



GHS Lessons Learned & Practical Solutions

Presented by
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SCHC Fall Meeting
September 26 2013



Outline

- Presentation on Challenges
 - Review ranking of challenges by SCHC/AIHA members
- Practical Solutions Workshop
 - SCHC Members Break Out (~ 20 Groups 10 each by tables)
 - Each group assigned an issue to identify practical solutions
 - Groups have *10 Minutes* to discuss
 - Appoint Group Spokesperson and Scribe
 - Identify and summarize practical solutions for their assigned issue
 - Group Spokes Persons present solutions *30 Seconds* each
 - Spokespersons Line up at Microphone (present overview of solutions identified)
 - Please – Do not repeat a prior group solutions (only different solutions)
- Final Conclusions



Where we are today

- OSHA issued Hazcom 2012
March 26, 2012
- Effective May 25, 2012
- Effective Dates
 - December 1, 2013
Employee training-new SDS
and labels
 - June 1, 2015
SDS and labels converted
 - December 1, 2015
Distributors can no longer
ship containers with old
labels
 - June 1, 2016
Employers update programs
/training



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17574

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DEPARTMENT OF LABOR

Occupational Safety and Health Administration

29 CFR Parts 1910, 1915, and 1926

[Docket No. OSHA-H022K-2006-0062
(formerly Docket No. H022K)]

RIN 1218-AC20

Hazard Communication

AGENCY: Occupational Safety and Health
Administration (OSHA), DOL.

ACTION: Final rule.

until the Department of Labor publishes in the **Federal Register** the control numbers assigned by the Office of Management and Budget (OMB). Publication of the control numbers notifies the public that OMB has approved these information collection requirements under the Paperwork Reduction Act of 1995.

The incorporation by reference of the specific publications listed in this final rule is approved by the Director of the Federal Register as of May 25, 2012.



Where we need to be

- OSHA issued Hazcom 2012 March 26, 2012
- Effective May 25, 2012
- Effective Dates
 - December 1, 2013 Employee training-new SDS and labels
 - June 1, 2015 SDS and labels converted
 - December 1, 2015 Distributors can no longer ship containers with old labels
 - June 1, 2016 Employers update programs /training



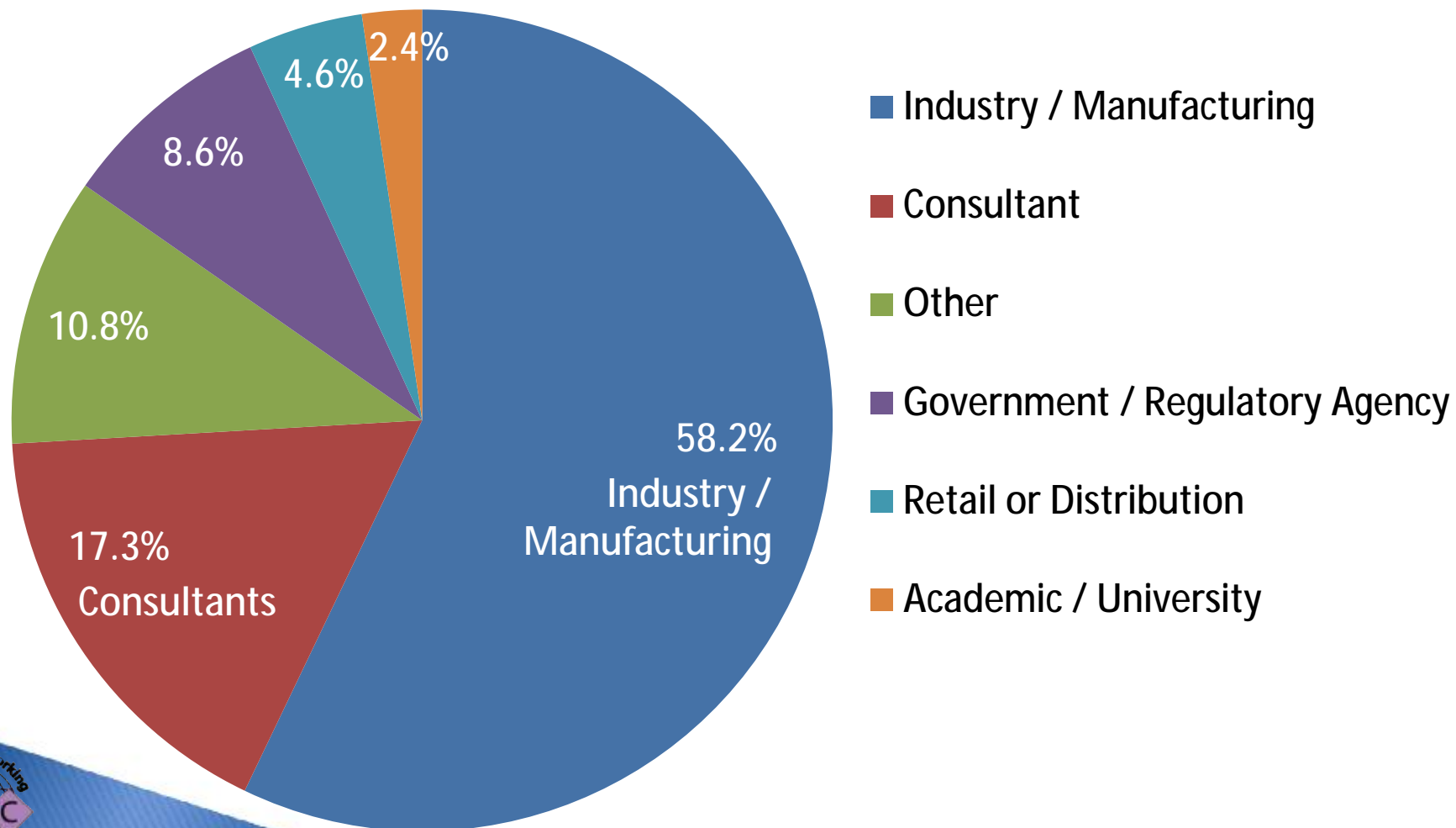
SCHC GHS Survey

- Early September – emailed all members & non-members to complete a survey on challenges in moving to GHS
- Rank 15 issues by importance
- Could add issues
- Collected demographic data
- Our top ten based on responses from SDS authors/managers only
- Total responses will be included in a future article to be sent to SCHC members and posted on website.



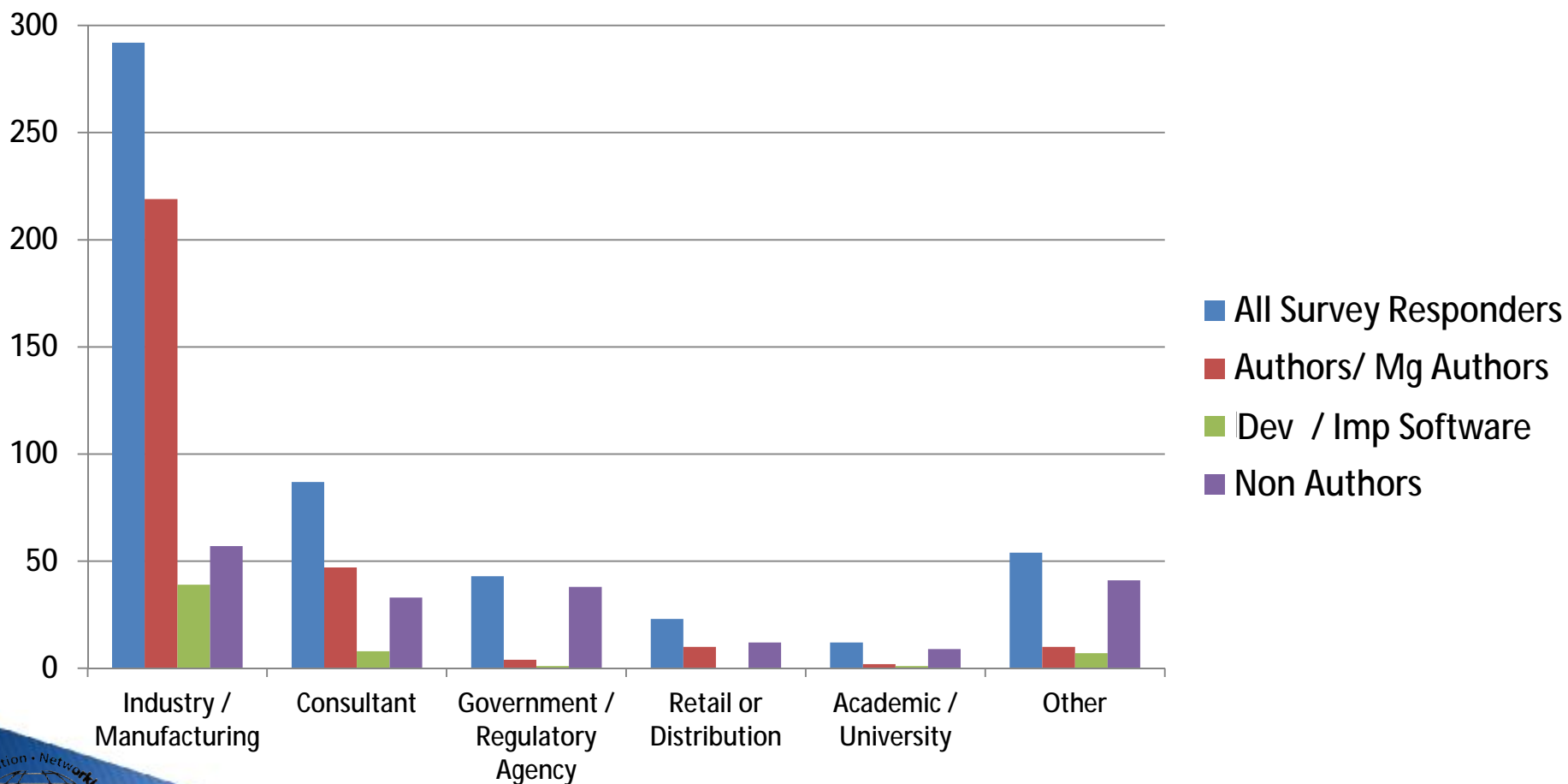


Demographics: Jobs & Sectors SCHC Survey Responders (n= 514)



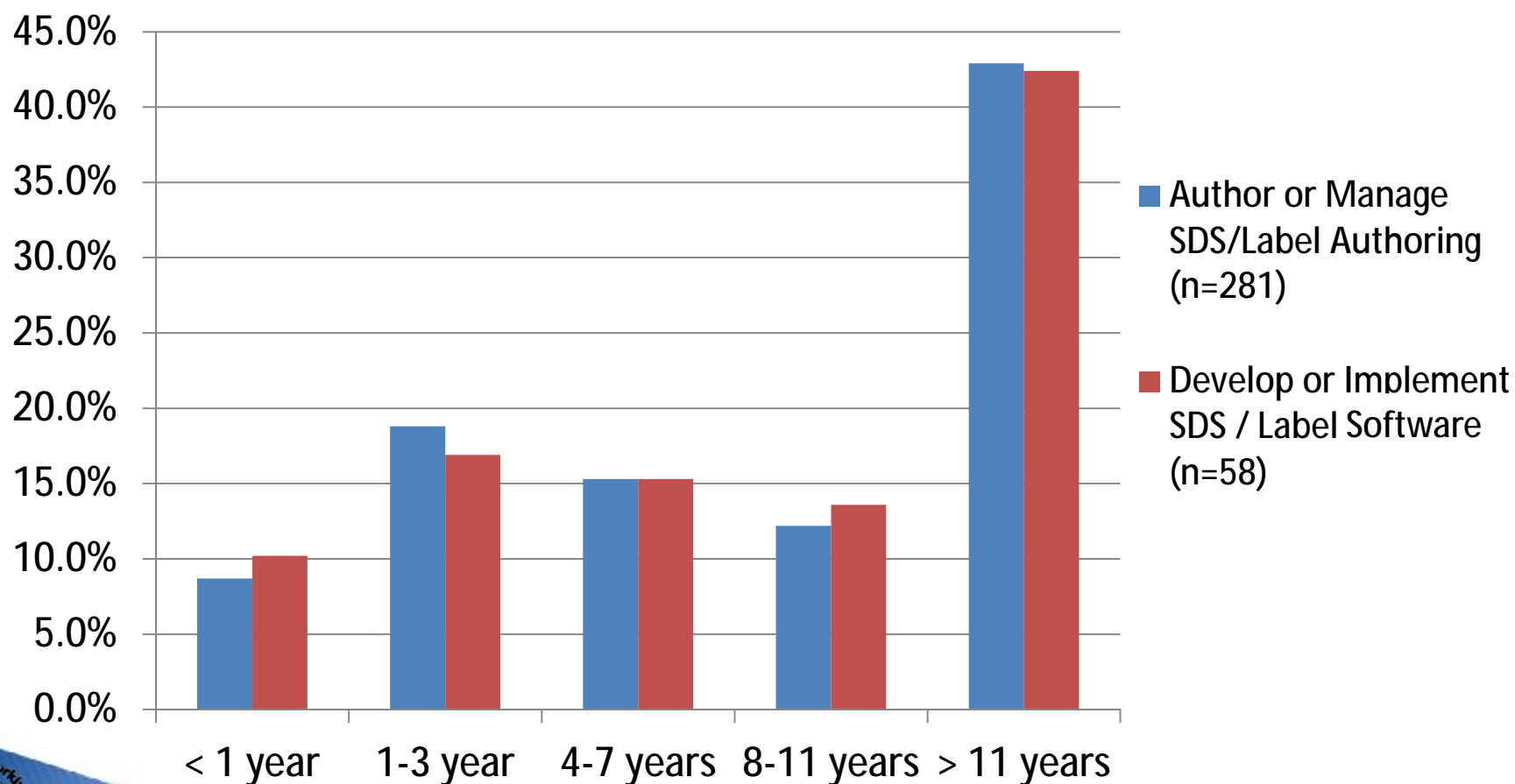


Demographics: Roles by Jobs & Sectors SCHC Survey Responders (n= 514)



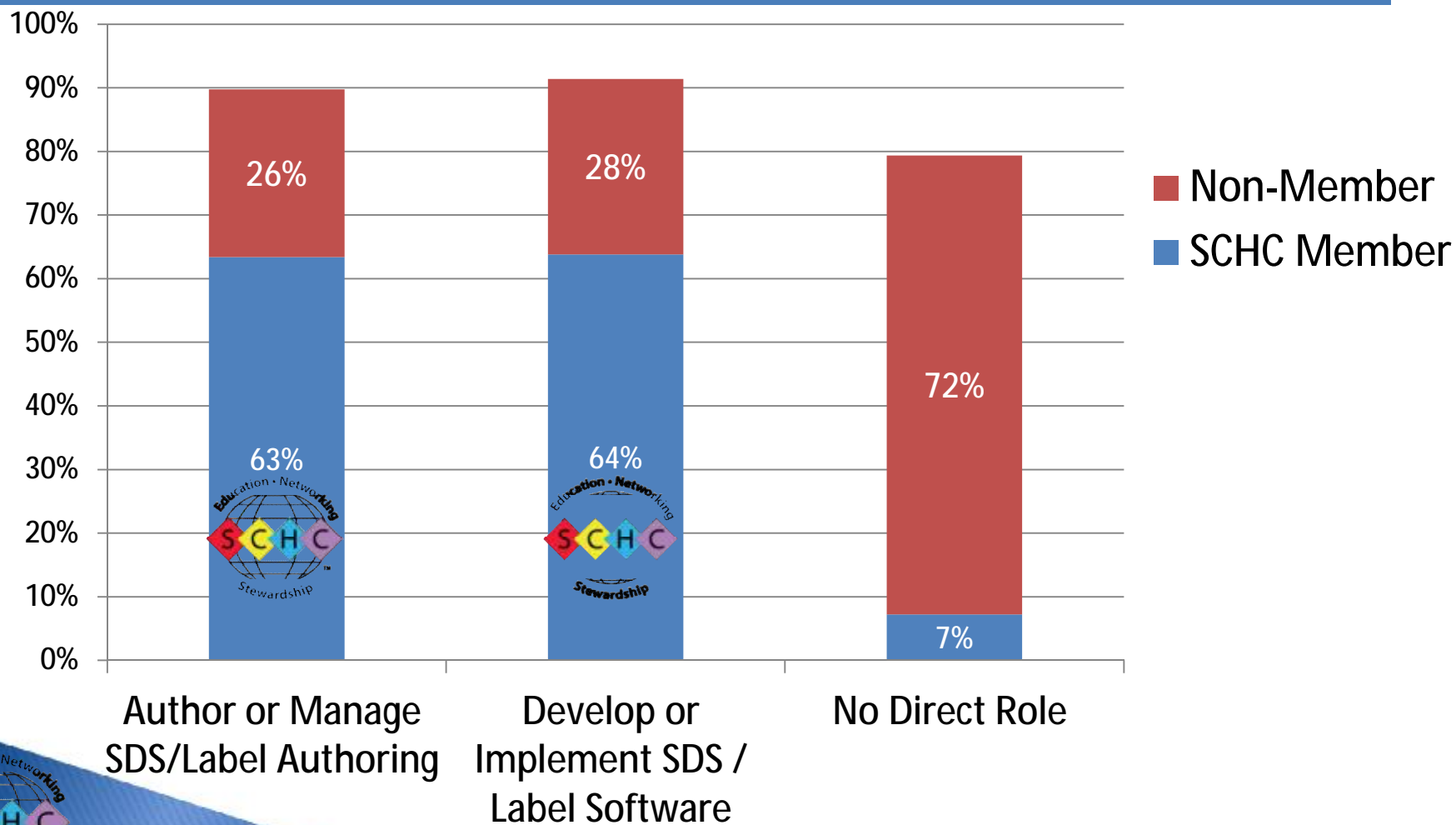


Demographics: Years Experience SCHC Survey Responders



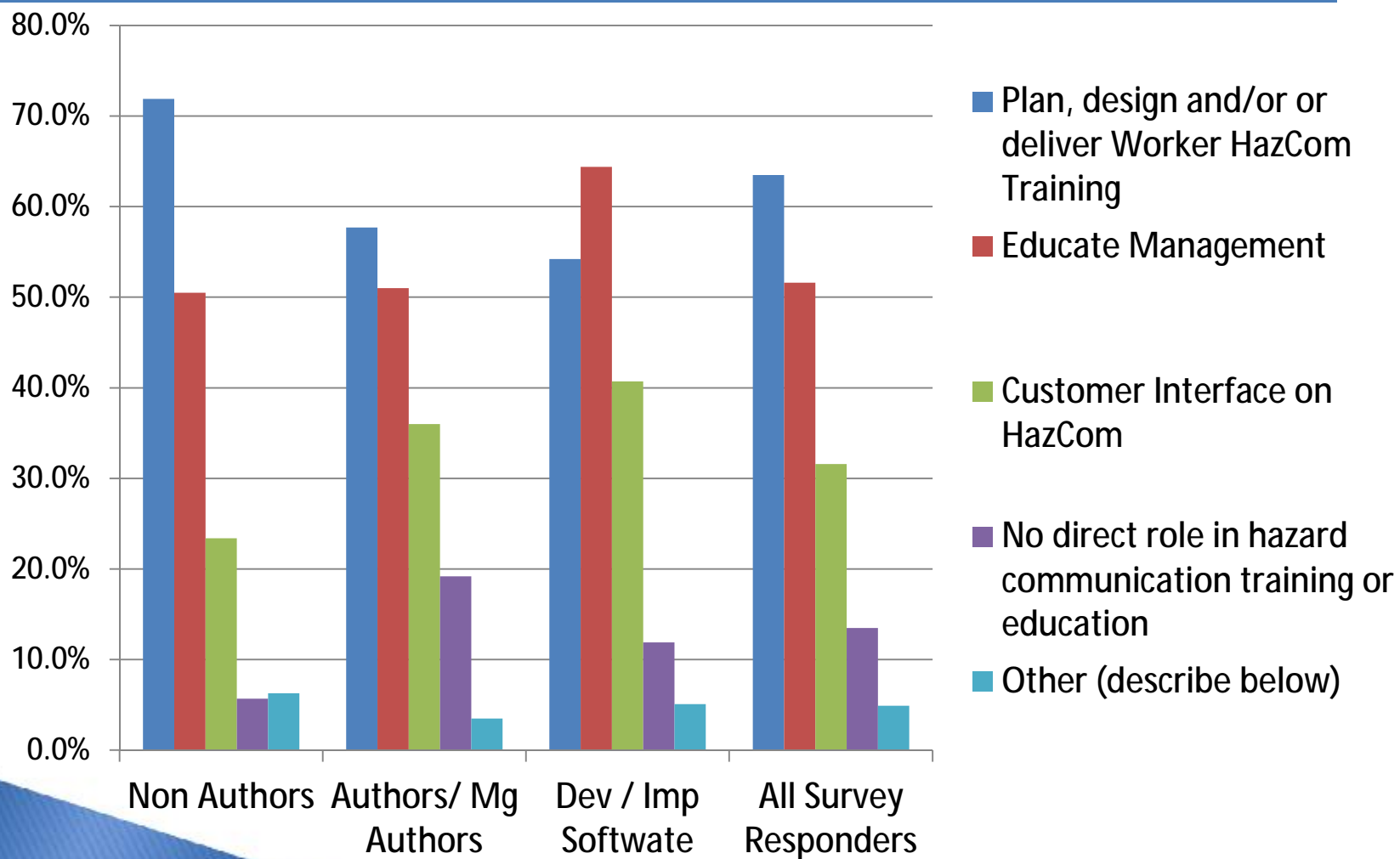


SCHC Membership in Different Roles SCHC Survey Responders (n= 514)





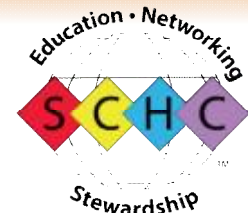
HazCom Training & Education Roles SCHC Survey Responders





Top Ten GHS Issues:

R SCHC Asked Members & Non-members



10. Re-labeling tanks, containers and revising batch sheets, internal documents
9. Software for SDS Authoring and Data Management
8. Impacts of GHS Reclassification on other HS&E Regulatory Compliance Programs
7. Communicating with Customer - about differences product labels / pictograms & classification of products
6. Labeling System Conflicts (HMIS/NFPA&GHS)1-4 Dual Labeling Systems
5. Maintaining Multiple Formats for SDS
4. Quality Control for Classification and SDS / Labels
3. Training of Workers on GHS SDS and Labels
2. Compliance Time Line Quickly Approaching
1. Accessible and Reliable Data to Classify Raw Materials / Ingredients





Other Issues Identified

- Labeling small packages (6)
- Differences in Global Implementation (6)
- Hardware – printer issues (color, compatibility with software)
- Lack of flexibility in P phrases
- Proprietary formulations (how to classify?)
- Management lack of committment





Experts Differ in Opinions Ranking Top Ten GHS Issues: R Asked SCHC & AIHA Experts



Comparison of Survey Rankings Top 10 Issues in Decending Order	Author/ Manage Authors	Dev / Imp Software	Non Author	All Survey Respond ers	AIHA PS&S Com
Other Issues:	15	14	15	15	12
Inconsistencies between pesticide labels and consumer labels in N.A.	14	15	13	14	15
Insufficient Pool of Qualified SDS Authors	13	13	14	13	8
Inbound SDS (Document) Management	12	8	4	8	14
Education of Management	11	11	2	4	3
Re-labeling tanks, containers & revising batch sheets, internal docs	10	12	6	9	13
Software for SDS Authoring and Data Management	9	3	12	12	11
Impacts of GHS Reclassification on other HS&E Regulatory	8	7	7	7	9
Communicating with Customer - about differences product labels in labels / pictograms and classification of products	7	6	9	10	10
Labeling System Conflicts (HMIS/NFPA & GHS) 1-4 / 4-1 – Dual Labels	6	10	3	5	5
Maintaining Multiple Formats for SDS	5	9	10	11	7
Quality Control for Classification and SDS / Labels	4	2	8	6	4
Training of Workers on GHS SDS and Labels	3	4	1	1	2
Compliance Time Line Quickly Approaching	2	5	5	2	6
Accessible and Reliable Data to Classify Raw Materials / Ingredients	1	1	11	3	1





Top Ten GHS Issues: Asked AIHA S&S Committee Experts



10. (7) Communicating with Customer - about differences product labels / pictograms & classification of products
9. (8) Impacts of GHS Reclassification on other HS&E Regulatory Compliance Programs
8. (13) Insufficient Pool of Qualified SDS Authors
7. (5) Maintaining Multiple Formats for SDS
6. (2) Compliance Time Line Quickly Approaching
5. (6) Labeling System Conflicts (HMIS/NFPA&GHS) 1-4 Dual Labeling Systems
4. (4) Quality Control for Classification and SDS / Labels
3. (11) Education of Management
2. (3) Training of Workers on GHS SDS and Labels
1. (1) Accessible and Reliable Data to Classify Raw Materials / Ingredients

• Red Numbers are SCHC rankings



Group Interaction Discussion

- Ground Rules
 - Quickly Form Groups of ~10 seated together – front row each 5 work with 5 behind them, etc.
 - Each group will be given one of the top 10 issues to identify practical solutions – *Focus on Solutions (only 10 minutes to flush out)!*
 - Assign a Scribe – to take notes and present practical solutions
 - Scribe to write name, phone number, and e-mail address on issue sheet
 - *If innovative and E-talented - Use laptop to summarize & send via e-mail to jph10@mww.com*
 - *Group Discussion – 10 Minutes*
 - Report Out - 30 Seconds / Group
 - All scribes line up at microphone & Report out on your Group's Practical Solutions
 - Groups in reverse order (Group 10 A/10B...to .. Group 1A/1B)
 - *30 Second Timer – Rapid Fire High Productivity Report Out (Keep it Short) PLEASE Do Not Repeat solutions already mentioned for your issue.*
 - Hand in your Groups Solutions – we will use inputs to publish summary in the SCHC News Letter



SCHC WORKSHOP REPORT OUTS

YOUR PRACTICAL SOLUTIONS





GHS Top Ten - Practical Solutions

R SCHC Workshop Report Outs



10. Re-labeling tanks, containers and revising batch sheets, internal documents





Group 10A

00:00:30

10. Re-labeling tanks, containers and
revising batch sheets, internal
documents

Thank You !
Next Group



Group 10B

00:00:30

10. Re-labeling tanks, containers and
revising batch sheets, internal
documents

Thank You !
Next Group



GHS Top Ten - Practical Solutions

R SCHC Workshop Report Outs



- 10. Re-labeling tanks, containers and revising batch sheets, internal documents
- 9. Software for SDS Authoring and Data Management





Group 9A

00:00:30

9. Software for SDS Authoring and
Data Management

Thank You !
Next Group



Group 9B

00:00:30

9. Software for SDS Authoring and
Data Management

Thank You !
Next Group



Group 9C

00:00:30

9. Software for SDS Authoring and
Data Management

Thank You !
Next Group



GHS Top Ten - Practical Solutions

R SCHC Workshop Report Outs



10. Re-labeling tanks, containers and revising batch sheets, internal documents
9. Software for SDS Authoring and Data Management
8. Impacts of GHS Reclassification on other HS&E Regulatory Compliance Programs





Group 8A

00:00:30

8. Impacts of GHS Reclassification
on other HS&E Regulatory
Compliance Programs

Thank You !
Next Group



Group 8B

00:00:30

8. Impacts of GHS Reclassification
on other HS&E Regulatory
Compliance Programs

Thank You !
Next Group



Group 8C

00:00:30

8. Impacts of GHS Reclassification
on other HS&E Regulatory
Compliance Programs

Thank You !
Next Group



GHS Top Ten - Practical Solutions

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8. Impacts of GHS Reclassification on other HS&E Regulatory Compliance Programs
7. Communicating with Customer - about differences product labels / pictograms & classification of products





Group 7A

00:00:30

7. Communicating with Customers -
about differences product labels /
pictograms & classification of
products

Thank You !
Next Group



Group 7B

00:00:30

7. Communicating with Customers -
about differences product labels /
pictograms & classification of
products

Thank You !
Next Group



Group 7C

00:00:30

7. Communicating with Customers -
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Thank You !
Next Group



GHS Top Ten - Practical Solutions

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6. Labeling System Conflicts (HMIS/NFPA&GHS)1-4 Dual Labeling Systems





Group 6A

00:00:30

6. Labeling System Conflicts
(HMIS/NFPA&GHS)1-4 Dual
Labeling Systems

Thank You !
Next Group



Group 6B

00:00:30

6. Labeling System Conflicts
(HMIS/NFPA&GHS)1-4 Dual
Labeling Systems

Thank You !
Next Group



Group 6C

00:00:30

6. Labeling System Conflicts
(HMIS/NFPA&GHS)1-4 Dual
Labeling Systems

Thank You !
Next Group



GHS Top Ten - Practical Solutions

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6. Labeling System Conflicts (HMIS/NFPA&GHS)1-4 Dual Labeling Systems
5. Maintaining Multiple Formats for SDS





Group 5A

00:00:30

5. Maintaining Multiple Formats for SDS

Thank You !
Next Group



Group 5B

00:00:30

5. Maintaining Multiple Formats for SDS

Thank You !
Next Group



Group 5C

00:00:30

5. Maintaining Multiple Formats for SDS

Thank You !
Next Group



GHS Top Ten - Practical Solutions

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4. Quality Control for Classification and SDS / Labels





Group 4A

00:00:30

4. Quality Control for Classification and SDS / Labels

Thank You !
Next Group



Group 4B

00:00:30

4. Quality Control for Classification and SDS / Labels

Thank You !
Next Group



Group 4C

00:00:30

4. Quality Control for Classification
and SDS / Labels

Thank You !
Next Group



GHS Top Ten - Practical Solutions

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3. Training of Workers on GHS SDS and Labels





Group 3A

00:00:30

3. Training of Workers on GHS SDS
and Labels

Thank You !
Next Group



Group 3B

00:00:30

3. Training of Workers on GHS SDS
and Labels

Thank You !
Next Group



Group 3C

00:00:30

3. Training of Workers on GHS SDS
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Thank You !
Next Group



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2. Compliance Time Line Quickly Approaching





Group 2A

00:00:30

2. Compliance Time Line Quickly
Approaching

Thank You !
Next Group



Group 2B

00:00:30

2. Compliance Time Line Quickly
Approaching

Thank You !
Next Group



Group 2C

00:00:30

2. Compliance Time Line Quickly
Approaching

Thank You !
Next Group



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1. Accessible and Reliable Data to Classify Raw Materials / Ingredients





Group 1A

00:00:30

1. Accessible and Reliable Data to Classify Raw Materials / Ingredients

Thank You !
Next Group



Group 1B

00:00:30

1. Accessible and Reliable Data to Classify Raw Materials / Ingredients

Thank You !
Next Group



Group 1C

00:00:30

1. Accessible and Reliable Data to Classify Raw Materials / Ingredients

Thank You !
Next Group



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Our Practical Solutions

1. Accessible and Reliable Data

- No Current Database has Good and Reliable Data
- SCHC to Consider - Develop Guidelines on Data Evaluation
- Develop an Internal Database of Reliable Information for their Use
- Good Starting Places – REACH Registrations, HSDB, EPA HPV data, others?
- Work with your Suppliers to Improve Data
- Work with Trade Associations to Develop Model SDS and Standard Approaches for Classification



Our Practical Solutions

2. Compliance Time Line Approaching Quickly

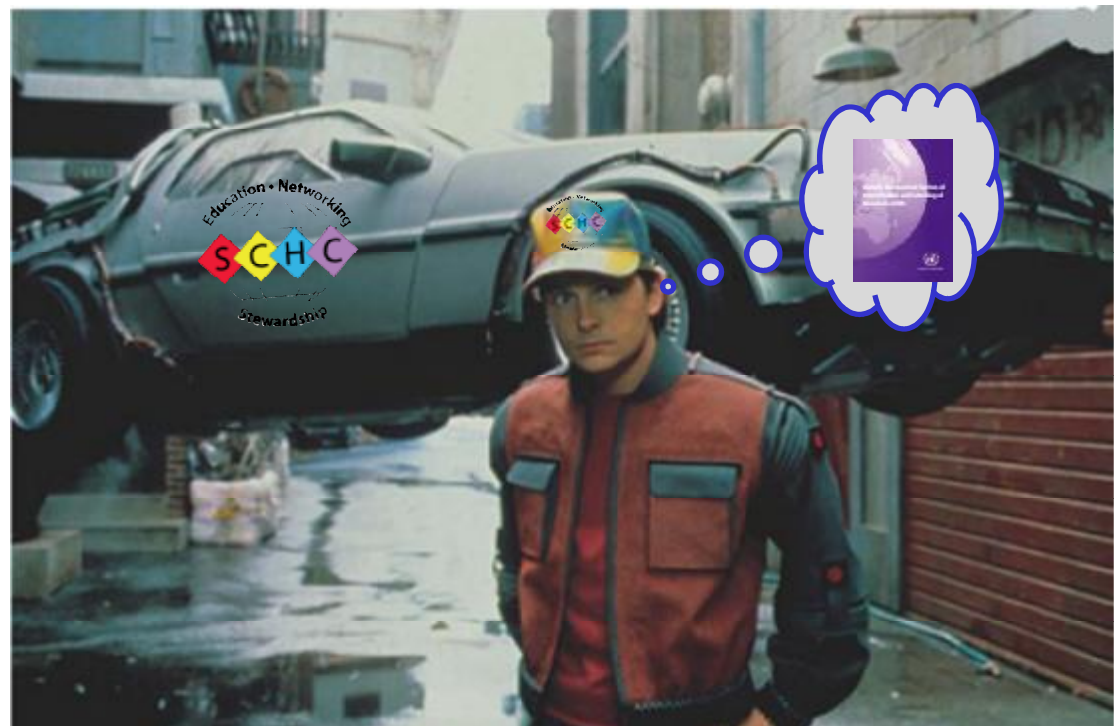


Our Practical Solutions



2. Compliance Time Line Approaching Quickly

- SCHC retain Michael Fox and his Delorean time machine to turn back clock
- Use Risk-Based Approach to Prioritize Updating SDS and Labels Based on:
 - Sales, profitability, degree of hazard, high risk intended end-use markets ...
- Communicate with suppliers on needs for GHS SDS for critical raw materials



Our Practical Solutions

3. Training of Workers on GHS SDS and Labels

- Consider computer based training, learn on demand systems
- Pool efforts through trade for your industry

4. Quality Control for Classification

- Registration of authors (trade)
- Internal peer review process

5. Maintaining Multiple Formats

- Use “smart” document file formats
- Single format



Our Practical Solutions

6. Labeling System Conflicts

- Consider eliminating multiple labeling systems within the workplace that conflict and are confusing: promote recognition of the GHS pictograms
- Consider ways to c Conflict 1 vs 4 hazard information labels – using the following table

GHS HAZARD		HMIS/NFPA	
Category	Hazard	Index	Hazard
1	highest	1	slight
2	high	2	moderate
3	medium	3	serious
4	low	4	severe



7. Communication

- SCHC to develop communication plan
- Develop toolkits (members-only SCHC)
- Encourage development of social media to address GHS communication
- Engage sales force to train customers – SCHC webinar?

NFPA

HMIS

Our Practical Solutions

8. Impacts of GHS Reclassification on other HS&E Regulatory Compliance Programs
 - Inventory Affected Program and Prioritize Actions to Address Changes
9. Software for SDS Authoring and Data Management
 - User groups – users should participate
 - Software providers offer web-based application for a per-document fee
 - Trade associations leverage group purchasing for reduced cost
10. Re-labeling tanks, containers and revising batch sheets, internal documents
 - Define Roles and Engage with Quality Management, Operations and Maintenance
 - Bounty Hunter Contest (engage employees in “round-up” and solution implementation)



Our Practical Solutions

- Other Issues
- Insufficient Pool of Qualified SDS Authors
 - Enhance internal training for authors
 - Outsourcing
 - Universities could offer student intern opportunities to work with small business and author SDS
 - Work with programs to develop courses and curriculum to train authors/product stewards as a career path
- Changing Product Labeling Printers and Printing Software
 - Participate in user groups – work with suppliers – coordinate with software suppliers



Challenges for Implementation

- Timing: Delivery of Training - “3-Bear” Dilemma
 - “Not Too Early <—> “Not Too Late” —> Just Right
- In-Plant Labels – Size & Printing
- Picture-Oh-Grams (“Star-Man” Pictograms) May Take >1000 Words to Comprehend
- Turtle Paced Changes
 - Many SDS & Labels will Remain Unchanged Until 2015 Deadlines
 - Strange Pictograms in Workplace May Not Appear for a Couple of Years
- New Hazard Classes - “Dust” to “Combustible Dust “
- “Only the Yardstick has Changed” - *Are reclassified materials more hazardous than before?*
- Customer Communication to Avoid Adverse Business Impacts
 - First Out of the Gate May Be At Competitive Disadvantage



Final Thoughts

- Transition to GHS very challenging
 - Resource Intensive
 - Expensive
 - Complicated
 - Stakeholder Communication
- Great Benefits in Time
 - Improved Understanding of Hazards
 - Greater Safety in Handling of Chemicals





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