

Year-End Regulatory Readiness:

Q4 AUDIT CHECKLIST FOR 2026

2026



TotalSDS
Simplifying Regulatory Compliance
by **enhesa.**



ALEX MILAN

HEAD OF SALES - SDS



VERONICA MARRERO

DIRECTOR OF PROFESSIONAL SERVICES AND
REGULATORY OPERATIONS

THANK YOU FOR JOINING US!

Today's Focus: A practical Q4 audit checklist and action plan to close out 2025 with confidence and prepare for upcoming 2026 regulatory changes across multiple regions.

Why Year-End SDS Wrap-Up Matters

Year-end compliance ensures:

- Avoidance of fines or penalties
- Organizational readiness for audits
- Efficient transition into 2025

Challenges if unprepared:

- Data disorganization
- Missed regulatory deadlines

CHALLENGES BENEFITS

Benefits:

- Peace of mind
- Streamlined operations



AGENDA

OSHA HazCom 2024 Updates

Canada WHMIS 2022 and upcoming
December 14th Deadline

EU CLP Updates

2025 Recap

Horizon Scanning

Inspection Readiness

Remediation Plan

Q&A

HazCom 2024 Standard Revision: took effect July 19, 2024, and the first compliance deadline is January 19, 2026.

Key Changes:

- New/updated hazard classes:
 - Aerosols
 - Chemicals Under Pressure
 - Desensitized Explosives
 - Flammable Gases
- Prescribed Concentration Ranges
- Updates to SDS Content requirements for sections 9 (Physical and Chemical Properties), 11 (Toxicological Information), 14 (Transportation Information)
 - Section 9: Data requirements and format changes.
 - Section 11: Inclusion of "interactive effects".
 - Section 14: Renaming of the subsection to 'Transport in bulk according to IMO instruments'.



OSHA HazCom 2024: SDS & Label Updates

SDS/Label Compliance Timeline:



OSHA HazCom 2024: SDS & Label Updates

Compliance deadlines for reference:

Compliance Date	Who it Applies To	What Must Be Done (required)	Notes
Jan 19, 2026	Chemical manufacturers, importers, distributors, and employers who evaluate substances	Update labels and Safety Data Sheets (SDSs) for substances per HCS 2024 classification & content changes.	This is the manufacturer/importer deadline for substances. Employers will receive additional time to update workplace items.
July 19, 2026	Employers (workplaces using substances)	Update alternative workplace labels, update written HazCom program (as needed), and provide any additional employee training for newly-identified hazards for substances .	OSHA gives employers 6 months beyond manufacturer substance deadline to update workplace labeling, program & training.
July 19, 2027	Chemical manufacturers, importers, distributors, and employers who evaluate mixtures	Update labels and SDSs for mixtures per HCS 2024.	Manufacturer/importer deadline for mixtures.
Jan 19, 2028	Employers (workplaces using mixtures)	Update alternative workplace labels, Written HazCom program, and training for mixtures .	Employers have 6 months beyond the manufacturer mixture deadline to update workplace items.

Action Items: Audit your U.S. SDSs and labels

- Ensure new hazard criteria (like flammable gas Categories 1A/1B, etc.) are applied
- Source updated raw material SDSs
- Check that small container labels include required info
- Plan necessary employee training on any new label elements.



OSHA HazCom 2024: SDS & Label Updates



Canada: WHMIS 2022 Transition Deadline

WHMIS 2015 → WHMIS 2022: Canada amended its Hazardous Products Regulations in Dec 2022 to align with GHS Rev. 7 (and some Rev. 8 provisions)

Transition Period Ends Dec 14, 2025:

- This means **by December 15, 2025**, every hazardous product in Canada must fully comply with the amended HPR
- Recent enforcement news from Health Canada on alignment with US deadlines



Canada: WHMIS 2022 Transition Deadline

What Changed in WHMIS 2022:

- New/updated hazard classes, e.g.:
 - Aerosols
 - Chemicals Under Pressure
 - Flammable Gases
- Tighter rules on requirements for ingredient disclosure in Section 3 of the SDS
- Updates to SDS Content requirements for sections 9 (Physical and Chemical Properties) with new data/updated data fields.

Final Compliance Push: By the end of Q4 2025

- Source raw material SDSs
- Reclassify and update all your Canadian product SDSs and labels to WHMIS 2022

Six New EU Hazard Classes introduced with the first compliance deadline in May 2025:

- Two categories of endocrine disruptors (for human health and for the environment)
- Four persistence/toxicity classes (PBT, vPvB, PMT, vPvM)

Impact on SDSs and Products: If you sell chemicals in the EU, review your portfolio for any substances (or mixtures) that could fall under the new classes.

Upcoming 2026 Deadlines: The regulatory change obligations continue into 2026.

- The new hazard class requirements will apply to mixtures starting 1 November 2026
- The EU's CLP is expected to update its requirements late 2025/early 2026 to align with GHS 8, 9, 10, parts of 11.



EU Regulatory Updates: CLP Hazard Classes & Labeling

Action Items:

- Before year-end, audit your SDSs and labels for EU distribution.
- Make sure your substance SDSs have been updated where necessary.
- Plan mixture reclassifications in 2026 and watch for any further EU guidance.



EU Regulatory Updates: CLP Hazard Classes & Labeling



Recap: 2025 Global SDS Deadlines for **Brazil**

Brazil

- **Brazil – NBR 14725:2023 (GHS 7):** Brazil updated its national SDS and labeling standard (ABNT NBR 14725) in line with GHS Revision 7, with mandatory compliance by 4 July 2025.
- **Key changes:**
 - New/updated hazard classes
 - SDS format changes
 - Terminology changes. For instance, the term for SDS in Portuguese officially shifted from FISPQ to FDS (Ficha de Dados de Segurança).
- **Action:** verify that all SDSs destined for Brazil have been re-authored to NBR 14725:2023 standards (check for updated section headings in Portuguese and GHS 7 hazard classifications).



Recap: 2025 Global SDS Deadlines for China

China

- **China – GB 30000 Series:** China aligned with GHS Revision 8 which took effect 1 August 2025.
- **Key changes:**
 - New hazard class
 - Updated hazard classification thresholds
 - SDS format updates
- **Action:** Check that all SDSs/labels for products marketed in China were updated to align with the new standard.

Enforcement & Market Impact: Both Brazil and China now require up-to-date SDSs for market access. Out-of-date SDSs can lead to:

- Workplace incidents and related legal ramifications
- Non-compliance findings or issues in workplace inspections
- Customs delays or penalties



Enforcement & Market Impact

ON THE HORIZON

Horizon Watch: Upcoming **EU & Japan** Regulatory Changes

EU – Ongoing Regulatory Evolution:

- Anticipated update to the CLP, adopting GHS revisions 8, 9, 10, parts of 11, by the end of this year/early 2026.
- European Chemicals Agency (ECHA) preparing enforcement initiatives in 2026



EU: Expected Updates



Japan:

Expected Updates

Japan – GHS Revision 9 Adoption expected by the end of 2025, likely adding new hazard classes/categories. Once published, implementation timelines will be set – last grace period was 3 years.

Japan – Expanding SDS Requirements: In parallel, Japan's authorities (MHLW) are moving to add 36 more chemicals to the mandatory SDS list.

- Today: Japan mandates SDSs for a specified list of substances.
- Recent proposal (late 2025): aims to include 36 more chemicals to the list
- Keep an eye out for the final rule publication from Japan, expected by end of 2025. Enforcement expected April 2028.
- **List of 36 chemicals** adding to the mandatory SDS list: **Contact us at info@totalsds.com for the full list.**



Japan: Expected Updates

Action Item:

Proactive Tracking: It's critical to track **these upcoming changes**.

- Leverage your regulatory experts or subscription services to get alerts on regulatory developments.
- Mark on your 2026 calendar any expected dates (e.g. EU CLP enforcement checks in 2026, Japan's GHS9-based standards effective date).

Have a Complete & Current SDS Library

- Have access to your up-to-date chemical inventory
- Ensure every hazardous chemical in your inventory has a current SDS.

Accurate Classification & Labeling

- Check for alignment of label with Section 2 of the SDS.
- Verify that label elements correspond to updated requirements.

Employee Access to SDSs

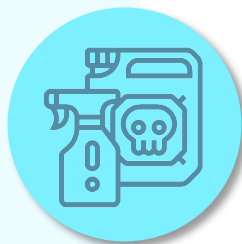
- Ensure SDSs are **readily accessible with no barriers**
- Train employees on how to access SDSs

Chemical Inventory Reconciliation

- Check for inventory-to-SDS mismatches
- Perform a year-end inventory cross-check:
 - archive outdated SDSs for products you don't use
 - obtain SDSs for any new or missing items

HazCom Program & Training Records:

- Ensure Written Hazcom Program is updated against HCS 2024
- Compile organized record of employee training



Inspection Readiness: Audit Documentation & Evidence

Remediation Plan: Closing Gaps Before 2026



Assess and Prioritize Gaps

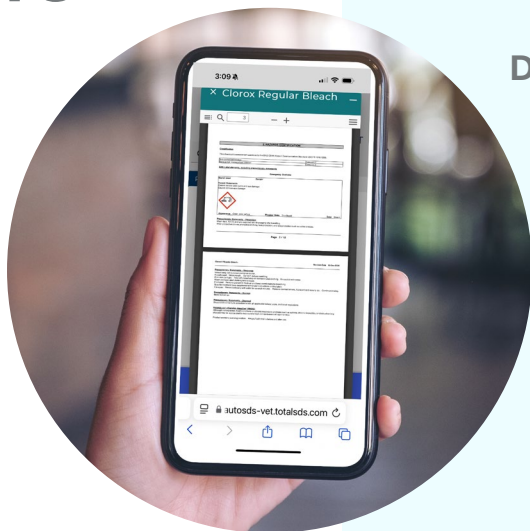
- Conduct a thorough year-end compliance audit.
- Identify any gaps:
 - Outdated SDSs
 - Missing hazard classifications
 - Labels that need reprinting
 - Training that hasn't been completed
- Document each gap and prioritize by risk and deadline

Update SDSs and Labels Proactively

- For each gap, develop an immediate corrective action.
- Re-author or obtain updated SDSs for any that don't meet updates requirements. **Don't forget to update labels too.**

Remediation Plan: Closing Gaps Before 2026

(continued)



Leverage Tools and Expertise: Consider using **digital tools or expert services** to streamline the remediation. *Manual regulatory-update tracking methods are risky.*

Training and Communication: As you implement changes, **inform and train your team.** Document the training.

Document Compliance Actions:

- Maintain a paper/email trail of all the updates and actions you perform.
- Create an updated SDS index or binder as of Dec 2025.
- Keep records of SDS revision dates, label change logs, training attendance sheets, and any correspondence with suppliers about obtaining new SDSs.

Centralize Your SDS Library: An SDS management platform provides a single repository where all SDSs are stored and indexed, accessible from anywhere.

Automate Updates & Version Control: Keeping up with regulatory changes is easier with software that is **kept up-to-date with global regulations**.

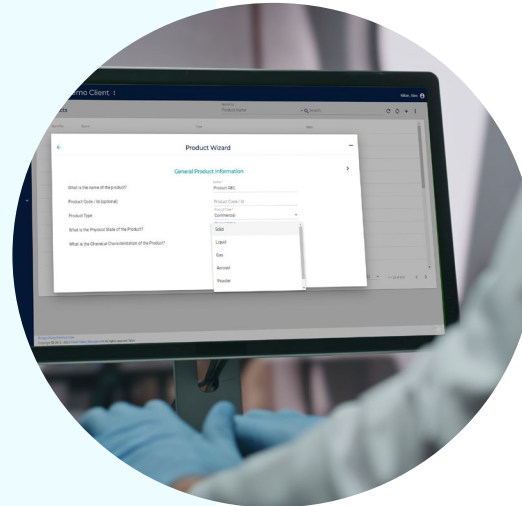
Features to look for:

- Integrated regulatory update process
- Accurate classification engine
- Digital archiving SDSs

Efficiency and Consistency: Software can:

- Reduce human error and save time
- Provide multi-language translations
- Consistently generate SDSs in the correct format
- Produce secondary container labels

Leveraging SDS Software



Questions?

Please list your questions in the chat.

Any questions we are not able to address during the presentation will be answered and provided to you after the webinar.





SIMPLIFYING REGULATORY COMPLIANCE

THANK YOU FOR JOINING US!

TotalSDS Author software accommodates for the updates and changes discussed in today's webinar.
Please contact us for a demo: info@totalsds.com or 813-859-5100

