



**ISSA petition for delayed implementation of the GHS standard**

*ISSA and the supporting trade associations say they felt compelled to petition OSHA for relief due to the lack of updated hazard classifications for raw materials down the supply chain.*

*When issuing the final rule, OSHA applied the same compliance date of June 1, 2015, for raw materials, intermediate mixtures, and final formulated products. OSHA assumed that currently available data and expected early compliance would allow for sufficient time for product formulators to receive or locate the necessary HCS compliant SDSs, and then process the information to create new labels and SDSs. This scenario has not played out like OSHA expected.*

*Compliance with the single deadline for many manufacturers of formulated products has been virtually impossible since manufacturers of individual raw materials are not required to provide SDSs that conform to the new standard until the June 1 deadline for all manufacturers. Accordingly, manufacturers who are members of the trade associations seeking this relief cannot develop accurate hazard classifications and produce complete labels and SDSs for their formulated products that are compliant with the new HCS classification scheme in time to meet the deadline. Industry is concerned about the completeness and accuracy of hazard communication materials if forced to meet the single deadline.*