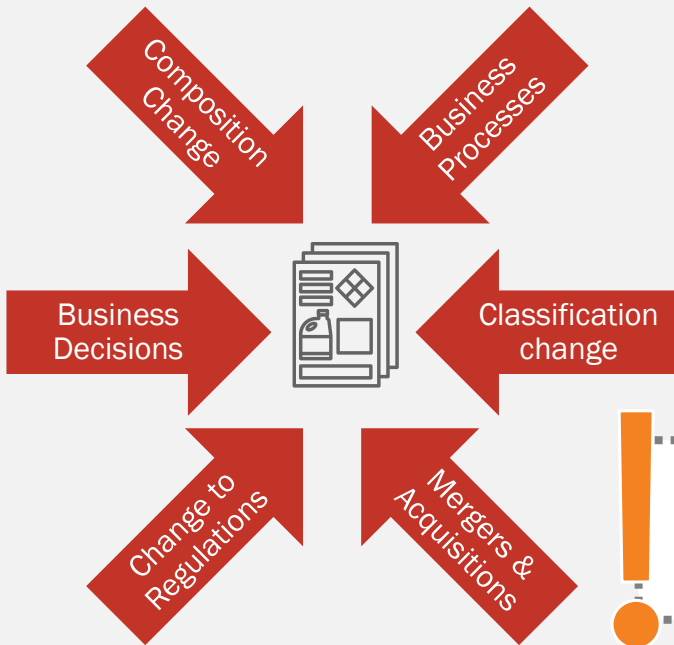


SDS Updates and the Impact on the Workplace

Abstract: Typically, we view and discuss Safety Data Sheets through the lens of the manufacturer, distributor, or importer. However, when making these changes have you ever considered how the change impacts the employers in the workplace? We all know that there are specific regulatory obligations which require SDSs to be authored as well as updated but there are other factors which influence a manufacturers' decision to create and or update an SDS. These decisions impact the workplace in many ways. This poster will explore: Regulatory requirements for manufacturers regarding updating SDSs; Employer requirements in the workplace for maintaining SDSs; Discuss various factors that drive manufacturers to update SDSs; How SDS updates impact employers and the workplace; Common misconceptions in the workplace regarding SDS update requirements

Factors that drive SDS Updates for Manufacturers, Importers, Distributors



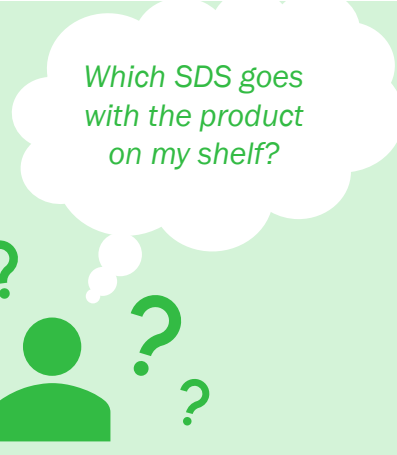
To save money on the cost of authoring SDSs, businesses may combine multiple SDSs into one SDS.

In other cases, because of criteria and classifications, products that might have been on a single SDS are split into many and similar materials appear on the same SDS.

Many times, authoring is independent of product packaging, the SDS is created and then the label and the product are packaged—leading to differences in product identification.

Authoring SDSs does not equal SDS management and decisions made in the authoring process impact how SDSs are being managed in the workplace. Associating incorrect SDSs to products by employers can lead to incorrect hazard, safety and compliance information for employees in the workplace.

Employer Perspective: Factors in the real world

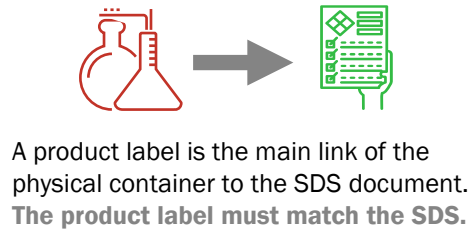


KEY TAKEAWAYS

- Employers are required to maintain the SDS received from the mfr. This means SDSs may not have GHS hazards or classifications on them if the SDS was obtained prior to June 1, 2015 or if the mfr. went out of business before June 1, 2015.
- Mfrs. are not required to update their SDSs every 'x' years – only to update SDSs when a change to the product has been made or when new hazard information has become available.
- Regulatory mandated SDS updates make up a small percentage of reasons why a mfr. may choose to update their SDSs.
- Mfrs. need to ensure product labels match the SDS generated for their products as this is the main link between the product in the workplace and the SDS it corresponds to. A failure to do so could result in workplace safety or compliance issues.

Mfr. Regulatory Requirements

- Create SDS documents for hazardous products
- Update them when/if the product changes or new hazard information becomes available
- Send SDS with first shipment or when an SDS has been updated
- Product Label **must** match SDS



Employer Regulatory Requirements

- Maintain SDS received
- Obtain SDS if one is not received with a shipment
- Train employees on hazard information and how to access SDSs