Why We Decided to Retain and Combine the Z400.1 and Z129.1 Standards
... and to Begin Now

ACC-ANSI Work Group
Open Meeting

October 15, 2008
Arlington, VA
Agenda

- Introductions     Dave Peters
- The ANSI process  Susan Blanco
- The standards     Anne Stieffenofer
- Why combine them  Ed Bisinger
- Proposed structure Catherine Croke
- Timeline          Dave Peters
- Question/Answers  All
The ANSI process

- American National Standards Institute (ANSI)
  - Does not develop standards
  - Provides framework for development and approval of voluntary consensus standards
- The American Chemistry Council (ACC) is the ANSI accredited standards developer (sponsor) for the Z400.1 and Z129.1 standards
The ANSI process

- ACC is responsible for maintaining the standards by updating them as necessary on a 5-year cycle
- We achieve consensus by using ANSI’s Accredited Canvass Method
- Final approval by ANSI Board of Standards Review
ANSI’s Canvass method

- ACC develops list of potential canvassees by identifying organizations having an interest in the standard
- These organizations are contacted and invited to participate in the canvass in one of three categories: “Producer” “User” “General interest”
- The canvass list includes all who agree to participate
ANSI’s Canvass method

- The revised standard is sent to the canvass list for ballot and comment
- All written comments are considered
- Standard is submitted to ANSI for approval
- To be approved by ANSI, the revised standard must receive positive votes from a majority of the canvass list and at least 2/3 of those voting on the revision, excluding abstentions
The ANSI Z400.1 Standard

- Provides guidance to MSDS Preparers:
  - To develop consistent, understandable MSDSs, providing useful information to a variety of audiences
  - Companion to ANSI Z129.1 Labeling Standard
- Originally developed as a CMA Guideline in early 1990’s
  - Approved as a consensus standard by ANSI in 1993
  - Revised in 1998 and 2004
  - Due for revision in 2009
The ANSI Z129.1 Standard

- Provides guidance to Label Preparers:
  - Establishes sound principles and guidelines for the preparation of precautionary labeling for hazardous industrial chemicals
  - Companion to ANSI Z400.1 MSDS Standard
- Originally developed from “A Guide for the Preparation of Warning Labels for Hazardous Chemicals” or Manual L-1; 1945
  - 6 revisions
  - Converted to an ANSI Standard; 1976
  - Due for revision in 2011
Timeline

- **September, 2007 - First meeting**
  - An exploratory group met to decide our path forward
    - Do we combine the standards?
    - Do we incorporate GHS?
    - Do we wait to see what OSHA does?

- **November, 2007**
  - Decided to combine standards
  - Model GHS without including classification
Who we were

The exploratory team

Co-Chairs

David Peters, Monsanto
Edwin Bisinger, AkzoNobel
Catherine Croke, RohMax
Mike Hulse, Shell
Donna Newhouse, Huntsman
Frank Rudy, Air Products

Anne Stieffenhofe, 3M
Jayne Clifton, Huntsman
Suzanne Hignet, PPG
Larry Klein, DuPont
Debra Randall, Arkema
Brian Zoretich, Lubrizol

Susan Blanco, ACC Staff
Why combine the standards

- Will provide SDS and label preparers with a unified, systematic approach similar to that of the HazCom Standard
- It will be a more robust standard that is consistent because there is only one document versus two
- Updates to one combined standard will be more easily managed and can follow GHS updates more uniformly as they occur
Why combine the standards

- Consistent examples (such as an SDS and labels for the same product using the same data)
- Most users of the standards use both standards together
- The difference in content between the two standards is somewhat contrived
  - Has been a source of confusion for users
- Easier to use and cheaper for the user
Why now

- If we did nothing now, we would have significantly more work when GHS is eventually in place in the United States
- We would likely have to revise both ANSI standards to incorporate GHS at the same time
- If we begin work on further incorporating the GHS into the new combined ANSI Standard, we will support GHS implementation in the United States
- We have a strong group available in 2008
  - If we wait 1-2 years, prospect of losing some key members
Who we are

- The ACC ANSI Work Group is an ad hoc committee under the American Chemistry Council’s (ACC) Health, Product & Science Policy Team
- The work group is composed of representatives of 16 member companies of the ACC
- The group includes toxicologists, product stewardship managers, and hazard communication experts
Who we are

Co-Chairs

David Peters, Monsanto
Edwin Bisinger, AkzoNobel
Karen Brooks, Dow
Jayne Clifton, Huntsman
Jennifer Ungvarsky, LANXESS
Suzanne Hignet, PPG
Debra Randall, Arkema
Sandra Schmidt, Sartomer
Sheryl Small, Sasol
Anne Stieffenofer, 3M
C. Bringer-Guerin, Sartomer
Trish Bruen, Air Products
Catherine Croke, RohMax
Janice Gadiare, Evonik
Donna Newhouse, Huntsman
Robin Ruppel-Kerr, Bayer
Matt Sczepanski, Dow
David Gasper, DuPont
Brian Zoretich, Lubrizol

Susan Blanco, ACC Staff
Z400.1 + Z129.1 =

- Working title

Z400.1 + Z129.1 =

- More than just reformatting

- Modeled on the GHS by incorporating classification, SDS preparation and labeling

- Does not adopt GHS classification and pictograms until regulatory action by OSHA
Proposed structure

- Structure based on how we work
  - Gather information
  - Perform the assessment
  - Write /review the safety data sheet
  - Write /review the labeling/label
  - Check for consistency
Proposed structure

- Introduction and Scope of the Standard
  - Introduction of the previous standards
  - Scope
- Purpose
- Application
- Audience
- Content and organization
Proposed structure

- Hazard evaluation
  - Definition of a hazard
  - Collecting the information
  - Determining hazards
Proposed structure

- Hazard evaluation
  - Physical hazards
  - Definition of a physical hazard
  - Physical hazard criteria
  - Physical hazard evaluation
  - Sources of information
  - Statements of physical hazards
Proposed structure

- Hazard evaluation
  - Health hazards
  - Definition of a health hazard
  - Health hazard criteria
  - Health hazard evaluation
  - Sources of information
  - Statements of health hazards
Proposed structure

- Hazard evaluation
  - Environmental hazards
  - Definition of an environmental hazard
  - Environmental hazard criteria
  - Environmental hazard evaluation
  - Sources of information
  - Statements of environmental hazards
Proposed structure

- Tables of precautionary statements
  - Physical hazards
  - Health hazards:
    - Skin corrosion/irritation
    - Eye corrosion/irritation
    - Respiratory irritation
    - Sensitization
    - Inhalation toxicity
    - Dermal toxicity
    - Oral toxicity
      - Additional statements
      - Additional environmental hazard statements
Proposed structure

- Effective communication principles
- Safety data sheets
  - SDS principles
  - SDS organization
  - SDS section by section
- Precautionary labeling
  - Labeling principles
  - Elements of a label
  - Preparing precautionary labeling
- Evaluation of documents
Proposed structure

- References
- Annexes
  - Annex A: Examples of labels and SDSs
  - Annex B: Glossary
  - Annex C: Background: The GHS
  - Annex D: Preparation resources document
Timeline

- **2008**
  - Broke into sub-groups to combine sections of the documents that are redundant and to work on inconsistencies
  - Met with CSB and OSHA regarding combustible dusts
  - Met with CSB regarding static accumulators
  - Open meeting
- ??? – What is OSHA going to do with GHS? What is OSHA’s timeline?
Timeline

2009
- March - April
  - Submit draft to canvass
- May - June
  - Canvass response and vote
- July - September
  - Reply to written responses
- November - December
  - Submit for approval and publication
Questions

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