Post-GHS

Safety Data Sheet acceptance in North America and Europe

by Toni-Ann McLean

"Every SDS in Canada, the United States and around the world will have to be changed to accommodate the GHS."

The Globally Harmonized System of Classification and Labelling (GHS) began in 1992 at the United Nations Conference on Environment and Development (UNCED). In 2011, the GHS has now been implemented in several countries around the world, including in Japan, China, New Zealand and the European Union (EU), and in others, is about to be implemented. In the US, for example, proposed changes to the current Hazard Communication Standard have been published and a final rule is expected out in the fall of this year.

Currently, the Occupational Safety and Health Administration (OSHA) in the US emphasizes flexibility to meet the needs of both suppliers and users. Therefore, OSHA allows suppliers to prepare Material Safety Data Sheets (MSDSs) in various formats, as long as the minimum required content appears in the MSDS. Similarly, in Canada, Health Canada also permits some flexibility and allows suppliers to prepare MSDSs in various formats (nine headings or 16 headings); again, as long as the minimum required content appears in the MSDS. In contrast to Canada and the U.S., however, the EU has only permitted the use of a 16 heading format Safety Data Sheet (SDS) for several years now and will continue to do so, post-GHS.

The question now for an SDS author in the U.S. or Canada is, will my one, single SDS be accepted in Canada, the United States and the EU, once the GHS becomes law in the US and Canada? In short, yes it will be... but there are still some important points to consider.

The GHS system requires SDSs to be in a 16-heading format, which has been based on the SDS Standard recommended by the International Labour Organization (ILO). All three regions of the world, post-GHS, will require a 16 section GHS-style safety data sheet (SDS), once the GHS becomes law in each region.

Inconsistencies or issues for an SDS will be in how specific sections of the SDS are treated in each region. In the US and Canada, some sections will be identified as not falling under the jurisdiction of OSHA or Health Canada (e.g., Section 14 will fall under the jurisdiction of the US Department of Transport and Transport Canada, Section 12 will fall under the jurisdiction of the US Environmental Protection Agency and Environment Canada). The content of those sections, therefore, will not be mandatory and will likely be highly variable in format. In the EU, however, every section of an SDS is required and has mandatory minimum information that must appear in each section. For an SDS author then, every section of an SDS must be extensively reviewed, even those not mandatory, in order for the SDS to be accepted in all three regions.

Other considerations are in some differing information requirements (i.e., US OSHA and ACGIH exposure limits vs. EU Member Country exposure limits), hazard classification differences (e.g., US proposed "Simple asphyxiant" hazard class is not currently regulated by the EU), and other more minor considerations such as units of measure (i.e., Farenheit vs. Celsius).

Every SDS in Canada, the United States and around the world will have to be changed to accommodate the GHS. However, the light at the end of the tunnel is in the fact that all regions will be adopting the exact same general format, and a single SDS will be possible, if a little longer. The same base set of hazard criteria will be used, the same base set of hazard symbols will be used and terminology will more closely match between the three regions than it has in the past. **HMM**

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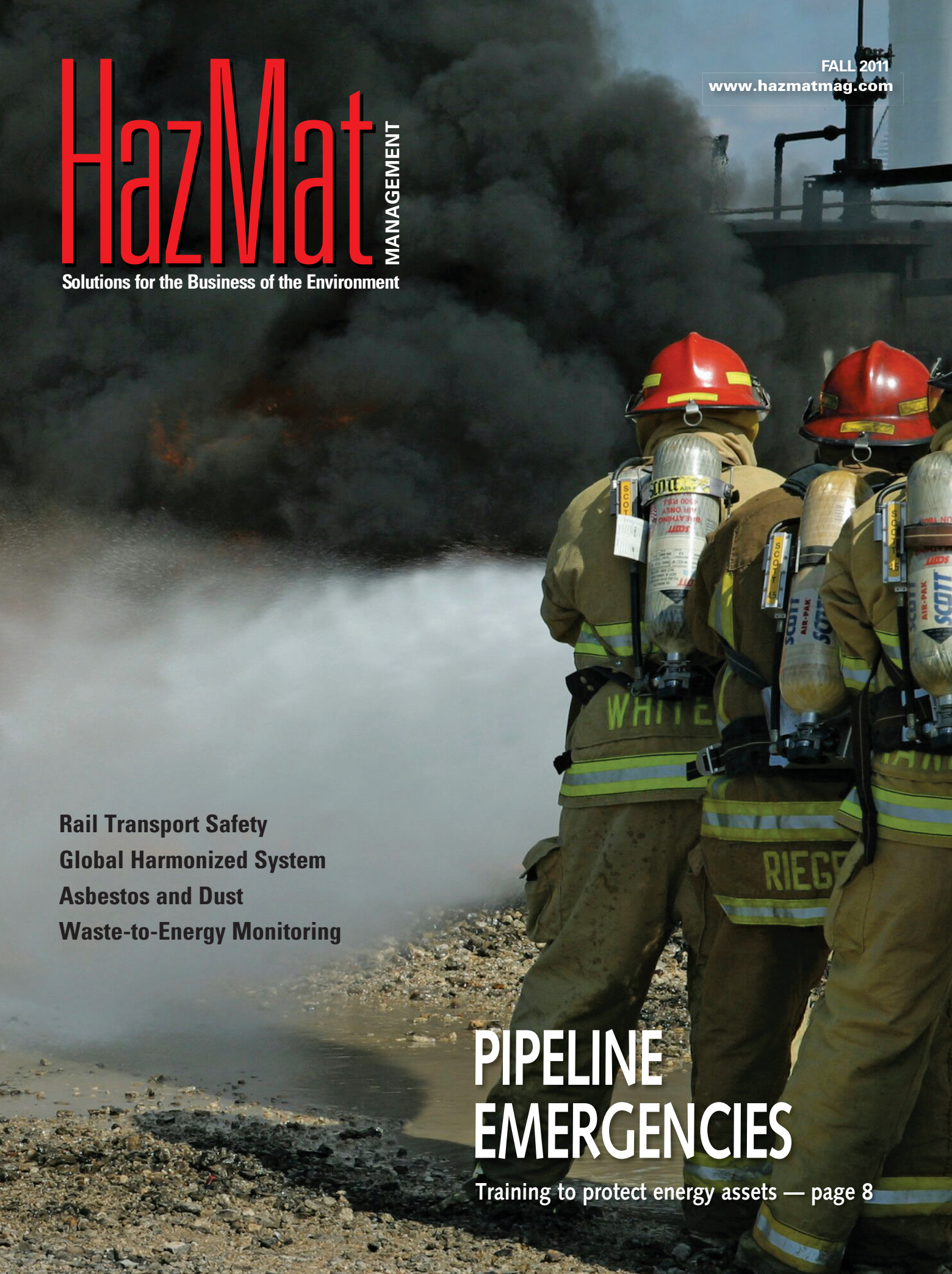

Rail Transport Safety
Global Harmonized System
Asbestos and Dust
Waste-to-Energy Monitoring

PIPELINE EMERGENCIES

Training to protect energy assets — page 8