



Revision to Hazcom Standard

Maureen Ruskin

SCHC Fall Meeting, 2020





Intellectual Property Statement

The material contained in this presentation is the work of expert(s) selected by the Program Committee of SCHC and is intended solely for the purpose of professional development and continuing education. Material in an SCHC-sponsored presentation does not constitute a recommendation or endorsement of any kind. This material is believed to accurately represent current regulatory requirements and industry standards for hazard communication. However, SCHC cannot guarantee the accuracy or completeness of this information. Users are responsible for determining the suitability and appropriateness of these materials for any particular application.



SCHC Fall 2020

OSHA GHS/HCS Update

**Maureen Ruskin
Deputy Director
Directorate of Standards
and Guidance**



Overview

- UN Subcommittee Update
 - Modified sessions
 - 2019/2020 Programme of Work
- OSHA Update

UN Sub-Committee



UN Subcommittee Meeting

- July Session – informal
 - UN provided an online platform for comments on all papers
 - US provided comments
 - UN sponsored an informal meeting to aid delegates to further progress of the programme of work
 - Chapter 2.1
 - Definition of physical hazard (ST/SG/AC.10/C.4/2020/11/Add.1- (Germany) Deletion of definitions for physical hazard classes in chapter 1.2 of the GHS)
 - Decision Logics

Un Subcommittee Meeting

- December 2020 - 39th session
 - Will convene a hybrid meeting December 9-11th
 - Informal sessions
 - Three formal sessions (2 hours each session)
 - Confirming decision taken in 2019
 - Finalizing (to the extent possible) proposals for the 39th session
 - Programme of work for the 2021/22 biennium
 - Election of officers
 - Draft resolution

2019-2020 Biennium Program of work

- Review of Chapter 2.1 (Explosives) of the GHS
- Use of non-animal testing methods for classification of health hazards
- Practical classification issues
- Aspiration hazard
- Nanomaterials
- Simultaneous classification in physical hazard classes and precedence of hazards
- Practical labeling issues
- Chemical Lists
- Improvement of Annexes 1 to 3 and further rationalization of precautionary statements
- Review of Annex 4, sub-section A4.3.3.2.3

Chapter 2.1

Programme of Work 2019-2020

Item	Task
1	Finalise the criteria for the new system
2	Assign appropriate hazard communication elements and Precautionary statements
3	Draft a new GHS Chapter 2.1 and review the Manual for associated amendments needed
4	Propose a new Chapter 2.1 for inclusion in the 9:th revised edition of the GHS, and the associated changes to the Manual

Practical Classification Issues

- Five additional examples ready for subcommittee adoption
 - Example 1: illustrates the criteria in 3.8.1.1 and 3.8.1.6 that a substance should not be classified into the specific target organ toxicity - single exposure hazard class when the target organ effect(s), following a single exposure, are serious adverse health effects (i.e., lethality) meeting the acute toxicity hazard classification criteria.
 - Example 2: illustrates the criteria in 3.8.1.1 and 3.8.1.6 when a substance can be classified into both the Specific Target Organ Toxicity – Single Exposure hazard class, for non-lethal effects, and Acute Toxicity hazard class, for lethal effects.
 - Example 3: illustrates the criteria in 3.9.1.1 and 3.9.1.6 that a substance can be classified into both Specific Target Organ Toxicity – Repeated Exposure hazard class, for non-lethal effects, and into the Acute Toxicity hazard class, for lethal effects.
 - Example 4: illustrates the criteria in 3.9.1.1 and 3.9.1.6 that a substance can be classified into both specific target organ toxicity – repeated exposure hazard class, for non-lethal effects, and into the acute toxicity hazard class, for lethal effects.
 - Example 5: illustrates the interpretation of the criteria in 3.9.1.1 and 3.9.1.6 and 3.8.1.1 and 3.8.1.6 regarding simultaneous classification into specific target organ toxicity – repeated exposure hazard class, specific target organ toxicity – single exposure hazard class and into the acute toxicity hazard class, for lethal effects or not.

Annex 1 to 3

- Proposed changes to Annex 3 to prevent substances/mixtures classified as causing serious eye damage or eye irritation being transferred from the hand to the eye
 - focus area (a): “to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners.”
- Corrections and amendments to Annex 3, sections 2 and 3

Non- Animal Testing

- Workstream 1
 - To review and revise Chapter 3.3, Serious Eye Damage, Eye Irritation, following as appropriate the work already done on Chapter 3.2.
 - Specific issue of classification using pH
- Workstream 2
 - To review and revise Chapter 3.4 in regard to skin sensitisation.
- Workstream 3
 - To consider whether updates are needed in Chapter 1.3 as a result of the group's work.

Other proposals up for adoption

- Physical Hazard Definitions
- Decision Logics
- Workplace labelling: clarification of 1.4.10.5.5.1
 - **Option 3 (a):**
 - “Decanted chemicals intended for immediate use could be labelled with the main **components ingredients** and directly refer the user to the supplier label information and SDS.”
 - **Option 3 (b):**
 - “Decanted chemicals intended for immediate use could be labelled with the **components product identifier** and directly refer the user to the supplier label information and SDS.”

UN Sub-Committee

- Program of Work
 - December 2018 Report pages 20-22
 - <https://www.unece.org/fileadmin/DAM/trans/doc/2018/dgac10c4/ST-SG-AC10-C4-72e.pdf>
- Link to UN website
 - https://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html
- Stakeholder meeting November 19th
- Next UN meeting: December 9-11

Purpose of Future HCS Rulemaking

- Maintain alignment with GHS
 - Hazard Classifications
 - Updates to the precautionary statements
- Address issues identified during implementation of HCS 2012
- Identify issues of concern for those complying with WHMIS 2015