

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

16 June 2021

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Item 4 (c) of the provisional agenda

**Development of guidance on the application of GHS criteria:
Practical labelling issues**

Digitalisation of hazard information for chemical products

**Transmitted by the European Chemical Industry Council (Cefic) on
behalf of the informal working group**

Background

1. At its thirty-ninth session, the Sub-Committee renewed the terms of reference of the informal working group on practical labelling issues, which was asked to consider the opportunities that digitalization may bring to convey GHS hazard information and make proposals to address them.
2. Five items to explore were identified:
 - (a) Access to digitalized information in different jurisdictions;
 - (b) The extent of harmonization required to avoid uncontrolled situations;
 - (c) Data privacy for the end user;
 - (d) Data compatibility across different systems;
 - (e) Supplemental information versus label information.

Discussion

3. The 2 thought starters provided during biennium 2019-2020 already give some insight:
 - (a) Thought starter on digitalisation of hazard information for chemical products (see informal document INF.7, 37th session)¹;
 - (b) Second thought starter on digitalisation of hazard information for chemical products (see informal document INF.22, 38th session)².
4. It has been recognized that the supply of hazard information in a digital format does not constitute an alternative to the “physical” label that should follow the labelling procedures set in 1.4.10.
5. It is proposed to start with the content and purpose of digitalization, i.e. items 2 (b) and 2 (e) above by considering the following questions:
 - (a) How can digital information improve the communication on hazards? (see paragraphs 6-10 of the second thought starter)

¹ <https://unece.org/DAM/trans/doc/2019/dgac10c4/UN-SCEGHS-37-INF7e.pdf>

² <https://unece.org/DAM/trans/doc/2019/dgac10c4/UN-SCEGHS-38-INF22e.pdf>

- (b) Which hazard information not appearing on the label (supplemental) may be provided digitally:
 - (i) More detailed list of ingredients than in the product identifier;
 - (ii) Information provided in additional languages (other than the official language(s) of the country where the substance or mixture is placed on the market);
 - (iii) Information that can be omitted from the label (i.e. small packagings in accordance with 1.4.10.5.4.4);
 - (iv) Information on safe use, use instructions;
 - (v) ...
 - (c) Can/should a distinction be made between digital information for workplace and consumer use?
 - (d) Should the digital information duplicate the label elements described in 1.4.10.5.2 to allow for comprehensive information?
 - (e) How to manage the possible coexistence of hazard and commercial information?
 - (f) How can initiatives to improve the comprehensibility of labels be integrated into our work?
 - (g) Could some information be better read/understood if provided digitally? e.g. naming of mixture components other than sensitizers.
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