Final Rule Modifying the HCS to Maintain Alignment with the GHS

OSHA has updated its Hazard Communication Standard (HCS) to primarily align with Revision 7 of the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The final rule was published on May 20, 2024, with an effective date of July 19, 2024.

The f nal rule updates the criteria for several health and physical hazard classes to provide better information to employees. It also contains revised provisions for labeling small containers and the relabeling of chemicals that have been released for shipment; amendments

They include updated hazard classes and categories, improved readability of the required information on the label, and additional guidance for hazard classif cation, including the use of alternative test methods. Similar to our major trading partners such as the European Union and Canada, OSHA is primarily aligning with Revision 7 of the GHS. This f nal rule also addresses implementation issues arising since 2012 and better coordinates with other federal agencies' requirements (e.g., EPA, DOT).

OSHA's major changes to the HCS

Hazard classification

- Health Hazards (Appendix A)
 - Updated skin corrosion/irritation and serious eye damage/eye irritation chapters

 small packages (100 ml or less) including very small packages (3 ml or less)

Safety Data Sheets: Updated sections 2, 3, 9 and 11. With this revised standard, OSHA f nalized the use of prescribed concentration ranges when an ingredient's concentration is withheld as a trade secret.

Dates: The f nal HCS is effective on July 19, 2024 and includes a multi-year tiered transition period (see below).

Compliance Dates and Requirements

C a ce Da e	Retri∡e e ()	Wh
18 months after effective date	Update labels and SDSs for substances	Chemical manufacturers, importers, distributors and employers
24 months after effective date	Update workplace labels, hazard communication program and training as necessary	Employers

C ' a ce Da e	Retri∡e e ()	Wh
36 months after effective date		