

# OSHA Hazard Communication Standard

## Worker Health & Safety



### Issue Summary

The Hazard Communication Standard (HCS) ensures chemical safety in the workplace by requiring chemical manufacturers to provide information through labels, safety data sheets, and training to employees about hazardous chemicals they may be exposed to.

In April 2021, OSHA proposed an update to the HCS to conform with the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS revision 7), which serves as the international approach to hazard communication.

The proposed rulemaking sets forth the following revisions to the standard:

- Beneficial updates to the rules on small package labeling
- Flexibility for chemicals released for distribution
- Flexibility for labeling of bulk shipments
- Problematic CBI-compromising concentration ranges
- Modifications to the Hazard Classification Requirements which will be difficult if not impossible to adhere to



## Business Impact on the Chemical Industry

New labelling requirements will have economic impacts on specialty chemical manufacturers, by requiring companies to develop new labels for products. The rule will also provide beneficial flexibility for labelling of small packages, bulk shipments and chemicals already released for distribution.

## Current Status

In late 2022, OSHA moved the proposed updates to HCS to its short-term regulatory agenda, indicating that the rule will likely be finalized by late 2023/early 2024. SOCMA will continue to track the issue and advocate in support of modifications that continue to ensure worker health and safety standards, including recommendations that benefit North American specialty chemical manufacturers.

## SOCMA Activity

- **June 2021:** Educated OSHA on aspects of the rule that have unintended consequences such as trade secrets and classification requirements.
- **May 2021:** Submitted formal comments during the rulemaking process.
- **September 2021:** Provided written testimony for OSHA Informal Public Hearing.
- **December 2021:** Joined Council of Chemical Association Executives [coalition letter](#) to OSHA and DOL advocating for changes to the Safety Data Sheets (SDS) requirements under the proposed rule.
- **March 2022:** Lobbied OSHA on the positive benefits the rule would provide regarding small package labelling.
- **March 2023:** Educated OSHA on aspects of the problematic aspects of the rulemaking.

## SOCMA's Goal

SOCMA supports inclusion of provisions on small package labeling, flexibility for chemicals released for distribution, labeling for bulk shipments, and extended compliance dates, and the exclusion of CBI-compromising concentration ranges and modification of Hazard Classification Requirements in the final HCS rule.