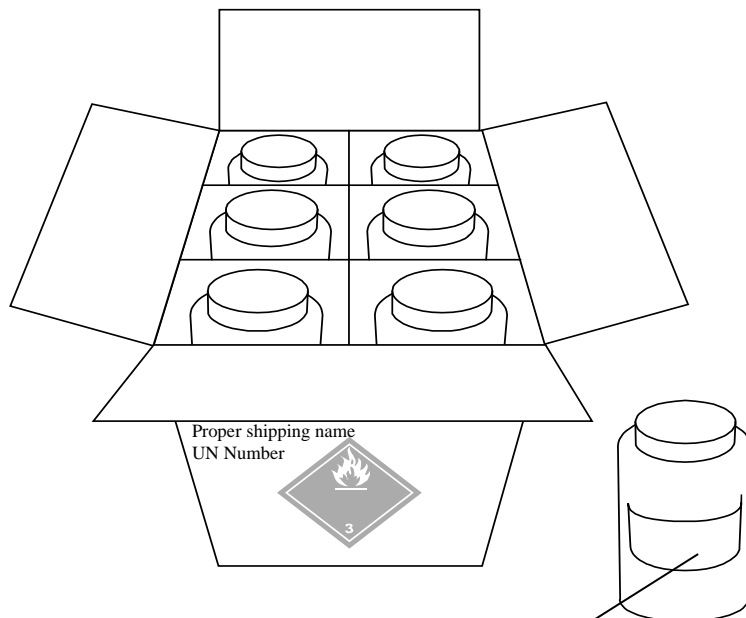
* Only the transport markings and labels as specified in the UN Model Regulations are required for outer packagings.”

Example 2 Replace with the following:



“Example 2: Combination packaging for a chemical with the classification: Flammable liquid, Category 2 and specific target organ toxicity – single exposure, Category 1

Outer packaging: Box with a flammable liquid transport label*

Inner packaging: Plastic bottle with GHS label



Product identifier (see 1.4.10.5.2 (d))

SIGNAL WORD (see 1.4.10.5.2 (a))

Hazard statements (see 1.4.10.5.2 (b))

Precautionary statements (see 1.4.10.5.2 (c)) and annex 3 sections 2 and 3)

Supplemental information as allowed or required by the competent authority as appropriate (see 1.4.10.5.4.2).

Supplier identification (see 1.4.10.5.2 (e))

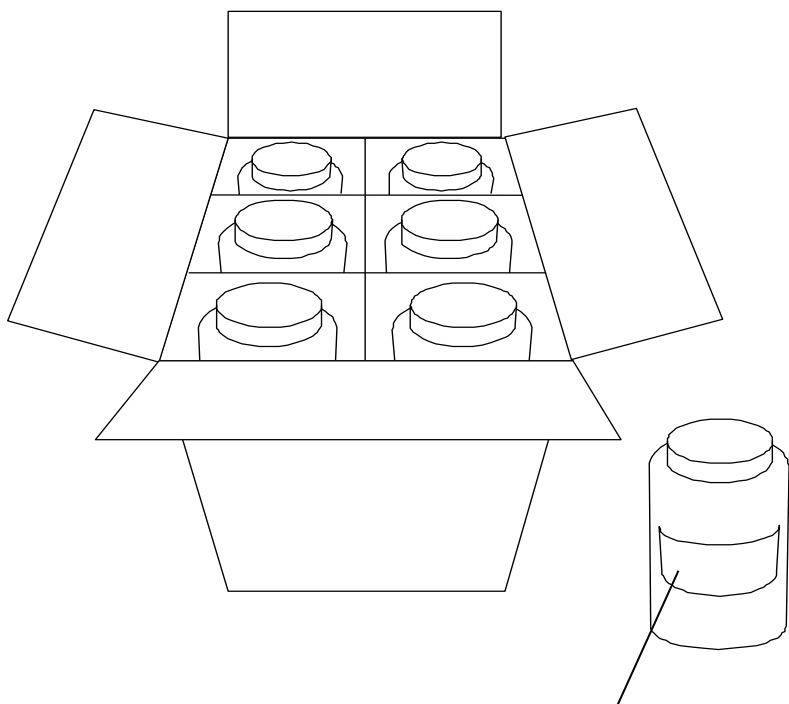
* Only the transport markings and labels as specified in the UN Model Regulations are required for outer packagings.”.

Example 3 Replace with the following:

“Example 3: Combination packaging for a chemical with the classification: skin corrosion/irritation, Category 2 and serious eye damage/eye irritation, Category 2A

Outer packaging: Box with no label required for transport*

Inner packaging: Plastic bottle with GHS hazard warning label



Product identifier (see 1.4.10.5.2 (d))



SIGNAL WORD (see 1.4.10.5.2 (a))

Hazard statements (see 1.4.10.5.2 (b))

Precautionary statements (see 1.4.10.5.2 (c)) and annex 3 sections 2 and 3)

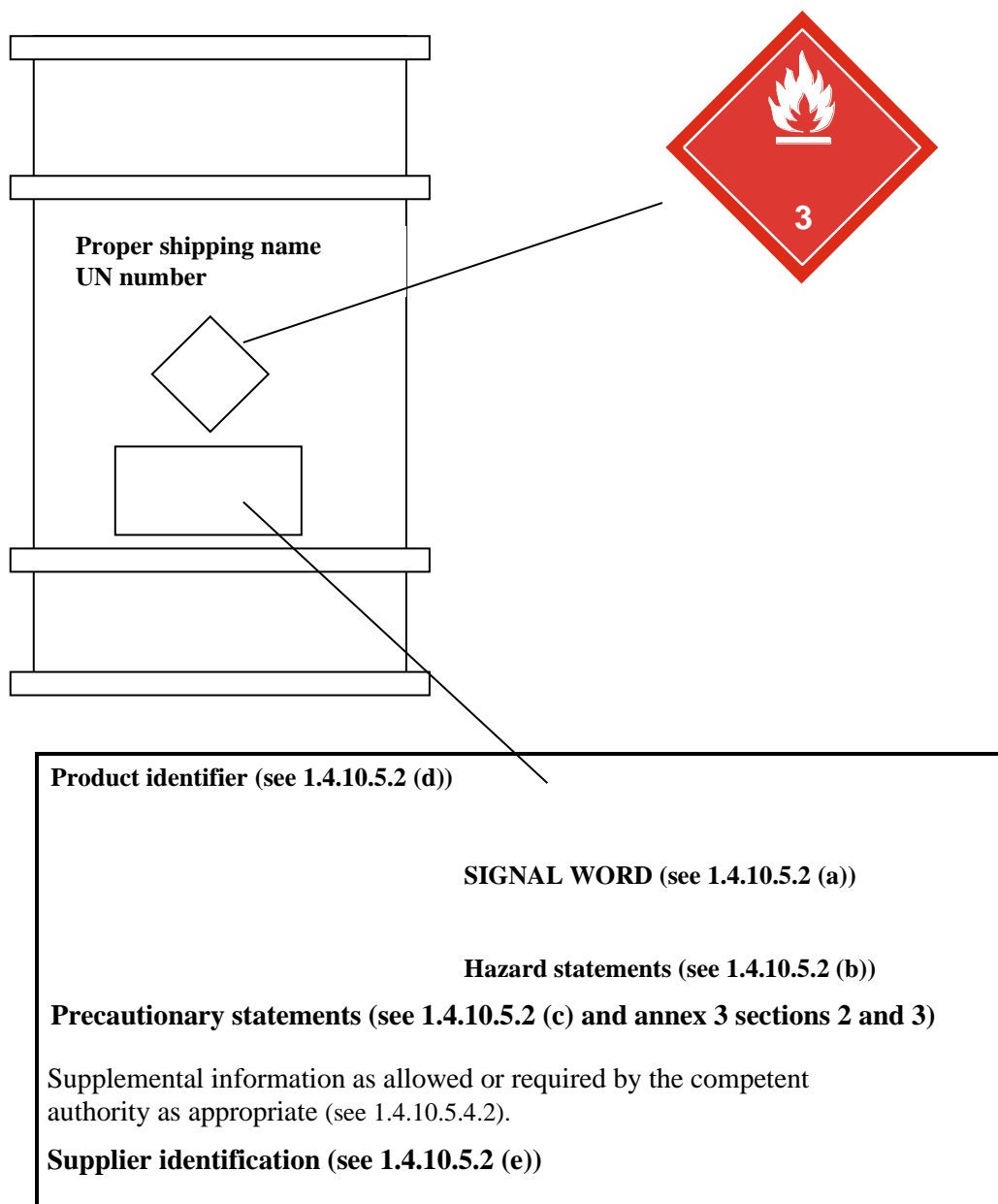
Supplemental information as allowed or required by the competent authority as appropriate (see 1.4.10.5.4.2).

Supplier identification (see 1.4.10.5.2 (e))

* *Some competent authorities may require a GHS label on the outer packaging.”.*

Example 4 Replace with the following:

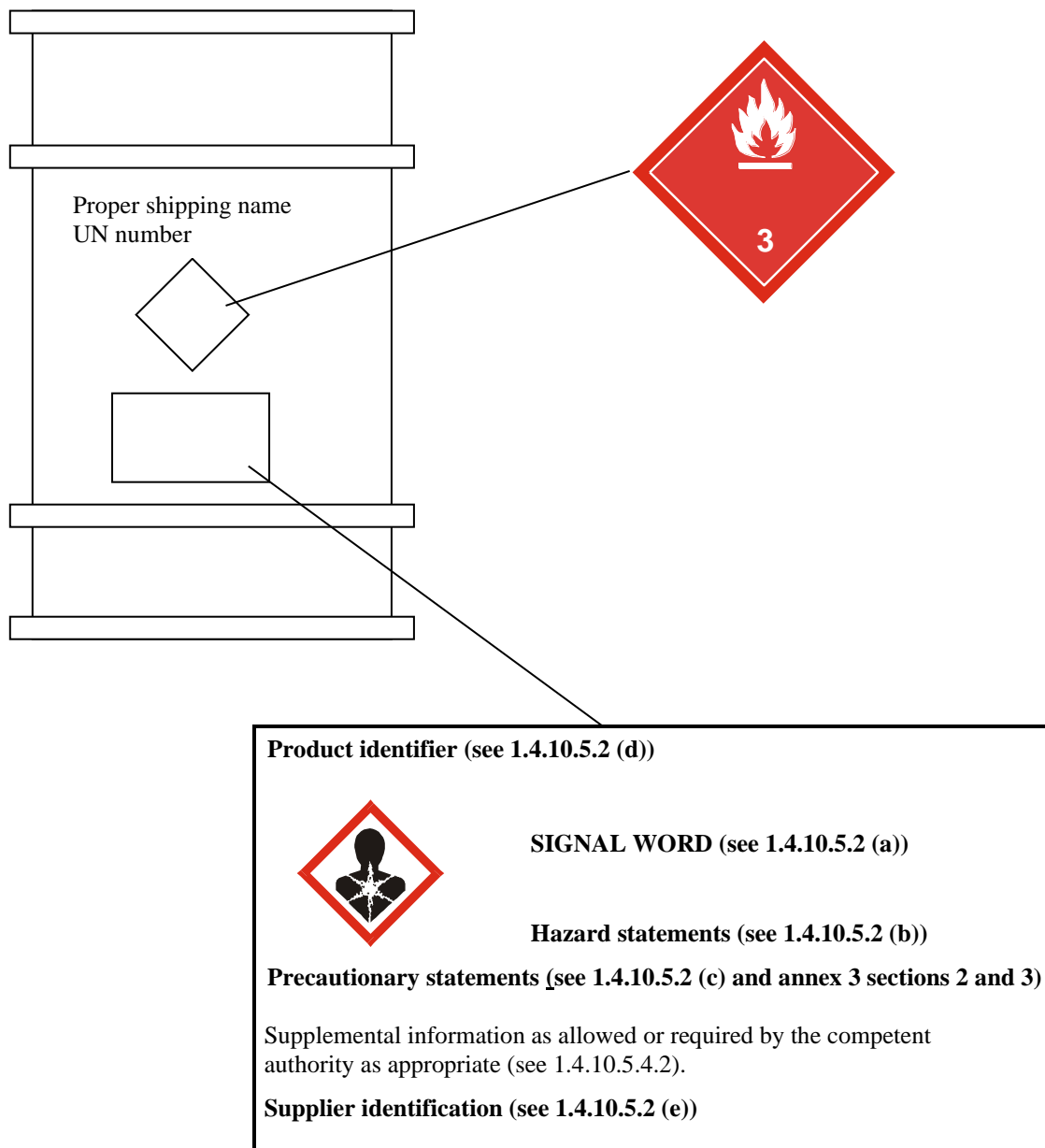
“Example 4: Single packaging (200 l drum) for a chemical with the classification flammable liquid, Category 2



Note: The GHS label and the Class 3 flammable liquid pictogram (commonly referred to as label in transport regulations, see 1.4.10.4) as well as any other markings required by the UN Model Regulations may also be presented in a combined format (see also example 7).”

Example 5 Replace with the following:

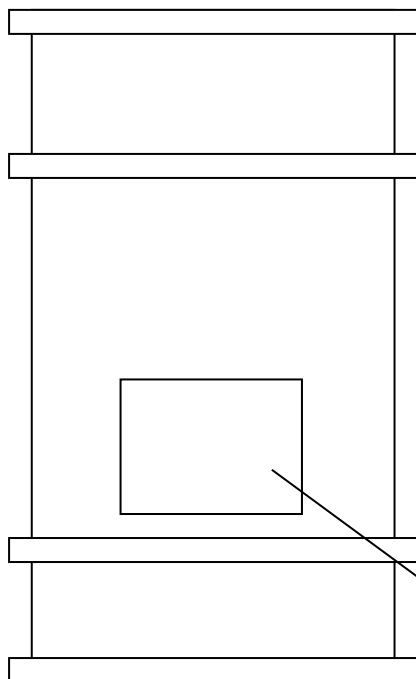
“Example 5: Single packaging for a chemical with the classification: Flammable liquid, Category 2 and specific target organ toxicity-repeated exposure, Category 1




Note: The GHS label and the Class 3 flammable liquid pictogram (commonly referred to as label in transport regulations, see 1.4.10.4) as well as any other markings required by the UN Model Regulations may also be presented in a combined format (see also example 7).”

Example 6 Replace with the following:

“Example 6: Single packaging for a chemical with the classification Skin corrosion/irritation, Category 2 and serious eye damage/eye irritation, Category 2A”



Product identifier (see 1.4.10.5.2 (d))



SIGNAL WORD (see 1.4.10.5.2 (a))

Hazard statements (see 1.4.10.5.2 (b))

Precautionary statements (see 1.4.10.5.2 (c) and annex 3 sections 2 and 3)

Supplemental information as allowed or required by the competent authority as appropriate (see 1.4.10.5.4.2).

Supplier identification (see 1.4.10.5.2 (e))

”

Example 7 Replace with the following:



“Example 7: Additional guidance when transport and other GHS information appear on single packagings

- (a) Where transport and other GHS information appear on a single packaging, consideration must be given to ensure that the label elements are placed in a manner that addresses the needs of the different sectors. The GHS pictogram does not appear on the GHS label when a transport label for the same hazard is already used (see 1.4.10.5.1);
- (b) Transport labels must convey information immediately in an emergency situation. They must be able to be seen from a distance, as well as in conditions that are smoky or otherwise partially obscure the package;
- (c) Transport labels are distinct in appearance from pictograms intended solely for non-transport purposes which helps to distinguish them;
- (d) Transport labels may be placed on a separate panel of a GHS label to distinguish them from the other information or may be placed adjacent to the other GHS information on the packaging;
- (e) The pictograms may be distinguished by adjusting their size. Generally speaking, the size of the non-transport pictograms should be proportional to the size of the text of the other label elements. This would generally be smaller than the transport labels (the size of which is intentionally regulated), but such size adjustments should not affect the clarity or comprehensibility of the non-transport pictograms;

Following is an example of how such a label may appear for a chemical in a 200 l drum for transport and use in the workplace.

This example is not intended to cover all specific requirements which may have been included in national legislation implementing the GHS nor all possible supplemental information which may be voluntarily included (e.g. “Directions of use” or “Filling weight”) or which may be required by some competent authorities. It takes account of the required basic GHS label information as described in section 1.4.10.

Single packaging using 3 adjacent panels to convey multiple hazards: A mixture with the classification: Flammable liquid, Category 2; Acute toxicity (inhalation) Category 4, and Specific target organ toxicity - repeated exposure, Category 2

| | | |
|---|--|---|
| <p>PRODUCT identifier (see 1.4.10.5.2 (d))</p> <p>Supplier identification ((see 1.4.10.5.2 (e))</p> |  |  |
| <p>Danger</p> | | <p>UN Number Proper shipping name</p> |
| <p>Highly flammable liquid and vapour. Harmful if inhaled. May cause liver and kidney damage through prolonged or repeated exposure.</p> <p>Keep container tightly closed. Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Store in a well- ventilated place. Keep cool. Ground and bond container and receiving equipment. Use explosion-proof ventilating equipment. Use non-sparking tools. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse affected areas with water or shower. In case of fire: Use dry chemical or carbon dioxide to extinguish. Take action to prevent static discharges. Use only outdoors or in a well-ventilated area. Do not breathe mist, vapours or spray. Wear protective gloves, protective clothing, eye protection and face protection. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Get medical help. Dispose of contents/container to the municipal collection point in accordance to local/national regulations.</p> | | |
| <p>Expiration date:</p> | | |