

First Deadline 1 Year Away for Revised OSHA Hazard Communication Standard

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On May 25, OSHA aligned its Hazard Communication Standard (HCS) with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) in use in Europe. We applaud a common and consistent look and feel and approach to communicating chemical hazards worldwide. We share the agency's optimism that aligning with the GHS will improve the quality of the hazcom information available to workers, and result in a safer workplace. Simpler documentation and easier to understand information on safe use and handling of workplace chemicals should result in improved workplace safety outcomes.

Link: <http://short.productionmachining.com/rdjvTvZb>

How this affects you and your company:

Your first deadline for compliance is **December 1, 2013**.

By this date, employers must complete training of employees on how to read GHS-formatted safety data sheets and labels. Employees in our shops will need to be trained on the new label elements, pictograms, signal words and safety data sheet (MSDS replacements) format by December 1, 2013. The purpose of this move to the GHS is to promote employees' "right to understand," not simply their "right to know."

The second deadline affects your suppliers. **By June 1, 2015**, manufacturers and distributors must comply with the revised HCS. This includes reclassifying chemicals and producing GHS-formatted labels and safety data sheets (SDSs). Safety data sheets will now follow an expanded 16-section format. Distributors get an additional 6 months to distribute old inventory that has already been labeled. This deadline impacts the companies that provide you with chemicals, coolants, materials, and so on.

The third deadline is aimed at your distributors. **By December 1, 2015**, distributors must fully comply with revised HCS. The grace period ends, and all materials in distributors' inventories and placed in trade must comply with the new GHS labeling requirements.

The fourth deadline affects all of our shops. **By June 1, 2016**, employers must fully comply with the revised HCS/GHS, and complete training of employees on newly identified hazards and/or any updates to the workplace hazard program.

These extended deadlines do not mean that you no longer need to pay attention to hazcom in your shop. Now is the time to look at your current hazcom training system. Is it complete? Is it being followed? Do you have evidence of training for all employees? Do you have all MSDSs for chemicals in your shop? Are they maintained in easy-to-lose paper files, or do you have them scanned for immediate electronic retrieval on your backed up servers?



OSHA wants this change to result in improved worker safety outcomes. There's nothing wrong with doing the prep work now to make your shop's hazcom training and systems more robust, and with improving documentation to establish that training has occurred. Continuous improvement is a great approach when anticipating any new "change." Use this change to improve your ability to provide evidence of your recordkeeping, training and evidence of effectiveness. You've got a bit of time.

