

# Packaged gases

## Navigating the road to GHS label compliance

By Brent Lockhart and George Ratermann

The Globally Harmonised System of Classification and Labelling of Chemicals (GHS) is certainly the most significant and comprehensive change in labelling requirements to affect both the cryogenic and compressed gas industry in recent memory.

Early on there was much confusion about what exactly GHS was and what effect it would have on our industry; in early 2013, Ratermann Manufacturing began to receive calls from customers asking for clarification on just what GHS was and what needed to be done. It was evident that we were dealing with a situation that was beginning to cause much anxiety within our industry.

Even though we were aware of the proposed changes, in order to harmonise the hazard definitions and label information of different US

regulatory agencies, the complexity and uncertainty associated with these proposed changes and the number of regulatory agencies involved, made it difficult to decipher just what changes would be applicable to our industry and how they would be applicable.

### Clarity

Ratermann made the decision to form an internal GHS Task Force to develop relationships and work closely with many of the regulatory agencies that are pertinent to our industry, such as the Food and Drug Administration (FDA), the US Department of Transportation (DOT), and the Occupational Safety and Health Administration (OSHA). We did this in order to gain clarity and get further explanations on the proposed changes. This effort proved to be invaluable and led us to being well

prepared to incorporate the changes in the Compressed Gas Association's (CGA) publication, *C-7 - Guide to Classification and Labelling of Compressed Gases* (CGA C-7), when they were published.

Once the updated CGA C-7 was published in November 2014, the real work began.

It posed a variety of different challenges, such as how to incorporate all of the necessary changes and have them be compliant, accurate and legible, while maintaining the current accepted label size in the industry – often, making one change on the label has an impact on how to

incorporate another. There are also changes and definitions in CGA C-7 – 2014 that we needed to gain additional perspective on, to confirm that our understanding was correct.

Once we fully understood the revisions, Ratermann began to focus its efforts on how to create an opportunity for its customers and put a positive spin on these new requirements. We designed our label templates to not only comply with the new GHS standards, but also to offer customers the ability to use the new labels as a marketing tool by formatting them to accommodate additional information, such as a company logo, and website address.

### Confidence

Only when we were confident that all of the changes could be incorporated, did we begin to produce templates for the individual gases. Once these templates were completed, three separate teams with three individuals in each team began the arduous task of proofing each label. Each label was reviewed by one team and then the next, until it had been reviewed and audited by all nine members of all three teams. Labels were reviewed for all changes, including UN#, CAS#, GHS pictogram, DOT pictogram, location of text, spelling, font size, and location of information. Yet again, we reached out to regulatory agencies and third party advisors to confirm the accuracy of the final product.

While implementing new GHS compliant labels has been – and will continue to be – a very challenging task for many, we're confident that our industry is well prepared to be GHS compliant by the 1<sup>st</sup> June 2015 deadline. 

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