



CIRSA COMPLIANCE ALERT

Published by the CIRSA Loss Control Department

Your Partner in Risk Management

Globally Harmonized Systems - Chemical Labeling

The Globally Harmonized System (GHS) of chemical labeling will soon be affecting Colorado. Although Colorado public entities are not legally bound by the standard, we will see labels, packaging, and Safety Data Sheets (SDS), formerly Material Safety Data Sheets (MSDS), changing in the very near future.

It is important to recognize the new labeling format and pictograms, understand the changes to the new safety data sheets, and provide adequate training for affected employees. Below is the timeline for implementation, as well as compliance dates for the manufacturers, importers, distributors, and employers.

December 1, 2013 – It is recommended for entities to have all affected employees trained on the new label and SDS elements by this date. ***Private sector employers are required to meet this deadline.***

CIRSA Note: This is relevant since many manufacturers have already started complying as new labels and new safety data sheets may already be showing up in the workplace.

June 1, 2015 – Manufacturers, importers, distributors and employers must meet all regulatory provisions with one exception for distributors, as listed below.

December 1, 2015 – Distributors must be in full compliance and ship all products with GHS compliant labels by this date.

CIRSA Note: While the June and December 2015 dates do not directly affect public entities, be advised that some will comply, and therefore, a mixture of old labeling and new labeling, as well as old MSDS and new SDS, may already exist and/or arrive from vendors until this compliance date is reached.

June 1, 2016 – It is recommended for all public entities to update their internal labeling requirements and provide any additional training requirements set forth within the standard. ***Private sector employers are required to meet this deadline.***

CIRSA Note: This primarily affects laboratories, fleet, public works and parks settings, or any other facility where bulk chemicals/materials are purchased and then transferred to unlabeled containers for use.

Recommended compliance can be achieved by watching CIRSA's previously recorded GHS Webinar, and/or by requesting CIRSA's new GHS training package. External resources may also be used.

