



How Will GHS Affect You?

By Ruth Mayo, Regulatory Compliance Specialist
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Regulatory compliance is a major concern for all of us and this is an especially revolutionary time in terms of environmental health and safety compliance. The adoption of the Globally Harmonized System (GHS) is the hot topic of discussion, both domestically and internationally. SiteHawk recently attended the American Society of Safety Engineers (ASSE) hosted teleconference discussing the United State's role in this adoption process. Jennifer Silk with OSHA and Mary Frances Lowe with the EPA participated in the teleconference. Discussions included which aspects of GHS would potentially be implemented into their respective preexisting legal and regulatory frameworks, as well as the appropriate time-frame companies should be allowed to comply with the new standards.

The conference representatives reported that, after lengthy negotiation processes amongst agency representatives and labor and industry stakeholders, it was agreed that the benefits far outweigh the short term setbacks when adopting the GHS standard. Domestic benefits include: clear, consistent label messages across sectors through harmonization of signal words, pictograms, and hazard warnings; better workplace protection; and the reduction of costs associated with preparation of labels and (material) safety data sheets by classifying chemicals once, for all agencies. Internationally, GHS will enhance protection of humans and the environment, facilitate international trade in chemicals, reduce the need for

duplicate testing and evaluation, and assist countries and international organizations in the sound management of chemicals.

In the United States GHS adoption is definitive. The question is not if, but how and when. In 2004 EPA provided a White Paper (<http://www.epa.gov/oppfead1/international/globalharmon.htm>) describing how the GHS might be applied to pesticides in the US. On September 12, 2006, OSHA completed the first step in GHS implementation by publishing an advance notice of proposed rulemaking (ANPR http://www.osha.gov/pls/oshaweb/owadis.p.show_document?p_table=FEDERAL_REG_ISTER&p_id=18890). The DOT has the fewest changes to make as they are already harmonized with the international transport system. Rulemaking associated with GHS is expected to be completed by 2008, with the timeframe for industry implementation still to be determined.

Preparation is the best prescription for prevention – do not be caught unprepared for the inevitable changes related to GHS. Contact your SiteHawk® Regulatory Product Specialist, Ruth Mayo (rmayo@sitehawk.com or 615.459.0064x19) with questions and to better understand how SiteHawk® can assist in preparing you and your company for the GHS revolution.

For more information on OSHA and EPA's GHS implementation plans please visit their websites at:

<http://www.osha.gov/SLTC/hazardcommunications/global.html> or
<http://www.epa.gov>

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