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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

Sixteenth session
Geneva, 10 -12 (a.m) December 2008
Items 3 and 7 of the provisional agenda

HAZARD COMMUNICATION ISSUES

Labelling of small packagings

Transmitted by the European Chemical Industry Council (CEFIC)¹

Background

1. At the fifteenth session of the Sub-Committee, CEFIC submitted a report on the progress on discussions within the inter-sessional informal correspondence group on the labelling of small packagings (document ST/SG/AC.10/C.4/2008/7).
2. The outcome of a meeting of the inter-sessional informal correspondence group held immediately prior to the fifteenth session of the Sub-Committee was reported in information document UN/SCEGHS/15/INF.44. At that meeting, participants:

¹ 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).

- (a) agreed on the general principles to be used as a basis for the development of guidance covering the labelling of small packagings; and
 - (b) highlighted the need for a review of the packaging terminology used in the GHS with a view towards promoting consistency, clarity and comprehensibility.
3. It was subsequently agreed that CEFIC would bring forward a working document for consideration by the Sub-Committee at its sixteenth session, covering:
- (a) the proposed addition of general principles to the GHS text addressing the issue of small packagings, and
 - (b) proposed activities to be included in the work programme for the next biennium.

Proposal for an addition to the GHS text on the labelling of small packagings

4. It is proposed to add the following general principles as a new paragraph 1.4.10.5.4.4:

“1.4.10.5.4.4 Labelling of small packagings

The general principles that should underpin labelling of small packagings are:

- (a) All the applicable GHS label elements should appear on the immediate container of a hazardous substance or mixture where possible;
- (b) Where it is impossible to put all the applicable label elements on the immediate container itself, other methods of providing the full hazard information should be used in accordance with the definition of “Label” in the GHS. Factors influencing this include *inter alia*:
 - (i) the shape, form or size of the immediate container;
 - (ii) the number of label elements to be included, particularly where the substance or mixture meets the classification criteria for multiple hazard classes;
 - (iii) the need for label elements to appear in more than one language.
- (c) Where the volume of a hazardous substance or mixture is so low and the supplier has data demonstrating, and/or the competent authority has determined, that there is no likelihood of harm to human health and/or the environment, then the label elements may be omitted from the immediate container;

- (d) Competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories where the volume of the substance or mixture is below a certain amount;
- (e) Some labelling elements on the immediate container may need to be accessible throughout the life of the product, e.g. for continuous use by workers or consumers.”

Programme of work for the biennium 2009 – 2010

5. CEFIC proposes that the following activities be included in the Sub-Committee’s programme of work for the next biennium:

(a) Labelling of small packagings

The inter-sessional correspondence group on the labelling of small packagings should continue work on the development of guidance, to be included in the GHS, on the application of the general principles for the labelling of small packagings with the goal of bringing forward a formal proposal by December 2009.

(b) Packaging terminology/definitions

The term ***Label*** is defined in Chapter 1.2 of the GHS as follows:

“Label” means an appropriate group of written, printed or graphic information elements concerning a hazardous product, selected as relevant to the target sector(s) that is affixed to, printed on, or attached to the immediate container of a hazardous product, or to the outside packaging of a hazardous product.

This definition includes the terms “immediate container” and “outside packaging” which are not defined in Chapter 1.2. Two other packaging terms (“outer packaging” and “inner packaging”) are used in Annex 7 to the GHS but again are not defined as such in Chapter 1.2.

The inter-sessional correspondence group on the labelling of small packagings has reviewed the need for various packaging definitions to be included in Chapter 1.2. While some participants stressed the need to keep the terminology as simple as possible and questioned the need for new terms and definitions, others suggested that a number of additional terms and definitions might improve clarity especially for application cross sectors.

It is therefore suggested that a review of the packaging terms in the GHS should be carried out with a view to improve consistency and clarity and to develop proposals for inclusion in Chapter 1.2 as appropriate.

Any proposed new GHS packaging definitions would need to be reviewed against existing definitions in the transport of dangerous goods regulations to ensure that they are consistent and/or do not create unnecessary confusion. . As this is linked to the work of the correspondence group, the group is ready to carry out this work in parallel to the development of guidance.

Action requested of the Sub-Committee

6. The Sub-Committee is invited to take note of the progress made, endorse the results achieved so far and include the activities as proposed above in the programme of work for the next biennium.
