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PREPARING FOR CHANGE

With the Notice of Proposed Rulemaking (NPRM) to modify the OSHA Hazard Communication Standard (HCS) right around the corner now is a good time to make sure you are up-to-speed on current HazCom requirements so that you will be prepared when the changes go into effect.

The current version of the HazCom Standard, HazCom 2012, is based on GHS Revision 3. The anticipated updates are likely to align with the UN's GHS Revision 7 and may also include elements from Revision 8. Because the NPRM proposes new and expanded hazard categories of certain chemicals, these classification changes may require a new evaluation of existing data. These changes along with other regional GHS updates will likely require multiple changes to your product portfolio SDSs and Labels.

HOW TO OPTIMIZE AND STREAMLINE

There is no need to wait until the US proposed rulemaking and other country GHS updates have been finalized. Prepare now to build a strategy. Identify opportunities for streamlining the updates and avoid one-offs. Here are some things you can do to get started to avoid missing critical compliance deadlines.



Know which countries your products are in and start to group them by Region/Country, Product types, and by GHS Implementation time.

- Build a regulatory tracker



Understand what needs to be updated – Hazard Classifications, SDSs, Labels, Product Data.

- Creating a business plan with trackable events



Identify and Involve all Stakeholders; give them an overview of the changes and impact.

- Establish regular communications and an MOC process



Review all product portfolios

- Remove obsoleted products, ensure formulations are accurate, ensure that products are mapped to the correct geography

If using a chemical management system or other tools;

- confirm that the data in the software system(s) and tools are accurate
- utilize the reports functionality generated by your current system(s)
- start to build a business case for new software systems (if necessary)



AND identify available staff or identify additional resources (e.g., hiring or 3rd party) to help through the transition

UPCOMING KEY GHS IMPLEMENTATION DATES



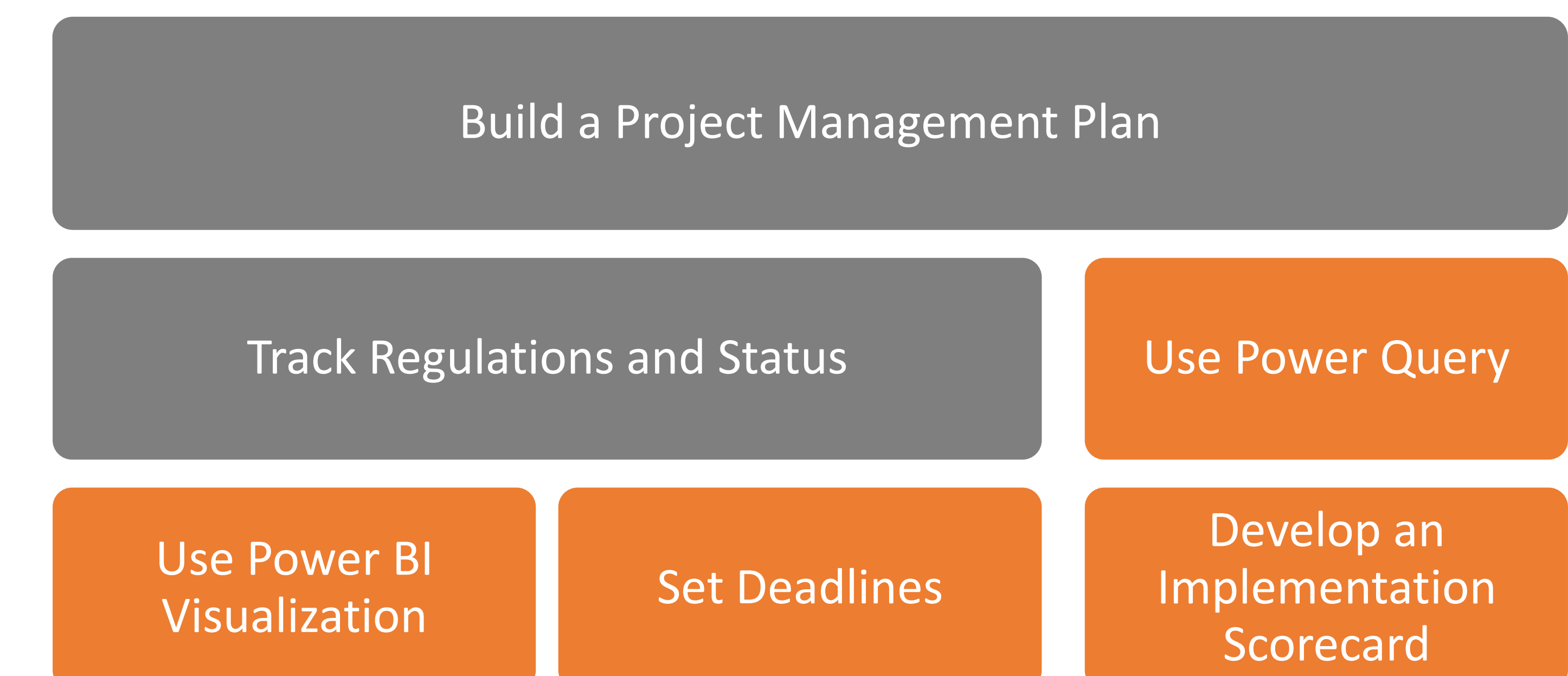
POSSIBLE ROADBLOCKS AND HURDLES

There are a few challenges that you can run into while planning. Early identification can help you avoid possible hurdles or roadblocks. Some of these are listed below.

- Determine the need for software and tools - No software system / Not happy with current software system / New software implementation / Outdated tools
- Discuss Large product portfolios early
- Consider Staff availability and possible shortages
- Plan for older SDSs that may require more in-depth review
- Enlist Stakeholder support

USE A DIGITAL APPROACH

Utilize digital analytics and data visualization as a tool to plan, optimize, and track your HazCom transition progress.



ABSTRACT

The update to OSHA's Hazard Communication Standard (HCS) includes new and expanded health hazard classes and categories, updates to safety data sheets and labels, and more expansive toxicological information. This proposed rule will have an effective date one month following publication in the Federal Register. The newest revision of the GHS Purple Book was published in 2021 under revision 9. The next revision is expected to be published in 2023. In addition, other countries may adopt or implement new revisions of the GHS Purple Book. All these changes may present the opportunity to implement revisions across many geographies. To maintain compliance, manufacturers and importers of hazardous chemicals need to get started now to implement a plan to reach GHS compliance by the mandated deadline(s). This poster will highlight ways to prepare, while maintaining compliance, by staging implementation of the changes and building a strategy to maximize efficiency during multiple GHS implementations. We will look at what organizations should be preparing for to manage any regulatory risk they may be facing and concepts to optimize and streamline business strategy.

CONCLUSION

GHS updates can be daunting to manage. Planning and identifying an approach to implementing updates early can lead to effective cost management and less rework. Setting goals can ensure that you are in the best position to implement the GHS updates to meet deadlines while maintaining compliance.

Start by having a clear understanding of what needs to be updated; group updates; and start to manage updates using a software system, "templates", or other tools. Utilize a digital approach to manage and track progress. Include your stakeholders, communicate often, and know when to ask for help.