



CIRS

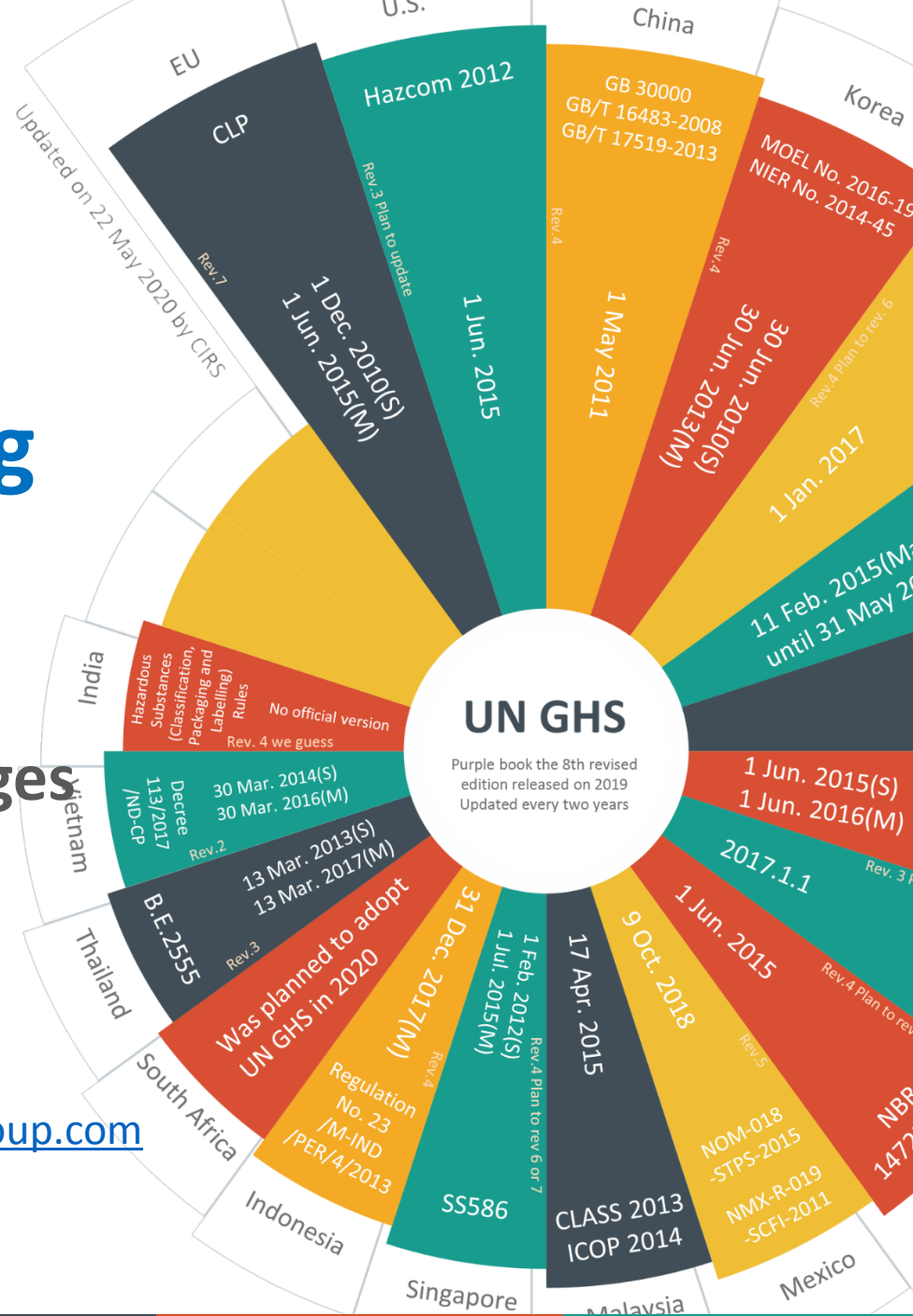
Global GHS Training Course

No.11 –GHS Labeling for Small and Awkward Packages



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Global Harmonized System (GHS)

Classification

Safety Data Sheet

Label

Global Harmonized System (GHS)

Classification

Safety Data Sheet

Label

GHS Label Elements



CODE:

PRODUCT NAME:

Cobaltous nitrate hexahydrate



Danger

Keep out of reach of children. Read label before use.

【Composition information】

Cobaltous nitrate hexahydrate

CAS #10141-05-6; EC# N/A

Purity: 98% min

May intensify fire; oxidizer. Harmful if swallowed. May cause an allergic skin reaction. May cause allergy or asthma symptoms or breathing difficulties if inhaled. Suspected of causing genetic defects. May cause cancer. May damage fertility or the unborn child. Very toxic to aquatic life with long lasting effects.

Prevention:

Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Keep away from heat. Keep/Store away from clothing/combustible materials. Take any precaution to avoid mixing with combustibles. Avoid breathing dust/fume/gas/mist/vapours/spray. Wash hands thoroughly after handling. Do not eat, drink or smoke when using this product. Contaminated work clothing should not be allowed out of the workplace. Avoid release to the environment. Wear protective gloves/protective clothing/eye protection/face protection. [In case of inadequate ventilation] wear respiratory protection.

Response:

IF SWALLOWED: Call a POISON CENTER/doctor if you feel unwell. IF ON SKIN: Wash with plenty of water. IF INHALED: remove person to fresh air and keep comfortable for breathing. IF exposed or concerned: Get medical advice/attention. Rinse mouth. If skin irritation or rash occurs: Get medical advice/attention. If experiencing respiratory symptoms: Call a POISON CENTER/doctor. Take off contaminated clothing and wash it before reuse. In case of fire: Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide to extinguish. Collect spillage.

Storage:

Store locked up.

Dispose:

Dispose of contents/container in according with local regulation.

Fill weight: Lot Number:

Gross weight: Fill Date:

Expiration Date:

Emergency telephone Number:

DIRECTIONS FOR USE: Refer to label.

COMPANY NAME: Street Address:

Phone Number: Fax:

GHS Label Elements

Product Identifier

Pictogram

CODE:

PRODUCT NAME:

Cobaltous nitrate hexahydrate

【Composition information】

Cobaltous nitrate hexahydrate

CAS #10141-05-6; EC# N/A

Purity: 98% min

COMPANY NAME: Street Address:

Phone Number: Fax:

Emergency telephone Number:

DIRECTIONS FOR USE: Refer to label.

Supplier Identifier

Fill weight:

Lot Number:

Gross weight:

Fill Date:

Expiration Date:



Danger

Keep out of reach of children. Read label before use.

Signal Word

Hazard Statement

May intensify fire; oxidizer. Harmful if swallowed. May cause an allergic skin reaction. May cause allergy or asthma symptoms or breathing difficulties if inhaled. Suspected of causing genetic defects. May cause cancer. May damage fertility or the unborn child. Very toxic to aquatic life with long lasting effects.

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Storage:

Store locked up.

Dispose:

Dispose of contents/container in according with local regulation.

Precautionary Statement

Supplement Information

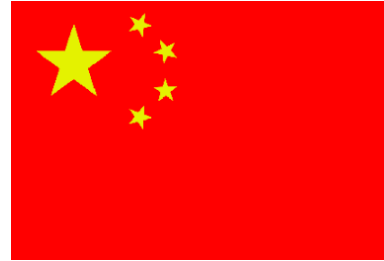
GHS Label DOES NOT have a standard layout

Special Labeling Requirement CIRS



Europe

If package size $\leq 3L$
Label size $\geq 52 \times 74 \text{ mm}$
Pictogram $\geq 10 \times 10 \text{ mm}$



China

If package size $0.1L - 3L$
Label size $\geq 50 \times 75 \text{ mm}$
If package size $\leq 0.1L$
Use simplified label
Should be seen in smog



Korea

If package size $\leq 5L$
Label size $\geq 5\%$ of total surface area
If package size $\leq 0.1L$
Use simplified label



Australia

If package size $\leq 0.5L$
Pictogram $\geq 15 \times 15 \text{ mm}$
Text size $\geq 2.5 \text{ mm}$



USA

No special requirement



Japan

No special requirement

Special Labeling Requirement CIRS

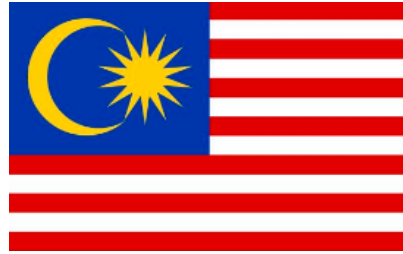


Singapore

If package size $\leq 3L$

Label size $\geq 52 \times 74 \text{ mm}$

Pictogram $\geq 10 \times 10 \text{ mm}$



Malaysia

Text size $\geq 7 \text{ pt}$



Indonesia

Label length:width=3:1

Pictogram should be visible

Language: Bahasa Indonesia



New Zealand

Label size $\geq 25 \times 25 \text{ mm}$



India

No special requirement

Challenges



Easy to be labeled



Too small to be labeled, the size requirement can not be fulfilled.

UN GHS Labeling



Requirement for Small Packages

Where volume of hazardous substance or mixture is so low and there is not likelihood of harm to human health and/or environment – with competent authorities approval – full label may be omitted.

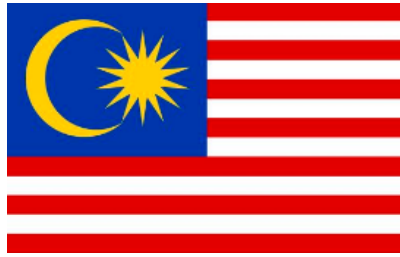
Competent authorities may allow certain label elements to be omitted from the immediate container for certain hazard classes/categories where the volume of the substance or mixture is below a certain amount

What is a “small package”?

Small Package Definition



Europe



Malaysia

$\leq 125\text{ml}$



China



Korea

$\leq 100\text{ml}$



USA

N/A



Australia

$\leq 500\text{ml}$

How to label a small package?

Label a small package



Fold-out Label

Tie-on Label

Outer Package

Label a small package

Fold-out Label

Tie-on Label

Outer Package



Label a small package

Fold-out Label

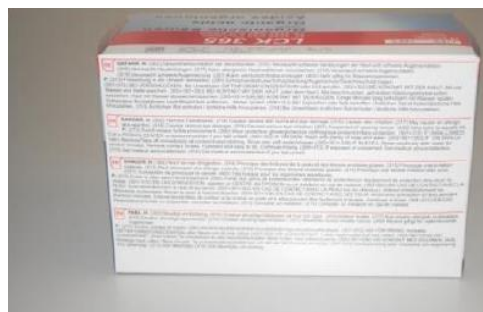
Tie-on Label

Outer Package



Label a small package

Fold-out Label



Tie-on Label



Outer Package

Inner/Intermediate Packages:

- Hazard Pictogram
- Product Identifier
- Supplier Information

Outer Packages:

- All the label elements

Requirement varies in different countries

Regulation (EC) No 1272/2008

Size Requirement

Capacity of the Package (in litres)	Dimensions of the label (in millimetres)	Dimensions of the pictogram (in millimetres)
Capacity ≤ 3	If possible, at least 52*74	Not smaller than 10*10, If possible, at least 16*16
$3 < \text{Capacity} \leq 50$	At least 74*105	At least 23*23
$50 < \text{Capacity} \leq 500$	At least 105*148	At least 32*32
$500 < \text{Capacity}$	At least 148*210	At least 46*46

-Fold-out label, Tie-on label, Outer package

-Omission of certain GHS elements for small packages ($\leq 125\text{ml}$)

Omission Rules

Hazard classification of the substance or mixture	Allowed omission elements
Oxidising gases cat. 1 Gases under pressure Flammable liquids cat. 2 or 3 Flammable solids cat. 1 or 2 Self-reactive substances and mixtures, type C, D, E or F Self-heating substances and mixtures, cat. 2 Substances and mixtures which, in contact with water, emit flammable gases, cat. 1, 2 or 3 Oxidising liquids cat. 2 or 3 Oxidising solids cat. 2 or 3 Organic peroxides, type C, D, E or F Acute toxicity cat. 4 (no supply to general public) Skin irritants cat. 2 Eye irritants cat. 2 STOT-SE 2 or 3 (no supply to general public) STOT-RE 2 (no supply to general public) Aquatic acute cat. 1 Aquatic chronic cat. 1 or 2	Hazard and precautionary statements
Flammable gases cat.2 Effects on or via lactation Aquatic chronic cat. 3 or 4	Precautionary statements
Corrosive to metals	Pictogram, signal word, p & h statements

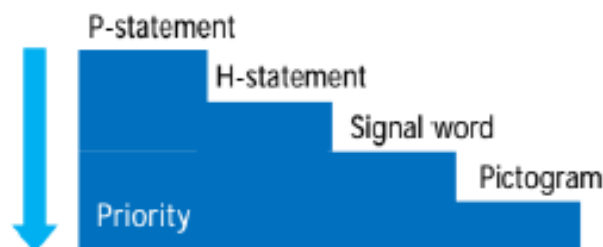
Europe

Example



N-Hexane (25ml)	Hazard Classification
	➤ Reproductive toxicity cat. 2 ➤ Aspiration toxicity cat. 1 ➤ Flammable liquids cat. 2 ➤ Skin irritation cat. 2 ➤ STOT-RE cat. 2 ➤ STOT-SE cat. 3 ➤ Aquatic chronic hazard cat. 2

Signal Word



1000000025	K12345678 808	25ml	Exp. Date 31.12.11
For analysis: ACS N-Hexane Index-No: 601-037-00-0 Company S.A., City, 80766 EU, www.company.com Tel. +41(0)1234 56-7890		Danger: Can be fatal if swallowed and enters airways. Suspected of damaging fertility. If swallowed, immediately contact poison control center or doctor. Do not induce vomiting.	
			

Pictogram

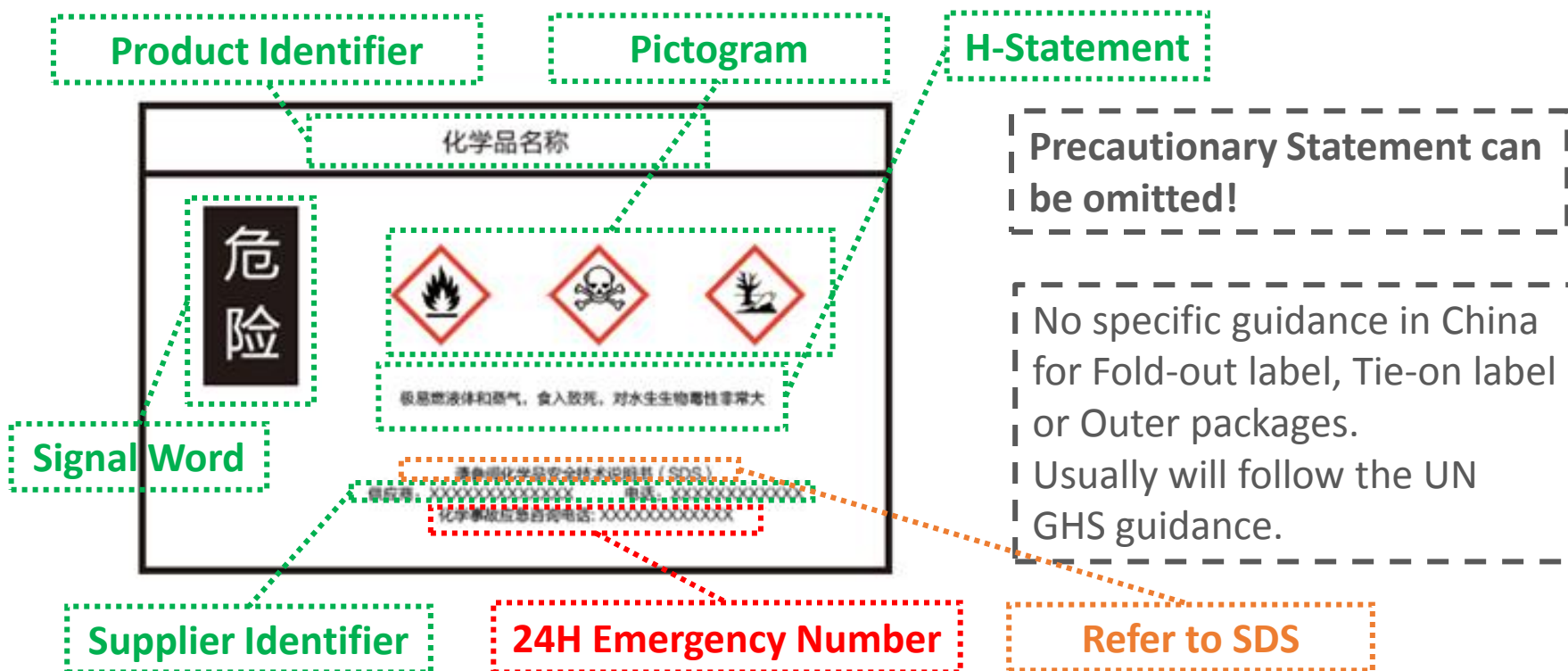
H-Statement

GB 15258-2009

化学品名称 A组分: 40%; B组分: 60%	Product identifier
危险    极易燃液体和蒸气, 食入致死, 对水生生物毒性非常大	Signal Word Pictogram Hazard Statement
【预防措施】: 远离热源、火花、明火、热表面, 使用不产生火花工具作业。 保持容器密闭。 采取防止静电措施, 容器和接收设备接地、连接。 使用防爆电器、通风、照明及其他设备。 戴防护手套、防护眼镜、防护面罩。 操作后彻底清洗身体接触部位。 作业场所不得进食、饮水或吸烟。 禁止排入环境。 【事故响应】: 如皮肤(或头发)接触: 立即脱掉所有被污染的衣服, 用水冲洗皮肤、淋浴。 食入: 催吐, 立即就医。 收集泄漏物。 火灾时, 使用干粉、泡沫、二氧化碳灭火。 【安全储存】: 在阴凉、通风良好处储存。 上锁保管。 【废弃处置】: 本品或其容器采用焚烧法处置。	Precautionary Statement
请参阅化学品安全技术说明书 供应商: XXXXXXXXXXXXXXXXXXXX 电话: XXXXXX 地址: XXXXXXXXXXXXXXXXXXXX 传真: XXXXXX 化学事故应急咨询电话: XXXXXX	Supplier Information 24h Emergency Number

24H emergency number must be a Chinese local number with expert who can provide emergency response to the product 24/7.

Simplified Label ($\leq 100\text{ml}$)



MoEL Notice No. 2016-19

Size Requirement

Container or Package capacity	Label Size	Size of Pictogram
500L < Capacity	450cm ²	1/40 of surface area; Min 0.5 cm ²
200L < Capacity ≤ 500L	300cm ²	
50L < Capacity ≤ 200L	180cm ²	
5L < Capacity ≤ 50L	90cm ²	
Capacity ≤ 5L	> 5% of area	

-For simplified label (≤100ml), the label should contain product identifier, pictogram, signal word and “Refer to SDS” statement.

-If supplier identifier is not shown on the outer package, then it must be shown on the label.

부탄니트릴 (2009-1-592)	
  위험	유해위험문구 • 인화성 액체 및 증기 • 삼키거나 피부와 접촉하거나 눈으로 들어갈 경우 유해함
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Hazard
Statement

Precautionary
Statement

Can be omitted

No specific guidance in Korea for Fold-out label, Tie-on label or Outer packages.

Usually will follow the UN GHS guidance.

OSHA's Hazard Communication Standard 2012

For immediate containers:

- Appropriate pictogram
- Product Identifier
- Supplier Information
- Signal word
- A statement indicating the full label information for the chemical is provided on the outside package

For outside packages:

- All the label elements as defined in 29 CFR 1910.1200 (f)(1)
- The complete label must be maintained on the outer package, visible and not destroyed
- The supplier must ensure that any alternative labeling used does not conflict with any other standards

Fold-out label, Tie-on label and Outer packages are applicable.

WHMIS 2015

Label form:

- Mark, sign, stamp, sticker, seal, ticket, tag or wrapper.
- Attached, imprinted, stenciled or embossed on the hazardous product or its container

Special requirement:

- Bulk shipment: a labeling exemption exists for products sold without packaging
- Capacity $\leq 100\text{ml}$: precautionary or hazard statement are not required
- Capacity $\leq 3\text{ml}$: labels are not required during their use stage

LABELLING OF WORKPLACE HAZARDOUS CHEMICALS Code of Practice

Size Requirement

Container capacity	Minimum hazard pictogram dimensions	Minimum text size
≤ 500 mL	15 x 15 mm	2.5 mm
> 500 mL and ≤ 5 L	20 x 20 mm	3 mm
> 5 L and ≤ 25 L	50 x 50 mm	5 mm
≥ 25 L	100 x 100 mm	7 mm

Required elements:

- Hazard pictogram or statement
- Product Identifier
- Supplier Information
- Other information

Fold-out label, Tie-on label and Outer packages are applicable.

Singapore

SS 586: 2014

Size Requirement

Capacity of the Package	Dimensions of the label (in millimetres)
$125\text{ ml} < \text{Capacity} \leq 3\text{L}$	If possible, at least 52*74
$3\text{L} < \text{Capacity} \leq 50\text{L}$	At least 74*105
$50\text{L} < \text{Capacity} \leq 500\text{L}$	At least 105*148
$500\text{L} < \text{Capacity}$	At least 148*210

For capacity $\leq 125\text{ ml}$:

- Pictogram
- Product Identifier

Fold-out label, Tie-on label and Outer packages are applicable.

South Africa

ZA. SANS 10234.2019

Size Requirement

Capacity of the Package (in litres)	Dimensions of the label (in millimetres)
Capacity ≤ 3	If possible, at least 52*74
$3 < \text{Capacity} \leq 50$	At least 74*105
$50 < \text{Capacity} \leq 500$	At least 105*148
$500 < \text{Capacity}$	At least 148*210

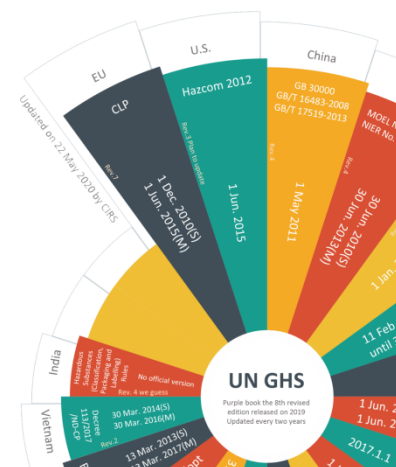
- Precautionary statement can be omitted.

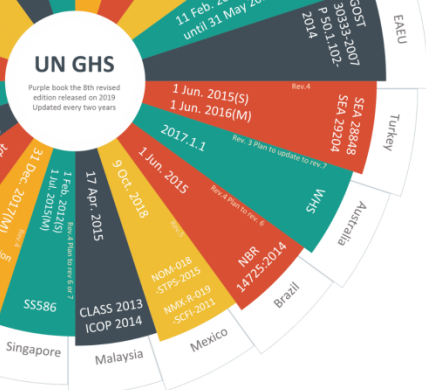
Summary

- Different labeling methods are applicable: fold-out label, tie-on label, outer package and etc.
- Certain label elements can be omitted for simplified labels
- Special requirements exist in different countries

Please use the below link to follow this series event for more updates:

<http://www.cirs-reach.com/news-and-articles/2020-CIRS-Training-Courses-Global-GHS.html>





Thank you for your attention

