

**GHS ONE YEAR
LATER**

**ARE YOU IN
COMPLIANCE
WITH THE
GLOBALLY
HARMONIZED
SYSTEM?**

SafetySmart™

**COMPLIANT | ENGAGING | EFFECTIVE
SAFETY TALKS, MEETINGS & VIDEOS**

Are You In Compliance with the Globally Harmonized System?

Flag the date June 1, 2016. **What's the significance?** That was the final deadline, in a series of four deadlines, employers, distributors, and manufacturers were required to meet to be compliant with the Occupational Safety and Health Administration (OSHA's) Hazard Communication System alignment with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

FOUR KEY COMPLIANCE DATES

December 1, 2013

- Employers were required to train employees on how to read GHS formatted labels and safety data sheets.

June 1, 2015

- Chemical manufacturers and distributors had to complete hazard reclassification and produce GHS styled labels and safety data sheets.
- Distributors got an additional 6 months to complete shipments of old inventory.

December 1, 2015

- Distributors had to comply fully with HCS requirements.
- Grace period for shipments of old inventory ends.

June 1, 2016

- Full GHS - alignment.
- Employers required to be in full compliance with the revised Hazard

Communication Standard (HCS).

- This Includes complete training of employees on new hazards and/or revisions to workplace hazard communication program.

According to OSHA, the changes to the HCS impacted over 43 million workers in over 5 million workplaces. It's very



likely you and your organization have been impacted by these changes. Let's look at what this means for organizations that haven't met the deadlines and how they can catch up.

PENALTIES FOR NON-COMPLIANCE

Now that the deadlines have passed and organizations are expected to comply, not being in compliance can be costly. The Hazard Communication Standard (1910.1200) is consistently one of the top five most frequently cited OSHA citations. Of those citations, the sections of the standard most often cited are:

- Training
- SDS Requirements
- Labels

Think about how easy hazard communication violations are to spot for inspectors.

- A quick look at a

workbench or inside a storage cabinet is all it takes to spot incorrect labels (both manufacturing and workplace)

- A flip through your SDS book can quickly show if your safety data sheets have been updated with the new standardized format.
- A short conversation with an employee or glance at your training records can put the spotlight on training shortfalls.

Citation and fines cost you and your organization time and money. And just this year OSHA penalties went up - which means you'll be paying more for these easy-to-spot violations.

Serious Violation Penalty

- \$12,675 per violation

Other-Than-Serious Penalty

- \$12,675 per violation

Posting Requirements Penalty

- \$12,675 per violation

Failure to Abate Penalty

- \$12,675 per day beyond the abatement date

Willful or Repeated Penalty

- \$126,749 per violation



Getting Compliant with Globally Harmonized Systems

The good news? These easy-to-spot violations are also often easy-to-fix. It can sometimes be overwhelming to even know where to begin, but here are three questions to get you started.

1. Are employees trained on the GHS changes?
2. Have SDSs been updated?
3. Are chemical containers updated with GHS labels?

EMPLOYEE TRAINING

Although the GHS doesn't include specific training requirements, OSHA, under the HCS, does. You must train workers who work with or near chemicals and mixtures on the GHS requirements, in addition to other training requirements in the standard.

At a minimum, GHS training should cover:

- The new chemical hazard classes and categories.
- The new standardized SDS format.
- The new pictograms used on labels and what hazards they represent.
- Information on GHS-

compliant labels and SDSs.

UPDATING SAFETY DATA SHEETS AND LABELS

If you haven't already, you will need to get updated SDSs for the chemicals at the worksite and ensure GHS-compliant labels are on them. Don't forget, you'll need to GHS-compliant workplace labels too. These are used for when chemicals are put into secondary containers.

For example, when workers transfer a chemical from its original container into a smaller container.

Labels for a hazardous chemical must have:

- Name, Address and Telephone Number
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statements(s)
- Pictogram(s)



Chemical Inventory

with Globally Harmonized Systems

How do you start to identify and track what chemicals you have and if those chemicals have updated SDSs available to employees and GHS labels on chemical containers?

You take a chemical inventory. This exercise is also an annual requirement of the HCS so, you'll be accomplishing several things at once!

WHAT'S A CHEMICAL INVENTORY?

At least yearly, employers are required to survey the workplace and develop a list of all the hazardous substances in use or being stored on site. This inventory can be in almost any format, but should contain the name of the hazardous chemical and the name and address of either the manufacturer or the distributor. It's also a good idea to sign and date your company's annual chemical inventory so you can determine when it was last completed.

FIVE BENEFITS OF A CHEMICAL INVENTORY

There are at least five ways companies can benefit from compiling a chemical inventory:



1. It Shows the Big Picture

An inventory gives you a complete picture of all the hazardous substances you are currently using at a given point in time. Once your chemical inventory is compiled, you can begin to group the substances into the major classes of hazards such as flammable, corrosive, toxic and reactive to begin to see where your biggest hazards lie.

2. It Reveals Your Storage Situation

Inventories can also help you evaluate potential storage problems or inefficiencies in the quantity of the substance you are keeping on site. For example, you might be able to store less of a hazardous substance in your workplace if you consolidate the locations of the hazardous substance or you streamline your ordering process so that one employee

can't inadvertently order a product when you already have plenty in stock in different storage locations.

3. It Gives You an Opportunity to Consider Alternatives

Another benefit of a chemical inventory is that it gives you the opportunity to consider whether there is a less hazardous substance you could substitute to reduce the risk to your employees.

4. It Identifies Your Training Needs

Once you've completed the inventory you can also use it to help develop your chemical safety training program. In addition to training employees on GHS, the HCS requires you train employees on the hazards of chemicals they work with or near and the safe use, storage and disposal of those chemicals.

5. It Helps You Identify and Correct HCS Compliance Issues

Finally, your chemical inventory can include an extra column or two to track your progress on obtaining new SDSs and GHS-compliant labels. This will allow you to easily track your compliance progress.

Your Action Plan

Gather a small workgroup, consisting of safety employees, a production or process

supervisor, a member of the maintenance department and one or two line staff. If you have a safety committee they can be responsible for the tasks in part or entirely. You could also add management staff, HR staff and representatives of other major departments in your organization

Divide the workplace into several sections or areas and assign a section(s) to each member of your workgroup to inventory for hazardous substances. Provide the attached form to complete their inventory so that your list from each member has the same information.

Meet as a group once the individual inventories are compiled into one to review storage issues, training needs and your GHS compliance progress.

Final Word

Your chemical inventory can be in almost any format, but should contain the name of the hazardous chemical and the name and address of either the manufacturer or the distributor. It's also a good idea to sign and date your company's annual chemical inventory so you can determine when it was last completed.

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