

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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HAZARD COMMUNICATION ISSUES

Labelling of very small packagings

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

The intersessional working group on labelling of small packagings met before the session and agreed to propose to the sub-committee:

- To introduce in Chapter 1.4 of the GHS, by the end of the present biennium, general principles to address the issue of very small packagings
- To add the development of guidance to the work programme of the next biennium

General Principles

In Chapter 1.2 of the GHS, “*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.

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

- (a) All the applicable GHS label elements should appear on the receptacle of a hazardous substance or mixture where possible;
- (b) Where it is impossible to put all the required label elements on the receptacle 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 receptacle;

- (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 man and/or the environment, then the label elements may be omitted from the receptacle.
- (d) Competent authorities may allow certain label elements to be omitted from the receptacle for certain hazard classes/categories where the volume of the substance or mixture is below a certain amount. Some labelling of the receptacle needs to be accessible through the life of the product.

Packaging definitions

Definition of **Label** in Chapter 1.2 includes terms “immediate container” and “outside packaging” which are not defined in Chapter 1.2. This may need amendment of the definition of Label in that chapter.

During various discussions on the labelling of small packagings issue, it became apparent that some packaging terms meant different things to different people. It was noted that the definition of containment and packaging had been considered by the Sub-Committee as per ST/SG/AC.4/2006/10 (Secretariat) and the July 2006 meeting report.

The correspondence group 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. There was consensus on the need to review any proposed new GHS definitions in light of existing definitions in the TDG to ensure that they are consistent and/or do not create unnecessary confusion.

The following packaging definitions taken from the Model Regulations for the TDG have been suggested by CEFIC for further consideration by the correspondence group and the Sub-Committee:

Receptacle: Containment vessel for receiving and holding hazardous substances, mixtures or articles, including any means of closing.

Package: The complete product of the packing operation, consisting of the packaging and its contents prepared for transport *or storage or use*.

Packaging: a receptacle and any other components or materials necessary for the receptacle to perform its containment function.
