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GHS and OSHA

Past, Present & Future

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Action and Reaction - Sustainable Approach to Emerging Chemical Issues

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OSHA Occupational Safety and Health Administration

OSHA and the GHS
The past…

- Hazard Communication Std, 1983

"The development of internationally agreed standards" would provide for:

  - the broadest recognition of identified hazards
  - avoid creation of technical barriers to trade
  - reduce cost of dissemination by eliminating duplicative requirements

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OSHA and the GHS
The past…

- Hazard Communication Std, 1983

"…these regulations will be reviewed on a regular basis with regard to…similar requirements…evolving in the US and in foreign countries."

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OSHA and the GHS
The past…

Build-up to current GHS

Years of bilateral trade negotiations

1992 United Nations mandate adopted at the "Earth Summit" (UN Conference on Environ. & Developmnt.)

Negotiations over 10 years involving several international organizations

System now available for adoption

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What is the GHS???
Why is it needed???

Globally Harmonized System
of Classification and Labeling of Chemicals

- **A common and coherent approach to defining and classifying chemical hazards, and communicating information on labels and safety data sheets**
- **Proposes specific criteria for labels and safety data sheets (pictograms, signal words, hazard statements)**

It's needed because:

- **Many national systems of communication**
- **Differences impact protection and trade**
- **Reduce confusion, increase comprehension**

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Acute oral toxicity LD_{50} (mg/kg)

Organization/Country /Regulation or Standard	High 0 ----------		Hazard < 50 ----------		< 500 ----------		Low < 5,000 ------
ANSI/US/Z 129.1	< 50 Highly Toxic		> 50 < 500 Toxic		> 500 < 2,000 Harmful		
OSHA/US/HCS	< 50 Highly Toxic		> 50 < 500 Toxic				
EPA/US/FIFRA	0 ≤ 50 Toxicity Category I		> 50 ≤ 500 Toxicity Category II		> 500 ≤ 5,000 Toxicity Category III		> 5,000 Toxicity Category IV
CPSC/US/FHSA	< 50 Highly Toxic		> 50 < 5,000 Toxic				
GHS	**≤ 5**	**> 5 ≤ 50**	**> 50 ≤ 300**	**> 300 ≤ 2,000**	**> 2000 ≤ 5000**		
DOT/US	< 5 Packing Group I	> 5 < 50 Packing Group II	> 50 < 200 (solid) Packing > 50 < 500 (liquid) Group III				
NFPA/US	≤ 5 Hazard Category 4	> 5 ≤ 50 Hazard Category 3	> 50 ≤ 500 Hazard Category 2	> 500 ≤ 2,000 Hazard Category 1	> 2,000 Hazard Category 0		
NPCA/US/HMIS	≤ 1 Toxicity Rating 4	> 1 ≤ 50 Toxicity Rating 3	> 50 ≤ 500 Toxicity Rating 2	> 500 ≤ 5,000 Toxicity Rating 1		> 5,000 Toxicity Rating 0	
EU	< 25 Very Toxic	> 25 < 200 Toxic	> 200 < 2,000 Harmful				
WHMIS/Canada	≤ 50 Very Toxic WHMIS Class D, Division 1, Subdivision A		> 50 ≤ 500 Toxic WHMIS Class D, Division 1, Subdivision B				
Australia/NOHSC	< 25 Very Toxic	> 25 < 200 Toxic	> 200 < 2,000 Harmful				
Mexico	< 1 Extremely Toxic	>20<50 Highly Toxic	>50 < 500 Moderately Toxic	>500 < 5000 Mildly Toxic			
Malaysia	<25 Very Toxic		200 to 500 Harmful				
Japan	< 30 Poisonous			300 to 3000 Powerful			
Korea	< 25 Very Toxic	>50 < 200 Toxic	>200<2000 Harmful				

Label Harmonization

CARCINOGENICITY				
Category 1A	**Category 1B**	**Category 2**	-	-
				
Danger **May cause cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)	**Danger** **May cause cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)	**Warning** **Suspected of causing cancer** (*state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard*)		
Not required under the *UN Recommendations on the Transport of Dangerous Goods, Model Regulations.*				

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Pictograms

- Nine Pictograms:

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Recent Past…

- In the May 16, 2005, semi-annual regulatory agenda, OSHA indicated that it was adding modification of the Hazard Communication Standard to adopt the GHS.
- On September 12, 2006, OSHA completed the first step by publishing an advance notice of proposed rulemaking (ANPR). Comments will be accepted until November 13, 2006.

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Current Activities…

- Comment summary completed/Analyzing
- *Preparing draft regulatory text*
- *Preparing economic analysis*
- *Continue meetings with:*
  - *Other Affected Agencies*
  - *UN Subcommittee*
  - *OECD Dialogue on Hazard Classifications*
- Compliance Assistance Needs

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OSHA's Current Activities

- Represent US in the UN Subcommittee of Experts on the GHS.
  - Pilot on classification using mixtures criteria
- Coordination with other agencies:
  - We continue to participate in interagency discussions about implementation.
- Awareness raising.
  - Presentations at meetings.

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Further Information Available on: www.osha.gov

- Web page on the GHS.
- Situational analysis:
  - OSHA has had a detailed comparison completed of the HCS to the GHS.
  - The comparison is available on our web page.
- The Guide to the GHS
- Advance Notice of Proposed Rulemaking

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