

OSHA Revises Hazard Communication Standard

OSHA recently revised its Hazard Communication Standard (HCS) to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). OSHA says that, "the [HCS] Standard in 1983 gave workers the right to know, but the new GHS Standard gives workers the right to understand." The new standard accomplishes this through changes to hazard classification, labels, safety data sheets and training.

Major changes to the Hazard Communication Standard

- **Hazard classification** - The new HCS requires suppliers to use the GHS-specific criteria for each type of health and physical hazard. For example, the new standard ranges from 1 for severe to 5 for minimal hazard in contrast to 0 for minimal to 4 for severe hazard under the previous categories. More information is provided at OSHA's website <https://www.osha.gov/dsg/hazcom/index.html>.
- **Labels** - Suppliers must develop new product labels that include signal words, pictograms, hazard statements, and precautionary statements for chemicals based on their hazard classification and category. Secondary labels will not need to be modified as long as they contain the product identifier and a description of the primary hazard. More information is provided on OSHA's website at https://www.osha.gov/Publications/HazComm_QuickCard_Labels.html.
- **Safety Data Sheets (SDS)** - Suppliers must prepare safety data sheets for their products that follow a standardized 16-section format in conveying information about the health effects of hazardous chemicals and their physical and chemical characteristics.
- **Information and Training** - To facilitate recognition and understanding, employers are required to train workers on the new label elements and safety data sheet format.

Important Compliance Dates

- Employers must train employees on the new label elements and new safety data sheet format by December 1, 2013.
- Chemical manufacturers, importers and distributors, as well as employers, must comply with the new HCS requirements by June 1, 2015 except that chemical distributors may ship containers under the old system until December 1, 2015.
- Employers must update any alternative workplace labeling and hazard communication program as necessary and provide additional employee training for newly identified physical or health hazards by June 1, 2016.
- During the transition period prior to the compliance dates identified above, chemical manufacturers, importers, distributors, and employers may comply with either standard or both.

Information & Assistance

Federal OSHA's Hazard Communication page (which includes links to training resources about SDSs, pictograms, and other label elements) can be accessed at <https://www.osha.gov/dsg/hazcom/index.html>. However, it is advisable that employers first check their state-specific OSHA program. Although most states currently follow Federal OSHA's Hazard Communication Program, certain states may have modified parts of other industry standards as well to ensure consistency with the newly modified Hazard Communication Standard requirements.

If you have questions regarding the implementation of your new Hazard Communication Standard, please contact EMPLOYERS Loss Control Services at (800) 588-5200, or email: losscontrol@employers.com.

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