Chemicals and the GHS... don't let your business be left behind



A new international system of chemical classification and labelling is on the way and it will affect any business in Australia that manufactures, buys, sells or uses hazardous chemicals – does your business fall into this category? **Bronwyn Capanna**, executive director of Accord, explains.

If you work with hazardous chemicals you need to get on board now with changes that will be in force by 31 December 2016.

GHS stands for Globally Harmonised System of Classification and Labelling of Chemicals. It replaces

the current Approved Criteria for Classifying Hazardous Substances [NOHSC:1008(2004)] and the Australian code for its labelling.

Initiated by the United Nations, GHS aims to facilitate ready identification of chemicals by the hazards that they pose. It also aims to internationally standardise chemical classification, labelling, and safety data sheets (SDS) in the workplace. Some of Australia's largest trading partners including Japan, China, Korea, Malaysia, New Zealand, the EU, Canada and the US have already adopted or are in the process of adopting GHS.

The move to GHS affects the way information on chemicals is communicated.

This includes changes to classifications of the chemicals themselves - GHS is hazard-based rather than risk-based and covers whole of lifecycle from manufacture to disposal.

There are also changes to the language and organisation of labels SDS - GHS has new signal words, hazard statements and precautionary statements advising on safely handling, disposal and storage.

Perhaps the most noticeable change will be the pictograms. There are now nine diamonds surrounded by a red border, with two new symbols for those that affect human health and one for environmental hazards.

Many Australian businesses have been preparing for the transition well in advance of 31 December 2016 deadline and are already GHS-ready.

But quite a few Australian businesses are unaware that GHS applies to them – and that significant preparation will be required to ensure compliance by the deadline.

What do you need to do?

All chemical manufacturers and suppliers (including importers) are responsible for relabelling and replacing SDS for all chemicals that meet the GHS criteria. This includes all product for sale as well as all existing NOHSC labelled stock to be retained beyond 31 December 2016.

All workplaces must ensure that any new purchases of hazardous chemicals beyond 31 December 2016 have GHS-compliant labels and SDS. Any existing NOHSC labelled stock requires relabelling and a new SDS.

Prior to relabelling and replacing SDS, the first step is to determine the correct chemical classification according to the GHS Third Edition. As you will appreciate, reclassification, relabelling and rewriting

SDS can be a complex and time-consuming process.

Some tips to get on top of GHS if you are a chemical manufacturer, supplier, or work with hazardous chemicals:

- Identify deadlines and plan ahead. An implementation schedule to 31 December 2016 may be helpful.
- Conduct an inventory of all your chemicals. You may wish to identify inactive products to eliminate unnecessary workload, and to source GHS-compliant products now or reconsider purchase quantities to avoid the need to relabel later.
- · Assess your readiness. You will need to check labels and stock and decide whether to keep and relabel, or dispose of/sell.
 - Start transition. You will need to prepare new labels and SDS or obtain these from the manufacturer/supplier; review the new SDS to identify new hazards that may require operational changes; update your systems; and train your workers on the new labels and SDS.

Accord has held free training sessions to assist our members in the introduction of GHS. We also provide regular updates via our monthly regulatory bulletins, and our in-house

> GHS experts are available to members for assistance with specific GHS matters.

Accord is also seeking an extension to the 31 December 2016 deadline for GHS implementation for complex mixture products.

Currently the deadline applies to both single substance chemical raw material suppliers and to formulators of complex mixture products. We are arguing that a staged deadline will allow time for downstream companies to receive and use GHS

classification information provided by their upstream raw materials suppliers. This is in line with arrangements made in other advanced markets overseas.

However, we advise all manufacturers, suppliers and users of chemicals to prepare for 31 December 2016 – is your business ready? Accord is the national industry association for manufacturers and suppliers of all types of cleaning, hygiene, disinfectant and specialised products for use in commercial, institutional and industrial applications

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