

Don't Hazard a Guess: December 1 is the Deadline for OSHA (Occupational Safety and Health Administration) Globally Harmonized System of Classification and Labeling of Chemicals (GHS) Employee Training

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In 2012, the **Occupational Safety and Health Administration (OSHA)** amended its Hazard Communication Standard (HCS) by adopting the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). GHS is a world-wide method of classifying and communicating chemical hazards. Hazardous communication experts around the world have been working on it for years. The revised HCS, which OSHA calls "HazCom 2012," covers every workplace where there is exposure to hazardous chemicals. Nationwide, five million facilities and 40 million workers are affected. The Kentucky Occupational Safety and Health Standards Board adopted the new standard *batim* on May 7, 2013. By December 1, 2013, employers must train their employees on the new label and safety data sheet (SDS) formats.

OSHA has nicknamed the new standard the "Right to Understand," an update of the "Right to Know" concept behind the former HCS. HazCom 2012 makes four, major changes to the HCS:

- **Hazard Classification:** Provides specific criteria for the classification of health and physical hazards, as well as the classification of mixtures.
- **Labels:** Chemical manufacturers and importers will be required to provide a label which includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.
- **Safety Data Sheets (SDS):** Formerly called Material Safety Data Sheets (MSDS), these forms will now have a specified, 16-section format.
- **Information and Training:** Employers are required to train workers by December 1, 2013, on the new labeling elements and SDS format in order to ensure recognition and understanding.

The new system is designed to communicate chemical hazards to employees more effectively. No

longer will a particular chemical have different hazard descriptions from different manufacturers. Additionally, the hazard classifications and definitions will now be aligned among all federal agencies. Manufacturers and distributors will have three years to change their labels and SDSs. They will be required to include the new SDS with their next shipment. Employers should automatically receive new SDSs, just as they do now when a MSDS is updated.

GHS-formatted documents are already making their way into U.S. workplaces and can be very different from what workers are used to seeing. International pictograms may be particularly confusing to untrained employees. The standard does not specify the length of training, but Kentucky's Occupational Safety and Health Program (KOSH) expects employers to expend adequate time and resources to ensure that employees actually *understand* the hazards and precautions to be taken with chemicals in the workplace. KOSH warns: "Employers who do not train the appropriate employees could face citations and monetary penalties." Employers who need help in meeting this important deadline should contact MMLK for assistance.

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