HAZARD COMMUNICATION (EMPLOYEE RIGHT-TO-KNOW)

The Hazard Communication Standard (HCS) has been revised to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update to the Hazard Communication Standard (HCS) provides a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets. The primary benefit of the revisions is to provide for a uniform approach to labels and safety data sheets around the world. The secondary benefit is to simplify hazardous communication training and communication.

These changes also apply to California business as they will be incorporated into the Cal/OSHA program. In addition, California has some unique requirements, such as those imposed by Proposition 65, the Safe Drinking Water and Toxic Enforcement Act.

While the phase-in period for all the changes will take several years, it is important the businesses begin to understand and adapt the new requirements in their hazard communication program.

Employers who use hazardous chemical in the workplace must take the following action:

- Prepare and execute a written hazard communication program
- Keep a written inventory of products that contain hazardous chemicals
- Maintain and make available to employees Safety Data Sheets (formerly Material Safety Data Sheets) for all chemical on the written inventory
- Make sure all containers are properly labeled
- Conduct employee training on the provisions of the HCS

To view the effective dates of the various provisions of the HCS CLICK HERE

Labeling Requirements

By December 2013, businesses must begin training employees on the new label format. The HCS has revised the product label provision and mandates that specific information be recorded on each label. New elements include a harmonized signal word (e.g., danger), hazard pictogram within a red border, and hazard statement (e.g., highly flammable liquid).

To view and download the HCS pictograms CLICK HERE

Safety Data Sheets (formerly Material Safety Data Sheets)

The old Material Safety Data Sheet (MSDS) format was only a recommendation which manufacturers were never required to follow. Under the new GHS there is now a prescribed format for Safety Data Sheets
(SDS). Now all SDS will have to conform to a sixteen section format developed under the American National Standards Institute standard ANSI-Z 400.1.

To view the new format of the SDS CLICK HERE

Employee Training

While the GHS does not change the employee training requirements, it does change the content of the training. Employers are now required to train workers by December 1, 2013 on the new labels elements and safety data sheets format to facilitate recognition and understanding. The HCS safety training must include the following elements:

The physical hazards of chemical used in the workplace.

The health hazards of chemicals used in the workplace.

Actions workers can take to guard against physical and health hazards (e.g., personal protective equipment and workplace safety procedures).

Description of the hazardous communication program, including the location of written hazardous communication program and SDSs, how to read and use SDSs, and an explanation of chemical labeling system.

For more detailed information about the Hazard Communication program CLICK HERE