

Introduction

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is an internationally agreed-upon framework aimed at standardizing the communication of chemical hazards across the globe. In 2024, several significant regulatory updates will be implemented worldwide, impacting chemical classification, labeling, and safety data sheet requirements. Staying current with these changes is crucial for maintaining compliance, ensuring safe chemical handling, and facilitating international trade.

China

Recently, China officially released the full text of the final version of the **GB 30000.1-2024 standard**. The new national standard will fully replace the current "General Rules for Classification and Hazard Communication of Chemicals" (GB 13690-2009) and will be officially implemented on August 1, 2025.

- Scope of Application:**
 - The revised standard explicitly does not apply to pharmaceuticals, food additives, cosmetics, or pesticide residues in food intended for ingestion. However, if there is potential exposure to workers or during transportation, compliance with this standard is required.
- Hazard Classification:**
 - Introduces the 17th physical hazard category: **Desensitized Explosives**, to align with international chemical safety standards.
 - The draft standard GB 30000.X-202X for "Desensitized Explosives" was released on June 16, 2023, and is currently under review.
 - Emphasizes consideration of all available information on possible "synergistic effects" when classifying mixtures.
 - Allows for the downgrading of a mixture's classification to a less hazardous category based on "antagonistic effects," provided there is sufficient data to support this decision.
- Chemical Safety Labelling:**
 - Enhances the coding system for hazard statements and precautionary statements, providing a basis for when these codes are mandatory in SDS and labels ("One SDS and One Label").
 - Introduces guidance on the "priority order" for hazard statements, particularly for aquatic hazards, skin corrosion, and eye damage, to ensure proper selection of statements.
 - Adds specific requirements for labeling small packages.
 - Updates technical specifications for tactile warnings to the new "GB/T 35929" standard.
- Safety Data Sheets (SDS):**
 - Clarifies the requirements for SDS format and content to align with international GHS standards.
 - Requires comprehensive details in all 16 sections of the SDS, including new guidelines on providing information about chemical hazards, first aid measures, handling and storage, and exposure controls.
 - Emphasizes the need for accurate, clear, and easily accessible information to ensure safe handling and use of chemicals.
 - Mandates regular updates to the SDS to reflect any new information on the hazards or safety measures related to the chemicals.
- Simplified Annexes:**
 - Streamlines the annexes to focus on essential information, reducing redundancy and simplifying compliance.
 - Provides clearer guidance on applying new classification criteria, especially for newly introduced hazard classes like desensitized explosives.
 - Simplifies the presentation of technical information and removes unnecessary content to make it easier for companies to understand and implement the requirements.

Turkey

Turkey - SEA No. 31330 Updates:

- Alignment with KKDİK Regulation:**
 - Replaces references to repealed regulations with references to the KKDİK Regulation; revokes Annexes 7-11 now that KKDİK is in force.
- Expanded C&L Inventory Notification Scope:**
 - Removes "Hazardous" from Article 2, paragraph (e), expanding C&L notification obligations to all substances under KKDİK, even if not hazardous.
- Alignment with EU CLP Updates:**
 - Incorporates ATPs 5-6-7-8-9-10-11-13, updating Annexes 1-6 and harmonizing classifications of substances.
- New Poison Center Notification Requirement:**
 - Article 44/A introduces a notification requirement effective from January 1, 2025.
- Transitional Provisions:**
 - Substances and mixtures placed on the market before January 1, 2023, are exempt from re-classification and re-labelling, allowing a 2-year transition period for compliance.

EU REACH

European Union (EU) - CLP Regulation Updates:

- 21st Adaptation to Technical Progress (ATP):**
 - The 21st ATP introduces new hazard classifications and updates to the EU CLP Regulation (EC No 1272/2008), aligning with the latest changes in the UN Globally Harmonized System (GHS) for chemical classification and labeling.
- New Hazard Classes Introduced:**
 - The revised CLP Regulation, published on March 31, 2023, introduces new hazard categories for identifying the endocrine-disrupting properties of chemicals (EDCs) and new categories for persistent and mobile substances. The new hazard classes are:
 - Endocrine Disruptors (EDCs):**
 - New classification rules for identifying substances with endocrine-disrupting properties.
 - Substance of very high concern:**
 - Persistent, Bioaccumulative, and Toxic (PBT)**
 - Very Persistent and Very Bioaccumulative (vPvB)**
 - Persistent, Mobile, and Toxic (PMT)**
 - Very Persistent and Very Mobile (vPvM)**
- Compliance Deadlines:**
 - The new classifications must be applied to substances by **May 1, 2025**.
 - For mixtures, compliance with the new classifications is required by **May 1, 2026**.
- Notification Requirements:**
 - Manufacturers and importers must notify the European Chemicals Agency (ECHA) of new classifications for substances under the CLP Regulation within one month of placing the substance on the market.
- Labeling and Packaging Changes:**
 - New labels and hazard pictograms are required for substances classified under the new hazard classes, along with updated signal words, hazard statements, and precautionary measures.
- Impact on Industry:**
 - Companies along the supply chain, including formulators and distributors, need to update product labels, Safety Data Sheets (SDS), and other compliance documents to align with the new classifications.
- Transitional Provisions:**
 - Existing stocks of products may be sold under previous classifications and labels until the compliance deadlines are met.

US and UK

United States: GHS Updates

- OSHA's Final Rule for Hazard Communication Standard (HCS):** On **May 20, 2024**, the Occupational Safety and Health Administration (OSHA) released the final rule to update the Hazard Communication Standard (HCS) to align with the **7th revision of the UN GHS** while incorporating some elements from the **8th revision**. The updated standard will take effect on **July 19, 2024**.
- Compliance Deadlines:**
 - Manufacturers, importers, and distributors of substances must comply by **January 19, 2026**.
 - For mixtures, compliance is required by **July 19, 2027**.

Key Revisions:

- Health Hazards:**
 - New rules for labeling chemicals corrosive to the respiratory tract.
 - Revised definition for germ cell mutagenicity.
 - Updates on using human experience data for acute toxicity.
- Physical Hazards:**
 - New classifications for flammable gases, desensitized explosives, and pressurized chemicals.
 - Changes to aerosol categories.
- Labeling:**
 - Simplified labels allowed for small containers.
- SDS Updates:**
 - New requirements for hazard presentation, concentration ranges, exposure limits, and physical properties.

United Kingdom: GHS Updates

- On June 24, 2024**, the UK HSE updated the **GB MCL** list for 88 substances, aligning with the 14th and 15th ATPs from the EU. The update took immediate effect.
- 62 substances** were added with classifications consistent with the ATPs, while **26 substances** were revised.
- Key changes** include the removal of **powdered titanium dioxide** and **granular copper** and updates to several other entries.
- Companies** must ensure their classifications and labels are up-to-date to comply with the new requirements.

Japan and Korea

Japan: GHS Updates

- Ministry of Health, Labour and Welfare (MHLW) Updates:**
 - Japan revised the Industrial Safety and Health Law (ISHL) to modernize SDS delivery methods. Electronic media, such as URLs and QR codes, are now accepted.
- New Requirements:**
 - From **April 1, 2024**, SDS must use weight percentage (w/w %) for component content and the exact amount should be specified. Ranges are still allowed in some cases where necessary.
 - SDS must be reviewed and updated every five years; any new changes must be communicated within one year to downstream users.
- Compliance Requirements:**
 - Manufacturers and importers must provide accurate and up-to-date safety information following these new rules
- Korea - GHS Updates:**
- MoEL Notice No. 2023-9:**
 - The Korean Ministry of Employment and Labor (MoEL) introduced Notice No. 2023-9 to strengthen the management of chemical safety in workplaces and ensure alignment with the latest GHS standards.
- Key Changes Introduced in Previous Revision (MoEL Notice No. 2020-130)**
 - Expanded Hazard Categories:**
 - New classifications have been added, including:
 - Flammable Liquids (Category 4):** Substances that have a flashpoint above 60°C and at or below 93°C.
 - Eye Damage/Irritation (Category 2B):** Substances that cause reversible eye irritation within 21 days.
 - Pyrophoric Gases:** Gases that ignite spontaneously in air at temperatures of 54°C or below.
 - Confidential Business Information (CBI) Provisions:**
 - Allows companies to withhold the names, CAS numbers, or concentrations of certain hazardous ingredients on SDS to protect confidential business information, provided that the hazards are fully disclosed, and approval is obtained from the MoEL.
 - Businesses must justify CBI claims and submit a request for approval to the Korean authorities.
 - Strengthened SDS Requirements:**
 - SDS must be provided in Korean, and companies must ensure that SDS are accurate and conform to the updated GHS criteria.
 - Requires regular updates of SDS to include new hazard information or changes to existing hazard classifications.
 - Companies must submit updated SDS to the Ministry of Employment and Labor (MoEL) for review and approval.
 - Labelling Requirements:**
 - Updated labeling requirements to include the new hazard categories, additional hazard pictograms, signal words, hazard statements, and precautionary statements in compliance with the latest GHS standards.
 - Labels must also include emergency contact information and handling precautions.
- Implementation Timeline:**
 - These changes have been effective since **January 16, 2021**, and all manufacturers, importers, and users of hazardous chemicals in Korea must comply. At the same time, MoEL Notice No. 2020-130 started to be effective.

Brazil and Chile

Brazil: GHS Updates

- Brazil's GHS updates** are aligned with the UN GHS Rev. 7.
- The new standard, NBR 14725:2023**, will come into effect on **July 4, 2025**.
- Main updates include:**
 - QR codes** on labels to access SDS information.
 - The name "FISPQ" for SDS has been changed to "Fichas de Datos de Seguridad."
 - Addition of new hazard categories:** Non-flammable aerosols, desensitized explosives (categories 1-4), and substances hazardous to the ozone layer.
 - Updates to **H/P statements** and requirements for small package labels.
 - Requirement to add a **24-hour emergency contact** number in Section 1 of the SDS

Chile: GHS Updates

- Chile is implementing the NCH2245:2021** based on **UN GHS Rev. 7**.
- The regulation for hazardous chemicals and mixtures, Decree 57/2019**, includes:
 - Notification requirements for hazardous substances and mixtures, with annual thresholds (≥ 1 ton for hazardous substances).
 - Implementation dates for different uses:
 - Industrial use:** February 9, 2022, for GHS implementation; February 9, 2024, for notification.
 - Non-industrial use:** February 9, 2023, for GHS implementation; February 9, 2025, for notification.
 - Updates on labeling requirements for small packaging and specific hazard categories



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