OSHA adds value to business, work and life.
GHS and OSHA

*Past, Present & Future*

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OSHA, Directorate of Standards and Guidance

*Action and Reaction - Sustainable Approach to Emerging Chemical Issues*

August 9-10, 2007
“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
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.”
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
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
<table>
<thead>
<tr>
<th>Organization/Country Regulation or Standard</th>
<th>High</th>
<th>Hazard</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>≤ 50</td>
<td>&gt; 50 ≤ 300</td>
</tr>
<tr>
<td>ANS/US/OSHA</td>
<td>&lt; 30</td>
<td>Highly Toxic</td>
<td>&gt; 30 &lt; 300</td>
</tr>
<tr>
<td></td>
<td>&lt; 30</td>
<td>Highly Toxic</td>
<td>&gt; 30 &lt; 300</td>
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<tr>
<td>EPA/US/FDRA</td>
<td>0 ≤ 30</td>
<td>Toxicity Category I</td>
<td>&gt; 30 ≤ 300</td>
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<tr>
<td></td>
<td>&lt; 30</td>
<td>Toxicity Category IV</td>
<td>&gt; 30 ≤ 5,000</td>
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<tr>
<td>GHS</td>
<td></td>
<td>Toxic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>≤ 5</td>
<td>&gt; 5 ≤ 50</td>
<td>&gt; 50 ≤ 300</td>
</tr>
<tr>
<td></td>
<td>&lt; 5</td>
<td>Packing Group I</td>
<td>&gt; 5 &lt; 50</td>
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<tr>
<td></td>
<td>≤ 5</td>
<td>Hazard Category 1</td>
<td>&gt; 5 ≤ 50</td>
</tr>
<tr>
<td></td>
<td>≤ 1</td>
<td>Toxicity Rating 1</td>
<td>&gt; 1 &lt; 5</td>
</tr>
<tr>
<td></td>
<td>&lt; 25</td>
<td>Very Toxic</td>
<td>&gt; 25 &lt; 200</td>
</tr>
<tr>
<td></td>
<td>≤ 30</td>
<td>Very Toxic</td>
<td>&gt; 30 &lt; 300</td>
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<tr>
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<td>&lt; 25</td>
<td>Very Toxic</td>
<td>&gt; 25 &lt; 200</td>
</tr>
<tr>
<td></td>
<td>&lt; 1</td>
<td>Extremely Toxic</td>
<td>&gt; 20 &lt; 30</td>
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<tr>
<td></td>
<td>&lt; 25</td>
<td>Very Toxic</td>
<td>200 to 500</td>
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<td></td>
<td>&lt; 30</td>
<td>Poisonous</td>
<td>300 to 300</td>
</tr>
<tr>
<td></td>
<td>&lt; 25</td>
<td>Very Toxic</td>
<td>&gt; 30 &lt; 200</td>
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</table>
# CARCINOGENICITY

<table>
<thead>
<tr>
<th>Category 1A</th>
<th>Category 1B</th>
<th>Category 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Danger</td>
<td>Danger</td>
<td>Warning</td>
</tr>
<tr>
<td>May cause cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)</td>
<td>May cause cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)</td>
<td>Suspected of causing cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)</td>
</tr>
<tr>
<td>Not required under the UN Recommendations on the Transport of Dangerous Goods, Model Regulations.</td>
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Pictograms

• Nine Pictograms:
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.
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*
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.
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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