

November 2017

Labelling, decanting and repackaging hazardous substances in the workplace

KEY FACTS

Make sure all containers in your workplace are labelled.

This means:

- keeping the manufacturer's or importer's label on original containers of hazardous substances
- labelling workplace containers
- providing information about substances in transportable containers.

Make sure the label is legible, in English, and has all the information required for the type of container and substance.

You need to label the following workplace containers:

- small portable containers for substances that are decanted or transferred from their original containers
- containers of hazardous waste
- stationary tanks and process containers.

If you move a substance from its original container to a workplace container, do it safely:

- read the safety data sheet (SDS)
- use the right personal protective equipment (PPE)
- prepare for emergencies such as spills, and
- make sure the container is suitable for the substance.

Introduction

Labels let workers and others, such as emergency services, know what hazardous substances are in containers at the workplace and inform them about the associated hazards.

Many businesses buy substances in drums or large containers and then decant or transfer smaller amounts into other containers for easier use or storage. If you do this, follow the recommendations in this guide to transfer the substances safely and correctly label the new containers.

'You' – the PCBU

This guide is written for persons conducting a business or undertaking (PCBUs) as they have a duty to make sure hazardous substances in the workplace are labelled. In this guide, 'you' means the PCBU.

In simple terms, a PCBU is an individual or a company carrying on a business, but it can also be other types of organisation. More information on PCBUs and other duty holders in the workplace and their duties is available on our website:

www.worksafe.govt.nz

Before containers get to your workplace

Before containers of hazardous substances get to your workplace, importers and manufacturers must label them according to the rules made by the Environmental Protection Authority (EPA) in the Hazardous Substances (Labelling) Notice 2017.

In your workplace, you must make sure, so far as reasonably practicable, that hazardous substances in their original containers retain the manufacturer's or importer's label and that these labels are maintained in a legible condition.

This could mean replacing the label if it can no longer be read.

It could also mean getting a replacement label for labels that fall off containers or that are damaged.

Workplace labels

When you take a substance out of its original container you must make sure the new container is labelled. The information you need to include on the label depends on the type of container. All labels must be in English.

You must make sure that a container that is labelled for a substance is only used for that substance.

Table 1 below summarises the workplace labelling rules for containers of hazardous substances that will not leave your workplace and that you:

- manufacture (eg mix or blend in a process bath) in the workplace
- decant or transfer into portable containers of 40 L or less.

Table 1 also summarises the workplace labelling rules for:

- containers of hazardous waste
- stationary tanks
- process containers
- tank wagons or transportable containers.

When don't you have to label a container?

If you put hazardous substances into a smaller container and use the substances so soon afterwards that it is not practicable to label the container, then you do not have to label the container.

However, you must thoroughly clean the container immediately after you use the substance so that no residue that could present a hazard remains.

An example of this could be when a worker transfers a small amount of a substance to a small portable container only for a specific task, immediately uses all of the substance for this specific task, and cleans the container afterwards.

Workplace labels

This table summarises the workplace labelling requirements:

CONTAINER OR SUBSTANCE	LABEL CONTENTS
Original containers of hazardous substances supplied by importers or manufacturers	Labelled according to the Hazardous Substances (Labelling) Notice 2017
Hazardous substances: <ul style="list-style-type: none"> - manufactured (ie mixed or blended in a vat) in the workplace or - decanted or transferred in the workplace into containers of 40 L or less, and - not for immediate use or for supply outside the workplace 	<p>The product name or chemical name</p> <p>A hazard pictogram reflecting the classification of the substance</p> <p>A hazard statement reflecting the classification of the substance</p>
Hazardous waste	<p>An identifier describing the nature of the waste as closely as possible (eg chlorinated solvent waste, flammable waste) if you don't have a product or substance name for waste that is a mixture of substances or products</p> <p>The name, address and business phone number of the producer of the waste (if known)</p> <p>A hazard pictogram based on what you know about the classification of the waste</p> <p>A hazard statement based on what you know about the classification of the waste</p>
Hazardous substances in stationary tanks or process containers	<p>The product name or chemical name</p> <p>A hazard pictogram reflecting the classification of the substances</p> <p>A hazard statement reflecting the classification of the substances</p> <p>For explosive, flammable or oxidising substances or organic peroxides, steps to prevent unintended explosion, ignition, combustion, acceleration of fire or thermal decomposition</p>
A hazardous substance in a bulk transport container or tank wagon	<p>Information complying with the applicable rule near the container at all times. The rules are:</p> <ul style="list-style-type: none"> - The Land Transport Rule: Dangerous Goods 2005 - Part 24A of the Maritime Rules (carriage of cargoes-dangerous goods) - Part 92 of the Civil Aviation Rules (carriage of dangerous goods)
The labelling requirements for these containers are taken from the specific rules for transporting goods by land, air and sea	

TABLE 1:
Workplace labelling requirements

Information on labels

Most labels have some common features. Importer and manufacturer labels generally have all of the features listed below, but the workplace labels listed above can be a simpler version of the importer and manufacturer labels on original product containers. Labels can include:

- hazard statements
- hazard pictograms
- signal words
- precautionary statements
- other information, including response, storage and disposal statements.

These features are detailed below.

Hazard statements

Hazard statements tell users about the hazardous properties of the substance. They can be a simple description of the substance class, for example:

- FLAMMABLE LIQUID AND VAPOUR.

Or they can tell users about the harm that the product can cause, for example:

- MAY CAUSE MILD SKIN IRRITATION.

There are more examples of the information you may see on hazard statements under the hazard pictograms below.

Hazard pictograms

Hazardous substances are put into classes depending on their hazardous properties.

On signs and labels, two types of pictograms (symbols) show the class a substance belongs to:

- GHS (Globally Harmonised System of Classification and Labelling of Chemicals) pictograms, or
- Transport of Dangerous Goods pictograms.

You will see GHS pictograms on labels and workplace hazard warnings and Transport of Dangerous Goods pictograms on containers used to transport hazardous substances.

There are some examples of GHS pictograms below.

PICTOGRAMS AND INFORMATION ABOUT HAZARDS:

Below are some of the GHS pictograms you will see on labels and some basic information about the hazards that they represent. This is the type of information you could see in a hazard statement.

Flammables

This pictogram represents products that ignite easily and burn rapidly. Keep them away from oxidising products.

There are also Transport of Dangerous Goods pictograms for flammable gases, liquids and solids, spontaneously combustible substances and substances that are dangerous when wet.



Oxidisers

This pictogram represents gases, solids or liquids that can cause or intensify fires or explosions. Keep them away from flammable products.



Organic peroxides

This pictogram represents organic peroxides, which are products that may contribute to fire, explosion or chemical decomposition.



Corrosives

This pictogram represents products that are corrosive. This means they can cause severe skin burns and eye damage and may also be corrosive to metals.



Gases under pressure

This pictogram represents products containing gas under pressure. They may explode when heated. If they are refrigerated gases, they may cause cryogenic burns or injuries. Even normally safe gases can be dangerous when pressurised.



Acutely toxic substances

This pictogram represents substances that are acutely toxic. If you see it on a label, be aware that you are handling very dangerous products that could cause death if they come into contact with your skin or you inhale or ingest them.



Less severe acute health hazards

This pictogram represents products that may cause skin sensitisation, skin or eye irritation, respiratory irritation, or drowsiness or dizziness.



Chronic (long-term) health hazards

This pictogram represents products that can cause chronic health issues including cancer, mutations, fertility issues, damage to an unborn child, and allergies, asthma or breathing difficulties if inhaled.

They can also be respiratory sensitisers - meaning they can cause hypersensitivity in the airways after they are inhaled. Respiratory sensitisers can also cause allergic respiratory reactions, including coughing, tightness of breath, runny or blocked nose or other symptoms.



Environmental hazards

This pictogram represents products that are toxic to the environment (ecotoxic).



Explosives

This guide does not contain information on labelling explosives. This is because explosives usually remain in their original packaging and are not decanted, transferred or 'manufactured' in the workplace. For information on explosives, see our website.



Signal words

You may see signal words like WARNING or CAUTION (for less dangerous substances), POISON, DANGER or DANGEROUS POISON (for more dangerous substances) on the labels of hazardous substances. You can also include these signal words on workplace labels.

Precautionary or prevention statements

Precautionary or prevention statements describe how to minimise or prevent the harmful effects of exposure to a hazardous product and properly store or handle a hazardous product. The following are examples of precautionary statements:

- KEEP OUT OF REACH OF CHILDREN
- USE ONLY OUTDOORS OR IN A WELL-VENTILATED AREA.

Other information on labels

You do not have to include response, storage and disposal statements on workplace labels, but you may see them on containers supplied by importers or manufacturers. You may also decide to include this information on workplace labels.

Response statements

Response statements tell you what steps to follow after exposure, including first aid advice or treatment recommendations, for example:

- take off contaminated clothing and wash before re-use
- if skin irritation occurs seek medical attention
- do not induce vomiting.

STORAGE STATEMENTS

Storage statements tell you how to safely store substances, for example:

- store in a dry place
- store in corrosive-resistant container
- store away from other materials.

DISPOSAL STATEMENTS

Disposal statements provide recommendations about how to safely dispose of substances. The following are examples of disposal statements:

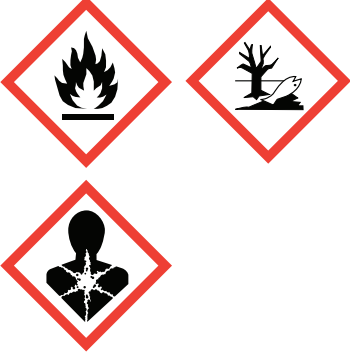
- avoid release into the environment
- do not allow to enter into drains or waterways.

Sample labels

Label on containers supplied by importers or manufacturers

This is an example of the features you can expect to see on a label on the original container of a hazardous substance when it arrives at your workplace.

Mineral Turpentine



DANGER

KEEP OUT OF REACH OF CHILDREN
Flammable liquid and vapour
May be fatal if swallowed and enters airways
Causes mild skin irritation
Toxic to aquatic life with long lasting effect

PREVENTATIVE MEASURES
Read label before use.
Keep away from heat and ignition sources. No smoking.
Keep container tightly closed when not in use. Avoid inhaling vapour, use only with adequate ventilation.
Wear rubber gloves and safety glasses when using or handling this product.

FIRST AID
If skin rash or irritation occurs get medical attention. Remove contaminated clothing and rinse skin with plenty of soap and water.
If swallowed, immediately call Poisons Centre (0800 POISON) or get medical attention.
Do NOT induce vomiting.
If medical advice is needed, have product or label at hand.

EMERGENCY RESPONSE MEASURES
In case of fire use CO₂ dry chemical or foam extinguisher.
Absorb spilled liquid with sand or inert material.

STORAGE
Store locked up, in a well-ventilated place and keep containers cool.

DISPOSAL
Avoid release to the environment. Do not allow to enter drains or waterways.
Dispose of this material and its container to a hazardous or special waste collection point.

Supplier information including emergency phone number

FIGURE 1:
Sample label on containers supplied by importers or manufacturers

Workplace labels

The following are examples of the workplace labels described in Table 1 using the example of mineral turpentine.

DECANTED OR TRANSFERRED SUBSTANCES

If you manufacture a hazardous substance in your workplace (ie mix or blend substances in a vat) or decant or transfer hazardous substances in your workplace from their original containers into smaller portable containers (of 40 L or less), the label must contain certain basic information as a minimum (the product or chemical name, a hazard pictogram and hazard statement(s)):

Mineral Turpentine



DANGER

Flammable liquid and vapour
May be fatal if swallowed and enters airways
Mild skin irritation
Toxic to aquatic life

FIGURE 2:
Sample label for
substances decanted
or transferred in
the workplace

Hazardous waste

Hazardous waste is waste you create (due to manufacturing or another industrial process) that is reasonably likely to be or contain a substance that meets one or more of the classification criteria for substances with explosive, flammable, oxidising, toxic and/or corrosive properties under the Hazardous Substances (Classification) Notice 2017. Waste may also have ecotoxic properties.

It might be difficult to provide an exact name for this waste. Hazardous waste can be a mixture of different hazardous substances that you cannot separate back into the original substances. For this reason, you need to identify the waste in a way that reflects its nature as closely as possible (ie flammable waste). You also need to provide details about its producer, and a hazard pictogram and hazard statement.

Flammable, corrosive and toxic waste



DANGER

Flammable liquid and vapour
May be fatal if swallowed and enters airways
Mild skin irritation
Toxic to aquatic life with long lasting effects

Producer's name
Producer's address
Producer's phone number

FIGURE 3:
Sample label for
hazardous waste

Hazardous substances in a stationary tank, process container or transportable container

A stationary tank is a tank that is normally located in a specific place in a workplace, for example an above ground tank for petrol.

A process container is a container where hazardous substances undergo or form part of a process, for example a mixer, treatment vessel, or a vat.

A transportable container is not fixed to the chassis (or base) of a vehicle, and can be unloaded or transported to another type of transport.

Because of the large quantities that stationary tanks and process containers hold, their workplace labels need to show measures to prevent unintended explosion, ignition, combustion, acceleration of a fire or thermal decomposition. They also need to show the product or chemical name, and a hazard pictogram and hazard statement.

Because tank wagons or transportable containers are used for transport, there needs to be a label on or nearby them that meets the relevant transport rule in Table 1.

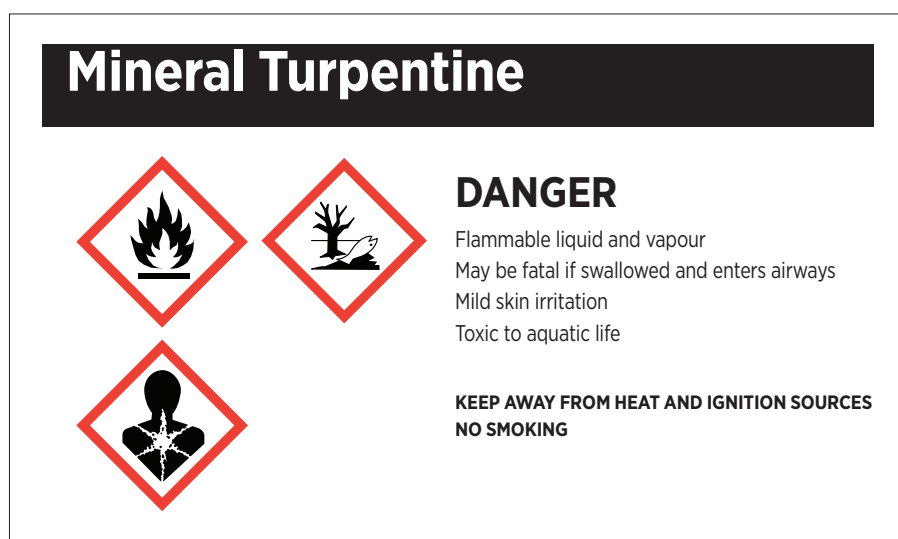


FIGURE 4:
Sample label for
stationary containers
or process containers

Decanting and transferring substances

Try to keep hazardous substances in their original containers. If you must move hazardous substances from their original containers (eg for easier use around the workplace), do it safely and make sure the new container is suitable.

Never use food or drink containers to hold small amounts of hazardous substances. People can get confused about what's in the container even if it is labelled. Many people are seriously harmed after drinking hazardous substances stored in drink containers.

Decanting or transferring substances safely

Here are some ways to keep safe when decanting or transferring hazardous substances:

- Read the SDS and note the hazards (eg is the substance flammable or toxic? Does it give off vapour?)
- Wear recommended PPE (eg eye and breathing protection, gloves and overalls).
- Depending on the substance and how you handle it, you may need eye wash stations or safety showers where you transfer substances, in case they spill on workers.
- Be prepared for spills during transfer. Keep your spill kit ready.
- Ventilate work areas so workers do not breathe in high concentrations of possibly poisonous gases and to prevent build-up of flammable vapours, which could ignite and cause a fire or explosion.

- Flammable liquids release flammable vapours so make sure there are no ignition sources in the area.
- Flammable liquids can generate static electricity that can ignite the substance. You need to earth or bond containers made of metal or conductive plastic.
- Label the new container with the substance's product or chemical name, a hazard pictogram and a hazard statement.

CHECK THE CONTAINER FIRST

If you decant or transfer a substance to a container in the workplace for use in the same workplace, make sure the container:

- is of sound condition (ie it will not break and can stand up to the substance)
- is made of a material compatible with the substance (ie that will not cause a dangerous reaction)
- doesn't usually contain food or beverages so that people in the workplace will not think that it is a food or beverage container
- can safely contain the substance at the temperature range at which you will use the container for as long as the substance will be packed.

Use containers that can safely store the substance. Some substances react dangerously with glass, plastic or other materials. Check the SDS or ask your supplier for more information about this.

Make sure the new container is clean and doesn't contain residues of other substances that may cause a violent reaction.

Further information

For more information on changes to the regulations for labelling see our interpretive guidelines, *Changes to the Regulations for Hazardous Substances in the Workplace*.

For more information about labelling hazardous substances, see *Your Practical Guide to working safely with hazardous substances* at: www.hazardoussubstances.govt.nz

Abbreviations

TERM	DEFINITION
EPA	Environmental protection authority
GHS	Globally Harmonised System of Classification and Labelling of Chemicals
PCBU	Person conducting a business or undertaking
PPE	Personal protective equipment
SDS	Safety data sheet