

Adopting the “Global Harmonization Standard” (GHS)

The United States has joined several countries throughout the world in adopting the Global Harmonization Standard (GHS). As of March 2012, OSHA has adopted this standard into the Hazard Communication Standard (HCS) 29 CFR 1900.1200.

WHAT IS THE GHS?

The GHS standardizes hazard communication practices, which each participating country must adopt, implement and enforce.

OSHA's role is to enforce compliance because it has adopted GHS through the Hazard Communication Standard 29 CFR 1910.1200.

WHAT CHANGES DOES GHS BRING TO THE CURRENT HCS?

The most significant changes GHS brings to the HCS involve:

- hazard classifications
- safety labels
- safety data sheets

This means everyone in the lifecycle of a hazardous chemical will likely have important adjustments to make.

TIMELINE FOR IMPLEMENTATION

The final rule was published in The Federal Register publication on March 26. <http://www.gpo.gov/fdsys/pkg/FR-2012-03-26/pdf/2012-4826.pdf>

December 1, 2013: Employers must complete training for all employees on the new label elements and the new Safety Data Sheet (SDS) format.

June 1, 2015: Hazard Classification, Label, SDS implementation from chemical manufacturers, importers, distributors and employers, but distributors may ship with old labels up to December 1, 2015.

WHAT IS THE DOWNSTREAM IMPACT ON EMPLOYERS?

- Document management (update to new SDS)
- Evaluate hazards to compare with changes in hazard classifications
- Update container labeling in-house
- Re-educate workers
- Ongoing: keep information up to date

WHAT ARE BUSINESS CONSIDERATIONS FOR EMPLOYERS?

Employers need to consider the business effects GHS will have, including cost and resources such as time, money and tools within their operations:

- What products are on site? Absent an accurate chemical inventory list, it will be difficult to assess GHS impacts.
- Increased updating effort and tracking volume of inbound SDS.
- Hazard reclassification challenges: some products that currently do not require an MSDS now, may require an SDS in the future; therefore, increased hazards may result in increased compliance requirements.
- Where/how to store, manage and retrieve GHS documents and data as it arrives.

COMPLIANCE STRATEGIES:

“Material Safety Data Sheet” becomes “Safety Data Sheet”

Elements or sections of the Safety Data Sheet will be:

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First-aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information, including date of preparation or last revision

Required Information on Shipped Containers

1. Product identifier
2. Name, address and telephone number of the chemical manufacturer, importer or responsible party

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3. Signal word
4. Hazard statement(s)
5. Pictogram(s) with red borders for all labels and empty borders are not permitted
6. Precautionary statement(s)

Outline your compliance framework NOW, predetermining the following:

1. Roles and responsibilities at a corporate, site and field level
 - Number of employees to be trained – estimated training hours required
 - Number of work sites impacted
 - Number of plant managers and safety professionals involved – estimated time requirement
 - Number of product MSDS to be revised
2. Develop a capacity plan to address the transition and all required changes.
3. Conduct a resource assessment.
4. Develop a draft training plan.
5. Analyze required infrastructure revisions and upgrades:
 - Expanded data fields
 - GHS symbols/pictograms
 - New label templates for internal containers
6. Analyze required internal process changes.
7. Evaluate the impact of GHS reclassification.
8. Analyze and confirm vendor capabilities to improve compliance.

SUMMARY:

OSHA's Hazard Communication Standard covers more than 5 million workplaces in the United States with hazardous chemicals on premises. The new GHS affects them all. It will take time for employers to make good decisions about transitioning to the revised HCS/GHS; therefore, making good decisions and taking appropriate actions will be a lot easier the sooner they get started.

Resource References:

<http://www.osha.gov/dsg/hazcom/side-by-side.html>
<http://www.osha.gov/dsg/hazcom/>

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