

Consumer Chemical Products Labelling Criteria (Initial Draft)

Overall Description

“GHS” (The Globally Harmonized System of Classification & Labeling of Chemicals) is the system that is approved and implemented by United Nations’ 2002 Johannesburg Sustained Development Summit and Chemical Safety Seminar. Based on the properties of health, environment, and physical hazards, the unified global classification criteria for chemicals is provided. It includes specifications for chemical labelling and Material Safety Data Sheet etc. It is the hazardous identification system recognized internationally to provide increased protection for human health and environment.

This system covers all chemicals in domestic products, medical products, automobile products, and electronic products etc. The levels of involvement are very comprehensive, including the international import and export trading of chemicals, the development of relevant laws and regulations, education and guidance, disaster relief, and emergency response etc. areas. And, countries over all the world are actively and aggressively promote the Harmonized System of Classification & Labelling of Chemicals. The establishment of chemical management meeting international trend not only can reduce obstacles of chemicals trading for relevant companies, and lower costs, as well as implement convenient and fast trading, but also can protect labors in relevant production and processing. And, from production or feed to waste disposal, a complete and thorough chemical management system can then be formed.

It is understood that, United Nations will implement the “The Globally Harmonized System of Classification & Labeling of Chemicals” in full in 2008 to strengthen the management of chemicals and the integration of labelling system. To keep track with international trend, our country will coordinate and implement this system so that products may be distributed throughout the world. The consumer chemicals are different from other common consumer products. They, in themselves, may have hazardous chemical properties. And, to identify and process these chemical properties requires persons with certain degree of professional knowledge.

These types of products spread widely in our life, such as detergents, bathroom cleaners, adhesives, automobile use oil products, air fresheners, as well as gas cylinders. From these products, we can see the conveniences and practical uses brought to our life by consumer chemicals. However, from the viewpoints of consumer protection, the current labelling for hazardous or emergency protection measures etc. labelling cannot provide consumers with criteria that are easily understandable. On the market, there are positive and negative descriptions of the hazards toward consumer chemicals. It is very difficult to distinguish clearly the phrases are for advertisement or warning. And, it is difficult to provide conclusive statement for the consumers to make beneficial selections. For example: “irritating

when contacting skin” etc.

Through the promulgation of consumer chemical laws, regulations and orders, and through the introduction of GHS labelling system, it is expected that the domestic labelling of consumer chemicals may be unified. Backed up with consumer education, it is expected to achieve the win-win objective for the protection of consumers and to the tracking with international trend.

To protect consumer rights, establish labelling for consumer chemical products, maintain the reputation of manufacturers, and keep track with GHS, thus, based on the requirement of Article 11 of the “Commodity Labelling Law”, this criteria is established.

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Proposed articles	Description of objectives
<p>A. To establish the required labelling for consumer chemical products, maintain reputation of manufacturers, and keep track with GHS, based on the requirement of Article 11 of the Commodity Labelling Law, this criteria is established. However, for exporting consumer chemical products, the labelling shall follow the requirement of importing countries.</p>	<p>A. Define clearly that the ultimate objectives of consumer chemical products labelling criteria are to enforce this criteria to be a labelling obligation by consumer chemical product manufacturers, to keep track with the trend of GHS (Globally Harmonized System of Classification and Labeling of Chemicals) and achieve the protection of consumer safety, as well as cover the healthy development of chemical industry.</p> <p>B. Since the consumer chemical product labelling requirement may be different within different countries, thus, the proviso is established to permit the manufacturers or suppliers that export consumer chemical products to label consumer chemical products in accordance to importing country requirement.</p>
<p>B. The consumer chemical products defined in this criteria represent chemical products and semi-products available on the general market. However it does not include the chemical ingredients contained in commercial products that would not be released under normal use conditions.</p>	<p>A. The chemical products, based on the places used and circulation, in principle, may be classified into consumer chemical products and business use chemical products two categories. The definition of consumer chemical products is based US Consumer Product Safety Act Article 3 (a) (1) and GHS requirement.</p> <p>B. The “general market” defined in this article represents the consumer market while general consumer products are circulated and</p>

sold. The professional marketing channel for manufacturers and producers are excluded. In addition, to be thorough, the scope of so-called chemical products defined in this criteria includes products and semi-products. The differences between products and semi-products are that if the consumers can use the consumer products directly. If they can be used directly, they are products. If mixing and formulation are required by the consumers, they are semi-products. Regardless of they are products or semi-products, the common characteristics are that the chemical reactions generated by the products are used directly and indirectly by the consumers, but not the primary use of the products. And, after the products are used, unless special chemical reactions are applied, the products cannot return to their original form.

C. Considering that the requirement of this criteria is not aimed at the chemical ingredients of general commodity products, thus, proviso is used to exclude chemical ingredients contained in general commodity products, while during normal use conditions, the chemicals contained inside would not release and lead to hazardous conditions. This is to avoid that this criteria exceeds the authorized requirement of the parent law and becomes the requirement for all the chemicals contained in commodity products.

D. And, although this criteria defines consumer chemical products, to achieve the objectives of consumer protection, our country has food hygiene management law, medicine law, cosmetic hygiene management regulation, and agrochemical law etc. special regulations to control food products, medicines, cosmetics, agrochemicals, and environmental hygiene chemicals, etc. products. And, based

	<p>on the exceptions in article B, they are not in the scope of these criteria. Thus, they are not discussed here. This is explained at the same time to avoid future argument.</p>
<p>C. The contents to be labeled in the consumer chemical products include the following two categories: (A) General labelling items. (B) Special labelling items.</p>	<p>Based on the contents to be labelled, of consumer chemical products may be classified into “general labelling items” and “special labelling items” two categories. The general labelling items are the name of the commodity products, main ingredients, use instruction and application. For the special labelling items, the industry is responsible to carry out hazardous labelling for consumer chemical products after risk assessment. And, after the chemicals are under the integration trend of GHS, the labelling items shall follow the information display method of that system to achieve the objective of consumer safety protection.</p>
<p>D. General labelling items: (A) Name of products. (B) Original manufacturing site of products. (C) Name of producer : Manufacturer, telephone, and address, and the name, telephone and address of importer in the case of imported products. (D) Contents of products: 1. Main ingredients or materials. 2. Net weight, volume, quantity or measurements etc. For net weight, volume or measurements, please indicate legal measurement units, if necessary, add other units. (E) Production date in Chinese calendar or western calendar. For those with expiration date, add expiration date or</p>	<p>For thorough protection of consumers, for general labelling items, in addition to required labelling items based on Item A to D of Article I, it shall consider the use instruction and characteristics of the consumer chemical products that are different from general consumer commodity products. Thus, based on the authorization of Item 5, Article I, the requirements of Primary use instruction and application are added.</p>















<p>effective period. (F) Primary use instruction and applications.</p>	
<p>E. Special labelling items: (A) Physical properties, health or environment hazards diagram. (B) Warning message. (C) Hazardous warning message. (D) Prevention, response, storage and waste disposal etc. hazard prevention measures.</p>	<p>A. This article is based on the standardized labelling items in reference to GHS and "Classification and Labeling of Chemicals" CNS15030 Z1051 issued by Bureau of Standards, Metrology and Inspection, MOEA. They are used as the contents of the special labelling items in this criteria. The purpose is to provide hazardous messages contained in the products to protect the safety of consumers. B. Items A to C are based on Bureau of Standards, Metrology and Inspection, MOEA issued "Classification and Labeling of Chemicals CNS15030 Z1051" established requirement for contents of items to be labelled by chemicals. The establishment of Item D also refers to the structure of the GHS. The focus is on the description of special storage methods, emergency response after the occurrence of hazardous incidents, and the disposal of containers or wastes after the use of the products etc. problems for the consumer chemical products.</p>
<p>(C) The physical properties, health or environment hazards diagram, warning messages, and hazardous warning messages in the special labelling items shall, based on the properties of the products, be labelled with the use of the classification corresponding texts and diagrams in accordance to the Bureau of Standards, Metrology and Inspection, MOEA issued "Classification and Labeling of Chemicals CNS15030 Z1051" classifications.</p>	<p>To prevent differences in labelling methods for the same types of consumer chemical products within the industry, the labels for physical properties, health or environment hazards diagram, warning messages, and hazardous warning messages in the special labelling items shall use the Bureau of Standards, Metrology and Inspection, MOEA issued "Classification and Labeling of Chemicals CNS15030 Z1051" as labelling criteria. After the industrial operators classified products in accordance to the national standard, then based on national standard, the corresponding texts and diagrams are used as the unified national product labels. In the future, if there are changes in CNS15030 Z1051 standard, the product labelling shall be</p>



	changed without any arguments.
<p>G. The hazards prevention measures in the special labelling items shall, based on the properties of the products, be selected and labelled by the industrial operators as necessary.</p>	<p>“Hazards prevention measures”, under the premise of providing more protections for the consumers, in addition to the labelling requirement under CNS15030 Z1051, the hazards prevention measures in the GHS shall be the special labelling items in this criteria. For this labelling item, after the industrial operators considered the overall product properties, if there are items requiring special attentions from the consumers, then they shall use texts to describe relevant prevention measures.</p>
<p>H. Labelling methods for the consumer chemical products are as follows:</p> <p>(A) Labelling items shall be labelled in print, or, use fixed labels marked on the main body or the clearest locations on the smallest unit packages.</p> <p>(B) Texts use for the labelling shall be traditional Chinese. If necessary, they may be replaced with foreign languages.</p> <p>(D) Case A: Texts and numbers used in the labels shall be greater than 0.15×0.15 cm. Case B: Texts, numbers and diagrams in the label shall be clear, and easily recognizable.</p> <p>(E) Case A: Diagrams in the label shall be greater than $\text{cm} \times \text{cm}$. Case B: The same as (C) above.</p>	<p>A. To provide uniform format standards for the enterprise operators, the requirement for the labelling methods, text types, font specifications, labelling diagrams, and the priority of warning labels are listed to be followed.</p> <p>B. The texts in the product label shall be primarily in traditional Chinese. But, considering that there are limited spaces for the description of special products, the name, original manufacturer, original production location, or names of the ingredients on the labels of the special products, if necessary, may be replaced with foreign languages instead of traditional Chinese.</p> <p>C. Case A: The communication of product information shall be clear and obvious. They shall be easily recognizable by the consumers. Thus, Items C and D of this article specify the minimal requirements for the texts, numbers and diagrams used. Case B: Based on the spirit of Article H of the “Dangerous material hazards labelling and identification requirements (Draft)”, the requirement of this Article is</p>

<p>(F) For the primary use instruction and applications, separately printed instruction manuals may be used.</p> <p>(G) For imported consumer chemical products, the labels shall be traditional Chinese. The contents shall not be less than the labels of the original production countries.</p> <p>(H) For exporting consumer chemical products turned domestic sales, attach the labels in traditional Chinese. The contents shall not be simpler than the requirement of this criteria.</p>	<p>established. There are no strict requirements for the minimal dimensions of the texts, numbers and diagrams. The only requirements are that they shall be clear, and easily recognizable.</p> <p>D. Considering that the properties of the consumer chemical products are different from that of general consumer products, Thus, Item 5 of this Article specially reminds enterprise operators that if consumers' problems on products' chemical properties, reasonable and correct use, and the development of the maximum performance cannot be described in details on the product containers, they may print instructions and included inside or outside the packaging, as means to communicate relevant messages.</p> <p>E. For operators of imported consumer chemical products to enhance the protection of our domestic consumers, Item F of this article is established to prevent importers only follow this basic labelling criteria requirement and lower than the standards of the original exporting countries. And, if exporting products are changed to domestic sales, to prevent they from following the lower standards required by the importing countries to evade our domestic more strict standards, it is clearly defined in Item G.</p>
<p>I. The implementation of the criteria begins on year month day .</p>	<p>For the implementation day of the criteria, the governing organization shall consider the adaptation conditions of domestic industries, and the conditions of keep tracking between domestic industries and GHS. With appropriate trial and promotion period, then, the official implementation date shall be announced to achieve the balance between the competitive advantages of our domestic products in consumer markets and the protection of consumer safety.</p>

Attachment Table 1:










The Globally Harmonized System of Classification & Labeling of Chemicals
physical hazard labels

Combustible gases	
Combustible gaseous adhesives	
Combustible solids	
Combustible liquids	
Compressed gases	
Ignitable liquids	
Ignitable solids	
Self heated materials and mixtures	
Auto reacting materials and mixtures	
Moisture sensitive materials and mixtures	
Oxidation gases	
Oxidation liquids	
Oxidation solids	
Organic peroxides	

Corrosive metals	
Explosives	

Attachment Table 2:

The Globally Harmonized System of Classification & Labeling of Chemicals health hazard labels

Acute toxicity materials	
Corrosive or skin irritation materials	
Severe damage/eye irritation materials	
Respiratory or skin sensitivity materials	
Reproduction cells mutation materials	
Cancerous material	
Reproduction toxicity materials	
Inhalation hazards materials	
Marked organ toxicity (single exposure)	
Marked organ toxicity (multiple exposure)	