



**Occupational Safety
and Health Administration**



UNITED STATES DEPARTMENT OF LABOR

HCS/GHS Update



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Overview

- International Update
 - RCC
 - UN Sub-Committee of Expert on GHS
- HCS 2012 update
 - Guidance Products
 - Regulatory Agenda

International



RCC – PHASE II

Health Canada and U.S. OSHA are preparing Regulatory Partnership Statement (RPS) and a Work Plan for Workplace Chemicals:

- RPS – Outlines regulatory plans, strategies and governance for how partnership activities will be managed between Health Canada and U.S. OSHA
- Work Plan – Presents the partnership activities. These activities may be adjusted based on discussions between the regulatory partners and/or

stakeholders <http://www.trade.gov/rcc/documents/c1-hc-osh-wp-workplace-chemicals.pdf>

The Regulatory Partnership Statement

SCOPE AND OBJECTIVES

Canada and the U.S. will continue to collaborate on the implementation of GHS and future developments of the GHS through the following objectives:

1. Continue to reduce and prevent Canada-U.S. variances through ongoing collaboration of our guidance materials,
2. Coordinate common positions in advance of United Nations (UN) and other international discussions on the GHS, including supporting harmonized implementation of the GHS globally through the UN Sub-Committee of Experts on the GHS and other international fora, and
3. Align Canada-U.S. positions on future updates and implementation of the GHS (e.g., development and adoption of future revisions of the GHS Purple Book)

Work Plan

WORK STREAMS

Work plan has two streams of work:

Stream 1:

- Continue to reduce and prevent Canada-US variances through ongoing collaboration and mutual review of guidance materials. Lessons learned from the US transition process will also be used to inform this work.

Stream 2:

- Coordinate common positions in advance of United Nations (UN) and other international discussions on GHS.
- Using existing mechanisms in place to align Canada-US positions on future updates and implementation of the GHS (e.g., development and adoption of future revisions of the purple book).
- Use existing fora (e.g., UN Sub-Committee of Experts on GHS) to promote harmonization of GHS. Stakeholders will be kept apprised of developments and discussions prior to and following international discussions on GHS.

UN Sub-committee



UN Sub-Committee of Experts on GHS 2013-2014 Biennium

- The 2013/14 Biennium ended in December

Notable work concluding:

- New physical hazard classes and hazard categories
 - Guidance/Clarifications and corrections
 - Example of labeling of a small packaging
- Rev 6 is available in hard copy and should be available soon on the UN GHS website

UN Sub-Committee of Experts on GHS

2015-2016 Biennium

- Work will continue on
 - Combustible Dust; Global List of classifications pilot program; Nanomaterials; Precautionary Statements; Physical hazard test methods; PCI working group; Aspiration hazards
- New work items
 - Review of the explosive chapter for guidance for workplace handling; Labeling of small packages – initiate work on another example; Classification of Flammable gases

Global List Study

UNSCEGHS is studying the possibility of creating a global list

Issue:

- harmonized classification criteria, but
- divergent national classification lists

Guiding Principles

1. Process clear and transparent, with opportunity for expert review, stakeholder input, conflict resolution, and updates for new information.
2. All hazard categories and classes covered.
3. Only substances included.
4. Each substance included must be accurately identifiable and described.
5. Data sets must be referenced, electronically available, and publically accessible; test methods scientifically sound and internationally validated.
6. Classifications will be nonbinding.

Global List Study

Two approaches considered:

- Existing list comparison
 - Reservations from stakeholders and countries who didn't participate in list creation
 - Questions about the availability of data on which lists based
- Classification by the Subcommittee
 - Reservations about time and resources it would take

Pilot project

- UNSECGHS and OECD are performing a joint pilot classification exercise
- Determine feasibility and resources needed to reach an agreed classification from scratch
- Chemicals selected by UNSCEGHS
- Work Group of the OECD Task Force on Hazard Classification to conduct the classification exercise
- Results reported back to the UNSCEGHS

Pilot Project

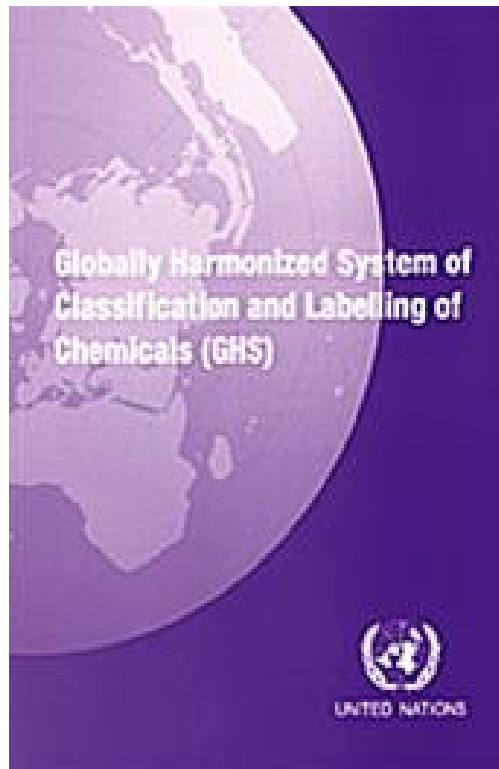
Three chemicals:

- Dimethyltin dichloride, CAS No. 753-73-1 (Sponsor: ECHA)
- Dicyclopentadiene, CAS No. 77-73-6 (Sponsor: Russian Federation)
- Di-n-butyl phthalate, CAS No. 84-74-2 (Sponsor: USA)

Pilot project

- Sponsors prepare draft assessments and classifications, which were uploaded on an OECD website on September 2, 2015.
- Interested parties may make comments until October 23, 2015.
- Sponsors would respond to comments in November 2015 (estimated).
- Initial meetings/teleconferences to discuss classifications would start in December 2015 (estimated).
- OECD would have a status report for the Sub-Committee in December.
- Resources used by sponsors and commenters are tracked.

UN GHS Links



- United Nations Economic Commission for Europe GHS Subcommittee
- http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html
- GHS Report from 28th Session:
<http://www.unece.org/fileadmin/DAM/trans/doc/2014/dgac10c4/ST-SG-AC10-C4-56e.pdf>



Hazard Communication Update

The standard that gave workers the right to know, now gives them the right to understand

Implementation

Effective Completion Date	Requirement(s)	Who
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 labeled 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



Aligns with the UN's Globally Harmonized System of Classification and Labeling of Chemicals

Hazard Communication

The standard that gave workers the right to know, now gives them the right to understand.

Safety & Health Topics Page:
Hazard Communication 1994

Labeling ▾

Safety Data Sheets ▾

Pictograms ▾

Hazard Communication Wallet Card

Effective Dates



Mr. David Michaels discusses the publication of the

"Exposure to hazardous chemicals is one of the most serious threats facing American workers today," said U.S. Secretary of Labor Hilda Solis. "Revising OSHA's Hazard Communication standard will improve the quality and consistency of hazard information, making it safer for workers to do their jobs and easier for employers to stay competitive."

The Hazard Communication Standard (HCS) is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update to the Hazard Communication Standard (HCS) will provide a common and coherent approach to classifying

Highlights

- [Hazard Communication Directive \(HCS 2012\)*](#)
- [API Letter A](#) | [API Letter B](#) | [API Letter C](#) | [API Letter D](#)
- [Hazard Communication: Small Entity Compliance Guide for Employers That Use Hazardous Chemicals*](#)
- [Hazard Communication: Steps to an Effective Hazard Communication Program for Employers That Use Hazardous Chemicals Fact Sheet*](#)
- [Letter of Interpretation](#): Classification of Combustible Dusts under the Revised Hazard Communication Standard. [1910.1200; 1910.1200(d)]
- Comparison of NFPA 704 & HCS 2012 Labels QuickCard [[PDF*](#)]
- [HCS/HazCom 2012 Final Rule](#)
 - [HCS/HazCom Final Rule Regulatory Text](#)

Educational Materials and Outreach

- OSHA's HCS safety and Health Topics Page
 - <https://www.osha.gov/dsg/hazcom/index.html>
 - Labeling, Safety data sheet, pictograms, Training, FAQs, Presentations
- Materials in progress
 - Hazard Classification; Weight of Evidence, Model Training, US/Canada fact sheets
- Partnering
 - DOT, HMIS, SCHC

Regulatory Agenda

Title: Update to the Hazard Communication Standard

- Will consider all updates through Revision 6:
 - Aerosols
 - Desensitized Explosives
 - Skin/Eye classification updates
- Long-term action

OSHA Information

Websites:

- HazCom 2012 Webpage

<http://www.osha.gov/dsg/hazcom/index.html>

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Questions?





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