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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

Eight session, 6-9 December 2004
Item 3 (c) of the provisional agenda

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Labelling Guidance

Transmitted by the expert from the United States of America

1. At the sixth session of the Sub-Committee, the Correspondence Group on Labelling provided agreed text to address issues that had been raised in their discussions regarding placement of information on labels and an agreed example of a label illustrating the issues that had been raised about the relationship of transport information to information for other sectors on labels that have both on a single packaging.
2. At its seventh session, the Sub-Committee agreed that this text and the example should be included in Annex 6 of the GHS, and that a formal proposal to do so should be presented at the next meeting, for inclusion in the revised GHS. Participants further noted that the example should be updated, notably with respect to symbols for aquatic toxicity and the recent decision by the International Maritime Organization to discontinue the “marine pollutant” symbol. The Chair of the TDG Sub-Committee suggested that for clarity and simplicity, it would be easiest to delete the aquatic toxicity symbols, since this particular hazard class was not central to the issue illustrated by the example.
3. In accordance with the Sub-Committee’s past decisions, this paper presents a simplified example and proposes its inclusion with the agreed text in Annex 6 of the GHS document as follows :

At the end of the existing Annex 6, add the following :

GE.04-23745

"Example 7: Additional guidance when transport and other GHS information appear on single packaging

- *Where transport and other GHS information appear on a single packaging (e.g. a 200 liter drum), consideration must be given to ensuring the label elements are placed in a manner that addresses the needs of the different sectors.*
- *Transport pictograms 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.*
- *The transport-related pictograms are distinct in appearance from pictograms intended solely for non-transport purposes which helps to distinguish them.*
- *The transport pictograms 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.*
- *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-related pictograms, 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:

[insert the content of page 3]

Single packaging using 3 adjacent panels to convey multiple hazards.

Product classified as (1) Category 2 flammable liquid, (2) Category 4 acute toxicity by inhalation, and (3) Category 3 target organ/systemic toxicity, repeat exposure.

CODE

PRODUCT NAME

COMPANY NAME

Street Address
City, State, Postal Code, Country
Phone Number
Emergency Phone Number

DIRECTIONS FOR USE:
XXXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXX

Fill weight: XXXX
Gross weight: XXXX

Lot Number: XX
Fill Date: XXXX
Expiration Date: XXXXXX



Danger
Keep out of the reach of children.
Read label before use.

Highly flammable liquid and vapor.
Harmful if inhaled.
May cause liver and kidney damage through prolonged or repeated exposure.

Keep container tightly closed.
Keep away from heat/sparks/open flame.
No smoking.
Use only outdoors or in a well-ventilated area.
Avoid breathing fumes.
Wear protective gloves and eye/face protection [as specified....]
Ground/bond container and receiving equipment.

IN CASE OF FIRE use [as specified] for extinction

FIRST AID
IF INHALED: Remove to fresh air and keep at rest in a position comfortable for breathing.
Call a Poison Control Center or doctor.

Store in a cool, well-ventilated place.

UN Number
Proper shipping name

[ADD UPCs]