



POSTER ABSTRACTS

Spring 2020
Charlotte, North Carolina

Authoring SDS for Pesticides

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AMVAC Chemical Corp.

Pesticides are unique chemical products that are associated with stringent regulations due to high toxicity. In addition to registration dossiers and labeling, safety data sheet (SDS) is another useful tool to provide valuable information about chemical hazard and safe handling of pesticides. In the EU, the SDS requirements for pesticides (plant protection products) came from the REACH registration, following the CLP (adopted from GHS) standard just like other hazardous chemicals. In the US, pesticide labels are regulated by EPA under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and exempted from the OSHA HazCom Standard. SDS, on the other hand, must comply with the OSHA HazCom, but at the same time, must not obscure or conflict with the labeling approved by EPA. The inconsistency between EPA and OSHA requirements makes SDS authoring for pesticides challenging.

This presentation will compare the classification standard between FIFRA and OSHA HazCom regulations, and discrepancies likely to occur between the FIFRA label and SDS, such as signal word, symbol, hazard statements, precautionary statements, engineering control, PPE, storage and disposal. In addition to regulation differences, these can also be caused by human factors, because pesticide labels and SDS are oftentimes handled by different people, and very likely from different departments. In this poster, we will discuss our workflow to share data and communicate other critical information, ensuring our SDS is accurate, up to date and free of misleading messages.



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'Brexit' and Trading in Europe

Craig Thomson
NCEC

UK's Brexit situation, for the first time in a while, has become clearer – with the UK leaving the EU at the end of January, entering into a transition period until the 31st of December 2020. Looking ahead, this poster will look at what Brexit is likely to mean at the end of the transition period. Whatever happens, this is going to have an impact on regulations, particularly REACH and CLP, which will include both SDS documentation and the requirement to register substances (or maintain registrations) within the two jurisdictions. We will review both potential end results; entering into some type of trade agreement with Europe and whether that brings regulatory alignment, as well as what happens if a trade deal cannot be made in time and we end the transition period without a deal. Both situations have potential regulatory ramifications for US companies which import, or put on the market, products into Europe and the UK, and understanding the considerations here is key for ensuring you maintain regulatory compliance. We will look at what organisations should be preparing for now to manage any regulatory risk that may be facing.

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.



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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.

ECHA Enforcement Forum Reports – What it Means to You

Kelsey Squelch, Alexis Sumner
UL, Materials & Supply Chain Division

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.

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 need to keep themselves, and the wider incident scene, safe.



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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.

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 mixtures pushed back until 1st Jan 2021, and the ability for Member States to receive notifications through the ECHA portal not consistently in place, we are often asked what organisations should be doing now / in 2020 to prepare for poison centre notifications, or to mitigate the impact of the updated regulation. This poster will summarise the current position within the Member States for notification, as well as discuss whether notifying now (under existing systems) would be beneficial for your business.



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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.

Regulation of Cleaning Products in Canada

Katherine Sullivan, Jeremy Long, Elizabeth Dederick, PhD
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 handling 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. 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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The QC Checklist

Bonita G. Reynolds
Verisk 3E

QA: Process

So you've taken the jumble of the Customers data and information. You have navigated the complexities of GHS – classification, country/jurisdictions. You have applied all the rules, business details and preferences. You have confirmed by expert judgement. Survived the complicated process. You have created a master piece of compliance! Or have you?

QC: Product

Time to confirm compliance of your deliverable. Time to check the boxes. Time to count the costs. Time to contribute robustly to “A safer world.”

(QA) Quality Assurance is the process by which an SDS Author creates a compliant Safety Data Sheet.

(QC) Quality control for the drafted SDS is the penultimate step before releasing those 16 Sections to the audience of stakeholders. Who should do QC, What should they look for, which comments should they make, how long should they take? This poster will share a QC Checklist that serves as an aid to the SDS Reviewer, and adds value to the FINAL SDS product.

Who Needs HazMat Training?

Jim Garvic
Reliance Label Solutions

The U.S. Department of Transportation (DOT), International Maritime Organization (IMO), the European Union, the International Civil Aviation Organization (ICAO), and other regulatory bodies require that all dangerous goods employees receive training. Anyone involved in the preparation or transport of dangerous goods in their company is required to be trained. The required training varies by job function: Packaging, accepting and receiving materials, preparing or loading, labeling and placarding, transporting and carrying, etc. With the help of our new hazmat training partner Currie Associates, our Spring 2020 infographic will help SCHC attendees learn more about the specific training courses needed by all of their employees who are involved with dangerous goods.



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Worldwide GHS Implementation and its Non-harmonized Aspects

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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.