

# Employer Readiness: Do I Need to Update My OSHA Hazcom Program?

**Does my Hazcom program already meet the GHS standards provided in the revised Hazcom, including detailed hazard determination, classification and response?**



If so, your compliance with new requirements will consist of deciding how and when to transition the supplemental information and training you presently provide to match your suppliers' changeovers from MSDSs to SDSs.

**Have I asked my chemical suppliers when they will replace their MSDSs with SDSs?**



Suppliers have until June 1, 2015, to convert to SDSs, but may do so as early as May 25, 2012. A supplier who already ships products to countries that require GHS standards may want to use SDSs as soon as possible. Be sure you're ready for the new information when it enters your workplace.

**Have I asked my chemical suppliers when they will update their labeling?**



You may receive containers with the new labeling as early as May 25, 2012, and all suppliers must use it by December 1, 2015. Your workers need to be ready to understand what they'll be seeing on the containers they handle.

**Have I scheduled revisions to my Hazcom training program?**



Your training must reflect the revised HCS no later than December 1, 2013. But keep in mind that if you wait that long, your training won't address actual labeling and safety information if any supplier provides SDSs and/or updates labeling before then.

**Have I scheduled revisions to my workplace labeling scheme?**



If your workers take chemicals out of shipping containers for workplace use (such as workstation spray bottles), you must ensure that the labels on your workplace containers meet the revised Hazcom requirements no later than June 1, 2016.