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AMERICA'S COMBAT LOGISTICS SUPPORT AGENCY

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**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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14. ABSTRACT With the advent of REACH implementation in the EU, the logistics system has been presented with a number of challenging conditions due to the dramatic variations in hazardous materials regulations in the U.S. regarding information on the MSDSs/SDSs. Changes are being made to the Hazardous Materials Information Resource System (HMIRS), in conjunction with EUCOM to provide a short term remedy. Of particular concern at the moment is the Classification, Labeling and Packaging portion of the Globally Harmonized System (GHS) being involved under REACH. The short-term aids being implemented in HMIRS will be identified which should be helpful until the U.S. regulations become more closely aligned than they presently are.					
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CHALLENGES WITH INCONSISTENT NATIONAL HAZMAT REGULATIONS

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Greatest Impact on DoD Today

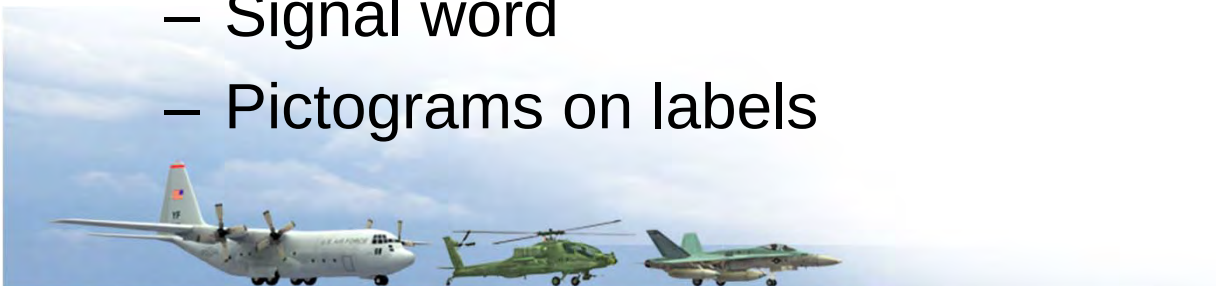
- US vs. EU
- Areas of greatest impact/variances
 - MSDS/SDS
 - Safety warning labels
 - Hazard classification methodologies





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

