

# New Guidance for OSHA Hazardous Communication Standard

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May 5, 2016

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PRACTICES OSHA, Labor and Employment

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OSHA has issued guidance related to the new Hazard Communication Standard.<sup>1</sup> On June 1, 2016, all employers are mandated to update their hazard communication programs and train their workforces as necessary on the updated system per the last implementation deadline of the new standard. The new guidance is in the form of a 432-page document titled “Hazard Classification Guidance for Manufacturers, Employers, and Importers” and a 32-page draft document titled “Guidance on Data Evaluation for Weight of Evidence Determination.”<sup>2</sup>

The purpose of the hazard classification guidance is to aid manufacturers and importers of chemicals in identifying chemical hazards, classifying chemicals as hazardous as necessary, and determining the degree of the hazard as appropriate, which all feeds into the hazard information displayed on chemical SDSs and labels. The document includes a detailed discussion of the different types of classifications of health and physical hazards along with classification procedures and guidance for each type. The draft weight of evidence guidance is intended to help employers in conducting a weight of evidence evaluation under the Hazard Communication Standard in order to assess the potential hazards of a chemical and determine what information must be disclosed on the chemical’s label and SDS under the standard. Comments on this draft guidance are due by May 2, 2016.

The primary group affected by this new guidance will likely be consulting firms and organizations who aid chemical manufacturers and importers in crafting their hazardous chemical policies and completing hazard identifications. A senior consultant from one such organization suggested that although the guidance won’t contain many surprises, it will help to clarify existing guidance and correct misinformation.

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<sup>1</sup> 29 CFR § 1910.1200. See Haynes Boone’s prior alert discussing the changes to OSHA’s Hazard Communication Standard, [Think Globally, Act Locally \(in Your Workplace\): Changes to OSHA’s Hazard Communication Standard](#).

<sup>2</sup> [Hazard Classification Guidance for Manufacturers, Employers, and Importers. Guidance on Data Evaluation for Weight of Evidence Determination](#) is open for public comment until May 2, 2016.