Technical Session 1B: National and International Regulatory Impacts on DoD Operations: Refining the Goals of DoD’s Strategic Plan for “REACH”

Impact of Inconsistent Regulatory Requirements at National Levels – HMIRS Short Term Assistance.

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Impact of Inconsistent Regulatory Requirements at National Levels - HMIRS Short Term Assistance.

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CHALLENGES WITH INCONSISTENT NATIONAL HAZMAT REGULATIONS

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Greatest Impact on DoD Today

- US vs. EU
- Areas of greatest impact/variances
  - MSDS/SDS
  - Safety warning labels
  - Hazard classification methodologies
Data Differences

• **US OSHA HAZCOM**
  – MSDS
    • Information based on known data or testing
    • Workplace hazard only

• **EU SDS – GHS/CLP – mandatory information**
  – Product assessment for health and environment
  – Hazard class and category
  – Precautionary statements
  – Hazard statement
  – Signal word
  – Pictograms on labels
Implementation Schedules

• US
  – Awaiting final rule from OSHA incorporating GHS into HAZCOM standard.

• EU
  – Implementing GHS/CLP now for pure substances
  – Will implement requirements for chemical formulations in the future.
Impacts on DoD Operations

- Pure substances from the US with HAZCOM complaint MSDS and warning label not compliant for use/transport in EU.
- Pure substances imported to US, produced in GHS implementing countries have documentation inconsistent with HAZCOM STD or understood by US workforce.
- Costs of accommodating variant requirements in a global operation.
Short Term “Bridging” Capability Plans

- Hazardous Material Information Resource System (HMIRS) evolving to:
  - Accommodate EU GHS/CLP information
  - Support EUCOM compliance efforts
  - HMIRS changes available in May/June 2012