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Hazard Communication Standard Update

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2026 AAOHN NATIONAL CONFERENCE

Disclosures

- **Accreditation statement:** The American Association of Occupational Health Nurses (AAOHN) is accredited as a provider of nursing continuing professional development by the American Nurses Credentialing Center's Commission on Accreditation
- **Contact hours:** .75
- **Successful completion:** Complete evaluation
- **Disclosures:** None of the planners or presenter for this activity have any relevant financial relationship to disclose with ineligible companies
- **Note:** The opinions expressed in this presentation are my own and not necessarily those ot AAOHN or any other organization

Objectives

- Know the timelines for Hazard Communication Standard changes to align with GHS revision 7
- State at least one change to Appendix A - Health Hazards
- Identify at least one change to Physical Hazards

Hazard Communication Standard (HCS)

Did you know?

- May 20, 2024 - OSHA published
  - HCS to align with the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS) Revision 7 with some revisions from Revision 8
- October 9, 2024 - HCS corrected based on errors noted
- January 15, 2026 – HCS implementation timelines extended 4 mos
  - OSHA needed time to publish necessary guidance materials for regulated community to review before revised HCS provisions take effect

HCS Updated Timeline 1.15.26

Compliance Date	Requirement(s)	Who
JMay 19, 2026	Update labels and SDSs for substances	Chemical manufacturers, importers, distributors, and employers
November19, 2026	Update workplace labels, hazard communication program, and training for substances	Employers
November 19, 2027	Update labels and SDSs for mixtures	Chemical manufacturers, importers, distributors, and employers
May 19, 2028	Update workplace labels, hazard communication program, and training for mixtures	Employers

Key Changes to HCS

1. Maintaining alignment with the GHS (primarily Rev. 7) and U.S. trading partners (including Health Canada's WHMIS)
    - Paragraph (f)(12) – small packages
        - Updates include 3 ml and 100 ml container special labelling provisions
    - Paragraph (i) – trade secrets
    - Updates include mandatory use of prescribed concentration ranges when exact percentages or percentage ranges of materials are claimed as a trade secret
    - Appendix A (health hazards) updates align primarily with revised health hazard definitions and general updates to hazard classes in GHS Rev. 7
        - Updates include, but not limited to, Skin corrosion/irritation and Serious eye damage/eye irritation chapters, with non-animal test methods from Rev. 8 added to skin corrosion/irritation to promote use of alternative methods

Key Changes to HCS (cnt'd)

- Appendix B (physical hazards) updates align primarily with Rev. 7 and include, but not limited to, Flammable gases (expanding hazard categories), Desensitized explosives, and Aerosols (including additional hazard category)
- Appendix C (label elements) updates align primarily with Rev. 7 and include new or updated hazards, updated guidance, and precautionary statements
- Appendix D (SDS) updates align primarily with Rev. 7 and include revisions to SDS Sections 2, 3, 9, and 11

Key Changes to HCS (cnt'd)

2. Addressing issues identified during 2012 implementation update
   - Paragraph (d)(1) – hazard classification - clarifies which hazards must be evaluated and hazard information required on label versus SDS
   - Paragraph (f)(11) – labels - adds flexibility for package label updates released for shipment
   - Paragraph (f)(12) – labels - clarifies small package labeling requirements
3. Improving alignment/coordination with other U.S. agencies
   - Paragraph (f)(5) – bulk shipment - provides increased coordination with DOT
   - Paragraph (c) released for shipment definition – aligns with EPA

Table A.2.1: Skin corrosion category and subcategories

	Criteria
Category 1	Destruction of skin tissue, namely, visible necrosis through the epidermis and into the dermis, in at least one tested animal after exposure ≤ 4 h
Sub-category 1A	Corrosive responses in at least one animal following exposure ≤ 3 min during an observation period ≤ 1 h
Sub-category 1B	Corrosive responses in at least one animal following exposure > 3 min and ≤ 1 h and observations ≤ 14 days
Sub-category 1C	Corrosive responses in at least one animal after exposures > 1 h and ≤ 4 h and observations ≤ 14 days

Note: All regulated as Category 1

Table A.2.2—Skin irritation category

	Criteria
Irritant (Category 2)	(1) Mean ~~value~~ score of ≥ 2.3 ≤ 4.0 for erythema/eschar or for edema in at least 2 of 3 tested animals from gradings at 24, 48 and 72 hours after patch removal or, if reactions are delayed, from grades on 3 consecutive days after the onset of skin reactions; or (2) Inflammation that persists to the end of the observation period normally 14 days in at least 2 animals, particularly taking into account alopecia (limited area), hyperkeratosis, hyperplasia, and scaling; or (3) In some cases where there is pronounced variability of response among animals, with very distinctive positive effects related to chemical exposure in a single animal but less than the criteria above.

Table A.3.1: Serious eye damage/Irreversible effects on the eye category

	Criteria
Category 1: Serious eye damage/Irreversible effects on the eye	A substance that produces: (a) in at least one animal effects on the cornea, iris or conjunctiva that are not expected to reverse or have not fully reversed within an observation period of normally 21 days; and/or (b) in at least 2 of 3 tested animals, a positive response of: (i) corneal opacity ≥ 3; and/or (ii) iritis > 1.5; calculated as the mean scores following grading at 24, 48 and 72 hours after instillation of the test material.

Table A.3.2: Reversible effects on the eye categories

	Criteria
	Substances that have the potential to induce reversible eye irritation
Category 2/2A	Substances that produce in at least 2 of 3 tested animals a positive response of: (a) corneal opacity ≥ 1; and/or (b) iritis ≥ 1; and/or (c) conjunctival redness ≥ 2; and/or (d) conjunctival oedema (chemosis) ≥ 2 calculated as the mean scores following grading at 24, 48 and 72 hours after instillation of the test material, and which fully reverses within an observation period of normally 21 days.
Category 2B	Within Category 2A an eye irritant is considered mildly irritating to eyes (Category 2B) when the effects listed above are fully reversible within 7 days of observation.

Figure A.3.1 Tiered Evaluation for serious eye damage and eye irritation

Step	Parameter	Finding	Conclusion
1a:	Existing human or animal serious eye damage/eye irritation data [a] →	Serious eye damage	Category 1
	↘	Eye irritant →	Category 2[b]
	↓ Negative data/Insufficient data/No data ↓		
1b:	Existing human or animal data, skin corrosion →	Skin corrosion	Category 1
	↓ Negative data/Insufficient data/No data ↓		
1c:	Existing human or animal serious eye damage/eye irritation data [a] →	Existing data showing that substance does not cause serious eye damage or eye irritation	Not classified
	↓ No/Insufficient data ↓		
2:	Other, existing skin/eye data in animals [c] →	Yes, other existing data showing that substance may cause serious eye damage	Category 1 [b]
	↘	Yes, other existing data → showing that substance may cause ~~or~~ eye irritation	Category 2[b]
	↓ No/Insufficient data ↓		

a) Existing human or animal data could be derived from single or repeated exposure(s), for example in occupational, consumer, transport, or emergency response scenarios; or from purposely-generated data from animal studies conducted according to validated and internationally accepted test methods. Although human data from accident or poison center databases can provide evidence for classification, absence of incidents is not itself evidence for no classification as exposures are generally unknown or uncertain

Table B.2.1: Criteria for flammable gases

Category			Criteria
1A	Flammable gas		Gases, which at 20 °C (68 ºF) and a standard pressure of 101.3 kPa (14.7 psi): (a) are ignitable when in a mixture of 13% or less by volume in air; or (b) have a flammable range with air of at least 12 percentage points regardless of the lower flammability limit, unless data show they meet the criteria for Category 1B.
	Pyrophoric gas		Flammable gases that ignite spontaneously in air at a temperature of 54 ºC (130 ºF) or below.
	Chemically unstable gas	A	Flammable gases which are chemically unstable at 20 °C (68 ºF) and a standard pressure of 101.3 kPa (14.7 psi).
		B	Flammable gases which are chemically unstable at a temperature greater than 20 °C (68 ºF) and/or a pressure greater than 101.3 kPa (14.7 psi).
1B	Flammable gas		Gases which meet the flammability criteria for Category 1A, but which are not pyrophoric, nor chemically unstable, and which have at least either: a lower flammability limit of more than 6% by volume in air; or a fundamental burning velocity of less than 10 cm/s.
2	Flammable gas		Gases, other than those of Category 1A or 1B, which, at 20 °C (68 ºF) and a standard pressure of 101.3 kPa (14.7 psi), have a flammable range while mixed in air.

NOTE 1: Aerosols and chemicals under pressure should not be classified as flammable gases. See B.3.

NOTE 2: In the absence of data allowing classification into Category 1B, a flammable gas that meets the criteria for Category 1A shall be classified by default in Category 1A.

NOTE 3: Spontaneous ignition for pyrophoric gases is not always immediate, and there maybe a delay.

NOTE 4: In the absence of data on its pyrophoricity, a flammable gas mixture shall be classified as a pyrophoric gas if it contains more than 1% (by volume) of pyrophoric component(s).

Figure C.1 – Hazard Symbols and Classes

Flame	Flame Over Circle	Exclamation Mark	Exploding Bomb
 Flammables Self Reactives Pyrophorics Self-heating Emits Flammable Gas Organic Peroxides Desensitized Explosives	 Oxidizers	 Irritant Dermal Sensitizer Acute Toxicity(harmful) Narcotic Effects Respiratory Tract Irritation HNOC (non-mandatory)	 Explosives Self Reactives Organic Peroxides
Corrosion	**Gas Cylinder**	**Health Hazard**	**Skull and Crossbones**
 Corrosives	 Gases Under Pressure Chemicals Under Pressure	 Carcinogen Respiratory Sensitizer Reproductive Toxicity Target Organ Toxicity Mutagenicity Aspiration Toxicity	 Acute Toxicity (severe)

Resources

OSHA – www.osha.gov

- HCS 2024 Compliance date extension notice: www.osha.gov/hazcom/rulemaking/extension
- HCS 2024 Redline Strikeout document: https://www.osha.gov/sites/default/files/HCS_Redline_RegText_Appendice_Jan13_2026_508compliant.pdf
- HCS Update - Questions & Answers: www.osha.gov/sites/default/files/HCS_Q-and-As.pdf