CPI GUIDANCE ON OSHA's REVISED COMMUNICATION STANDARD: GLOBALLY HARMONIZED SYSTEM (GHS) OF CLASSIFICATION AND LABELING OF CHEMICALS

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Purpose

The purpose of this document is to provide general information on the Occupational Safety and Health Administration (OSHA) modifications to the Hazard Communication Standard (HCS) to conform with the United Nations (UN) Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The updated standard will apply to manufacturers and workers who produce or handle hazardous chemicals across the United States.

OSHA has revised the HCS (29 CFR 1910.1200) to align with the provisions of the UN GHS. GHS is an international approach to hazard communication providing standardized criteria for health, physical, and environmental hazards of chemicals to provide consistent information to workers, employers and chemical users. This means the look of labels and safety data sheets or SDSs (formerly known as Material Safety Data Sheets or MSDSs) will change. Most of the toxicity information will not change, but the classifications may change due to the new criteria.

Elements of HazCom 2012

On March 26, 2012, the OSHA Final Ruling Update: Globally Harmonized System of Classification and Labeling of Chemicals was published. One of the major differences between the old standard and the new standard is that the labels and possibly SDSs will have pictograms on them to help better communicate the hazards of the product. A copy of the final rule in its entirety can be found on OSHA's website at http://www.osha.gov/dsg/hazcom/ghs-final-rule.html.

Hazard Classification

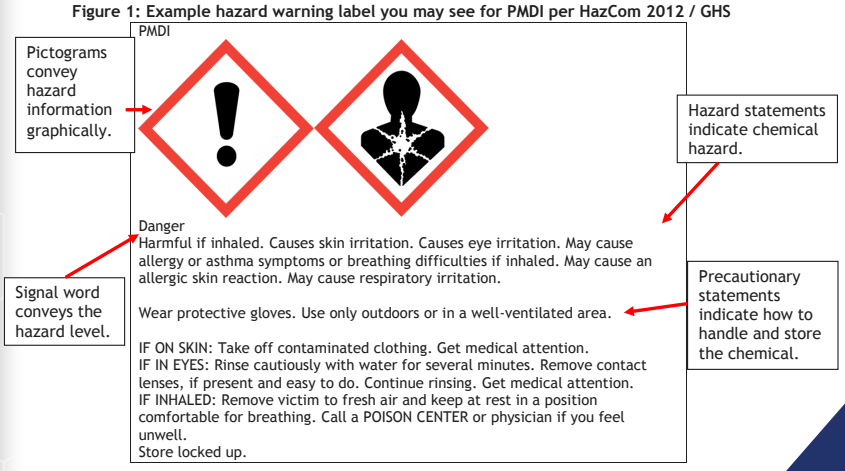
Provides specific criteria for classification of health and physical hazards, as well as classification of mixtures. For additional information on Hazard Communication's SDS, visit the OSHA website at http://www.osha.gov/Publications/HazComm_QuickCard_SafetyData.html.

Safety Data Sheets

SDS will now have a required 16-section format. The SDS format is the same as the ANSI standard format that is already widely used in the U.S. For additional information on Hazard Communication's SDS, visit the OSHA website at http://www.osha.gov/Publications/HazComm_QuickCard_SafetyData.html.

Labels

Figure 1: Example hazard warning label you may see for PMDI per HazCom 2012 / GHS



Chemical manufacturers and importers will be required by OSHA to provide a label that includes a common signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided (See Figure 1). For additional information on Hazard Communication labels, visit OSHA's website at http://www.osha.gov/Publications/HazComm_QuickCard_Labels.html.

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Figure 2: HCS Pictograms and Hazards

Health Hazard	Flame	Exclamation Mark
		
• Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	• Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
Gas Cylinder	**Corrosion**	**Exploding Bomb**
		
• Gases under Pressure	• Skin Corrosion/ burns • Eye Damage • Corrosive to Metals	• Explosives • Self-Reactives • Organic Peroxides
Flame over Circle	**Environment (Non Mandatory)**	**Skull and Crossbones**
		
• Oxidizers	• Aquatic Toxicity	• Acute Toxicity (fatal or toxic)

OSHA requires standard pictograms on labels to convey information graphically about the hazards of a chemical (See Figure 2). To view the Hazard Communication pictograms, visit OSHA's website at http://www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html.

Information and Training

Employers are required by OSHA to train workers by December 1, 2013 on the new label elements and SDS format to facilitate recognition and understanding by workers.

Table 1: Effective Dates

Effective Completion Date	Requirement(s)
December 1, 2013	Ensure employees are trained on the new label elements and SDS format.
June 1, 2015	Manufacturers must comply with all provisions of OSHA's Final Rule. (The rule allows distributors may ship chemicals previously labeled with old labels until December 1, 2015).
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.

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