

TOOLBOX TALK #5

SAFETY DATA SHEETS

The Hazard Communication Standard (HCS) is commonly referred to as the “right-to-know” standard because it states that employees have a need and a right to know about the chemicals they encounter in the workplace.

Recently, OSHA revised this standard to align with the United Nations’ Globally Harmonized System of Classification and Labeling of Chemicals, also known as GHS. GHS presents a worldwide, standardized approach to hazard communication by defining requirements for chemical classification and labeling. In addition, GHS prescribes a consistent format for Safety Data Sheets, previously known as Material Safety Data Sheets.

The 1994 Hazard Communication Standard set a performance-based approach to SDSs, specifying guidelines to follow but not requiring a specific format. With the adoption of the revised standard (HCS 2012) comes a shift to a standardized structure for SDSs.

New uniform format

Under HCS 2012, SDSs must be in a uniform format that includes at least the required section numbers, headings and related information outlined in GHS. The intent is to create consistency and promote a more worker-friendly, harmonized format.



With minor alterations, the adopted structure follows the voluntary standard established by the American National Standards Institute for a 16-section SDS.

However, OSHA considers sections 12-15 to be non-mandatory because the information they contain falls outside the Agency’s jurisdiction. Although OSHA will not enforce these sections,

they are included in Appendix D of HCS 2012 to show what information a fully GHS-compliant SDS would need to include.

Unchanged expectations

Despite the changes involving SDSs, some provisions from HCS 1994 remain the same in the revised standard, and the responsibility of employers to ensure SDS accessibility is one of them:

- Employers must have an SDS in the workplace for each hazardous chemical used.
- Employers must make SDSs readily available to employees in their work areas and during their shifts.
- Employers must provide SDSs in English.

OSHA recommends that employers either maintain physical SDS copies in binders or make them available on a computer. Either way, the important thing is that they must be immediately available to employees in their work areas. Employers should also establish procedures to ensure SDSs remain current.