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Why Isn't "Globally Harmonized" Always Harmonized? – Quantifying GHS Classification Differences Across APAC

Yukiko Furuya
3E

The GHS was designed to bring consistency to chemical hazard communication across countries, but many of us working in the field know that consistency can be elusive. This poster explores how GHS classifications vary between Japan, Korea, China, and Australia, with the EU (ECHA) serving as a point of comparison.

This poster aims to quantify how often countries agree—or disagree—on hazard classifications for the same substance by compiling and organizing government-published classification lists. Classifications are compared by CAS number, and discrepancies are measured across jurisdictions. The analysis also looks at how frequently certain types of classification differences occur, and which substances are most affected.

For HazCom professionals dealing with SDSs, labels, or global compliance, these differences aren't just theoretical – they can affect how hazards are communicated and interpreted across markets. This poster offers an early look at the scope of these discrepancies and lays the groundwork for a broader discussion on how to manage them in day-to-day regulatory practice.

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Tale as Old as Time – Substances with a Composition (MOCS)

Katie McGee
Sphera

Substances with a composition - UVCB, Multi-Constituent and even Mono-Constituent substances have always existed. Hazard Communicators have had to make decisions to determine the classifications for substances with a composition and then the mixture classifications that apply when a substance with a composition is in mixture. The latest EU CLP update adds clarification on how classifications should be determined for substances with a composition, now called more than one constituent substance (MOCS), both on their own and when in a mixture. What is still not clarified in the regulatory text or formal guidance is the format in which to provide the composition information for substances with a composition both for the substance itself and when a substance is in a mixture.

This poster provides a simple practical view of the intent of the MOCS provisions for determining classifications and then seeks to provide a forum to consider the different ways to communicate a mixture composition which includes a substance with a composition in section 3 of the SDS.

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Endocrine Disruptors in the GHS: History, Current Status, and Future Outlook

Sheeba Kapoor
Avient

Endocrine-disrupting chemicals (EDCs) are known to interfere with hormonal systems. However, they are still not officially classified in the international hazard communication systems. This poster aims to provide readers with a comprehensive and overall view of the scientific and regulatory philosophy on endocrine disruptors by highlighting their inclusion in the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals. Beginning with the early recognition of the 1990s, the timeline highlights significant milestones, including the WHO/IPCS definition and the EU's regulatory advances through REACH and CLP, as well as the growing influence of OECD guidance. A special focus is given to the recent modification of the CLP Regulation of the European Union, which introduces specific hazard classes for endocrine disruptors affecting human health, as well as the global environmental precedent-setting amendment. The poster also highlights the existing deficiencies in the GHS, the involvement of the United Nations Sub-Committee and the OECD in addressing these gaps, and the anticipated evolution of future classification standards. The discussion of practical implications for industry, hazard communication professionals, and international trade is also brought to the forefront, highlighting the necessity for proactive compliance and the alignment of regulations. Attendees will gain insights into how the regulatory landscape is shifting and what it means for the global management of endocrine-disrupting substances.

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HMIS® Implementation Manual, Fifth Edition: Alignment with GHS and Enhanced Hazard Communication Tools and Training Materials

Riaz Zaman, Diane Nash
American Coatings Association

HMIS is a longstanding, easily recognized and widely used system for in-plant hazard communication. The planned release of the HMIS® Implementation Manual, Fifth Edition, incorporates the most recent modifications to the Hazard Communication Standard, to align the standard more closely with the GHS. In addition, improvements have been made in the Fifth Edition to enhance the user experience and provide new tools to support implementation of the HMIS® System as part of a comprehensive hazard communication program. The chapters have been organized to improve flow and are designed to provide users an overview of the Hazard Communication Standard and the Personal Protection Equipment Standards; a detailed explanation of the HMIS® System, including the categories and the ratings and the relationship to GHS; instructions for determining the HMIS® ratings using a detailed GHS conversion table; easy to follow rating examples; and guidance on incorporating the HMIS® System into site specific hazard communication programs.

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EPCRA 313: Strategic Compliance in a Shifting Regulatory Landscape

Julia Adkins, Terence Ma, Cortney von Hahmann, Heather Write
BASF Corporation

The EPA finalized changes to the Toxic Release Inventory (TRI) reporting requirements under EPCRA Section 313 in October 2023, including two significant updates. First, EPA reclassified the PFAS chemicals as "chemicals of special concern" and eliminated the use of the de minimis exemption for "chemicals of special concern." As a result, facilities must now report releases of TRI-listed PFAS at any concentration without the practical reporting thresholds provided in 40 CFR 372.38(a). Second, the supplier notification provision at 40 CFR 372.45 requires that chemicals listed without any de minimis concentration threshold be accurately reflected in Section 15 of the SDS or are otherwise communicated in writing to customers. These updates have the intention to improve transparency and accountability in chemical reporting, with facilities required to comply with the July 1, 2025 deadline.

We will explore the impacts of the EPCRA 313 regulatory update, hazard reporting and effectiveness of achieving the EPA's stated objectives. We will examine the challenges faced by the industry in complying with the new requirements, as well as the benefits and drawbacks from a customer perspective. By analyzing these aspects, we aim to provide a comprehensive understanding of the regulatory changes and their implications for various stakeholders.

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Building a Better Data Foundation: Strategies for Accurate Supplier Information

Jaden Henry, Talha Ali
Henkel Corporation

Increasing regulatory complexity continues to raise expectations for data accuracy and transparency across the supply chain. One of the most persistent challenges is obtaining complete and timely data from raw material suppliers to support downstream compliance and customer needs. The goal of our presentation will be to share some insight into our data collection processes and open a dialogue on improving data standardization.

To manage this, we have implemented two data collection workflows: one proactive and one reactive. The **proactive workflow** is initiated during raw material onboarding and includes collecting a standardized set of regulatory data points, with routine follow-ups scheduled at defined intervals to keep information current. Whereas the **reactive workflow** is triggered when customer inquiries or regulatory demands reveal missing data, prompting outreach to suppliers for specific documentation or clarifications.

Both workflows have helped improve response times and overall data quality, but each presents unique challenges. The proactive approach can be resource-intensive, while the reactive approach often encounters delays due to inconsistent supplier responsiveness or incomplete submissions. Pain points also include varying global data formats and differing regulatory interpretations.

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Safer Products Restrictions and Reporting for Washington State Chemical Rulemaking Cycle

Kyle Wilson
Exponent

In addition to Federal regulatory requirements, there are also state regulations that must be considered for product compliance. As an example, in July 2023, Washington state adopted Chapter 173-337 WAC — Safer Products Restrictions and Reporting to which manufacturers, distributors, and retailers must comply. This regulation is intended to protect sensitive populations while creating a pathway to keep harmful chemicals out of the environment by reducing the use of chemicals of concern in consumer products within Washington state. Through this regulation, Washington can restrict or eliminate certain chemicals when it determines that safer alternatives are available. In the first cycle, Washington identified five priority chemicals used in specific priority consumer products that are now restricted or require reporting as of 2025. This policy authorizes the state's Department of Ecology to regulate chemicals in consumer products in 5-year cycles. Washington is currently in Cycle 1.5, phase 4 rulemaking to adopt restrictions and reporting requirements related to the intentional use of PFAS and Cycle 2, phase 3 determination of regulatory actions for additional chemical classes and priority products. Washington's cyclical process of identifying chemicals in products is a regulatory framework that has not been seen or utilized by other states. Understanding and engaging with this evolving framework is essential for continuing regulatory compliance, commitments to human health and the environmental.

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Binders to Behavior: Driving HazCom Engagement and Implementation

Coltrin Haun
Global Safety Data

Correctly identifying and listing chemical hazards is only half of HazCom. Without effective and engaging hazard communication, accidents are bound to happen. What enhancements can be made to how Safety Data Sheets (SDS)s are written, accessed and applied? This poster will discuss how each of these areas can be improved and demonstrate their effects on workplace safety culture.

Compliance is only the beginning of SDS authoring. Effective SDSs should be written to provide the foundation of a safety culture. Copious “Data not available” fields destroy interest in learning and implementing hazard awareness in the same way unnecessary precautionary statements cause panic and diminishes the credibility of the document. Putting information in the hands of users has never been easier. QR codes can direct end users and workers to critical safety information listed in the SDS. Application of safety practices included in an SDS can be improved by implementing SDS games. Hosting these exercises is more engaging for workers and boosts the recall of HazCom information and emergency procedures. Examples of an engaging game and effectively written SDSs will be shown on the poster.

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Unusual Results from UN Pyrophoricity Test

Helen Hatch
Rio Tinto Lithium

Rio Tinto Lithium is one of the leading producers of Butyllithium, which is a pyrophoric lithium alkyl. We test the pyrophoricity of our butyllithium products using the test method in the UN Recommendations. The same test method is used for GHS also.

It is very important to know if a material is pyrophoric or not because pyrophoricity is one of the most dangerous physical hazards presented by chemical materials. Pyrophoric materials are forbidden for air transport due to the high level of danger presented if they come in contact with air or moisture. Improperly classifying a material as non-pyrophoric could lead to a dangerous situation if it is accidentally shipped by air in reliance on an improper classification.

We encountered unusual results when testing one of our butyllithium formulations, when the solution tested non-pyrophoric even at high concentrations that we knew were extremely reactive. Careful observation indicated that a phase change occurred which interfered with the reaction of the mixture with moist air, leading to a non-pyrophoric result.

These unusual results should be discussed in the regulated community so that people are aware of the possibility of a false negative result due to phase changes in the solution tested.

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Evaluating GHS Classification Challenges for Complex Active Pharmaceutical Ingredients

Tiffany Cho, Amanda Tuesdale
SafeBridge Consultants, Inc.

Active pharmaceutical ingredients (API) possess a wide range of pharmacological and toxicological properties, some of which may pose significant risks to workers involved in their manufacturing and handling. The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) has a robust and internationally recognized framework for identifying and communicating chemical hazards; however, the application of GHS classifications to complex pharmaceuticals, particularly antibody-drug conjugates (ADCs), monoclonal antibodies (mAbs), and other large-molecule biologics, can be challenging. The data available for these therapeutics often suggest they may not be classified as hazardous under GHS, yet their potency and toxicity, especially in the case of ADC payloads, raise unique concerns for occupational exposure and appropriate hazard classification.

It is important to systematically assess these complex APIs and evaluate the implications for worker safety and global transport compliance, while highlighting inconsistencies and gaps in hazard classification. Special attention is given to the complex nature of ADCs, where the conjugated cytotoxic payloads often meet criteria for acute toxicity, reproductive toxicity, germ cell mutagenicity, and/or carcinogenicity under GHS. These substances may then be regulated as dangerous goods (DG) under international transport regulations, triggering specific packaging, labelling, and shipping requirements. For these advanced therapies, improvement in hazard communication with an approach that strengthens safe handling practices and their practical application will be important in the drug development process.

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Navigating Post-Transition Poison Centre Requirements: EU and Global Perspectives

Gill Pagliuca, Georgie Walker
Ricardo

The transition period for EU Poison Centre Notifications (PCNs) officially ended on January 1, 2025. Now all hazardous mixtures in the EU must be notified using the harmonised format, and timely updates to notifications are required when changes to products are made.

However, this is not the whole story. Several EU Member States have additional national requirements. These may include national submission systems outside the harmonised format, additional information and payment of fees direct to the national body. Several countries also have specific obligations for detergents, even for non-hazardous mixtures, adding complexity to the regulatory landscape. Companies need to be aware of these additional requirements to remain compliant in Europe.

PCN requirements also continue to evolve with several changes introduced through the CLP Revision in 2024.

Outside of the EU, Turkey and Ukraine have introduced requirements to submit PCNs as part of their adoption of REACH and CLP-like regulations. Globally, poison centre frameworks are also emerging, with efforts toward regulatory alignment. This poster will explore the interplay between EU harmonisation, national divergences, and global trends, offering practical insights into compliance, supply chain communication, and leveraging SDS and ER data to meet both current and emerging obligations across jurisdictions.

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ECHA REF-11 Enforcement Forum Report – What it Means to You

Alexis Wilhelm
UL Solutions

The ECHA Forum Working Group published REF-11, addressing EU Safety Data Sheet (SDS) compliance. The first report was issued in 2010; the most recent report was issued in December 2024. Non-compliance issues cover the SDS updates as part of Regulation (EU) 202/878, nanoforms, physical-chemical properties, endocrine disrupting properties and mandatory substance data including SCLs, M-factors and ATE values. This review will summarize the Working Group's findings, give recommendations to SDS authors and direct them to tools that exist to assist with creating compliant EU SDSs.