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April 26, 2013

**Re: Globally Harmonized System - Update to Hazard Communication**

Honorable Board Members:

The California Industrial Hygiene Council (CIHC) wishes to take this opportunity to express its appreciation to the Cal-OSHA Division of Occupational Safety and Health (DOSH) and the Cal-OSHA Standards Board in proposing a practical approach to the revision of California's Hazard Communication (HazCom) Standard by including hazard determination and communication requirements of the recently revised Federal Standard which incorporates the international Globally Harmonized System (GHS). We do, however, have a few comments regarding these revisions which we hope will be considered by both DOSH and the Standards Board prior to formal regulatory proposals.

Founded in 1990, the CIHC represents the occupational and environmental health profession in California and is affiliated with the American Industrial Hygiene Association (AIHA), an 11,000 member national organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene organizations in over 34 countries. The CIHC is comprised of occupational and environmental health and safety professionals who are members of the five California AIHA Local Sections represented on the CIHC Board of Directors. As such, our members and their organizations are vitally interested in and impacted by regulatory changes to this critically important occupational health and safety standard.

The intent of GHS was triggered by the United Nations a decade ago to establish global harmonization of chemical hazard determinations, descriptions, definitions, and chemical labeling and hazard information. We are pleased that, in its Horcher process, DOSH has presented language to the Standards Board which, with a few exceptions, directly incorporated the language and requirements of the Federal HazCom Standard (which incorporates the GHS). However, we note that the proposed language also includes definitions and terminology not in the Federal Standard, as well as specific language formerly in the Federal Standard (now removed, but still retained in the California version). Proposed California language which does not recognize an international consensus loses the intent of harmonization.

We are specifically concerned that:

- California's proposed deviations from the Federal Standard will create confusion among employees faced with addressing label and safety data sheet (SDS) information from non-California chemical manufacturers which is not consistent with terms or information presented by their California counterparts;

