

## OSHA Publishes HazCom Guidance on New Labeling and Training Requirements

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Andrew C. Brought

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Employers subject to OSHA's Hazard Communication Standard (HazCom), **29 CFR 1910.1200**, should already be well aware of the **major changes pending to OSHA's HazCom Standard** as a result of revisions in 2012. While compliance with the technical aspects do not take effect until June 1, 2015, employers must train employees on the new labeling requirements and format for Safety Data Sheets by no later than December 1, 2013. In an effort to assist employers with that training and in understanding the new labeling and pictogram requirements, OSHA recently published guidance materials in February 2013 on the new HazCom labeling and training requirements.

OSHA's **Fact Sheet on the training requirements** specifies that training must include:

- The type of information an employee will encounter on new labels (e.g., product identifier, signal word, pictogram, hazard statement, precautionary statement(s), and contact information);
- How an employee might use labels in the workplace;
- The general understanding of how the elements on the label work together;
- The format of Safety Data Sheets; and
- The interrelationship between information on a label and the Safety Data Sheets.

OSHA has also issued **recent guidance on the Labeling and Pictogram requirements**. The guidance provides detail on the type of information that must be included on labels and employers' responsibilities pertaining to the labels.

By way of background, the HazCom Standard requires employers to develop a HazCom Program that adequately communicates and trains workers exposed to hazardous chemicals in the workplace, including requirements such as container labeling. The HazCom Standard also requires chemical manufacturers and importers to convey hazard information through development of material safety data sheets (MSDS).

In March 2012, OSHA enacted new regulations as part of a 324-page **final rule** so as to modify the HazCom Standard to conform to the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS), 77 Fed. Reg. 17,574 (March 26, 2012). Major changes to the HazCom Standard include the following:

- Safety Data Sheets – No longer known as MSDS, SDS will have a standardized 16-section format;
- Labels – Every label will be required to have a hazard statement, a Pictogram, signal words (such as "danger" for more severe hazards, and "warning" for less severe hazards), and a precautionary statement; and
- Hazard Classification – The revised HazCom Standard will have specific criteria for each health and physical hazard and also addresses mixtures.