



FREQUENTLY ASKED QUESTIONS

GLOBALLY HARMONIZED SYSTEM (GHS)

This document provides an explanation of the label and MSDS changes that you will be seeing as a result of OSHA's (Occupational Safety and Health Administration) adoption of Globally Harmonized System (GHS) provisions. This document also addresses our overall rebranding efforts. The Environmental, Health and Safety group (EH&S) within Euclid Chemical has been working on this program for the past 12 months in order to meet the June 1, 2015 government-imposed deadline. It is important to note that formulations have not changed, only the label design and content along with SDS content.

These requirements are for the United States and Canada, which recently adopted GHS.

The Q&A format provides explanations to the most often asked questions. **If you still have questions after reading this document, please call or email Jason Bungard in the Cleveland office (800-321-7628).**

WHAT DOES GHS STAND FOR AND WHAT IS IT?

GHS stands for the United Nations Economic Commission for Europe's (UNECE) "Globally Harmonized System of Classification and Labeling of Chemicals". It is a standardized (harmonized) way of evaluating and communicating the hazards posed by chemical substances and blends of chemical substances and introduces standardized content and format to Safety Data Sheets and labels.

WHY DOES GHS APPLY TO US?

The Occupational Safety and Health Administration has amended their Hazard Communication Standard (often referred to as HazCom) to reflect GHS requirements. **The HazCom standard changes are primarily confined to the sections concerning Safety Data Sheets and labels, while the rest of the standard has remained basically unchanged.** The amended HazCom standard will require us to modify all of our existing MSDSs and product labels. Canada is also working on amending their WHMIS standard to include the GHS provisions.

WHAT CHANGES WILL WE BE SEEING?

There are a number of changes that you will be seeing. These will include:

- Material Safety Data Sheets (MSDSs) will now be called Safety Data Sheets (SDSs).
- A 16-section format SDS will be required with each section containing specific information. It should be noted that Euclid has used a 16-section format for many years now.
- Labels will need to include: Product identification, manufacturer information, pictogram(s), signal word, hazard statements and precautionary statements. Euclid has always included this type of information on our product labels (except for the GHS pictograms), but the wording of the hazard and precautionary statements will change to match the verbiage required by the standard.
- We will be taking advantage of the GHS packaging change to rebrand all of our packaging to match the new corporate design.



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WHAT WILL THE LABEL CHANGES LOOK LIKE?

Overall Design - The new packaging will have a sleek design, uniform appearance and incorporates the new company logo. In addition to the GHS format, each label will contain 3 languages (English, French and Spanish) and a QR code which is linked to the product Technical Data Sheet that provides Instructions for Use.

GHS Information - The layout of the label is still up to the manufacturer so each company's label will continue to have a unique look. We will be maintaining the 'hashed' border around the signal word and hazard and precautionary statements due to the Canadian WHMIS regulation.

Instructions - Water content and material thickness text will remain on the label while spacing requirements will cause the removal of the detailed mixing instructions. The most current instructions will continue to be updated on the company web site. The attached page is an example an updated label.

WHEN ARE THE LABEL AND SDS CHANGES REQUIRED TO BE COMPLETE?

OSHA HazCom implementation deadlines for SDSs and labels are:

June 1, 2015 – SDSs and product labels leaving the site of manufacturer need to comply with the updated standard.

December 1, 2015 – All products in distribution must have the updated labeling.

WHAT IS EUCLID DOING?

We have been actively engaged in a number of areas during the past year to address the changes to the HazCom standard. Activities have included:

- Working with the SAP team to upgrade the SAP EHS module to incorporate the new classification system and to automatically create new SDSs and label wording.
- Manually classifying products and developing new label information.
- Updating preprinted packaging artwork to include the updated information.
- Contacting suppliers to ensure they are providing us with the information that we need to ensure proper product classifications.

WHEN WILL WE START SEEING THE PACKAGING CHANGES?

Packaging changes have been made already for some of the higher volume sale, pre-printed lithographed packaging. Use of the new labels will occur as we deplete our current stock of bags, pails, cans, cartridges, and boxes.

Print-on Demand labels and private label products are being modified to meet the GHS requirements as well.

We will transition to the new design over time, especially with the lower sales volume products. Plain white labels may be necessary to be placed over pre-printed labels on a temporary basis.

WHEN WILL THE NEW SDS FORMAT BE AVAILABLE?

The updated SAP EHS module is projected to become active in March. Updated SDSs will be available shortly thereafter.

