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Connection

AMERICAN INDUSTRIAL HYGIENE ASSOCIATION

POSITION STATEMENT **MATERIAL SAFETY DATA SHEETS**

It has been almost 20 years since the Occupational Safety and Health Administration (OSHA) adopted the Hazard Communication Standard with its provisions for development and distribution of Material Safety Data Sheets (MSDSs) for hazardous chemicals. As originally intended, an MSDS was not meant to be a stand-alone document. It was part of an overall hazard communication program. The AIHA is keenly interested in the issues surrounding MSDSs because they are essential tools in the protection of employees exposed to chemical hazards in the workplace. Members of several of our expert technical committees have extensive experience and direct involvement with technical and policy issues regarding MSDSs. Many are involved in the development or review of MSDSs for their employers.

AIHA considers MSDSs to be essential information sources that enable the anticipation, recognition, evaluation and control of workplace exposures and environmental hazards of chemical substances. AIHA shares the concerns of others about the risks posed by inaccurate or incomplete MSDSs. Reports from recent accidents involving toxic chemicals have called into question the accuracy of MSDSs.

AIHA supports the overall goals of both the ANSI Standard on MSDS Preparation Z400.1 and the Globally Harmonized System (GHS) in that they improve the quality of MSDSs by establishing a harmonized structure and meaningful recommendations on content.

AIHA fully supports one MSDS format for all target audiences. This issue is not confined to the United States, but rather is of global concern. AIHA encourages the use of international standards/guidelines (including recommended phrases and symbols) that allow MSDS preparers to communicate hazards in an understandable way to the various MSDS users. AIHA recognizes that providing information on an MSDS is necessary to fulfill the needs of the various target audiences.

AIHA

Your Essential Connection:

*Advancing Occupational and Environmental Health
and Safety Globally*

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AIHA believes that:

- There is a need to ensure accessibility to scientifically valid peer-reviewed data available on the physical and chemical properties, and health, safety and environmental hazard information on materials and their components to enable MSDS authors to improve the accuracy, consistency, and effectiveness of MSDSs.
- The quality, accuracy and usefulness of MSDSs can be improved by enhancing the competency of MSDS authors through targeted training. Practical guidelines on the preparation and maintenance of MSDSs would be needed.
- It is essential that MSDS authors have both the necessary technical skills and the tools to ensure that MSDS information is accurate and is written in clear and understandable language.

AIHA recommends:

- OSHA develop alliances and partnerships between regulators, professional organizations, universities, educators, and the regulated community to develop best practices and evaluation tools for MSDS quality that would serve to improve the current situation regarding inaccurate, incomplete and outdated MSDSs.
- OSHA require MSDS authors to have adequate training and certification to be competent professionals. AIHA recommends that, at a minimum, Competent Professionals authoring MSDSs should possess training in a relevant science such as industrial hygiene, environmental health; toxicology; hazardous materials; emergency response; or safety. Certification such as CIH and CSP as well as experience in the hazardous materials field is also recommended.
- Regulatory agencies, consensus standard groups or qualified professional industry associations consider developing and/or adopting “model language” for hazardous chemicals used in commerce to promote consistency of warning statements on MSDSs. AIHA recommends that agencies, consensus standard groups, industry associations and other relevant organizations work cohesively on existing requirements and terminology in an effort to avoid conflicting specifications.
- An Electronic Data Interchange (EDI) standard should be developed to facilitate exchanging data on materials and their components.
- Periodic review of MSDSs be conducted in an approach similar to that done in Canada. In Canada, suppliers are prohibited from supplying MSDSs that have a MSDS preparation date exceeding three years prior to the sale or importation of a controlled

product. Thus, if a supplier has not changed any information on his/her MSDS for three years, he/she must review that information to ensure that it is still accurate and that there is no new available and applicable information that should be disclosed.

- Support improvement and expansion of the curriculum of universities, and the promotion of hazard communication training in trade and technical schools and community colleges.

AIHA believes that industrial hygiene professionals have a key role in improving the quality and value of information available on an MSDS. We intend to educate our members and others about the current activities related to the preparation and use of MSDSs, including efforts to increase their quality and utility, implementation of a globally harmonized approach to their presentation, and updating the existing voluntary consensus standard that provides guidance for development.

In conjunction with the AIHA/OSHA alliance, we pledge our full assistance to OSHA, other regulatory bodies, industry, and the international community, and will continue to monitor, comment and advise in this process, in order to promote the best MSDS to deliver safety and health information to all users. We strongly request OSHA to review the status of current MSDS requirements, as well as ways in which the agency might be able to improve the completeness and accuracy of MSDSs, bearing in mind the fact that existing regulations can be modified but it will be difficult to regulate better MSDSs into existence. If changes are to be considered for the OSHA MSDS requirements, these changes should be done in full recognition of the MSDS guidelines being developed as part of the Global Harmonized System for hazard communication.

Approved by AIHA Board of Directors – September 2, 2005