ARE YOU READY FOR GHS?

All companies and government entities that are currently required to keep, read and understand MSDS (material safety data sheets) will have to revise their HAZCOM system. OSHA will require the new SDS (safety data sheets) and a revised HAZCOM written plan, as defined by the new OSHA Standard GHS (Globally Harmonized System), by 2016. However, employee training must be completed by December 2013.

The goal of the GHS is to create consistency and harmonization of chemical safety documents and hazard communication.

As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier and supplier identification. Each pictogram consists of a symbol on a white background framed in a red border and represents a distinct hazard(s).

GHS IMPACTS

GHS mostly affects companies and government entities that have to classify hazards or prepare safety data sheets or workplace labels. Some of the more important changes include:

- **(M)SDS** – The material safety data sheets will need to be changed to classify all products for health and physical hazards based on the GHS criteria. Employers and workers use the SDS as a source of information about hazards and to obtain advice on safety precautions.

- **LABELING** – GHS will require the standardization for all labels using pictograms, signal words, hazard statements, and precautionary statements.

- **HAZARD CLASSIFICATION** – GHS specifies the detailed criteria for implementation of communication elements for each hazard class.
TRAINING – Companies must educate employees on the label, SDS changes and the standardized symbols.

WRITTEN PROGRAM – Companies need modify their written materials to include changes to labeling and SDS communication for employee training.

GHS TIMELINE

December 1, 2013 – Deadline to train employees on new HCS labels and SDS format
June 1, 2015 – Deadline for compliance with all provisions of the U.S. Final Rule
June 1, 2016 – Effective date for new HazCom

Click here for updates on the OSHA website.

CONTACTS

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You may also visit our website for additional information about the Willis Pooling Practice or to read prior issue of our Pooling Bulletin.

The observations, comments and suggestions we have made in this report are advisory and are not intended nor should they be taken as legal advice. Please contact your own legal adviser for an analysis of your specific facts and circumstances.