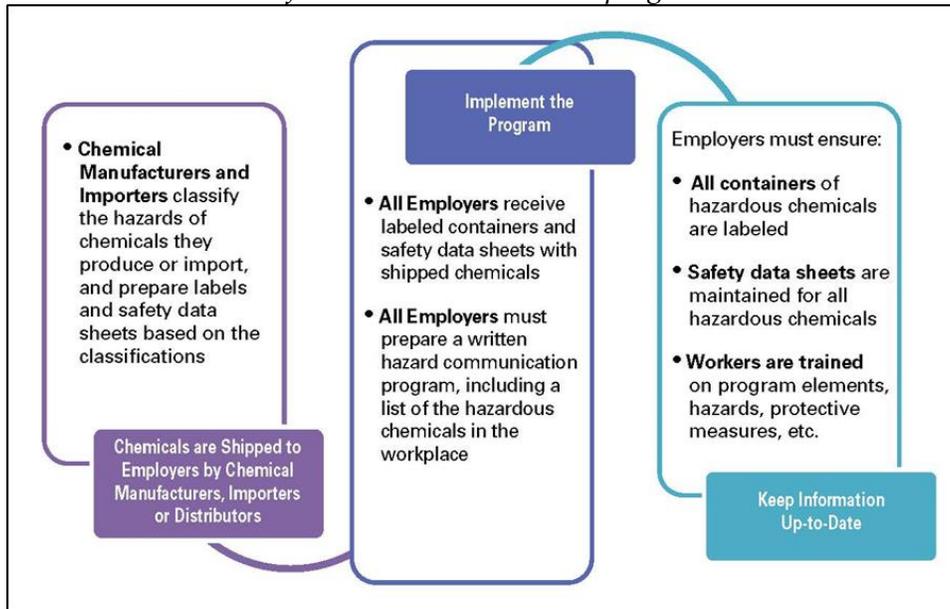


Revisions to OSHA’s HAZCOMM: ‘Change is gonna come’

OSHA's Hazard Communication standard (HAZCOMM) has been the lynchpin of chemical hazard communication in workplaces and in the community for thirty five years. HAZCOMM requires employers to obtain hazard and safety information from chemical suppliers/distributors; employers are then required to establish a written program that communicates these hazards to their workers. Firefighters, emergency responders and environmental agencies who deal with chemical emergencies and regulating chemicals also rely on this information that HAZCOMM helps generate.

OSHA estimates that HAZCOMM prevents an estimated 580 chemical injuries and illness and forty-three fatalities every year.

Basic outline of worksite HAZCOMM program



GHS: Globally Harmonized System of Classification and Labeling of Chemicals

Back in 2012 OSHA made several revisions to HAZCOMM to align it with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) developed by the United Nations as well aligning it with US Department of Transportation labeling requirements. GHS was agreed to by the United Nations with the goal of adopting a uniform system for chemical hazard classifications, chemical labeling requirements and a standard format for safety data sheets for chemicals in international commerce.

The GHS is revised about every two years, and the United Nations just completed the seventh edition. With each revision, the UN has updated various requirements regarding precautionary statements for various hazards and how such statements should be worded. *The labeling and SDS requirements that OSHA adopted for the 2012 HAZCOMM were based, however, on the 2009 edition of the GHS.*

Since then GHS has been revised four more times. OSHA is now proposing to update the 2012 HAZCOMM to incorporate elements of the latest GHS editions sometime in 2019. Changes to hazard classifications, SDS requirements, and labeling practices will surely impact companies that manufacture, import, or distribute hazardous chemicals, as well as all downstream employers.

GHS Changes Since 2012

Since 2009 the UN Globally Harmonized System of Classification and Labeling of Chemicals has been revised several times to include new hazard categories for chemically unstable gases and non-flammable aerosols, as well as further adjustments to the precautionary statements and some clarifications of criteria for precautionary statements to avoid differences in their interpretation.

Added revisions range from provisions intended to further clarify the criteria for some hazard classes (skin corrosion/irritation, severe eye damage/irritation, and aerosols); new hazard class for desensitized explosives; new hazard category for pyrophoric gases; miscellaneous provisions intended to clarify the criteria for some hazard classes (explosives, specific target organ toxicity following single exposure, aspiration hazard and hazards to the aquatic environment).

OSHA has not as yet indicated which elements of updated GHS revisions it intends to adopt.

Another goal of OSHA's HAZCOMM revision is to "codify a number of enforcement policies that have been issued since the 2012 standard." OSHA has released a number of compliance directives, letters of interpretation, and memos intended to clarify how OSHA interprets provisions of the standard in the field, and how they are enforced. It seems that many of these would likely form the basis for additional revisions to the HAZCOMM standard. So stay tuned for upcoming revisions to the HAZCOMM rule.

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