Implementation of the Globally Harmonized System

Worldwide System of Hazard Communication

Jennifer Silk, DOE, 3/14/2006

Development of the GHS

- US supported the process and actively participated.
- Multiple international organizations involved.
- Stakeholders (industry and labor) represented in both the negotiation and implementation processes.

US Agencies Affected by GHS

- Environmental Protection Agency (EPA)
  - Pesticides Program
- Department of Transportation
  - Hazardous Materials Regulations
- Consumer Product Safety Commission (CPSC)
- Occupational Safety and Health Administration (OSHA)

Impact on OSHA

- Hazard Communication Standard includes the affected requirements.
- OSHA has more requirements affected by the GHS than other US agencies:
  - Cover all acute and chronic hazards.
  - Have requirements for labels and material safety data sheets.
  - Cover over 7 million workplaces and 945,000 hazardous chemical products.

OSHA's Current Activities

- Awareness raising.
  - Presentations at meetings of trade associations, consensus standards committees, and professional societies.
  - In the process of preparing a Guide to the GHS to help disseminate information.
  - Web page on the GHS.

Current Activities, cont.

- Situational analysis:
  - OSHA has had a detailed comparison completed of the HCS to the GHS.
  - The comparison is available on our web page.
- Coordination with other agencies:
  - We continue to participate in interagency discussions about implementation.

Current Activities, cont.

- International coordination:
  - OSHA and Health Canada conducted a workshop on the GHS in Mexico City as part of NAFTA discussions regarding handling of hazardous substances in the workplace.
  - OSHA and the European Commission discussed GHS implementation at a joint conference on occupational safety and health in September 2005 and completed a pilot project related to the GHS.

Current Activities, cont.

- Represent US in the UN Subcommittee of Experts on the GHS.
- Added GHS to the regulatory agenda, published 5/16/2005.
- Next step is an advance notice of proposed rulemaking, expected to be published soon.

ANPR

- Opportunity to solicit input from the public on issues related to implementation.
- Timing and transition are the primary issues.
- Biggest impact is on the chemical industry. Need to take advantage of the normal cycle of updating labels and safety data sheets.

Activities of Other Agencies

- EPA—White Paper on Implementation; situational analysis.
- DOT—Plan to adopt regulatory changes in 2007, implement by 2008.
- CPSC—Beginning work on situational analysis.

Significant Differences

- The HCS is performance-oriented while the GHS is specification-oriented.
  - In order to harmonize, decisions needed to be made regarding specific aspects of hazard communication.
  - Other systems started with a more specific approach.

Differences, cont.

- Hazard determination.
  - The HCS has criteria, but also has a general approach that one good toxicological study is enough to define a health effect.
  - The one study rule is accounted for in the GHS re: chronic effects, but the definitions of hazard are much more detailed and generally involve multiple classes within each category of hazard.

Differences, cont.

- The scope of hazards covered in the GHS is generally the same as the HCS, although there may be some differences.
- The specificity of the criteria will make it more likely that hazard evaluators will come to the same conclusions regarding the hazardous effects.

Differences, cont.

- Labels.
  - HCS allows producer to determine the language.
  - GHS specifies certain core information by category and class:
    - Pictograms are used and are specified.
    - Signal words are also required.
    - Hazard statements are harmonized.

Differences, cont.

- Benefits of specific approach:
  - Chemical producers will not have to determine their own language to convey hazards.
  - Communication will be improved through standardized language.
  - Translation of phrases will be done, so it will be easier for producers to determine the appropriate label for other countries.

Allocation of Label Elements

CARCINOGENICITY				
Category 1A	Category 1B	Category 2	-	-
				
Danger **May cause cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)	**Danger** **May cause cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)	**Warning** **Suspected of causing cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)		
Not required under the *UN Recommendations on the Transport of Dangerous Goods, Model Regulations.*				

Differences, cont.

- Safety data sheets (SDSs).
  - HCS requirements allow any format to be used.
  - GHS provisions incorporate the 16-section SDS format originally developed by ANSI, but switch order of sections 2 and 3.

Differences, cont.

- Benefits of GHS SDS approach:
  - 16-section format addresses comprehensibility issues with information order.
  - Consistent with industry consensus standard approach.

Conclusion

- OSHA and other agencies continue to explore issues related to implementation of the GHS.
- Stakeholder support and input will be required to move forward on implementation.
- For more information: http://www.osha.gov