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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

Fourteenth session
Geneva, 12-14 December 2007
Item 5 (c) of the provisional agenda

HAZARD COMMUNICATION ISSUES

Labelling of very small packagings

Transmitted by the European Chemical Industry Council (CEFIC)^{*/}

Background

1. At the twelfth session of the Sub-Committee, CEFIC submitted document ST/SG/AC.10/C.4/2006/12 concerning the labelling of very small packagings. Subsequently an inter-session correspondence group was set up with a view to progressing on the issue.
2. A small number of the correspondence group members have contributed to the discussions within the group since their informal meeting in Geneva in July 2007.

^{*/} In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14) (Work on hazard communication issues).

3. While there is consensus that the labelling of small packagings needs to be specifically addressed, it is clear that there are a number of divergent views on how the GHS should deal with the problem.

Progress report

4. Some issues still need to be solved as follows:

- (a) *What should be the size limits for a small pack (if any)? Should there also be a definition of a very small pack?*

Some members believe that in some cases it will not be practical, or possible to fully and correctly label a packaging of less than 250 ml. Others believe that a small packaging should be defined as having a smaller volume than this.

Some members have proposed that a very small packaging could be defined as one of less than 10 ml. Others have suggested 30 ml as the very small packaging threshold to align with excepted quantities for transport.

There are other suggestions that a small packaging should be defined based on the available label area.

- (b) *Should detailed guidance for labelling of small packagings be put in place or should there only be broad guiding principles? What should be relevant information on a small packaging label?*

Some members believe that it should only be necessary to adopt broad guiding principles to be followed depending upon competent authority requirements. Others believe this would not readily lead to global harmonization and they favour a more structured approach. One option is to set out a hierarchy of labelling elements. Another option that has been put forward is to use a decision tree based on various groups of users, with the precise details of what to include or omit being the responsibility of the labeller.

Further details of possible options appear in the annex.

Next steps

5. The correspondence group believes that this issue needs to be moved forward so that a harmonised approach to small pack labelling can come into effect. In order to do this the group would appreciate some direction on how to proceed from the Sub-Committee.

Annex

- (a) *What should be the size limits for a small pack (if any)? Should there also be a definition of a very small pack?*

Options:

1. Do not specify any particular minimum size;
2. Define a small packaging as having a volume of 250 ml or less;
3. Define a very small packaging as having a volume of 10 ml or less;
4. Define a very small packaging as having a volume of 30 ml or less;
5. Define a small packaging as one having an available label area of less than [18 cm²].

- (b) *Should detailed guidance for small pack labelling be put in place or should there only be broad guiding principles? What should be relevant information on a small pack label?*

Options:

1. Apply only broad guiding principles

If an immediate container or outside packaging is not large enough to accommodate all GHS label elements, then the remaining GHS label elements are to be attached to the container or outside packaging, or accompany the product. Competent authorities may specify specific label information required on the immediate container or outside packaging, or to accompany the product.

2. When it is not possible for all label elements to be applied to the label on a small packaging without a loss of legibility, then as many label elements as possible should be applied using the following order of precedence:

- (i) Product identifier (Substances: chemical identity of the substance; Mixtures: trade name only);
- (ii) Supplier identification: (Name of the manufacturer or supplier only plus emergency telephone number);
- (iii) GHS hazard pictograms;
- (iv) Hazard statements;
- (v) Signal words;
- (vi) Precautionary statements;

3. A decision tree gives basic conditions for the various groups of users, such as industrial and professional users who always receive safety data sheets with full product-specific labelling, for private final consumers and for the various forms of distribution (combined packaging, single packaging) in this sector. The precise implementation (e.g. selection of symbols and safety instructions) is left to the expert knowledge of the party placing the product on the market, within this party's product responsibility. The priority objective is the protection of human health and the environment. Basic conditions are given in the decision tree while, as mentioned above, implementation falls within the responsibility of the party placing the product on the market.
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