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www.motomco.com

Manufacturing & Sales:

3699 Kinsman Blvd.

Madison, WI 53704

(800) 418-9242

FAX (608) 241-9631

Transitioning to the New GHS SDS System

While the primary compliance load of the transition to GHS belongs to the chemical manufacturers and distributors, employers have a few key obligations related to SDSs of which they need to be aware.

Most importantly, employers should make sure they understand the 4 key compliance deadlines established under HazCom 2012:

- **December 1, 2013** – Employers must train employees on how to read GHS formatted labels and SDSs. Changes to labels are probably more substantial, however, employees need to understand where to find information on the SDS, especially in Section 2 where critical hazard information (Hazards Identification) is located.
- **June 1, 2015** – Chemical manufacturers and distributors should have completed their reclassification of chemicals and be shipping GHS formatted SDSs and labels with their shipments. By this date a majority of your library should be composed of the new SDSs.
- **December 1, 2015** – Distributors have an additional 6 months beyond the June 1, 2015 date to pass along manufacturer labels and SDSs in the older formats. However, beyond December 1, 2015, all SDSs and labels in the U.S. must adhere to HazCom 2012 guidelines.
- **June 1, 2016** – Employers should be fully compliant with HazCom 2012. Compliance includes making any necessary updates to HazCom programs, training employees on any newly identified chemical hazards, and updating safety data sheets libraries and secondary labels.

Considering the deadlines, one key obligation that employers have is that incoming SDSs will need to be checked against older MSDSs to see if there are any new hazards or precautions. It is likely that by the end of the transition, some of the chemicals that your employees have used for years, and upon which they have already been trained, will have new hazards or changes to the handling requirements that will require updated training. OSHA requires employees to be trained on all of the hazards of the chemicals to which they are exposed.

It is suggested that you have a system in place for catching new changes to safety data sheets. For example:

1. Have a designated employee in charge of the transition to GHS
2. Make sure your employees, especially those on the front lines in procurement and the loading dock (where MSDSs are likely to first enter the facility), are on the lookout for updated SDSs
3. When a new safety data sheet comes in – have a system in place for comparing it to the earlier version, making note of any relevant changes
4. Plan/execute training
5. Update your MSDS library / archive old MSDS

Please see <https://www.osha.gov/dsg/hazcom/index.html> for more information

Reference: MSDSONline