Safety topic

The Globally Harmonized System (GHS) – Impacts for Hazard Communication

SS-928

last updated: June 2015

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Introduction

Federal OSHA has adopted elements of the United Nations guidance document "Globally Harmonized System of Classification and Labeling of Chemicals" into its revised Hazard Communication Standard, termed "HazCom 2012"

Between now and June 1, 2016, there are significant changes that impact employers as well as chemical manufacturers, importers, and distributors of hazardous chemicals.

The changes will be phased in during the multi-year transition period, but now is the time to begin implementation.

This guide provides an overview of the key changes, outlines key implementation dates, and supplies you with a "HazCom 2012 Implementation Checklist" to prepare your organization.

Background

After 10 years of technical work and negotiation, a United Nations Economic and Social Council Subcommittee adopted the Globally Harmonized System for Classification and Labeling ("GHS"), and recommended that it be disseminated throughout the world. By promoting common, consistent criteria for classifying chemicals and developing compatible labeling and safety data sheets (formerly called material safety data sheets), the GHS is intended to enhance safety and health by improving the understanding of the physical and health effects of chemicals, as well as reduce trade barriers.

To date, over 70 countries have adopted elements of the GHS. In March of 2012, federal OSHA modified its existing Hazard Communication Standard to align with GHS.

HazCom 2012 has several phased implementation dates that are outlined later in this document. Oregon is a state-administered OSHA plan state, and Oregon OSHA has chosen to develop its own version of the federal changes that is at least as stringent.

Overview of changes

- The alignment of HazCom with GHS results in changes to the following:
  - Chemical classification
  - Label content
  - Safety data sheet (formerly material safety data sheet) content and standardization
  - Employee training on new labels and safety data sheets (SDS)

- The alignment **does not** result in changes to the following:
  - Scope and exemptions of HazCom
  - Requirement that all containers be properly labeled
  - SDS distribution and availability in the workplace
  - Requirement that all affected employees be trained to recognize hazards and take proper precautions
  - Trade secrets (except to include percentages)

Federal implementation dates for HazCom 2012

The final implementation date for HazCom 2012 is June 1, 2016. While this appears to be a long time away, the changes are significant and may impact several safety and health programs.

Date	Requirement	Primary impact
December 1, 2013	Train employees on new labeling elements (pictograms, signal words, precautionary, and hazard statements) and the 16 section SDS format.	Employers
June 1, 2015	Complete hazard classification using specified criteria and produce GHS-styled labels and 16 section safety data sheets. Comply with all modified provisions of the final rule, except for the Distributors exemption below.	Chemical manufacturers, importers, and employers
December 1, 2015	Distributors shall only ship containers with GHS-compliant labels.	Distributors
June 1, 2016	Chemical labeling and SDS are consistent with HazCom 2012 requirements. Written hazcom program is updated. Training to reflect newly identified hazards is completed.	Employers
Transition period to the effective completion dates listed above	May comply with either HazCom 2012 or the older standard, or both	Chemical manufacturers, importers, distributors, employers

With the exception of the compliance elements listed above, elements from both the old and the new Hazard Communication Standard can be used during the transition, as long as employees understand both. Employers are not required to maintain two sets of labels and SDS for compliance purposes.

HazCom 2012 checklist: What to do now

Part I. Employers

- ❑ Ensure you have a central ordering process for all chemical purchases, and take measures to prevent ”rogue” purchases. These serve to potentially weaken your hazcom program’s effectiveness.
- ❑ Reduce your chemical and current SDS inventory by removing unused or unneeded chemicals from your facility. Consult the Department of Environmental Quality or your local fire marshall for strategies on appropriate chemical disposal.
- ❑ Update your chemical inventory list. While this is only required of hazardous chemicals, a best practice is to include all chemicals.
- ❑ Familiarize yourself with the GHS-compliant safety data sheet format and labels (see links below).
- ❑ Begin looking for the arrival of GHS-compliant safety data sheets, and prepare to transition from your existing material safety data sheet formats to the standardized 16-section GHS complaint safety data sheets.
- ❑ Talk to suppliers to ensure you will be receiving GHS-compliant SDS and chemicals with compliant labels within acceptable timeframes.
- ❑ Prepare to revise your hazcom training to include information on new labeling (signal words, pictograms, and precautionary and hazard statements), the format of the GHS-compliant, 16-section SDS, as well as newly identified hazards (i.e., combustible dusts).
- ❑ Develop a plan to ensure your workplace labeling system is GHS compliant, and includes a combination of product identification, words, and pictograms (see links below).
- ❑ Prepare to revise your written Hazard Communication Program to reflect changes in terminology, chemical inventory, and workplace labeling system.
- ❑ Stay current with updates on changes from federal and Oregon OSHA.

Part II. Manufacturers/importers

- ❑ Begin work on the actions listed in Part I above.
- ❑ Begin the process of hazard classification of health and physical hazards based on criteria outlined in 29 Code of Federal Regulations (CFR) 1910.1200 Appendices A & B.
- ❑ Begin updating safety data sheets using section (g) and Appendix D of 29 CFR 1910.1200.
- ❑ Prepare to update your labels for chemicals that are shipped to include a product identifier; name, address, and phone number of your company; signal word and a pictogram; and hazard and precautionary statement for each hazard class and category (see link).

  Create a process to ensure and verify that shipments of chemicals with GHS-compliant SDS and labeling occurs within the scheduled implementation date for manufacturers and importers.

Part III. Distributors

- ❑ Begin work on the actions listed in Part I above.
- ❑ Plan to reduce your stock of chemicals with nonupdated SDS and GHS-compliant labeling.
- ❑ Contact your manufacturer/importer partners to discuss expectations for labeling and SDS formatting on newly purchased chemicals.
- ❑ Create a process to ensure and verify that shipments of chemicals with GHS-compliant SDS and labeling occurs within the scheduled implementation date for distributors.

Resources

Oregon OSHA topic page: hazard communication
http://www.orosha.org/subjects/hazard_communication.html

Federal OSHA safety and health topics: hazard communication
https://www.osha.gov/dsg/hazcom/index.html

United Nations Economic Commission for Europe (UNECE) information resources: GHS
http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html