



Be Right™

Globally Dis-harmonized System of Small Labeling: What to Do Now?

Now and Next Steps

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Agenda



- Manufacturing and labeling challenges
- My predictions on small labeling regulations if no action is taken
- Labeling proposals and request for support
- Regulatory advocacy

What does Hach do?

- Hach makes & sells chemical reagents and instruments used to test water quality globally
- ***Our Mission***
 - *Ensure water quality for people around the world*
- ***Our Vision***
 - *Make water analysis better – faster, simpler, greener, and more informative*



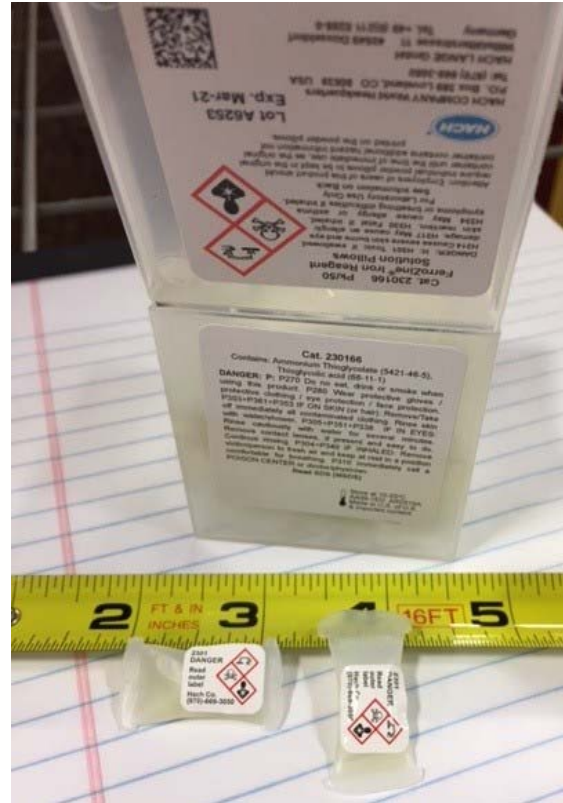
Hach's small chemical containers

Boxes with vials or other containers that hold ≤ 25 ml and even ≤ 5 ml



Hach's small chemical containers

3-5 ml containers



Labeling challenges

- Extremely limited space
- Legibility
- Suitable equipment for high-speed, small-size color printing
- Quality control to avoid contamination
- Exponential part number proliferation (*e.g.*, translations)



Labeling challenges

- Regulators not appreciating practical realities
 - 77 FR 17727: “Very small packages are less frequent in the workplace than in consumer settings”
 - Many public comments for HCS 2012
 - LOIs requested by NIST, US Pharmacopeia, Adhesive & Sealant Council, C&G Containers, and Henkel
 - CEFIC’s GHS working paper
 - Hach’s and Givaudan’s advocacy efforts
 - No response to proposals (*e.g.*, Australia, Brazil, Canada, EU)

Labeling challenges

- Regulators not recognizing the difficulty, cost, increased carbon footprint, and impracticality
- Lack of enforcement creating an unfair advantage for competitors who flout the regulations
- “**Disharmony**” of global requirements: many countries have unique requirements for GHS labeling



Compliance with practical regulation is better than non-compliance with impractical regulation

Predictions on small container labeling

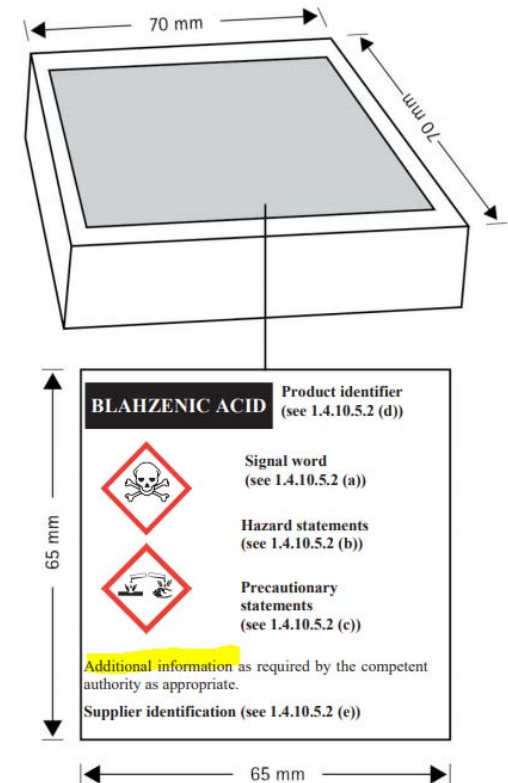
- Certain countries will continue the cold shoulder.
- Some countries will defer to the Purple Book.
- More countries will become more prescriptive and not provide variances or accommodations.



Small labeling proposals

- **Outer packaging label (>125 ml)**
= Full GHS labeling + guiding words for inner packages

e.g., “Keep inner packages inside original box until immediate use. The box carries additional hazard information not printed on the packages.”



Small labeling proposals

- For inner containers sized > 10 ml and ≤ 125 ml
 1. Product identifier
 2. Supplier's name
 3. Pictogram(s)
 4. Signal word
 5. Statement indicating the full label info is provided on the outside package
(e.g., "See the outer label", "Read the outer label", or "Read the full label")



Small labeling proposals

- For inner containers sized > 5 ml and ≤ 10 ml
 1. Product identifier
 2. Supplier's name
 3. Pictogram(s)



Small labeling proposals

- For inner containers sized ≤ 5 ml

1. Product identifier



Regulatory advocacy

- Seek to influence implementing laws or regulations that impact your business.
- **How?**
 - Talk to the regulators
 - Participate in the rulemaking comment
 - Ask for OSHA LOI
 - Ask for variance (<https://www.osha.gov/dts/otpca/variances/index.html>)
 - Participate in UN GHS Subcommittee meetings (<https://www.unece.org/trans/main/dgdb/dgsubc4/c4age.html>)
 - Work with industry associations



Regulatory advocacy

- **Why?**
 - Regulatory advocacy works. There are successes.
 - “No” does not be always mean no.
 - If you don’t speak up, regulations may become even worse.



Questions



Thank you!