



Background

Under Australian work health and safety legislation, all hazardous chemicals must be correctly labelled according to the *Globally Harmonised System of Classification and Labelling of Chemicals* (GHS).¹ The GHS (Edition 3) was implemented in all the Australian states and territories as part of the move to harmonise our workplace health and safety laws. We have now transitioned to using the 7th revised edition of the GHS (GHS 7) so that from 2023, chemical classifications, labels and SDS will have to comply with GHS 7.^{2,3}

All chemicals that are classified as hazardous according to the GHS must be labelled accordingly. The regulator in each jurisdiction provides guidance as to what information must be included on chemical labels. In Victoria, labelling guidance can be found in WorkSafe Victoria's Compliance Code 'Hazardous Substances'.⁴ The corresponding Code of Practice in other jurisdictions is based on Safe Work Australia's 'Model Code of Practice: Labelling of workplace hazardous chemicals' and can be accessed via the regulators' websites.⁵

Safe Work Australia also provides guidance material on how the transition to GHS 7 will affect chemical classification, labelling and SDS preparation.^{2,3} For schools, probably the most relevant change is that Category 2B eye irritants now come under the definition of 'hazardous chemical', whereas previously, chemicals in this category were exempt from the definition.⁶

Decanted chemicals

The Model Code of Practice (Chapter 3)⁷ covers the requirements for special labelling situations where reduced labelling is permitted, such as with small bottles and decanted chemicals. This Code defines 'decant' as *'to transfer a hazardous chemical from a correctly labelled container to another container within a workplace'*⁷ and specifies the following minimum requirements to include on the label of a decanted chemical:

- *'the product identifier [e.g., the chemical name];*
- *a hazard pictogram or hazard statement consistent with the correct classification of the chemical.'*⁷

For workplaces subject to the Victorian OHS legislation,⁴ only the product identifier is required on the label for decanted chemicals.

Other relevant information can be included on the label where space allows. The model Code of Practice⁷ advises that *'You should always aim to provide as much information on the hazards and safe use of the chemical on the label as possible.'*⁷ For example, if there is sufficient space on the label, you could also include the signal word, precautionary statements, the date of preparation of the chemical and/or its expiry date.

Note that the manufacturer's details are not a requirement for labels of decanted chemicals.

Solutions prepared on site

Solutions prepared on the school site, whether intended for use by students and/or staff, should be labelled in accordance with GHS requirements. The GHS classification of a solution can be determined from the cut off concentrations⁸ or by consulting a current Australian SDS for the same chemical at the same dilution. The label should comply with the minimum requirements for decanted chemicals (see above) and may contain other relevant information as space allows.

We recommend that non-hazardous solutions be labelled 'Laboratory Reagent', to encourage safe laboratory practices.

Chemicals purchased before 2023

Manufacturers and importers of chemicals into Australia are required to label their products according to the GHS as specified under Australian law.² Thus, purchased chemicals in their original containers will already have a compliant label and do not need to be relabelled.²

Where chemicals were purchased prior to the implementation of the GHS and are in their original containers which bear the original label, there is no obligation to replace the old label with a new GHS-compliant label.¹⁰ However, if the label does not give any hazard information or is degraded, then the bottle should be relabelled with a GHS label. Where the label is old and degraded, it is advisable to assess the condition of the chemical as disposing of it may be the better course of action.

Where chemicals were purchased after the implementation of GHS 3 but prior to 2023 and are in their original containers which bear the original label, there is no obligation to replace the label with a new GHS 7-compliant label.⁹

Household chemicals

Consumer goods which are hazardous and which have their original label are exempt from GHS labelling requirements if they are used in the workplace

- *in a quantity that is consistent with consumer household use*
- *in a way that is consistent with consumer household use, and*
- *in a way that is incidental to the nature of the work carried out by a worker using the chemical.*⁷

For example, hazardous consumer products which are purchased in small quantities and are used by staff as cleaning agents in the laboratory would meet the above conditions.

Hazardous household substances which are decanted into jars or bottles for use as reagents in class practicals should be labelled according to the GHS requirements for decanted chemicals (see above).

Common household substances which are non-hazardous are not subject to the GHS labelling requirements. However, we recommend that where non-hazardous substances are used as reagents in science practicals or in preparation tasks, they should nevertheless be labelled "Laboratory Reagent" so that they are not inadvertently used for human consumption. The general precautionary statement "Not to be taken" could also be included on the label if space permits.

For common household items contained in non-chemical-resistant packaging (such as paper or plastic bags that are prone to deteriorate over time), the contents should be transferred into suitable glass or plastic containers. Combustible packaging in particular, such as paper bags or cardboard boxes, should not be stored in the chemical store alongside oxidising agents.

Note:

This information sheet is an update of the previously published information sheet. It is also a review of, and replaces, previously published Q&As on the following topics:

How can we ensure that our chemical labels are compliant with the GHS for

- decanted chemicals?
- solutions prepared on site?
- household chemicals which are used in practical classes? and
- chemicals which were purchased before the GHS was implemented and those labelled according to GHS 3?



References

- ¹ Safe Work Australia, *Labelling Hazardous Chemicals*, <https://www.safeworkaustralia.gov.au/safety-topic/hazards/chemicals/labelling-hazardous-chemicals> (accessed January 2023)
- ² Safe Work Australia, 2020, Changes to workplace chemical laws in Australia – transition to GHS 7, <https://www.safeworkaustralia.gov.au/doc/changes-workplace-chemical-laws-australia-transition-ghs-7>
- ³ Safe Work Australia, 2021, Changes to chemical classifications and labelling under GHS 7, <https://www.safeworkaustralia.gov.au/doc/changes-chemical-classifications-and-labelling-under-ghs-7>
- ⁴ WorkSafe Victoria, 2019, *Compliance Code: Hazardous Substances (Edition 2)* <https://www.worksafe.vic.gov.au/resources/compliance-code-hazardous-substances>
- ⁵ Links to information about jurisdictional regulators: <https://www.safeworkaustralia.gov.au/law-and-regulation/whs-regulators-and-workers-compensation-authorities-contact-information>
- ⁶ Safe Work Australia, 2020, Changes to chemical classifications and labelling under GHS 7 <https://www.safeworkaustralia.gov.au/doc/changes-chemical-classifications-and-labelling-under-ghs-7>
- ⁷ Safe Work Australia, 2020, Model Code of Practice: Labelling of workplace hazardous chemicals <https://www.safeworkaustralia.gov.au/doc/model-code-practice-labelling-workplace-hazardous-chemicals> © Commonwealth of Australia. This work is licensed under a [Creative Commons Attribution 4.0 licence](https://creativecommons.org/licenses/by/4.0/)
- ⁸ Safe Work Australia, 2020, Hazardous chemical information system (HCIS), Cut off Concentrations <http://hcis.safeworkaustralia.gov.au/UserGuide>
- ⁹ Safe Work Australia, 2021, Suppliers and users of workplace hazardous chemicals – transition to GHS 7 <https://www.safeworkaustralia.gov.au/doc/suppliers-and-users-workplace-hazardous-chemicals-transition-ghs-7>
- ¹⁰ Safe Work Australia, Model Work Health and Safety Regulations, Regulation 341, <https://www.safeworkaustralia.gov.au/law-and-regulation/legislation>

