A Plan for Successful GHS Transition

What impact will the implementation of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) have on hazmat programs at U.S. companies?

By Kim Stier and Carma Roetcisoender

GHS – adopted by the United Nations in 2003 with the goal of implementing it internationally by 2008 – provides a comprehensive approach to defining health, physical and environmental hazards of chemicals. The system creates classification processes and communicates hazard information through uniform labels and material safety data sheets (MSDSs).

Proponents of GHS have been appealing to OSHA to adopt the standard as soon as possible. This would mean that the agency would have to make changes to the hazcom standard as well as its MSDS requirements.

"GHS is expected to bring more consistency and clarity, both from a national and international perspective, to hazardous chemical regulations in the workplace," OSHA Administrator Edwin Foulke Jr. said. "The diverse and sometimes conflicting national and international requirements can create confusion among employers who seek to use hazard information to effectively protect their employees. One of the many benefits of adopting GHS is that it would provide a consistent format for labels and safety data sheets, making the information easier to comprehend and access when making hazard assessments."

While the benefits of such a globally harmonized system are apparent, determining how to implement such a far-reaching change is a challenge most safety, environmental and risk managers will need to address in some fashion. As a result, the two main questions certain to top many lists will be: "How will this affect me?" and "What will I need to do to be compliant?"

The following is a brief overview of the implications of GHS as compared to the current hazcom standard and regulations, and five things to consider when preparing for the challenges many workplaces will face in transitioning to a new system.

Hazcom/GHS Comparison

Material Safety Data Sheets (MSDSs) – One of the most significant changes will occur to MSDSs. Many MSDSs will experience extensive change after adoption of the GHS, as all products will need to be classified for health and physical hazards based on GHS criteria. Another change will be to the format of MSDSs. A 16-section document (as adopted by ANSI Z400.1-2004) will be required.

Labeling – Standardization probably will have the greatest impact on the labeling of chemicals. GHS includes standardized pictograms, signal words and hazard statements that must be included on labels. While precautionary statements are not yet standardized, they will be required and is anticipated they will be standardized in the next GHS revision, due to be published in 2007.

Training – Current training procedures for hazcom are more detailed than the GHS training recommendations. Therefore, educating employees on the updated product classifications and related pictograms, signal words, hazard statements and precautionary measures will represent the greatest training challenge.

Written Program – Because OSHA indicated it will retain the provisions of hazcom that are not affected by GHS, the written program is expected to be largely unchanged. It will need to be modified to include any resulting changes to labeling and MSDS communication as well as related employee training.

Five Points to Ponder

There are five things to remember when developing your GHS transition plan:

Get Informed – Learn all you can about GHS and educate yourself about its potential impact on your organization. Find a good resource for gathering GHS-related information and check it often (http://www.ghsinformation.com). Be sure you are aware of implementation dates, not only in your country, but also in the countries with which you do business (see http://www.unece.org/trans/danger/publi/ghs/implementation_e.html for a timeline by country). Since GHS utilizes the building-block approach, it also is important that you determine which portion of the plan is adopted by relevant countries.

Make sure your product and service providers have a transition
plan in place. This includes vendors for training, MSDS management and authoring, labeling and transportation. Will they be able to assist you with the transition to GHS and will they be a useful resource for you?

Vendor MSDS Management – Support your transition with a chemical information management system that will aid in the administration of documents classified under existing and future regulations. Be sure your system is ready for GHS and is able to provide a consistent and clear message to your employees, even in the event the MSDS does not. Have a plan in place to deal with vendors who are slow to transition to GHS and provide the updated MSDSs your employees need.

Workplace Labels – Workplace labels will need to be updated to include the new pictograms and statements. To ensure workplace safety and allow for consistency, GHS labels may need to be created before an updated vendor MSDS is available. How will you create such a label and classify it appropriately? Contact your labeling vendor to find out how they plan to assist you with compliance for the upcoming label changes. Ask for their transition plan.

MSDS Authoring and Distribution – How will you reclassify your products according to GHS and how will that information be distributed to your customers? Be sure your authoring method supports GHS classification and that it can create the necessary product labels and documents. You might consider adding an addendum with the GHS classifications and pictograms to your product MSDSs during the interim period, before full implementation. A validated electronic distribution method could greatly assist in aligning some of the associated costs with such a project.

Training Program – Training will be a key component of your overall GHS approach and should incorporate information as it is introduced into the workplace. Employees and emergency responders will need to be trained on all new program elements, from hazard statements to pictograms. Bear in mind, if products are imported from countries that implement GHS prior to the United States and Canada, your employee training may need to begin earlier than expected.

Widespread Impact

OSHA estimates that in the United States alone, more than 7 million workplaces and 945,000 hazardous chemical products will be affected by the GHS. While the implementation of GHS in the United States may not occur until 2008, the changes will be far-reaching and vast in nature. Thoughtful preparation is the best way to ensure a successful and smooth transition. As Alexander Graham Bell wisely advised, “Before anything else, preparation is the key to success.”

Editor’s note: The full official text of GHS is available at http://www.unece.org/trans/danger/publi/ghs/ghs_rev00/00files_e.html.

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