

Crawling to adopt global hazcom unity

UN-backed standard progresses slowly in U.S.

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The world of hazard communication faces one of the most far-reaching initiatives for change: the Globally Harmonized System (GHS). Developed by the United Nations to improve international trade efficiency for hazardous materials by coming up with a standardized method of hazard communication, GHS encompasses three critical areas: classification of materials, labeling of containers and Safety Data Sheets (SDSs).

Some nations have already adopted the system, and over the next few years we expect to see partial compliance in most countries around the world. While the UN hoped implementation would be complete by 2008, this date has been overly optimistic for North America.

The current version of GHS will take a three-pronged approach. It will:

- 1. Assign chemicals to hazard classes, based on physical, health and environmental hazards.

- 2. Require warning labels for materials classed as hazardous.

- 3. Require SDSs detailing hazards and recommended safe handling and emergency procedures. The SDSs, similar to current Material Safety Data Sheets (MSDSs) that follow the standard by the American National Standards Institute (ANSI), must contain 16 sections.

Countries may implement all requirements at one time or piecemeal. The system may also be implemented in certain sectors (for example, industrial health and safety) before others (such as consumer products).

Worldwide GHS status

The United States, although officially committed to implementing GHS, has not yet developed any draft legislation for implementation. The state of preparation depends on the agencies involved, with estimated time frames between 2008 and 2012.

OSHA has taken the first steps toward

implementation, issuing an Advanced Notice of Proposed Rulemaking (ANPR) on September 12, 2006. OSHA has also prepared a comparison between OSHA and GHS hazard communication. OSHA officials are scheduled to be in Geneva at a GHS forum in December of this year.

EPA has prepared a white paper outlining its initial thinking on how the GHS might be applied to pesticide labels.

The Consumer Product Safety Commission (CPSC) has indicated that it is studying how to best introduce GHS with respect to the Federal Hazardous Substances Act (FHSA); however, it is concerned about differences in labeling philosophy. CPSC endorses "risk-based labeling," which addresses the likelihood that a product may cause harm. GHS uses "hazard-based labeling," which assigns warnings based on the presence of hazardous materials, without calculating the degree of risk due to form, concentration, or other factors.

The U.S. Department of Transportation (DOT) has implemented GHS revisions to the classification scheme in the Hazardous Materials Regulations of 49 CFR. Hazard communication under that regulation should not change significantly — the biggest future concern will be with the classification of environmental hazards.

On the world stage, individual countries are proceeding at various speeds. In June 2007, the European Union adopted a proposed version of GHS, the "Proposal for a Regulation of the European Parliament and of the Council on classification, labeling and packaging of substances and mixtures, and amending Directive 67/548/EEC and Regulation (EC) No 1907/2006."

This proposal includes a number of variations from GHS, making the system far less "harmonized" than initially proposed by the UN. For example, it will incorporate some hazards not yet addressed by GHS, such as ozone-depleting chemicals, but deregulate certain other hazards. This regulation has been tied in with the environmental regula-

tion called REACH, and stipulates that it should start to be implemented for pure chemicals by November 10, 2010, and for mixtures by June 1, 2015.

In Asia, most countries are looking at some implementation at least by the end of this year.

Japan has already implemented GHS for about 100 chemicals, expected to be expanded to around 650 more by December, 2008. A manual for classifying 1,500 chemicals under GHS criteria has been published, although this is described as a guidance document only. Japan has published national standards for labels and SDSs, but only the one on SDSs is currently available in English.

China is currently studying GHS, with proposed implementation by the end of 2008, but no specific details are available yet.

Most South Asian countries have committed to adopt GHS by the end of 2008.

If you manufacture products that might be regulated by GHS, be prepared for change. Unfortunately, the various phase-in periods by individual countries means that we will not soon see across-the-board adoption of GHS.

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