



GHS

Globally Harmonized System Solutions

Education. Training. Labeling.
Organization. Compliance.

Implementing Your Updated Hazard Communication Program

OSHA's update to its Hazard Communication Standard changes the requirements when it comes to chemical labeling and mandatory employee training. This means you need to know exactly what the Global Harmonized System (GHS) is and how it affects your business. That's where we come in. As your trusted business advisor for over 100 years, Brady offers the information you need and a wide variety of products and services to help you transition to the new system and stay compliant.



What is GHS?

GHS = Globally Harmonized System of Classification & Labeling of Chemicals

GHS is a system that's been created by the United Nations for standardizing the classification and labeling of chemicals throughout the world. In the United States, OSHA is enforcing GHS through its updated Hazard Communication Standard (CFR 1910.1200):

- Defining environmental, physical and health hazards from chemicals
- Communicating these hazards and protective measures on standardized labels and Safety Data Sheets (SDS)

» Under the new GHS format, labels have 6 elements and SDS sheets have 16 elements.

Why does GHS matter?

Chemical import/export means big business

Globally, the production and use of chemicals is a more than \$1.7 trillion per year enterprise (\$400 billion in the U.S. alone). Chemical labeling has appeared differently based on different regional requirements. With such an impact on the world economy, it's critical that the import and export of chemicals be made as safe and efficient as possible. The GHS standard globally helps keep workers safe and informed of chemical hazards.

Number of Federal OSHA HazCom Violations*



(In Fiscal Years)

*#2 on OSHA's Top 10 list of most frequently cited standards for 2015.

Compliance Timeline and Checklist

- Schedule and document periodic re-training on pictograms, labels and SDS
- Post GHS signs, posters, and hand out wallet cards
- Be able to demonstrate that workers clearly understand the hazards associated with each chemical they're exposed to, along with practice measures they must take
- Separate SDS and Material Safety Data Sheet (MSDS) binders and sheets as part of the management system. This will help you create secondary container labels with SDS information and determine which chemicals haven't been updated



- Update your chemical database as new SDSs are received
- Review and ensure that all MSDS for any chemicals received after December 1, 2015, have been converted to SDS format
- Notify and document your communications with suppliers who have not provided new SDS information
- Audit all containers for compliance with updated regulations. Establish policies to control improperly labeled containers

December 1, 2013

Employers must train employees on the new label elements and Safety Data Sheet (SDS) format.

June 1, 2015

Chemical manufacturers, importers and distributors reclassify chemicals, send SDS & labels in GHS format.

December 1, 2015

Distributors send only updated SDS & labels.

June 1, 2016

Employer full compliance deadline.



- Identify secondary container labeling needs and procedures
- Purchase GHS labeling equipment and supplies
- Implement labeling procedures (create your own labels or order preprinted versions) based on new SDS sheets
- Archive old MSDS for determined amount of time (We recommend 30 years)
- Re-train on GHS as well as your existing HazCom system (NFPA/HMIS) until full conversion to GHS is complete

- Ensure your training policy is in place, including new and existing chemical and internal product changes. Annual training is always recommended
- Update and complete a written HazCom program that includes a system of labeling, pictograms, training schedule and how/where to obtain more information
- Perform audits as conditions change or once a year to ensure program effectiveness

- Note any new hazards identified on SDS and potential Personal Protection Equipment (PPE) changes. As new chemicals are brought into your facility, new hazard and PPE needs may be created
- Ensure your written HazCom program is updated and reflects all internal and external changes
- Provide training to all new employees working with hazardous chemicals