

Hazard Communication Standard and GHS Update



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What I will cover

- GHS update
- RCC update
- Hazard Communication
Rulemaking Considerations
- Questions

Ongoing work at the UN



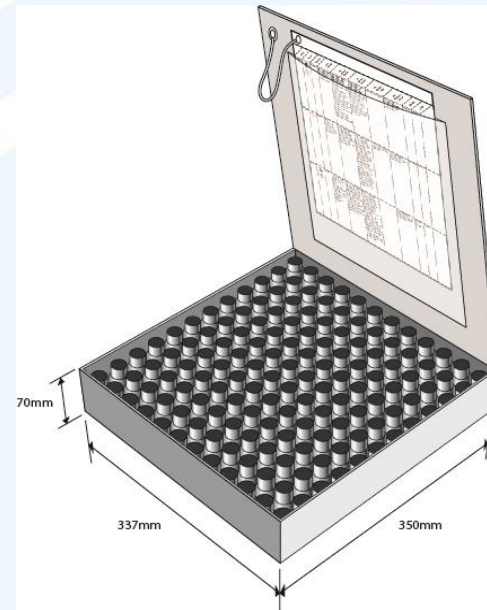
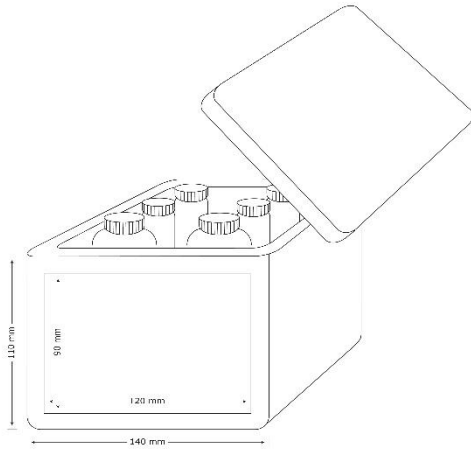
Program of work – 2017-18

Biennium

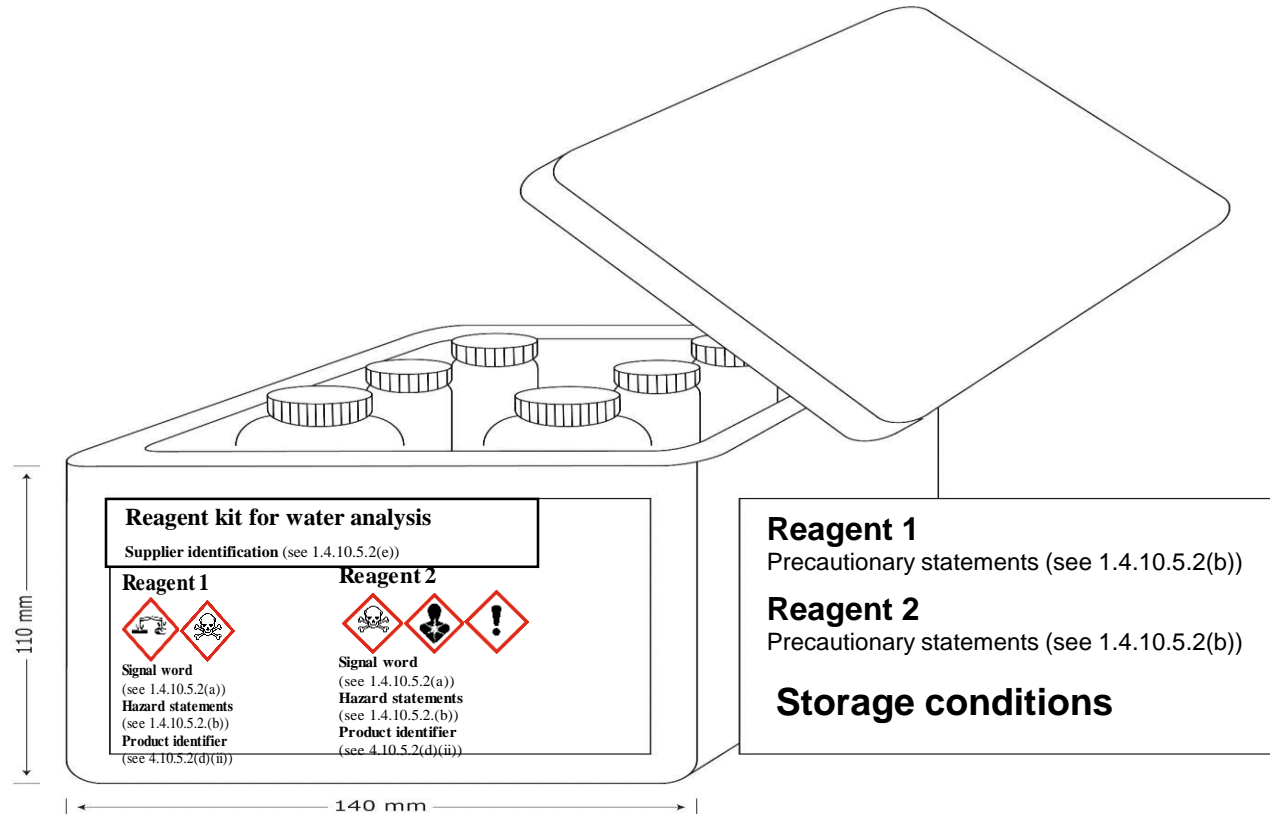
- Continuation of on going work
 - Small packages
 - Review of Chapter 2.1 (Explosives)
 - Annex 1 to 3
 - Global List
 - Dust Explosion Hazards
- New work items
 - Non animal testing
 - Chemicals under pressure

Small Packages

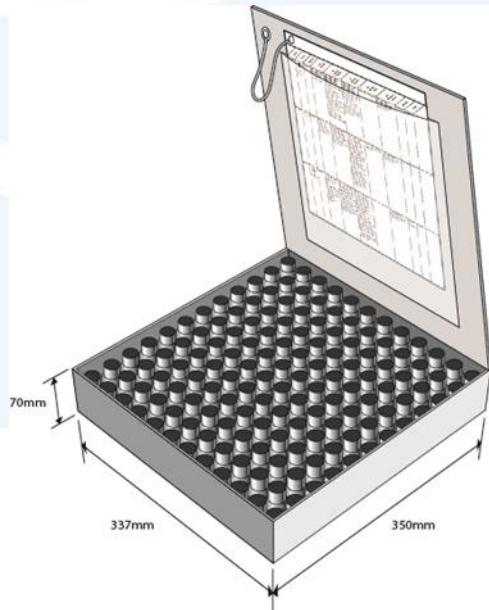
- Creating examples for labeling kits
 - Multiple examples illustrating how label a box that contain different small containers of hazardous chemicals



Small Packages Scenario 1



Small Packages Scenario 2



As shown to the right, full label information regarding each inner packaging is contained within the outer packaging.

The sheets of full label information are permanently connected to the inside of the combination packaging using a secure method of attachment (e.g. fold out label adhered to box tie on tag as shown)

Small Packages Scenario 2



Review Chapter 2.1 (Explosives)

- (a) Any changes to the current classification system should not affect the existing transport classification;
- (b) Information on divisions should be retained, as they are widely used in many downstream regulations, in particular those addressing storage;
- (c) Any new requirements for testing should be avoided;
- (d) The consequences of any proposed changes should be weighed in relation to their added value.

Concept of New Criteria For Chapter 2.1

17 July 2017

Lorens van Dam, Sweden

Possible new GHS classification system for Explosives as discussed at UN-meetings in July 2017

Red texts are the main areas of discussion.

Category	[1]	[2A]	[2B]					[3A]	[3B]
Division	<i>n/a</i>	<i>n/a</i>	1.1	1.2	1.3	1.5	1.6	<i>n/a</i>	<i>n/a</i>
Description	Very high hazard		High hazard					Medium hazard	Low hazard
Criteria	Positive results in Test Series 3 or 4 or Test 8(a).	Positive results in <u>Testseries 2</u> or test 8(b) or 8(c) or intentional explosive, and not exempted article nor Category [1].							
Additional criteria		Division not assigned	Div. 1.1 as configured for transport.	Div. 1.2 as configured for transport.	Div. 1.3 as configured for transport.	Div. 1.5 as configured for transport.	Div. 1.6 as configured for transport.	Division 1.4X as configured for transport and individually not posing a high hazard	Division 1.4S as configured for transport and individually not posing a high or medium hazard
Symbol	GHS01	GHS01					GHS01	<i>No symbol</i>	
Signal word	DANGER	DANGER					WARNING	WARNING	
Hazard statement	H200	H20X	H201	H202	H203	H205	H206	H204	H204

Principles agreed

Do not affect transport classifications
Retain information on Divisions
Avoid new requirements for testing
Weigh changes to the added value

Non Animal Testing

- (a) Using a step-wise approach, starting with a hazard class to be determined by the informal working group, identify and evaluate, relative to existing accepted *in vivo* test methods upon which the existing GHS classification criteria are based
- (b) For each relevant GHS hazard class and category, assess: all relevant information and determine the appropriate approach (Integrated or tiered evaluation)
- (c) Prepare draft amendments and additions to the GHS to facilitate hazard classification using non-animal methods, where appropriate and considering relevant limitations and uncertainties. They should include as appropriate classification criteria, notes, decision logic, tiered evaluation and guidance, and should take into account the needs of all sectors. The proposed changes should provide, so far as possible, a consistent approach across the different hazard classes. If appropriate, suggestions for further developments of non-animal methods should be given.
- (d) Report back to the GHS Sub-Committee as appropriate

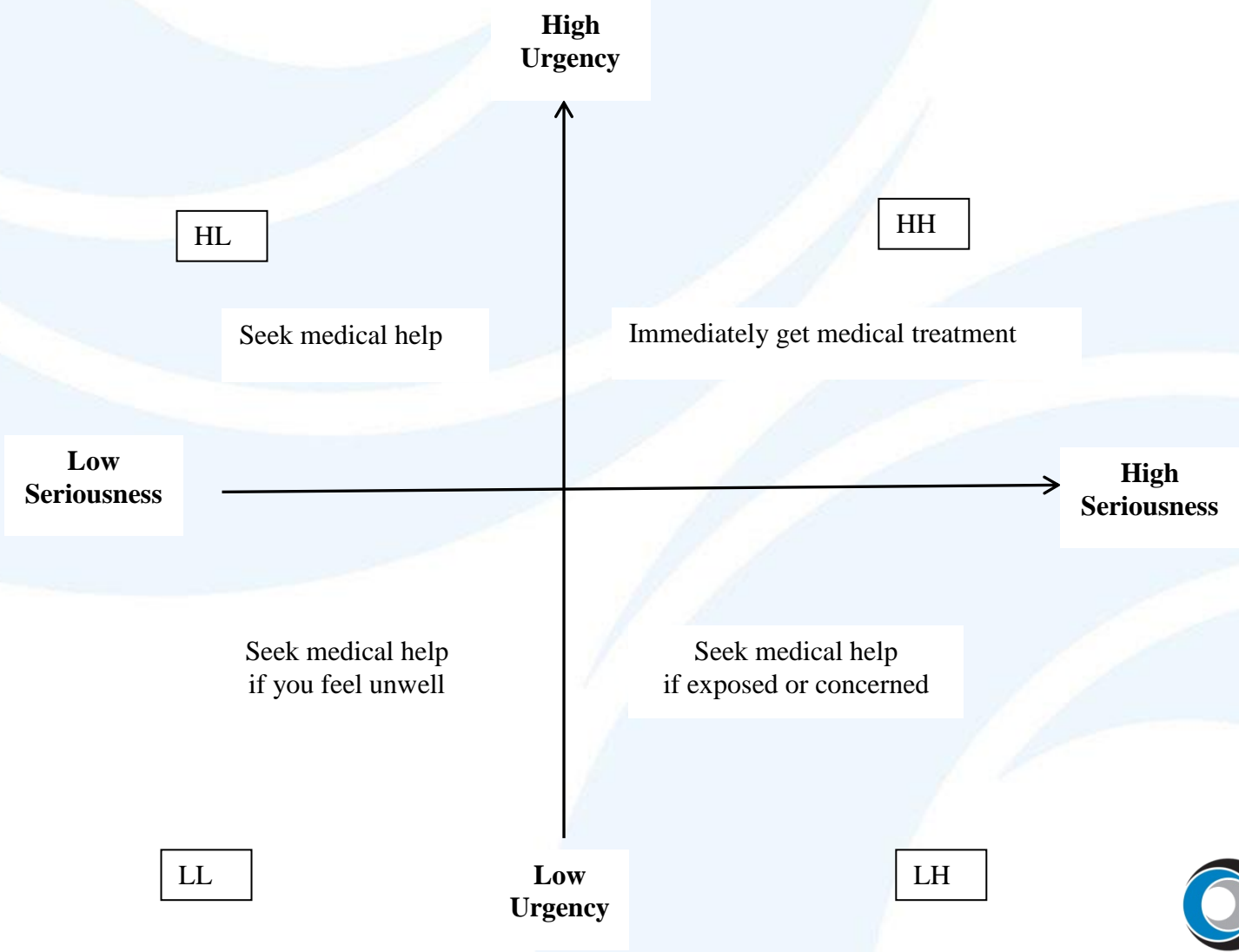
Annex 1 to 3

- Workstream 1: to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners. This may include proposals to rationalise and clarify ambiguous or unhelpful instructional precautionary statements, such as statements relating to medical response and disposal.
- (Workstream 2: to eliminate inconsistencies in the presentation of precautionary statements in Annex 3, including looking at disparities between the application of precautionary statements for different hazard classes/categories.
- Workstream 3: to consider and address other issues within the Correspondence Group's terms of reference as they arise.

Work Plan

Work stream	Topic	Priority/complexity	Lead	Proposed start of topic
1	Medical response PS (P310-P315)	High; expected to be relatively difficult/complex	USA	January 2017
3	Precautionary pictogram	High; expected to be problematic	AISE	January 2017
3	Hand-eye contact			
1	P201 and P202	Medium; expected to be relatively straight forward	UK (DT)	September 2017
3	Pictograms and notes in Annex 1		UK (DT)	October 2017
2	Combination of sections 2 and 3		UK (DT)	November 2017
2	Sensitisation - respiratory	Low; expected to be relatively straight forward		
2	Sub-categorisation		UK	
1	P501 – Waste disposal PS	Low; expected to be relatively difficult		
2	Combination statements	Low; expected to be problematic		
2	Amendments to headings used for A3.3.4 and A3.3.5 (i.e. Matrix of precautionary statements by hazard/class and category)	Low; expected to be relatively straight forward	UK (DT)	

Medical Precautionary Statement



Pictogram for keep out of the reach of children



ASTM icon for liquid laundry packets



A.I.S.E. Safe Use Icon Keep away from children



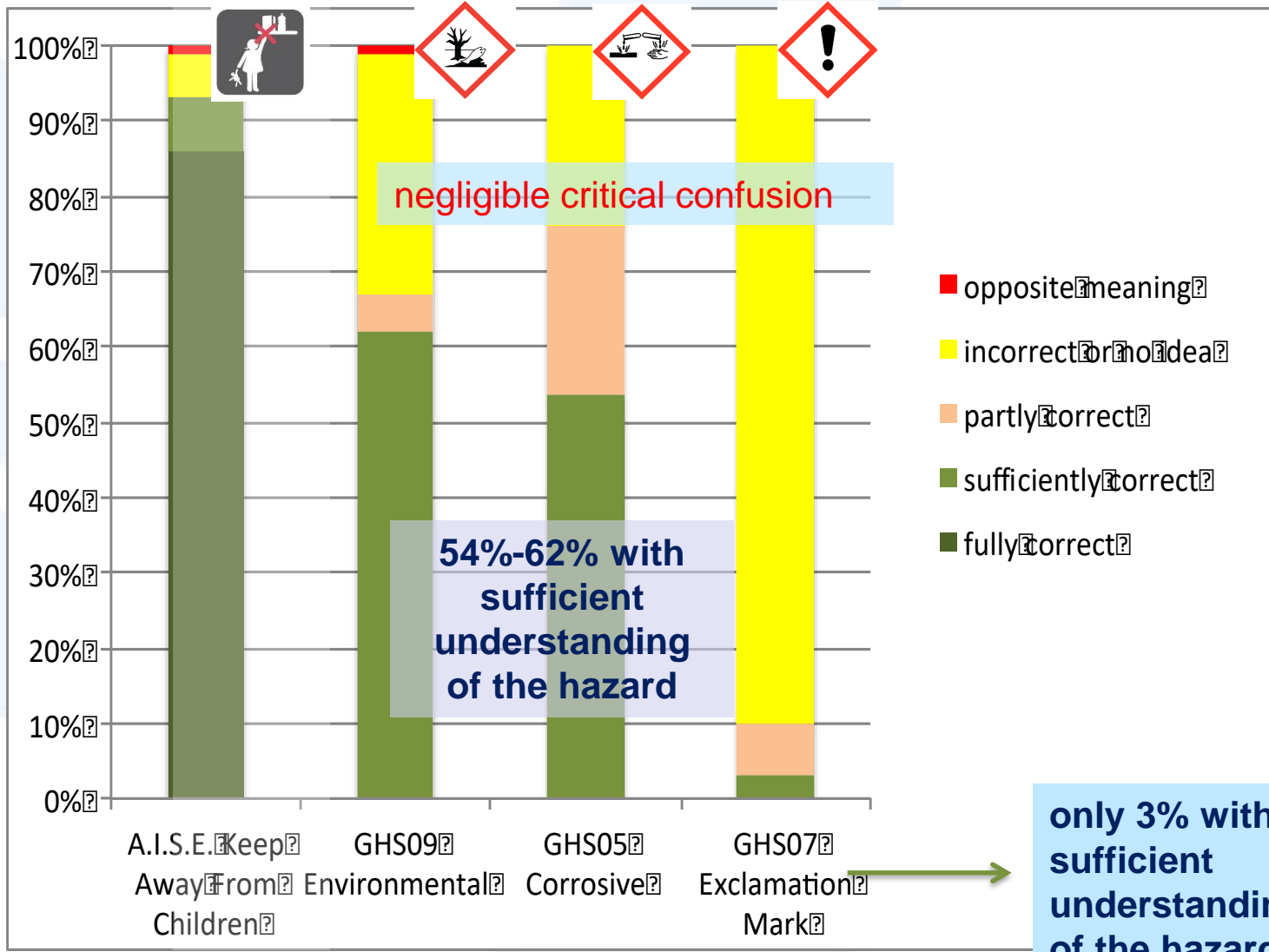
Safe use icon developed by the Japan Soap and Detergent Association (JSDA)



Annex V of EU Directive on "Safety of toys"



ISO Keep away from children symbol for use on equipment



only 3% with sufficient understanding of the hazard

Chemicals under Pressure

- Chemicals under pressure
 - *Aerosols* are different products to *chemicals under pressure*. *Aerosols* are by definition non-refillable, have limited capacity and have a relatively low permitted maximum internal pressure. Further the can construction requirements, flammability classification scheme and criteria as well as labelling provisions are different to *chemicals under pressure*.
 - The Sub-Committee agreed that classification and labelling of chemicals under pressure was an issue that needed to be addressed during the next biennium

RCC



R 2016-17 RCC Work Plan for Workplace Chemicals update

<http://www.trade.gov/rcc/documents/2016-rcc-workplace-safety-work-plan.pdf>

Three main areas of work, and ongoing activities in support of these areas:

- (1) Guidance development to support implementation of the GHS and understanding of interpretation of technical issues and requirements in both Canada and the U.S.
- (2) Coordination of common positions and participation in international discussions on the GHS
- (3) Maintaining alignment on the GHS implementation



RCC Guidance Update

Three joint guidance documents being prepared by HC and OSHA

1) Guidance document on labelling requirements

This document will outline the labelling requirements for hazardous products under the HPR and the HCS 2012.

Variances are identified (e.g., language requirements).

Notwithstanding these variances, it is still possible to meet the requirements of both countries using a single label.



RCC Update

- 2) Guidance document on labelling requirements for Hazards Not Otherwise Classified (HNOC), Physical Hazards Not Otherwise Classified (PHNOC) and Health Hazards Not Otherwise Classified (HHNOC)

Under the HPR, for hazardous products classified as PHNOC or HHNOC, specific information elements are required on the label.

Under the HCS 2012, no label elements are required for HNOC.

This document will provide guidance on label elements that would be acceptable in both countries for products that are HNOC/ PHNOC/HHNOC.

RCC Update

3) Guidance document on allocation of authorities

This document will provide an overview and comparison of how Canada and the U.S. allocate authorities relating to hazardous products used in workplaces.

Preparation for HCS Update

The standard that gave workers the right to know, now gives them the right to understand



Principles & Assumptions

- As with HCS 2012, OSHA plans to modify only the provisions of the HCS that must be changed to align with the GHS
 - The basic framework of the HCS will remain the same
 - Chemical manufacturers and importers are responsible for providing information about the identities and hazards of chemicals they produce or import
 - All employers with hazardous chemicals in their workplaces are required to have a hazard communication program, and provide information to employees about their hazards and associated protective measures
- OSHA will maintain or enhance the overall current level of protection of the HCS



Purpose of Future HCS Rulemaking

- Maintain alignment with GHS
- Address issues identified during implementation of HCS 2012
- Identify issues of concern for those complying with WHMIS 2015

Comments so Far

- Cautiously Improve alignment with Canada
 - Concentration ranges/CBI
- Visit issues with small packages
- Distribution issues
 - Relabeling at time of shipment versus “release for shipment”
- Maintain alignment with EU
- Cut-off values variances

Questions to consider

- How the change will effect your company or Industry?
- What are the burdens your industry/company expects?
- Please provide information on potential feasibility issues
 - Technical – can not physically be done
 - Financial
 - Please provide examples/costs associated with issues

Special Thanks



Questions?



OSHA Information

Websites:

- HCS 2012 Webpage

<http://www.osha.gov/dsg/hazcom/index.html>

Contact information:

- 202-693-1950

