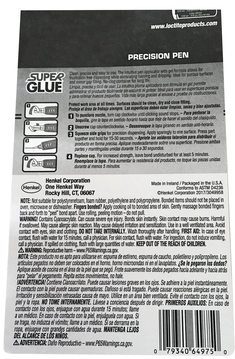
GHS Labeling and Global Products – The Struggle Is Real

Abstract

Current regulations based on GHS guidelines create challenges for global companies. Products that are sold in the global marketplace have unique difficulties in complying with this “Globally Harmonized System” that is not fully harmonized. This poster elaborates on the differences that create these challenges, shows some examples and offers potential solutions which should serve as discussion points and further exchange.

Challenges

- Not easily identifiable which region/country is covered
- Confusing for customer if labeling is different
- Labeling at destination or origin? Bill of lading?
- Relabeling is not always possible (e.g. frozen products)
- Labeling requirement of font size and symbol size/languages challenging due to space limitations



Differences in EU and US labeling

Example consumer product – Precision Pen

Europe

SDS and Label/Blistercard:

- Exclamation mark
- Warning
- H315, H319, H335, EUH202
- P261, P280, P305+P351+P338 P337+P313, P501
- Contains: Ethyl-2-cyanoacrylate

Label/primary pack:

- Contains: Ethyl-2-cyanoacrylate
- EUH202

US

SDS:

- Exclamation mark
- Warning
- H227, H320, H335
- P210, P261, P264, P271, P280, P304+P340+P312, P305+P351+P338, P337+P313, P370+P378, P403+P233, P403+P235, P405, P501

Label:

- Consumer label (non-GHS)

Differences in EU and US labeling

Example industrial product

Europe

SDS and Label:

- Exclamation mark
- Warning
- H319
- P280

US

SDS and Label:

- Exclamation mark
- Warning
- H227, H315, H319, H336
- P210, P261, P264, P271, P280, P302+P352, P304+P340+P312, P305+P351+P338, P332+P313, P337+P313, P362, P370+P378, P403+P233, P403+P235, P405, P501

Reasons for differences

- Countries were able to adapt the standard/ system within current regulatory framework
  - Different revisions of UN GHS adopted
  - Building block approach
  - Additional on top laws/regulations in different regions/countries (regulating above UN GHS requirements)
- Classification of chemicals not harmonized
  - Different prescribed classifications from different regulatory lists
  - Different application of GHS (see above) i.e. specific concentration limits
- Not all regions/countries have adopted GHS for consumer products
- Not all regions/countries mandate environmental labeling
- H/P Code requirement to put on the label
- Prescribed size for label, symbols and text
- Requirement to have different languages

POTENTIAL SOLUTIONS:

		PRO	CON
1	Vison: Truly Globally Harmonized System	• Ensure safety and cost effectiveness	• Global alignment not in sight
2	Dual labeling	• Removes the necessity of relabeling for separate region / country	• Can be problematic for small packages • Can only be done if labeling doesn’t contradict • Worst case label not well accepted by customers
3	Destination labeling	• Ensures correct GHS information in region / country	• Can’t be done for frozen products • Re-labeling necessary (cost/time consuming) • Drop shipment to customer not possible
4	Country of origin label / bill of lading solution	• Can be done for frozen products	• Need to know which batches get shipped where (batch and stock management)

Combination of solutions 2-4 in place
Clear identification which region / country the label is intended for needed

Differences in EU and US labeling

Example consumer product – Renew White

Europe

SDS and Label/Blistercard:

- Exclamation mark
- Warning
- H319
- P102, P101, P280, P305+P351+P338

Additional for label/blistercard:

- Contains preservative: Thiabendazole

Label/primary pack:

- Contains preservative: Thiabendazole
- P102, P101

US

SDS:

- Exclamation mark
- Warning
- H319
- P264, P280, P305+P351+P338, P337+P313

Label:

- Consumer label (non-GHS)

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