

# Update on the OSHA HCS and the UN GHS

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# OSHA's Hazard Communication Standard

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- 1970 – recommendation for Department of Labor to promulgate regulation requiring employers to inform workers of hazardous workplace chemicals
- 1983 – OSHA promulgated first Hazard Communication Standard
  - Updated again in 1994
- 2012 – aligned OSHA HCS with UN GHS revision 3
  - Became known as the “right to understand”
- 2021 – proposed to align with UN GHS revision 7
  - Including expanded use of non-animal test methods (rev. 8)
  - Updated precautionary statements
  - New hazard classes

# Hazard communication in the workplace

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- Implementation of hazard communication has been a game changer in the workplace
- There is a tremendous amount of science underpinning effective hazard communication
  - Identify hazard
    - Toxicology, epidemiology, ecotoxicology, physical sciences
  - Communicate hazard
    - Behavioral science, psychology, education, communication

# Concepts within the Updated HCS and GHS

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- Hazard communication should be “evergreen”
  - Updates based in large part on learnings from implementation
- Occupational behavior science and education are key components to hazard communication
- Aggregate exposures are important factors in identifying and communicating hazards
  - Leads to better risk assessment and management
- Hazard communication is a key element of an overarching EHS strategy and is fundamental to Occupational Safety and Health

# Purpose for Updating the HCS

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- The update to the HCS was proposed to improve and enhance worker protection through:
  - Providing additional clarification of existing regulatory requirements
  - Incorporating new hazard classes and categories
  - Improving and streamlining precautionary statements
  - Facilitating international trade through increased alignment

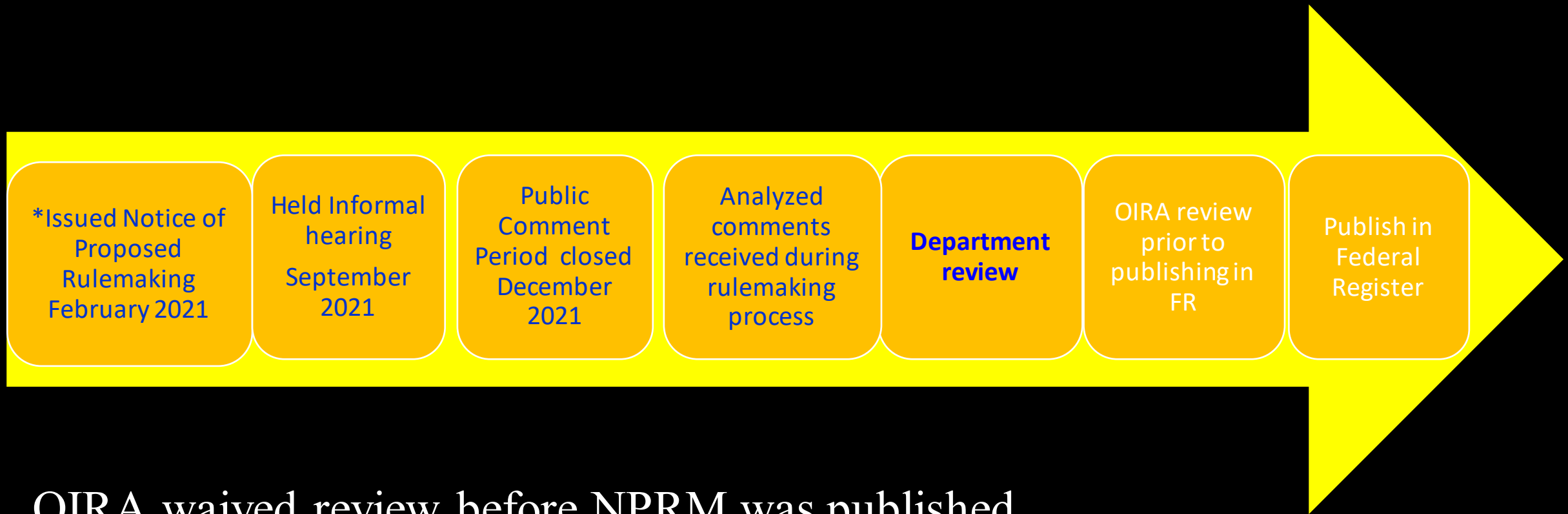
# Principles & Assumptions

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The final rule will maintain the same basic framework of the HCS

- Chemical manufacturers and importers are responsible for providing information about the identities and hazards of chemicals they produce or import
- All employers with hazardous chemicals in their workplaces are required to have a hazard communication program, and provide information to employees about their hazards and associated protective measures

# Rulemaking Process and Timeline



OIRA waived review before NPRM was published

<https://www.reginfo.gov/public/do/eoPackageMain>

# Update of UN GHS Activities

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- Potential hazard issues
- Non-animal test methods
- Germ cell
- Annex 1-3
- Global lists
- Combination of physical hazards
- Explosives
- Practical labelling issues
- Practical classification issues
- Hazards to the atmospheric systems
- New items
  - Flammable vapors in headspace
  - Should/shall/may/must



Questions????