



Training for New OSHA Hazard Communication Standard Must Be Complete by December 1, 2013

Insights

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The Occupational Safety and Health Administration's Hazard Communication Standard has been changed to now align with the United Nations' Globally Harmonized System of Classification and Labeling Chemicals (GHS). Since the Hazard Communication Standard became effective almost 30 years ago, employers have had to provide "right to know" information to their employees about the chemical hazards in their workplace. The key difference in the revised standard, however, is that it provides a single set of harmonized criteria for classifying chemicals according to their health and physical safety hazards as opposed to the previous standard that allowed chemical manufacturers and importers to convey information on the labels in whatever format they chose. This revised standard, like the original one, requires chemical manufacturers and importers to evaluate chemicals they produce or import and provide hazard information to employers and employees. However, the old standard's "Material Safety Data Sheets" (MSDS) are now replaced by more detailed Safety Data Sheets (SDS's) as well as new labeling requirements. Under the new standard, OSHA is requiring that all employees be trained on the new rule and how to understand the new SDS's and new labels by December 1, 2013.

The major revisions to the Hazard Communication Standard include the following:

- **Hazard Classification:** Chemical manufacturers and importers are required to determine the hazards of the chemicals they produce or import. Hazard classification under the new, updated standard provides specific criteria to address health and physical hazards as well as classification of chemical mixtures.
- **Labels:** Chemical manufacturers and importers must provide a label that includes a signal word, pictogram, hazard statements, and precautionary statements for each hazard class and category.
- **Safety Data Sheet (SDS):** The new format requires 16 specific sections, ensuring consistency in presentation of important protection information. The new SDS's will replace the currently used MSDS's.
- **Information and training:** To facilitate understanding of the new system, the revised standard requires that all covered employees be trained by December 1, 2013 on the new label elements and safety data sheet (SDS's) format, in addition to the current standard training requirements.

What Employers Need To Do and When:

Employers using hazardous chemicals (as defined by the standard) need to continue to update safety data sheets when the new ones become available and provide training on the new label elements. In

data sheets when the new ones become available and provide training on the new label elements. In addition, employers need to update their hazard communication programs when new hazardous chemicals are introduced.

Chemical producers should review hazard information for all chemicals produced or imported, classifying chemicals according to the new classification criteria, and update labels and safety data sheets.

The final rule became effective 60 days after publication in the Federal Register; however, OSHA has provided the following extended compliance dates to meet the new requirements:

- December 1, 2013 :Employers must train employees on the new label elements and SDS format.
- June 1, 2015: Compliance with all modified provisions of the final rule for chemical manufacturers, importers, distributors, and employers. The only exception is for the December 1, 2015, distributor compliance date below.
- December 1, 2015: Distributors shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label.
- June 1, 2016: Employers must update alternative workplace labeling and their hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.

This new standard covers all employees who produce or use hazardous chemicals in their workplace. All covered employers are encouraged to start the required training as soon as possible to ensure that all training is completed before the December 1, 2013 deadline.

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