



Trends and Considerations for Multi-lingual Hazmat Compliance

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Atlantic City, NJ

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Background



- Globalization is here to stay
- Internet is collapsing time and distance barriers
- Compliance is a cost
 - Pressure to reduce cost
 - Continual demand to do more with less
- EHS workforce is aging
- EHS performance getting more visibility

- Compliance issues to be considered
 - Multi-framework global regulations
 - Enforcement environment
 - Issue sensitivity
 - Language
 - Culture
 - Infrastructure and tools



Discussion Scope



- “Product Compliance” and “Workplace Compliance”
 - Note: Workplace compliance as it relates to chemical products

- Infrastructure and tools

- Regulatory knowledge management

- Inventory control

- Incident response

- Waste tracking and management
 - Incident response

- Compliance task management



Only 3E **ENHANCES** product and workplace **COMPLIANCE** throughout the *entire* chemical lifecycle.



3E ONLINE
Web Access



3E ONCALL
24-7-365 Call Center



3E ONTIME
Event-Driven Projects



3E ONDATA
Data Integration

- Is the product on the respective inventory
- Are employees/public protected
- What documents are needed for distribution
- What is the best way to ship
 - Packaging/Classification/Labeling
 - Segregation
 - Risk
- What is the impact on the environment
- Are rules the same across target markets



- Web based regulatory knowledge tool
 - Full text
 - Data for reference
 - Data for integration
- Change notification alerts
- Change management
- Language Choices



- Having visibility and control of chemical inventory is critical to EHS compliance
- Using MSDS management as a lever to manage inventory is a best practice
 - Product constituent information
 - Incident response
 - Employee hazard communication
 - Product stewardship tool





Global MSDS Management



- Successful multilingual MSDS management
 - Multiple formats
 - Multiple languages
 - Ease of use
 - Simple to train
 - Simple to use

The screenshot shows the login interface for the 3E Only system. At the top, there is a header with the 3E COMPANY logo and the phone number 24-7-365. Below the header, the text "Willkommen" (Welcome) is displayed. The main form contains two input fields: "Benutzername" (Username) and "Kennwort" (Password). Below these fields is a button labeled "Anmeldung" (Login). Underneath the login button, there is a section titled "Mindestanforderungen" (Minimum requirements). Below this section, there is a list of language options, each with a play button icon: English, Español, Français, Français (Canada), Deutsch, and Italiano. At the bottom of the page, there is a button labeled "3E InstaCall" with a globe icon.



Global MSDS Management



3E Company Portal - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites Refresh Print Mail New Tab

Address <http://www.3eonline.com/eeeOnlinePortal/DesktopDefault.aspx> Go

Search Web My Yahoo! Yahoo! Games Mail

24-7-365 3E COMPANY EH&S INFORMATION & COMPLIANCE SERVICES

3E Company Demo - European Edition

Willkommen eemanager! | [Abmeldung](#)

(M)SDS

(M)SDS

Suchen nach

Produktname enthält

Zu verwendende Sprache

Deutsch

- Deutsch
- Englisch
- Spanisch
- Französisch
- Französisch (Kanada)
- Italienisch

Suchen [Diese Suche individuell einrichten](#)

Expose as many language options as possible to allow employee's to access information in a format that they are most comfortable with

3E InstaCall

Bitte besuchen Sie www.3ecompany.com Telefonnummer für 3E: 800-461-8346

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Version 5.7.1.0

Get Adobe Reader

Internet



Importance of MSDS Data



- Each country maintains its own MSDS requirements
- Products/Chemicals are manufactured by the same materials in the US as in other parts of the world
 - Acquire MSDS for the country where the product is stored
 - Transcribing a MSDS from one language/format has to be overseen by knowledgeable compliance professionals
- Display the appropriate product information by country to ensure safety program is compliant
 - Ensure employees are aware of the appropriate hazards
 - Understand regulatory impact on products by country



Global MSDS Management



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Back Forward Stop Home Search Favorites Refresh Mail Print W Search Web

Address <http://www.3eonline.com/eeeOnlinePortal/DesktopDefault.aspx?tabid=72&id=3Np%2fAgCdtcausnddrgSzodcgH5E5MidK2ix5dvbKTUoMhvxvRnwXpVhk3pxdxDO4zTPwBKD4W6JdwAFr> Go

Y! Search Web My Yahoo! Yahoo! Games Mail



3E Company Demo - European Edition

Welcome eemanager! | [Logout](#)

- Home
- (M)SDS
- Product Catalog
- Inventory
- Chemical Analysis
- RegImpact**
- Admin
- Help

RegImpact > [Regulatory Analysis Matrix](#) > [Regulation Analysis By Location](#)

Global Inventories - All locations

Items per page: 15

Location Name	MF_LST	TSCA	TSYN	DSL	NDSL	EU_LST	EINECS	ELINCS	ENLP	SUI_INV	AUSTR	CHINA	ENCS_ALL	ENCS_LST	JCAT	JCL1_LST	JCL2_LST
France																	
Lyon	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Paris	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Germany																	
Cologne																	
Dusseldorf	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Munich																	
United Kingdom																	
London																	
Production																	
R&D Lab																	
Warehouse																	

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Please note that this information is based on the CAS information provided on the MSDS. If the CAS RN is not listed on the MSDS the chemical will not appear in the results.

All CAS RN listed on the MSDS are on the list.
 Some of the CAS RN listed on the MSDS are on the list.
 No CAS RN listed on the MSDS are on the list.



Visit www.3ecompany.com Phone 3E: 800-451-8346

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version 5.7.1.0





Incident Response



- Infrastructure to respond to incidents may vary by country
 - Availability of PPE or response equipment
 - Reliance on public sector for response and clean up
- Language of response can be critical
 - Not everyone understands English
 - Non-English MSDS may not be available
 - Third-party translator capabilities maybe critical



Waste Management



- Regulations for waste management may not be fully evolved or fully implemented in various countries
 - Challenges in meeting corporate requirements
 - High cost to meet company policies
 - Partner with like-minded companies
- Transcend cultural issues on what is considered waste
 - Sensitivity to local customs



Compliance Task Management



- Tracking and managing compliance related tasks
 - Urgency and timeliness may vary by culture
 - Clash between “corporate edicts” and local practices
- Permits, disclosure and local reporting requirements
 - Difficult to ascertain
 - Can be a significant liability
 - Local law firms can assist

- Globalization affects EHS compliance
- Culture and language add additional complexity to challenging (and uncertain) compliance requirements
- Adopt a life-cycle approach to EHS compliance
 - Implement tools to stay on top of evolving regulations
 - Absolute control over inventory; leverage MSDS (or other specification sheets) to control inventory
- Be sensitive to local customs
 - Partner with local companies, law firms and compliance service providers