

OSHA's HazCom Clock Is Ticking: What Employers Must Do by November 20

By Mini Kapoor, Ph.D., Jonathan Keller | October 23, 2026

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OSHA revised its Hazard Communication (“HazCom”) Standard, 29 C.F.R. § 1910.1200, on May 20, 2024, and provided a series of deadlines for compliance with the revised requirements. The next deadline falls on Nov. 20, 2026, when employers must update their workplace labels, written hazard communication program and employee training, as necessary, to reflect the new classifications for substances. Mixtures follow on a later track, with supplier obligations due Nov. 19, 2027 and employer obligations due May 19, 2028.

Among other revisions, the rule adds desensitized explosives as a new hazard class, expands the aerosols class to cover non-flammable aerosols and chemicals under pressure, divides flammable gases into two categories, revises the criteria for skin and eye hazards, and sets new labeling rules for containers holding 100 milliliters or less. It also requires classifiers to account for hazards from a change in a chemical’s physical form and from reaction products tied to known or reasonably anticipated uses.

This alert summarizes what the Nov. 20 deadline requires and the steps employers should take before it arrives.

HazCom requires every employer whose workers may be exposed to hazardous chemicals to learn what hazards those chemicals present and to pass that information down to employees. To that end, employers must (i) label the containers in their own workplaces, (ii) maintain a written program describing how they manage chemical hazards, and (iii) train employees to recognize and protect against those hazards. HazCom ranked second on OSHA’s list of most frequently cited standards in fiscal year 2025.

HazCom reaches general industry, construction, shipyards, marine terminals and longshoring. It applies to any hazardous chemical present in the workplace that employees may be exposed to under normal use or in a foreseeable emergency. That captures ordinary materials such as solvents, paints, acids, fuels, adhesives, compressed gases and cleaning products. The new aerosols and chemicals under pressure categories reach common items like spray adhesives, aerosol lubricants and pressurized cleaning foams, so some products an employer has treated as routine now carry hazard classifications and label elements they did not carry before. Retail-purchased products are no exception, unless the employer can show both that it uses the product for its intended purpose and that employee exposure matches what a consumer would experience.

Any employer whose workers may be exposed to hazardous chemicals, including employers that only use or store them, should be prepared to comply with the following by the Nov. 20 deadline.

1. Reconcile the chemical inventory against the updated safety data sheets and labels suppliers were required to issue by May 19, 2026. Request anything still outstanding, and flag every substance whose hazard classification, signal word, pictograms or precautionary statements

changed. Confirm that the safety data sheets remain accessible to employees on every shift in their work areas.

2. Update workplace labeling under paragraph (f)(6) of the revised standard. Each container in the workplace must carry either the full information from the shipped container label or the product identifier plus words, pictures or symbols that convey the hazards. Employers that rely on signs, placards, process sheets, batch tickets, or operating procedures in place of labels on individual stationary process containers must revise those materials and keep them accessible in the work area throughout each shift. In-house rating systems such as HMIS or NFPA still have to convey the current hazard information.
3. Revise the written hazard communication program required by paragraph (h)(1). The program must list the hazardous chemicals present using a product identifier that cross-references the label and the safety data sheet, describe the labeling and safety data sheet procedures the workplace follows, and explain how employees learn the hazards of non-routine tasks and of chemicals in unlabeled pipes. Employers that produce, use or store hazardous chemicals where another employer's workers may be exposed must also address how they share hazard information on multi-employer sites. A generic template will not satisfy the requirement, because the program must describe actual practice.
4. Train employees under paragraph (h)(3) on any newly identified physical, health or other hazards. Training must cover the methods and observations used to detect a release, the hazards themselves, the protective measures available, including work practices, emergency procedures, personal protective equipment, and an explanation of the labels and safety data sheets employees will encounter. Distributing written materials alone does not meet the requirement. The standard does not prescribe recordkeeping, but documenting the date, content and attendance may be a practical way to demonstrate compliance during an inspection.

Employers covered by an OSHA-approved state plan should confirm their state's adoption, because some state plans have set different compliance dates.