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Globally Harmonized System of Classification and Labeling of Chemicals (GHS)

What Employers Need to Know about Their Responsibilities



The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is an international system adopted by the United Nations to eliminate differences in the way that countries handle the provision of information on chemical hazards in the workplace. In 2012, the Occupational Safety and Health Administration (OSHA) amended its hazard communication standard (HCS) to align its requirements with the GHS. The amendments to the HCS include (1) a new classification system for chemical hazards in the workplace; (2) new container labeling to include pictograms and other standardized communication mechanisms; and (3) using standardized “Safety Data Sheets (SDS),” instead of Material Safety Data Sheets (MSDS). An organization must modify its written hazard communication program to include any resulting changes to labeling and SDS communication, as well as related employee training.

OSHA has been phasing in the GHS amendments to the HCS over several years. ADP has provided various written communications and safety awareness training opportunities regarding these amendments since they were adopted, including risk and safety client bulletins, electronic client newsletters, and ADP University trainings.

The table below summarizes the phase-in dates required under the amended HCS, and specifically outlines the requirements by employers.

Deadline	Required Action	Who is Responsible
December 1, 2013	Employers must train employees to read, interpret, and use new GHS SDSs and labels.	Employers
June 1, 2015	Companies that manufacture, import, or distribute hazardous chemicals must re-classify products and must replace MSDSs with new SDSs according to GHS criteria. Employers must begin using the new GHS SDSs.	Chemical Manufacturers, Importers, Distributors, and Employers
December 1, 2015	Companies that manufacture, import, or distribute hazardous chemicals must replace labels with new GHS labels. Employers must begin using the new GHS labels.	Chemical Manufacturers, Importers, Distributors, and Employers
June 1, 2016	Employers must modify their hazard communication programs, use new GHS labels and SDSs, and provide additional employee training for newly identified hazards.	Employers
Transition Period	Employers must comply with either 29 CFR 1910.1200 (the amended the standard), or the current standard, or both.	Chemical Manufacturers, Importers, Distributors, and Employers

Phases of GHS Compliance

GHS employee Training – Deadline: December 1, 2013 (Employers)

By **December 1, 2013**, employers should have trained employees to read and interpret SDSs and GHS-compliant labels. All employees who otherwise would need to be trained in the HCS and an employer's hazard communication program would need to at least be trained in the following by **December 1, 2013**:

- Requirements of the HCS standard, including the GHS revisions
- How to access and use SDS information, including order of information listed on the SDS
- How to read and understand the new GHS-compliant labels

Chemical Reclassification and Preparation of SDSs – Deadline: June 1, 2015 (Chemical Manufacturers, Importers, Distributors, and Employers)

By **June 1, 2015**, under the GHS amendments, chemical manufacturers, importers, and distributors must follow new criteria to evaluate chemicals they produce, import, or distribute in order to classify the chemicals and chemical mixtures according to their physical and health hazards. Manufacturers, importers, and distributors must classify chemicals on the basis of (1) the type of hazard; (2) the degree of the hazard, and (3) the severity of the hazard, and must also prepare and make available to its customers GHS-compliant SDSs, in lieu of MSDSs, currently required under the HCS. Employers should be receiving compliant SDSs before and/or after June 1, 2015, with new shipments of products. Additionally, pursuant to Section 1910.1200(g)(6)(iv) chemical manufacturers or importers must provide employers with SDSs upon request. If employers do not receive compliant SDSs, they are encouraged to contact the chemical manufacturer and/or importer and request one. Once employers receive compliant SDSs, they must update their SDS binders and maintain these new SDSs.

Employers must ensure that each hazardous substance used on site has an appropriate SDS, the SDS is available in a language understood by all employees, and is readily available during all shifts to all employees, including contractors, who work with hazardous chemicals.

SDSs have a uniform format using the following 16 headings in this specific order. For reference, a downloadable PDF OSHA SDS QuickCard is available through <https://www.osha.gov/dsg/hazcom/ghsquickcards.html>.

- **Section 1** - Product and Company Identification
- **Section 2** - Hazard Identification
- **Section 3** - Composition/Information on Ingredients
- **Section 4** - First-Aid Measures
- **Section 5** - Firefighting Measures
- **Section 6** - Accidental Release Measures
- **Section 7** - Handling and Storage
- **Section 8** - Precautions to Control Exposure/ Personal Protection
- **Section 9** - Physical and Chemical Properties
- **Section 10** - Stability and Reactivity
- **Section 11** - Toxicological Information
- **Section 12** - Ecological Information – Not OSHA-Mandated (Governed by Other Agencies)
- **Section 13** - Waste Disposal Considerations – Not OSHA-Mandated (Governed by Other Agencies)
- **Section 14** - Transport Information – Not OSHA-Mandated (Governed by Other Agencies)
- **Section 15** - Regulatory Information – Not OSHA-Mandated (Governed by Other Agencies)
- **Section 16** - Other Information

Labeling with GHS Requirements - Deadline: December 1, 2015 (Chemical manufacturers, importers, distributors, and employers)



By **December 1, 2015**, companies that manufacture, import, or distribute hazardous chemicals must replace former labels with new GHS-compliant labels, and employers who receive new labels must ensure that all containers of hazardous chemicals in the workplace are labeled with these new GHS-compliant labels. Employers must ensure that labels and other warnings are legible, in a language understood by all employees, and prominently displayed on containers.

The GHS-compliant labeling includes product identifiers and a combination of standardized pictograms, signal words, and hazard and precautionary statements to provide general information about the chemical hazards and specific information regarding the potential physical and health hazards. For reference, a downloadable PDF OSHA labeling and pictogram QuickCards are available through <https://www.osha.gov/dsg/hazcom/ghsquickcards.html>.

Full Compliance with GHS - Deadline: June 1, 2016 (Employers)

By **June 1, 2016**, employers must use SDSs and GHS labels, continue to provide additional employee training for newly identified hazards, and update their hazard communication programs to incorporate GHS. The hazard communication program updates include:

1. Changing all references to MSDS to SDS, as well as changing any of the other language to comply with SDS requirements;
2. Listing the methods used to ensure that containers of hazardous chemicals have labels, tags, or other GHS-compliant markings identifying the chemicals and warning about the hazards they pose; and
3. Revising the employers' hazardous chemical inventory.

**For assistance with complying with GHS requirements,
please contact your dedicated ADP Risk & Safety Consultant.**