

# GHS Labeling With Focus on Small Packages

## Rev 8 /Annex 7 and PLI Working Group

September 2019



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engage your senses

# Rev 8 /Annex 7 and PLI Working Group

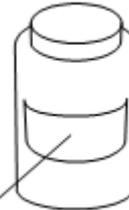
- 1. Labelling of small packagings without accomodation**
- 2. Ampoules**
- 3. Fold out labels**
- 4. Sets and Kits – Scenario A**
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# Labelling of small packagings without accomodation

## Single packaging label

### Required elements:

- Product identifier
- Pictogram
- Signal word
- Hazard statement
- Precautionary statements
- Supplemental information
- Supplier identification



**PAINT (FLAMMALINE,  
LEAD CHROMOMIUM)**

Product identifier  
(see 1.4.10.5.2 (d))

**DANGER**

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))

Additional information as required by the competent authority as appropriate.

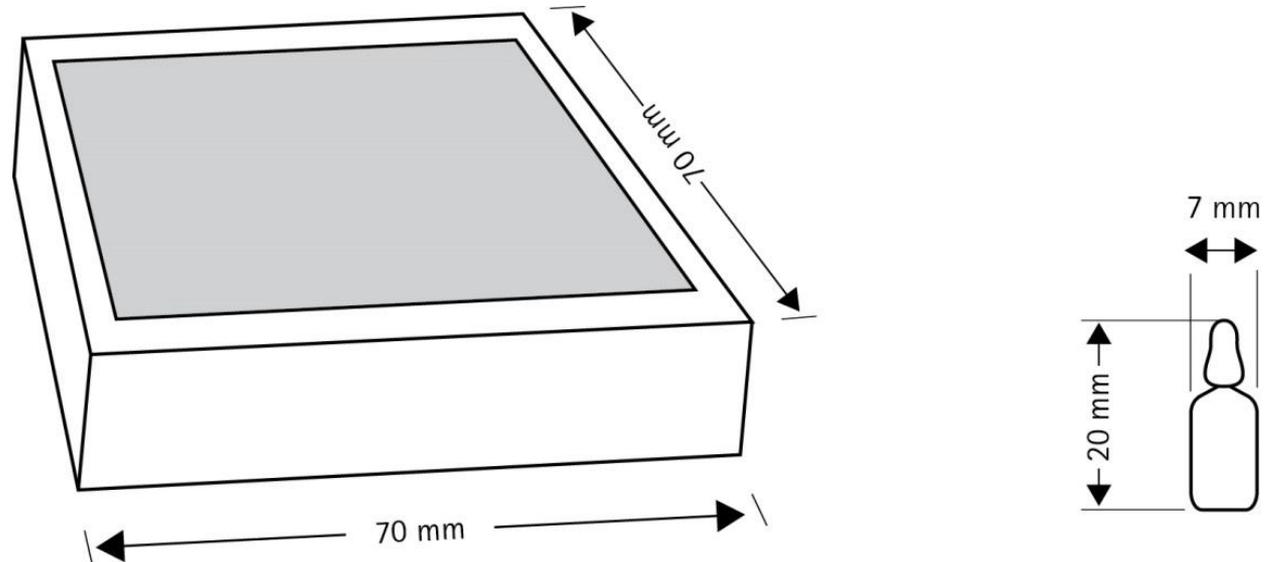
Supplier identification (see 1.4.10.5.2 (e))

# Ampoules - Example 8

**Small immediate container that cannot be labelled based on shape/size and restrictions relating to the method of use, contained in an outside packaging which can display the entire information required on the GHS label.**

**Cardboard box containing glass ampoules of a product used as laboratory reagent.**

**Each ampoule contains 0.5 g.**



# Inner packaging

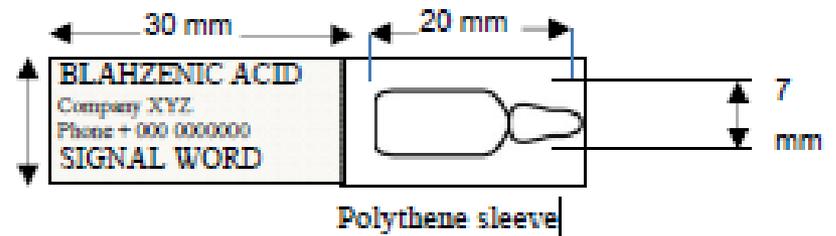
## Reduced labelling elements

### Required elements:

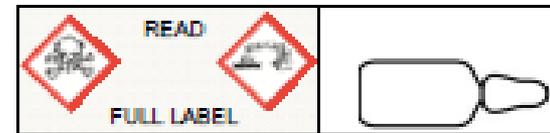
- Product identifier
- Supplier NAME & telephone number
- Signal word
- Pictogram
- "Read Full Label"

Inner packaging  
sleeve with minimum required GHS label elements

One side



Reverse side

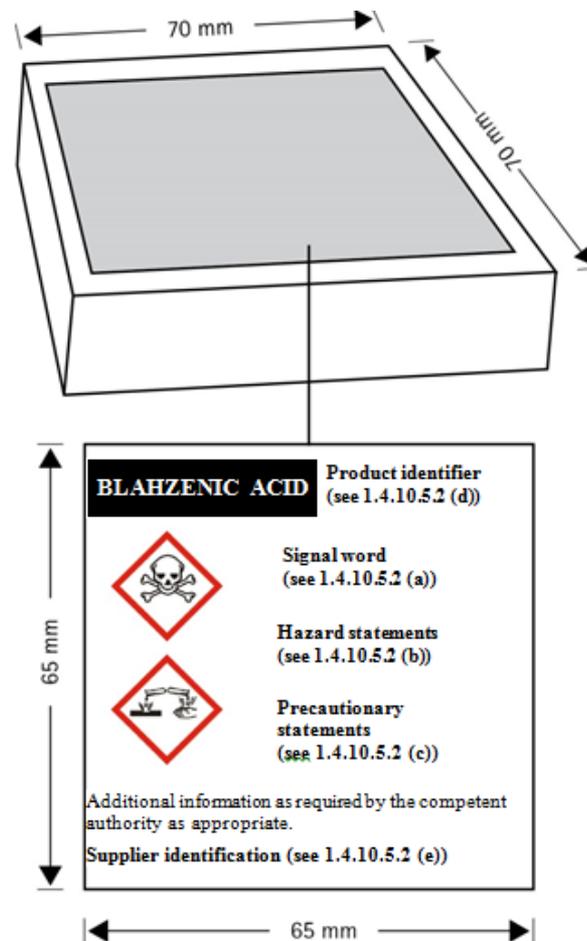


# Outer Packaging

## Full labelling elements

### Required elements:

- Product identifier
- Pictograms
- Signal word
- Hazard statements
- Precautionary statements
- Supplemental information
- Supplier identification



# Fold-out labels - Example 9

e.g., Household cleaners



## A fold-out label is:

- Securely affixed to the immediate container (i.e. the fold-out label is attached so that it remains affixed during the foreseeable conditions and period of use)
- Produced in such a way that:
  - The front part cannot be detached from the remainder of the label
  - Label can repeatedly be closed, opened and closed again so it is not hanging loose

# What goes where?

## Front page

- Product identifier\*
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

### Additional Info

- A symbol to inform the user that the label can be opened to illustrate that additional information is available on inside pages
- If more than one language is used on the fold-out label: the country codes or language codes

## Text pages/ Pages inside

- Product identifier including, as applicable, hazardous components contributing to the classification
- Signal word
- Hazard statements
- Precautionary statements
- Additional information (e.g. directions for use, information required by other regulations, etc.)

### Additional Info

- If more than one language is used on the fold-out label: the country codes or language codes

## Back page

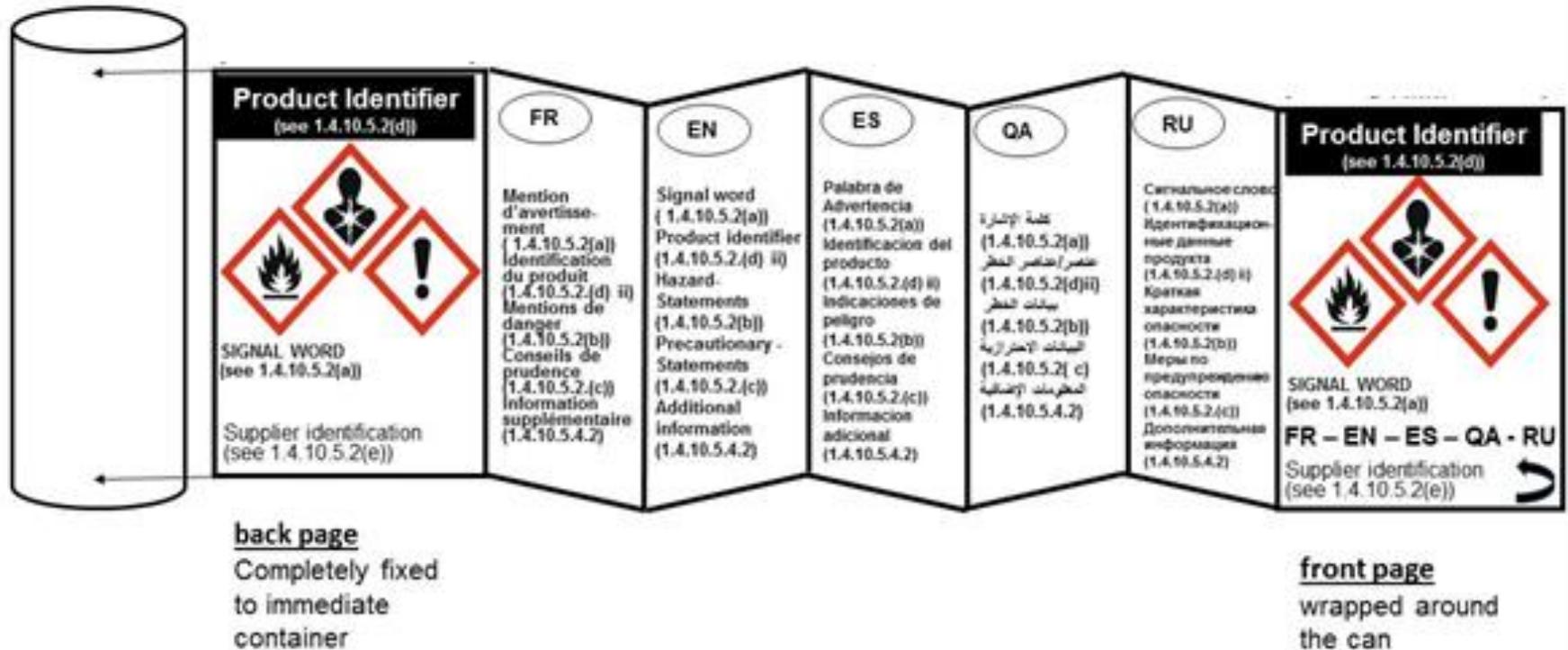
(affixed to the immediate container)

- Product identifier\*
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

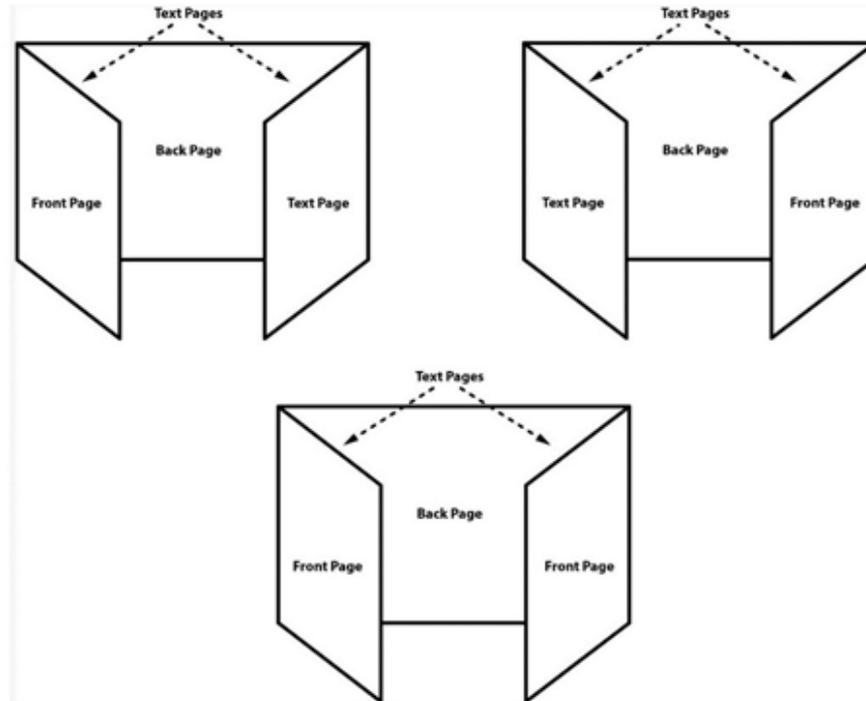
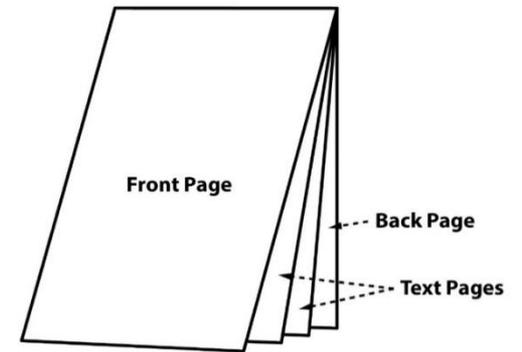
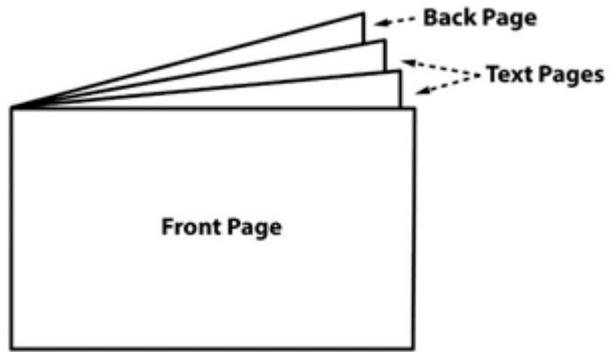
\*The product identifier on the front and back page does not include hazardous components.

If hazardous components are required on the label, they are displayed in the appropriate languages on the text pages.

# And you're done!



# But wait, there's more!



# Sets and Kits - Example 10

A set or kit :

- Is a combination packaging intended for defined applications
- Contains two or more small removable inner containers
- Each inner container contains different products which can be hazardous or not hazardous substances or mixtures

Insufficient space on inner packaging due to:

- Packaging is too small
- Too many hazard and precautionary statements
- Labelling information must be presented in multiple languages

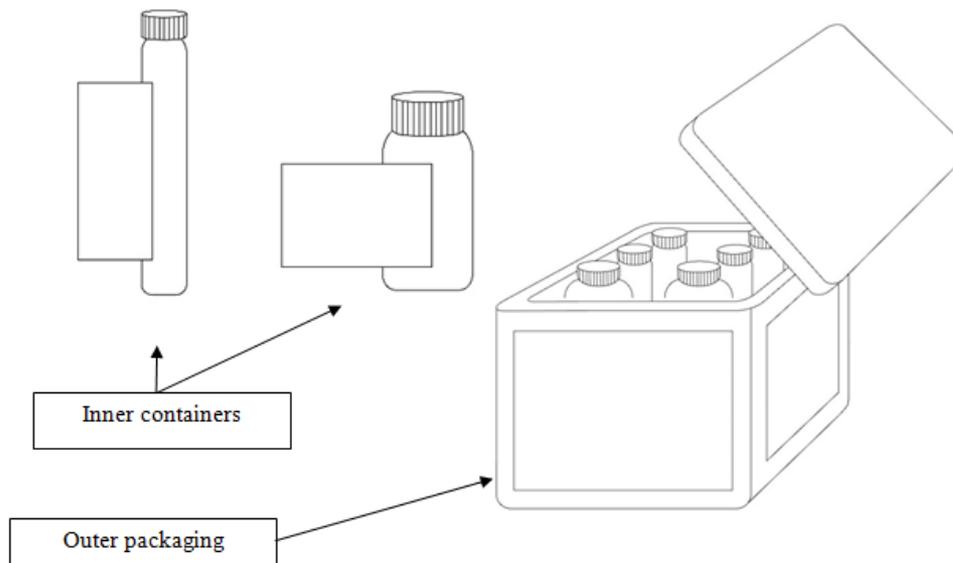


# Scenario A

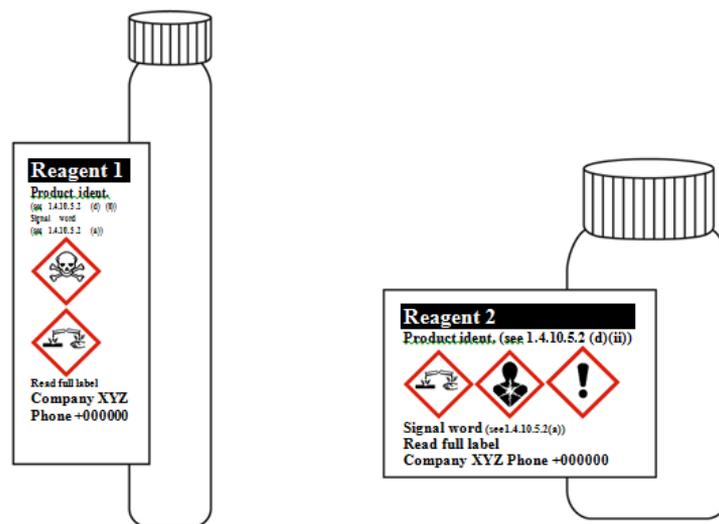
## Inner packaging

### Required elements:

- Product identifier \*
- Supplier name & telephone number
- Signal word
- Pictograms
- "Read Full Label"



- \* for each substance or mixture matching the identifier used on the outer packaging label and SDS for that substance or mixture, e.g., "Reagent 1" and "Reagent 2"

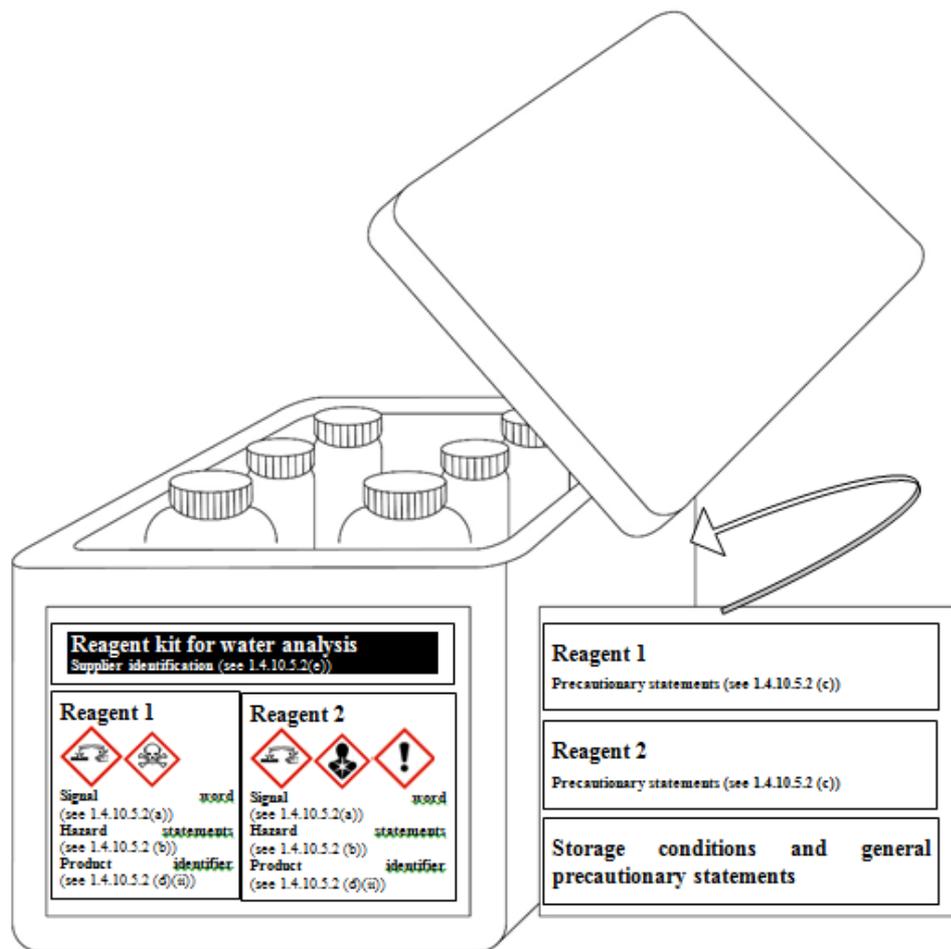


# Scenario A

## Outer packaging

### Required elements:

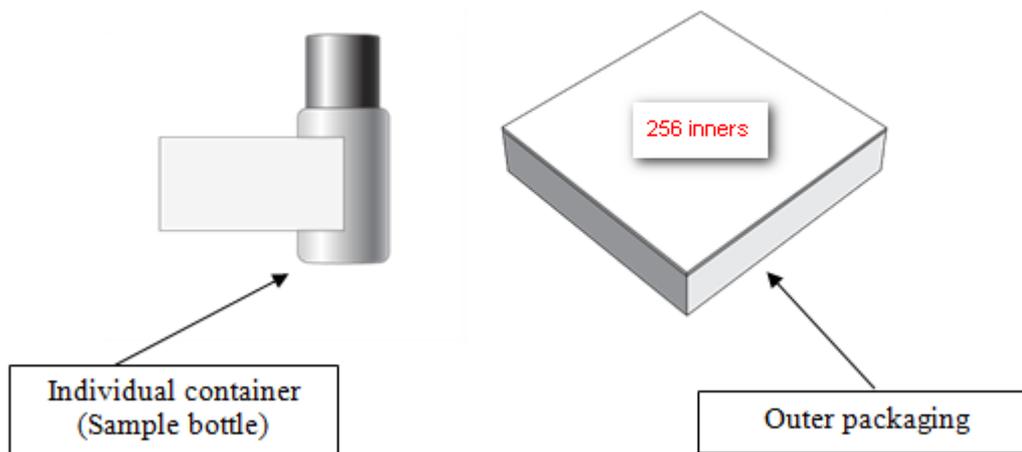
- Kit Identifier
- Supplier identification
- For each inner:
  - Product identifier
  - Pictogram for each hazardous substance or mixture
  - Signal word
  - Hazard statements
- Separate from above label elements
  - Precautionary statements for each inner
  - Storage conditions and general precautionary statements
  - Supplemental information



# Scenario B

This scenario presents a sample kit:

- Used for marketing purposes which consist of a large number of different substances or mixtures in individual containers (sample bottles) presented in an outer packaging (e.g. a box)
- Depending upon the contents of each bottle, some or all of the different substances or mixtures may be classified as hazardous
- The individual inner containers (e.g. bottles) are stored in the outer packaging throughout the lifecycle of the sample kit
- Customers may select individual bottles and remove them from the box to check clarity, color or odor and then replace them into the open slot within the outer packaging

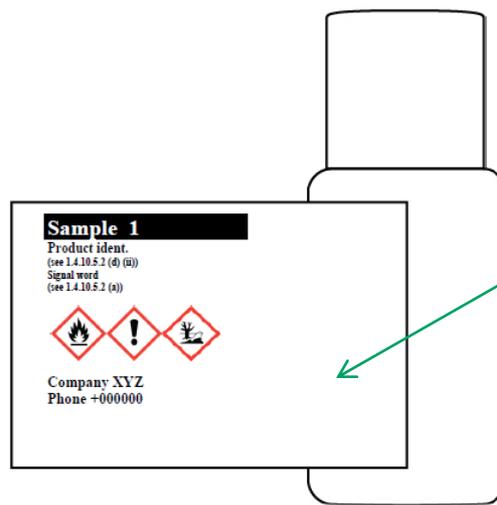


# Scenario B

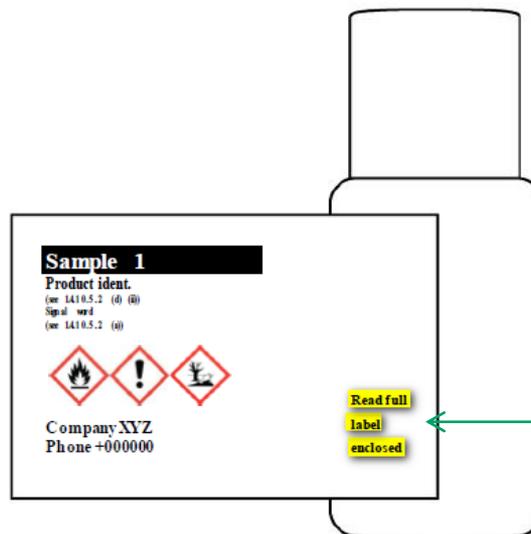
## Inner packaging

### Required elements:

- Supplier name & telephone number
- Product identifier
- Pictograms
- Signal word
- "Read Full Label Enclosed"



Rev 8 English version is missing the note (correct in French version)



Correction forthcoming

# Scenario B

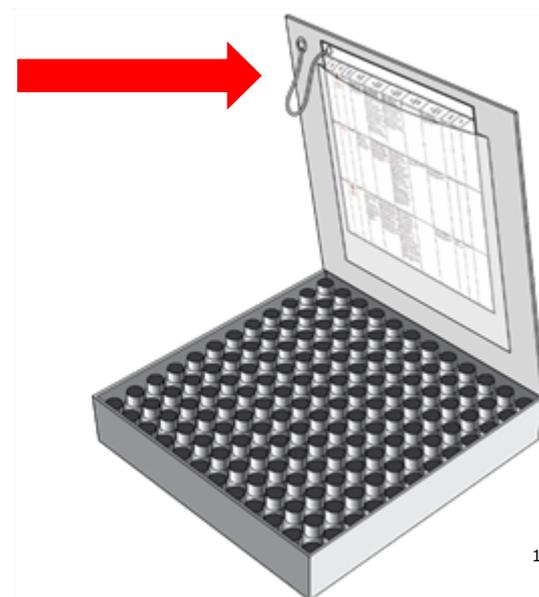
## Full Label Information

Attached to the inside of the outer packaging is the full GHS label information for each individual container containing a hazardous substance or mixture

Product identifier (see 1.4.10.5.2 (d) (ii))	Pictogram(s) (see 1.4.10.4)	Signal word (see 1.4.10.5.2 (a))	Hazard statement(s) (see 1.4.10.5.2 (b))	Precautionary statement(s) (see 1.4.10.5.2 (c))	Supplemental information (see 1.4.10.5.4.2)
123		Warning	Flammable liquid and vapour. Causes skin irritation. Toxic to aquatic life with long lasting effects.	Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Keep container tightly closed. Use explosion-proof equipment. Use non-sparking tools. Take action to prevent static discharge. Avoid release to the environment. Wear protective gloves. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse affected areas with water. In case of fire: Use dry sand, dry chemical or alcohol-resistant foam for extinction. Store in a well-ventilated place. Keep cool.	

As shown to the right, full label information regarding each inner container is contained within the outer packaging.

The sheets of full label information are permanently connected to the inside of the combination packaging using a secure method of attachment (e.g. fold out label adhered to box tie or tag as shown)

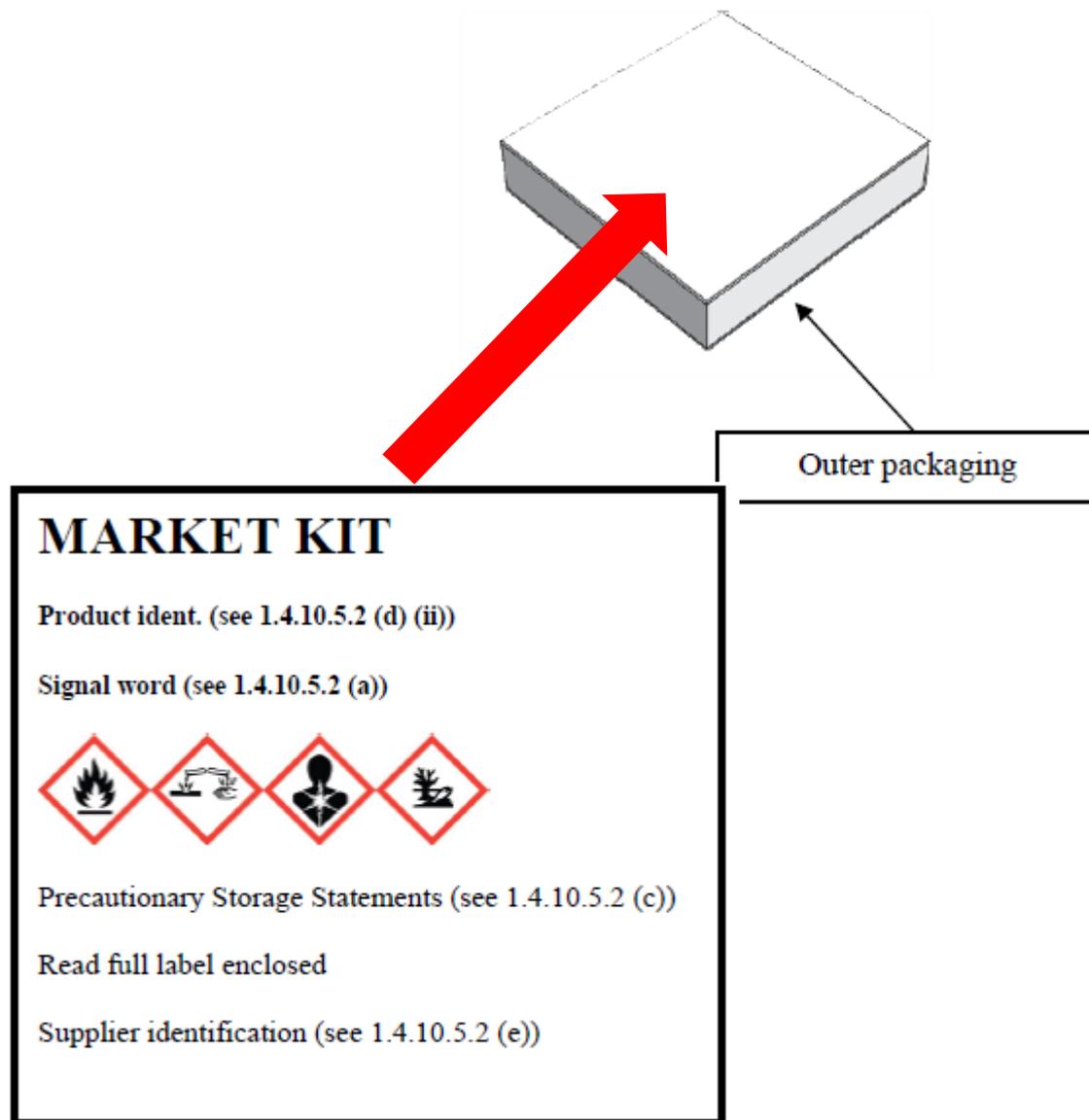


# Scenario B

## Outer packaging

### Required elements:

- Kit Identifier (name of kit)
- Supplier identification
- Storage and general precautionary statements (for the kit as a whole)
- Pictograms (without duplication)
- Signal word (the most stringent)
- "Read full label enclosed"



# Country Regulations - Small package exceptions

## Europe



- Small container:  $\leq 125\text{ml}$
- Precautionary statements, hazard statements, signal word or even pictogram can be omitted
- Which elements can be omitted depend on a product's GHS classification
- More reading:  
[GHS in EU](#)

	Hazard Classification	Elements that can be omitted
$\leq 125\text{ml}$	Flammable liquids category 2 or 3	Hazard and precautionary statements
	Flammable gases cate. 2	Precautionary statements
	Corrosive to metals	Pictogram, signal word, p & h statements.

# Country Regulations - small package exceptions

## Canada & Australia

### CANADA



- Small container:  
≤ 100ml
- Precautionary or hazard statements can be omitted
- English and French
- More reading:  
[GHS in Canada](#)

### AUSTRALIA



- Small container:  
size not specified
- Precautionary statements can be omitted
- More reading:  
[GHS in Australia](#)

# Country Regulations - Small package exceptions

## China



- Small container:  
≤ 100ml
- Precautionary statements can be omitted (see picture below)
- More reading:  
[GHS in China](#)



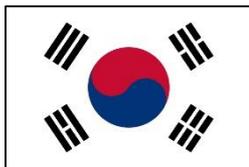
Table 1 Minimum Dimensions of Labels

Volume of container or packaging/ L	Label dimensions (mm x mm)
≤ 0.1	Use a simplified label
> 0.1 ~ ≤ 3	50 x 75
> 3 ~ ≤ 50	75 x 100
> 50 ~ ≤ 1000	100 x 150
> 500 ~ ≤ 1000	150 x 200
> 1000	200 x 300

# Country Regulations - Small package exceptions

## Korea, Taiwan & Japan

### KOREA



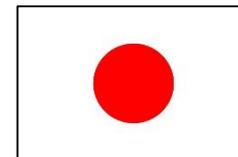
- Small container:  
<=100mL
- Minimum info required includes product identifier & pictogram(s)
- More reading:  
[GHS in Korea](#)

### TAIWAN



- Small container:  
<=100mL
- Hazard and precautionary statements can be omitted
- More reading:  
[GHS in Taiwan](#)

### JAPAN



- Small container:  
size not specified
- Tie on tag or fold out label can be affixed to container with:
  - Pictogram(s)
  - Signal word
  - Hazard statements
  - Precautionary statements
  - Name, address & telephone number
- More reading:  
[GHS in Japan](#)

# Country Regulations - Small package exceptions

## Singapore, Malaysia & Vietnam

### SINGAPORE



- Small container:  
≤125mL
- Minimum info required includes product identifier & pictogram
- More reading:  
[GHS in Singapore](#)

### MALAYSIA



- Small container:  
≤125mL
- Hazard and precautionary statements can be omitted
- More reading:  
[GHS in Malaysia](#)

### VIETNAM



- Small container:  
size not specified
- Precautionary statements can be omitted
- More reading:  
[GHS in Vietnam](#)

# Update on Practical labelling Issue WG

## Plans for this Biennium

### Digitalization of hazard information for chemical products

- Advances in digital technology are providing society with potential benefits relative to hazard communication.

WG is exploring:

- How digital information could be provided in addition to the traditional physical label
- How it can help increase readability and understanding of hazard information especially in countries with low literacy rates
- Supplemental and additional information could be easily accommodated including special needs
- Swift and targeted updates of hazard information could be provided
- Actions Planned:
  - Review the existing digital means of communication that can be used to convey GHS hazard information to users (e.g. electronic label, QR code etc.)
  - Consider the development of general principles and criteria when providing this information digitally
  - Develop guidance and examples wherever appropriate. This can also include an assessment of backup solutions for users who are unable to connect to digital information

### Review and update of examples 1 to 7 in Annex7

# Digitilization

- Discussion points:
  - Benefits - More effective and targeted hazard communication?
  - Concerns – Accessibility? Complexity etc.
  - Available technologies - Bar code, QR code, RFID
  - Backup – Lack of connectivity, internet failure etc. ...options?
  - Digital label – Parallel or complementary to physical label?
  - Parallel use – Under what conditions can it be used?
  - Complementary use - Under which conditions digital information can be used to complement the physical label (e.g. to complement the limited information given on the physical label of very small packaging?)
  - Alternative use – Under what conditions could it be used as an alternative for physical label?
  - Information layout – May require some thought
  - Label definition – In chapter 1.2
  - Sector differences - Differences between sectors (e.g., the workplace and consumer sector)

# Thank you

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