Hazard Communication and the Globally Harmonized System (GHS)

Cal/OSHA revised the Hazard Communication Standard (HCS) found in Title 8 of the California Code of Regulations (T8CCR), Section 5194 to align with the Globally Harmonized System (GHS) of classification and labeling of chemicals. The key changes in the Hazard Communication Standard affect both chemical suppliers (manufacturers, importers, distributors) and employers whose employees may be exposed to hazardous chemicals.

GHS is an international approach that standardizes chemical hazard classification, labeling and safety data sheets. For more information visit OSHA’s GHS website at www.osha.gov/dsg/hazcom/ghs.html.

### Effective Completion Date

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Responsibility</th>
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<tbody>
<tr>
<td><strong>December 1, 2013</strong></td>
<td>Train employees on the label elements and safety data sheet (SDS) format.</td>
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<tr>
<td><strong>June 1, 2015</strong></td>
<td>Compliance with all modified provisions of T8CCR 5194 including all GHS label requirements except:</td>
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<tr>
<td><strong>December 1, 2015</strong></td>
<td>Until December 1, distributors may ship containers with non-GHS labels if received from suppliers prior to June 1, 2015.</td>
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<td><strong>June 1, 2016</strong></td>
<td>Update any alternative workplace labeling used under section 5194(f)(6), update the hazard communication program required by section 5194(h)(1), and provide any additional employee training in accordance with section 5194(h)(3) for chemicals with newly identified physical or health hazards.</td>
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<tr>
<td><strong>Transition period to the effective completion dates noted above</strong></td>
<td>May comply with either section 5194 revised as of July 6, 2004, or the current version of this standard, or both during the transition period, per the above effective completion dates.</td>
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</table>

### Required Product Label Elements

Suppliers must develop new product labels that include signal words, pictograms, hazard statements, and precautionary statements for chemicals based on their hazard classification and category. Employers must ensure that employees understand the meaning of each of these elements on the new labels.
New Hazard Classification Requirements

The revision to the HCS requires suppliers to use the same classification criteria for each type of health and physical hazard as required by GHS. Detailed instructions for evaluation, classification, categorization of the hazards and use of label elements are provided in the mandatory Appendices A, B, C, D, and F of the standard (T8CCR 5194).

Safety Data Sheets Format

Safety data sheets (SDS) have replaced material safety datasheets (MSDS). Suppliers now must prepare safety data sheets for their products that follow a standardized 16-section format in conveying information about a hazardous chemical’s health effects and physical and chemical characteristics.

Written Hazard Communication Program

As before, it remains the employer’s responsibility to develop and implement a written hazard communication (HAZCOM) program, which includes a list of hazardous chemicals known to be present, container labels, safety data sheets, and employee information and training. Safety data sheets must be immediately available to employees.

New Employee Training Requirements

New requirements include training on the meaning of the new label elements, the new safety data sheet format, and any newly identified physical or health hazards.

All employers must continue to provide information and training to their employees about the hazardous chemicals the employees may be exposed to in the workplace. The information and training must be provided at the time of their initial assignment and whenever a new chemical hazard is introduced.

Additional Information

- Additional Cal/OSHA standards were affected as a result of GHS adoption. For more information visit the Cal/OSHA Standards Boards website at [www.dir.ca.gov/oshsb/oshsb.html](http://www.dir.ca.gov/oshsb/oshsb.html)
- Key resources and training materials are found at the Federal OSHA’s Hazard Communication website at: [www.osha.gov/dsg/hazcom/index.html](http://www.osha.gov/dsg/hazcom/index.html)

Contacting Cal/OSHA Consultation Services

Publications:  [www.dir.ca.gov/dosh/PubOrder.asp](http://www.dir.ca.gov/dosh/PubOrder.asp)  
Consultation Programs:  [www.dir.ca.gov/dosh/consultation.html](http://www.dir.ca.gov/dosh/consultation.html)  
Toll-free Number: 1-800-963-9424

Onsite Assistance Program Area Offices:

- Central Valley: 559-454-1295
- San Diego/Imperial: 619-767-2060
- No. California: 916 263-0704
- San Bernardino: 909-383-4567
- SF/Bay Area: 510-622-2891
- San Fernando Valley: 818-901-5754
- La Palma/LA/Orange: 714-562-5525

This document is not meant to be either a substitute for or a legal interpretation of the occupational safety and health regulations. Readers shall refer directly to Title 8 of the California Code of Regulations and the Labor Code for detailed information regarding the regulation’s scope, specifications, and exceptions and for other requirements that may be applicable to their operations.