# SCH C

### POSTER ABSTRACTS

Fall 2020

#### ECHA enforcement forum reports - what it means to you

Kelsey Squelch, Alexis Sumner UL

For ten years the ECHA Forum Working Group has published results on REACH, CLP and PIC compliance. Currently, there are eight reports providing an overview of the progress made in creating appropriate documentation to support the sale of products in the EU, including the creation of compliant EU Safety Data Sheets (SDSs). The first report was issued in 2010; the most recent report was issued in late 2019. Data sources, document structure and nuance differences that exist between the EU and US, all need to be considered as part of the SDS authoring process. This ten year 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.

#### Consumer chemical product labeling – less harmonized than GHS!

Jackie Foster, Rose Passarella, Inez Kasimba Intertek

Understanding the different labeling criteria for multiple jurisdictions can be challenging. The UN GHS provides classification criteria and labelling requirements that are reasonably consistent among jurisdictions for chemicals used in workplaces. However, consumer chemical products are much less harmonized than the GHS. In the US, hazardous consumer chemicals must be labeled according to Federal Hazardous Substances Act (FHSA). Challenges include the California Proposition 65 updated warning requirements and the California Cleaning Product Right to Know Act which requires manufacturers of cleaning products, household and industrial, to disclose information related to known hazardous chemicals on the label and website. Hazardous consumer chemicals, in Canada, must comply with the Consumer Chemicals and Containers Regulations (CCCR). The CCCR requires the use of unique symbols, prescribed hazard phrases, and the hazard information must be in French and English. The required CCCR phrases and signal words are not always aligned with those in the UN GHS.

The EU applies "Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures" (CLP) to hazardous consumer products, with the requirement of additional precautionary phrases, and a Tactile Warning of Danger (TWD) for certain hazard categories. This poster will demonstrate the differences between jurisdictions and challenges that companies face with labeling hazardous consumer chemical products and why a single label is often not feasible.



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#### **Emergency response best practice**

Tim Kennedy NCEC

NCEC recently sat with cefic and BASF in Europe to discuss what best practice looks like from an emergency response perspective, both in terms of emergency response for supply purposes (SDS) and for transport purposes. This poster summarised those discussions, linking back into the real drivers for emergency response. We will look at this from a customer perspective, to help demonstrate what those who are facing an emergency with your product really are looking for, and how you can prepare your own arrangements to give them the support and advice the near to keep themselves, and the wider incident scene, safe.

#### Poison centres in 2020

Tim Kennedy NCEC

This poster will act as an update to the evolving poison centre discussion, which NCEC has continued to update SCHC members about. With the deadline for consumer and professional mixtures rapidly approaching on the first of 1st Jan 2021, we are increasingly being asked what organisations need to do in order to complete these notifications, and to mitigate the impact of the updated regulations. This poster will summarise the current position with Europe for poison centres, how to approach your poison centre notifications, and what you should be doing now.



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#### 'Brexit' and trading in Europe

Craig Thomson NCEC

UK's Brexit situation continues to become clearer, with ongoing negotiation as to the 'future relationship' between the UK and the EU. As part of the UK's preparation, we now have a much clearer understanding of what implications Brexit will have on this importing chemicals into the UK, and also importing into the EU with an Only Representation (OR) in the UK, particularly from the perspective of REACH. This poster will review both scenarios, helping US based organisations understand how to maintain continuity of trading into these two key markets, as well as discuss how related regulations (e.g. CLP) will be impacted. We will look at what organisations should be preparing for now to manage any regulatory risk that may be facing.

#### Regulation of cleaning products in Canada

Katherine Sullivan, Joanne Houck knoell USA

Cleaning products are comprised of a large group of chemicals used for an array of varying functions, from foaming to disinfection. The laws regulating these chemicals vary from country to country, even with the implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Therefore, it stands to reason that Canada has its own standards and guidance for communicating hazards regarding such chemicals. For Canada, cleaning products like detergents are regulated mainly by the following national authorities: Canadian Centre for Occupational Health and Safety (CCOHS), Environment and Climate Change Canada, and Health Canada. These regulations outline the required information needed to bring these substances to market. This poster highlights the needed hazard communication elements and illustrates them through specific chemical examples. It is important for manufacturers and importers to become familiar with these regulations to ensure that their products are compliant with Canadian laws before importing into and distributing in Canada.



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#### Worldwide GHS implementation and its non-harmonized aspects

Manuela Dukeshire, MA, MBA DR-Software, Inc.

When creating Safety Data Sheets, specialists are faced with changing legislation, country-specific nuances, unclear legislation as well as misinformation. With the world-wide spread of the Globally Harmonized System, and its efforts at harmonization and ensuring that more countries have strong and consistent legislation, come new challenges. Each country has specific needs that must be met. Some needs are industry specific; other needs are company specific. On top of that, misinformation and a learning curve experienced by those newly exposed to the GHS, are amplified by constant changes to the legislation and differences in interpretation. While such detail could fill volumes, there are some aspects of GHS implementation of which it is important to be aware. I would like to discuss some of the main SDS concerns faced by those creating them, focusing on the world-wide GHS implementation and what it means to the SDS author.

## HazCom essentials SDS Check – even more essential post recent compliance and enforcement project results

Ruth Donlon, Katie McGee Sphera Solutions

It's been almost 5 years since the end of transition periods for GHS adoption in major world economies considering that OSHA and EU both completed their transition to GHS adoption in 2015. Hazard Communication professionals have had a lot of time to learn and grow while ensuring the companies they work for are compliant. Despite this length of time, recently conducted compliance and enforcement projects have highlighted that there are problems with the information being provided on the SDSs being put out into the market. This is a concern for hazard communication professionals because we want to remain compliant and ensure that people are protected by the SDSs that we are generating. One essential skill for hazard communication is the ability to do a quick end to end SDS review to determine if there is anything out of place. This poster will highlight how to check the sections that were identified as areas of non-compliance in recent reports.

# Stewardship

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## Implementing data visualization for real-time hazard communication and chemical management

Richelle Romanchik, Christina Clements, Beth Dederick ERM

In an ever-changing landscape of chemical regulations and product development, arming decision makers with real-time information in an intuitive and accessible format is key to enabling data-driven business and product stewardship decisions. This poster will demonstrate the value of implementing a management dashboard to improve hazard communication, chemical management and evaluation of risk by providing interactive data to a range of people, from workers in a manufacturing plant to senior executives at a Fortune 500 company. Worker and consumer hazards can be visualized by gathering data from a simple life cycle assessment of components, and a full review of the product trail, from raw material to final products. Interactive dashboards facilitate tracking of watch lists (government, industry and non-governmental organizations) and emerging regulations, and support compliance in the US and international markets. Dashboards can be easily updated to provide timely information on complex topics in an intuitive format. Management dashboards, built with Power BI, provide EHS workers, product stewards and senior leadership the ability to monitor the hazards of and exposures to chemical substances, thus enabling timely hazard communication.

#### Print technology for hazard communication labels

Todd Campbell
Brandywine Drumlabels

Which print technology is most effective for you? The dual goals of improved hazard communication and lower overall labeling costs are at the forefront of all SCHC members minds. Brandywine will highlight the advantages and challenges associated with available print technologies in the world of hazard communication. Technologies include: laser print technology, pigment based inkjet technology, Memjet based inkjet technology, and legacy print platforms still in use today. Highlighting the advantages and challenges of each will inform SCHC members of options available inclusive of cost considerations. As brand recognition has emerged as a priority for most organizations, it is imperative that regulatory compliance specialists are aware of all available technologies. Brandywine will provide recommendations to lower overall labeling costs, improve hazard communication, and improve brand recognition. Included in the analysis are options for labels from drums and totes, to small containers and sample labels. Brandywine will provide resources for regulatory compliance specialists to implement industry best-practices, while highlighting available print technologies.



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# Understanding *in vitro/in chemico* skin sensitization testing methods and application in hazard classification

Mahesh Rachamalla, SDSRP, MRSB, EPt University of Saskatchewan

Over the last decade, phenomenal development has been made in the development of non-animal tests to assess contact hypersensitivity. Understanding skin sensitisation potential of chemical is essential, chemical regulatory authorities require sensitization test data for hazard classification and labeling of products to alert workers and consumers. Recent advances in adverse outcome pathway (AOP) framework yielded several validated non-animal tests for determination of sensitisation potential. These validated *in vitro/in chemico* methods include OECD TG442C (Peptide/protein binding), TG442D (keratinocyte response) and TG 442E (monocytic/dendritic cell response). These tests are not regarded as stand-alone tests and the result from such a test should be used together with other data in an overall weight of evidence (WoE) assessment. Further, at present there is no agreed strategy on how to use *in vitro/in chemico* methods for direct estimation of sensitising potency, but data from such tests can be used in a WoE assessment together with other data in order to assess skin sensitisation potency. Currently, there is a necessity for all hazard communication professionals are aware and understanding these testing methods as all toxicity testing moving towards non-animal models. I would like to use this platform to give overview about these methods in hazard classification.