



ARE YOU COMPLIANT?

THE NEW GHS STANDARD

What is the Globally Harmonized System?

GHS is an international approach to hazard communication, providing criteria for classification of chemical hazards, and a standardized approach to label elements and safety data sheets

The result of this negotiation process is the United Nations' document entitled "Globally Harmonized System of Classification and Labeling of Chemicals," commonly referred to as The Purple Book.

What has changed from the 1994 to the new GHS Standard?

- Change in purpose and scope - from "assessment" to "classification"
- From MSDS to SDS
- New SDS format
- Labeling requirements
- Employee training requirements
- New statements of composition without trade secret disclosure
- Change in definitions - for example, chemical - from element or compound to "substance"

Why must training be conducted prior to the compliance effective date?

OSHA is requiring that employees are trained on the new label elements (i.e., pictograms, hazard statements, precautionary statements, and signal words) and SDS format by December 1, 2013, while full compliance with the final rule will begin in 2015.

What is the phase-in period in the revised Hazard Communication Standard?

The table below summarizes the phase-in dates required under the revised Hazard Communication Standard (HCS):

Effective Completion Date:	Requirement(s):	Applies to:
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015 December 1, 2015	Compliance with all modified provisions of this final rule, except: The distributor shall not ship containers label by the chemical manufacturer or importer unless it is a GHS label.	Chemical manufacturers, importers, distributors and employers
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.	Employers
Transition period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors and employers

During the phase-in period, employers would be required to be in compliance with either the existing HCS or the revised HCS, or both. There will be a period of time where labels and SDSs under both standards will be present in the workplace. Employers are not required to maintain two sets of labels and SDSs for compliance purposes.

How will labels change under the revised Hazard Communication Standard?

Under the current Hazard Communication Standard (HCS), the label preparer must provide the identity of the chemical, and the appropriate hazard warnings.. Labels will require the following elements:

- **Pictogram**
- **Signal words**
- **Hazard Statement**
- **Precautionary Statement**

When must label information be updated?

Chemical manufacturers, importers, distributors, or employers who become newly aware of any significant information regarding the hazards of a chemical shall revise the labels for the chemical within six months of becoming aware of the new information, and shall ensure that labels on containers of hazardous chemicals shipped after that time contain the new information.

What pictograms are required in the revised Hazard Communication Standard? What hazard does each identify?

HCS Pictograms and Hazards

<p style="text-align: center;">Health Hazard</p> 	<p style="text-align: center;">Flame</p> 	<p style="text-align: center;">Exclamation Mark</p> 
<ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<ul style="list-style-type: none"> • Irritant (Skin and Eye) • Skin Sensitizer • Acute Toxicity (Harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer
<p style="text-align: center;">Corrosion</p> 	<p style="text-align: center;">Gas Cylinder</p> 	<p style="text-align: center;">Exploding Bomb</p> 
<ul style="list-style-type: none"> • Skin Corrosion/ burns • Eye Damage • Corrosive to Metals 	<ul style="list-style-type: none"> • Gases under Pressure 	<ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p> 	<p style="text-align: center;">Environment</p> 	<p style="text-align: center;">Skull and Crossbones</p> 
<ul style="list-style-type: none"> • Oxidizers 	<ul style="list-style-type: none"> • Aquatic Toxicity 	<ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

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