

Manufacturers and importers of workplace hazardous chemicals – transition to GHS 7

On **1 January 2021**, a two-year transition period from the 3rd revised edition of the GHS (GHS 3) to the 7th revised edition of the GHS (GHS 7) started.

This information sheet is for manufacturers and importers of workplace hazardous chemicals. Manufacturers or importers means anyone who manufactures or imports chemicals that fall within the definition of 'hazardous chemical' in the model Work Health and Safety (WHS) Regulations. There are further obligations for suppliers of workplace hazardous chemicals, which are outlined in the information sheet for supplier and end users:

<https://www.safeworkaustralia.gov.au/doc/suppliers-and-users-workplace-hazardous-chemicals-transition-ghs-7>

From **1 January 2021**, Australia began the transition to GHS 7 for workplace hazardous chemicals. The transition period is for two years and will end on **31 December 2022**. More information about the transition period can be found in the information sheet on changes to workplace chemical laws in Australia: <https://www.safeworkaustralia.gov.au/doc/changes-workplace-chemical-laws-australia-transition-ghs-7>

What's new in GHS 7?

GHS 7 introduces several changes to classification, labelling and safety data sheet (SDS) requirements for workplace hazardous chemicals. The key changes between GHS 3 and GHS 7 are:

- new hazard categories and classes for:
 - desensitised explosives
 - pyrophoric gases
 - chemically unstable gases
 - non-flammable aerosols
- updated precautionary statements.

In addition to these changes, the definition of 'hazardous chemical' under the model WHS laws is being clarified ensure it captures all Category 2 eye irritants. Chemicals can be further sub-categorised as Category 2A and 2B, but this is not mandatory in Australia.

What do you need to do?

Manufacturers or importers of hazardous chemicals must:

- make sure, so far as is reasonably practicable, that chemicals they manufacture or import are without risks to health and safety, and
- correctly classify the chemicals that they import or manufacture and prepare correct labels and SDS for those chemicals.

Under the model WHS Regulations, a business that packages or re-labels a hazardous chemical with its own product name is a manufacturer and has the same duties as other manufacturers.

From 1 January 2021 to 31 December 2022, you can use either GHS 3 or GHS 7 to classify hazardous chemicals and to prepare labels and SDS.

Any chemicals manufactured or imported from 1 January 2023 must be classified, labelled and have SDS prepared in accordance with GHS 7.

It is a good idea to begin reviewing and updating the classifications, labels and SDS for your chemicals now. This is particularly important if you import or manufacture chemicals that are classifiable as:

- flammable gases
- pyrophoric gases
- chemically unstable gases
- non-flammable aerosols
- desensitised explosives, or
- Category 2 eye irritants.

Precautionary statements

New precautionary statements introduced as part of GHS 7 must be added to labels and SDS. GHS 7 also provides greater flexibility in the use of precautionary statements, including combining precautionary statements and allowing for variations of text, provided that it does not affect the safety message.

If the meaning of the precautionary statement has not changed between GHS 3 and GHS 7, you do not need to update the precautionary statements on labels and SDS. However, if changes are required to the classification or other SDS and label elements, or if you are reviewing the SDS, you should update precautionary statements to their GHS 7 versions.

The table below shows examples of GHS 3 phrases and new GHS 7 phrases. In the examples below, it would not be necessary to update the SDS and label to account for the change to P340, or P223, but P364 would need to be added.

GHS 3	GHS 7
P223: Keep away from any possible contact with water, because of violent reaction and possible flash fire	P223: Do not allow contact with water
P340: Remove victim to fresh air and keep at rest in a position comfortable for breathing	P340: Remove person to fresh air and keep comfortable for breathing
-	New phrase - P364: And wash it before reuse

Safety data sheets

You must review the SDS for your chemicals at least once every five years and amend the SDS whenever necessary to make sure the information it contains is correct and current.

As Australia moved to GHS 3 in 2017, the 5-year review period for many SDS may fall within the 2-year transition period to GHS 7. If this is the case for your SDS, you should consider updating your SDS to align with GHS 7 at the same time you are reviewing your SDS.

Note that it is not necessary to review or update the SDS if the chemical has not been manufactured or imported in the past five years.

Further information

See our suite of guidance documents on the transition to GHS 7:
<https://www.safeworkaustralia.gov.au/ghs-7-transition>