

Risk Services Update

September 7, 2011

Upcoming Changes to the Hazardous Communication Standard

If you haven't heard about the Global Harmonized System (GHS) for hazard communication, this is your opportunity to learn a little history and learn about upcoming changes to the U.S. Hazard Communication Standard. GHS is the Globally Harmonized System of Classification and Labeling of Chemicals which was developed by the United Nations with the assistance of the U.S. and other countries, and published in 2003. The GHS appeared on OSHA's horizon in September 2006. In September 2009 OSHA proposed a rule to revise the Hazard Communication Standard to include GHS conventions. Following the normal regulatory process, OSHA has now announced that it intends to issue the Final Rule amending the Hazard Communication Standard, incorporating GHS changes, in September 2011.

The revised Hazard Communication Standard will continue to require a written "Haz-Com" program, provisions for employee information and training, and maintenance of Safety Data Sheets (the "M" for "material" will be dropped from the MSDS designation) on work sites just as before. Revisions, to bring the U. S. standard in line with GHS, include changes to the classification of chemical hazards, labeling, including new hazard pictograms. Use this link to view the new warning pictograms, the format for SDS, and definitions:

<http://www.unece.org/trans/danger/publi/ghs/pictograms.html>

In the past, most industrialized nations have developed systems of chemical hazard regulation. Although there are many similarities in these systems, there are also differences which have proven confusing during international business and trade relations. GHS is based mostly on U.S. and Canadian hazard communication standards, the European Union system for preparation, classification and labeling of substances, and the UN Transportation of Dangerous Goods system. It is expected to standardize the communication of hazardous substances among nations adopting the system. Among other things, the UN indicates one purpose of the GHS as "...enhancing the protection of human health and the environment by providing an internationally comprehensible system for hazard communication..." The GHS is intended to benefit consumers, workers and emergency responders exposed to hazardous substances. The GHS has two main elements: hazard classification and hazard communication.

Hazard classification uses the following sub elements:

- Health hazards
- Environmental hazards
- Physical hazards
- Mixtures



Like the existing U. S. Hazard Communication Standard, the GHS also uses labeling and Safety Data Sheets to communicate regarding hazards of chemicals in the workplace (and elsewhere).

What do these changes mean for us? Basically, that labels and Safety Data Sheets will now adhere to an internationally accepted format. We still need to have a written program, train our people, and maintain SDS on each job site, and also become familiar with the new warning pictograms, some of which will be familiar and some of which will not. It is likely that extended periods, 2 to 3 years, will be available for employers to move to the new labeling and marking requirements and to conduct retraining of employees.

To Obtain More Information or Help from Rutherford, contact any of our Consultants:

<p>Richmond Office</p> <p>Mark Sisler 804-339-5037 mark.sisler@rutherford.com</p> <p>Max Travis 804-641-3737 max.travis@rutherford.com</p> <p>Rob Stiles 804-244-1200 rob.stiles@rutherford.com</p>	<p>Roanoke Office</p> <p>John Hill 804-685-3115 john.hill@rutherford.com</p>
<p>Charlotte Office</p> <p>John Tallent 980-522-1896 john.tallent@rutherford.com</p>	<p>Alexandria Office</p> <p>Judie Soares (703) 813-6532 judie.soares@rutherford.com</p>