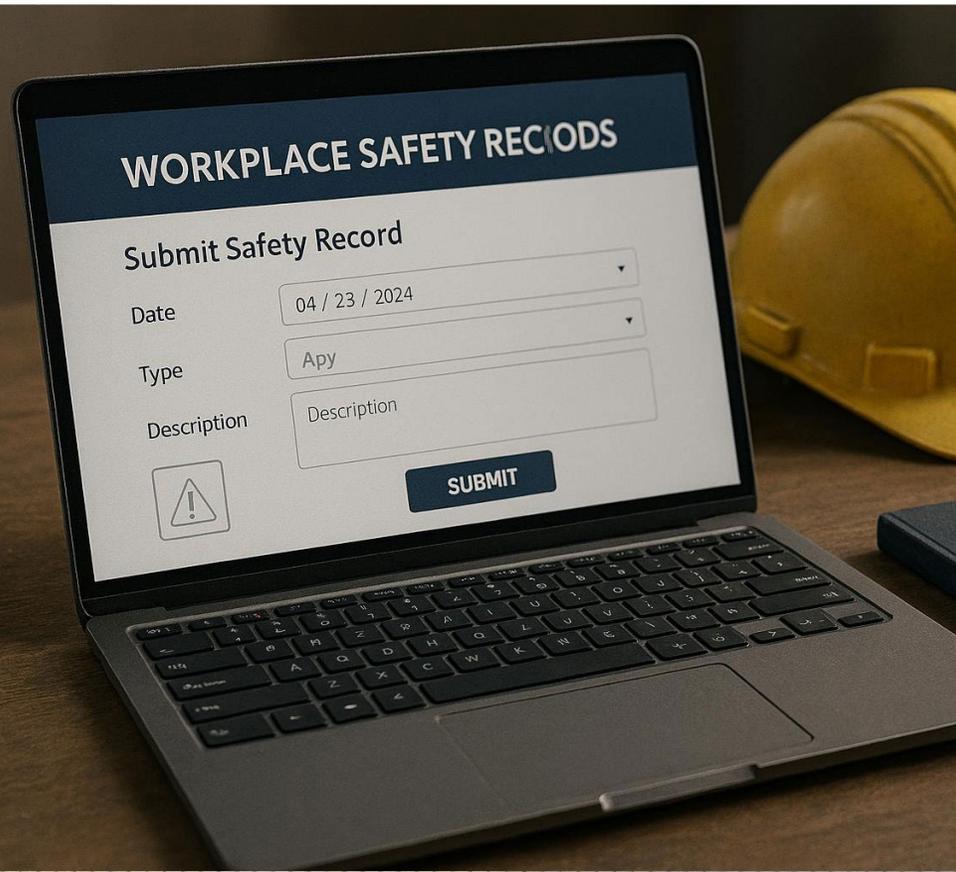


SAFETY UPDATES FOR
MASSACHUSETTS MUNICIPAL
EMPLOYERS (2026)

OSHA Recordkeeping Updates: What's New and How to Comply

Requires injury tracking throughout the year, special recordkeeping criteria, and Summary posting from Feb 1 through March 31.

- **Expanded Electronic Submission:** Employers with 250+ employees, or 100-249 employees in specific high-hazard industries, must submit case-specific details from Forms 300 (Log) and 301 (Incident Report), not just the 300A summary.
- **Data Accuracy & AI:** OSHA is using standardized coding to identify industry patterns. Employers should ensure precise, auditable records as data is used for enforcement and public scrutiny.



Hazard Communication Changes: Enhanced Labeling and Information



Enhanced Labeling Requirements

The 2026 updates introduce detailed chemical hazard pictograms and revised label content for clearer hazard communication.

Training and Education

Updated training programs will educate employees on new pictograms and labeling to reduce chemical-related incidents.

The key differences in labeling compared to the 2012/2024 standard include more specific, updated physical hazard categories, improved labeling for small containers, and stricter requirements for releasing updated information.

Here are the specific, example differences in updated hazard communication labeling versus the previous standard:

- Small Container Labeling (Under 100ml): The 2026 update provides for more comprehensive, yet flexible, labeling on small containers, such as vials, to ensure critical information is still readable while acknowledging space constraints.
- "Chemicals Under Pressure" Classification: A new hazard class, "Chemicals under pressure," is added. Labels for these items must now include the specific pictogram, signal word, and hazard statements reflecting this category (e.g., "Contains gas under pressure; may explode if heated").
- Prohibition of Blank Red Borders: While the 2012 standard allowed for empty red pictograms, the 2026 update strictly prohibits them. Every red diamond pictogram MUST have a hazard symbol inside.
- "Hazards Not Otherwise Classified" (HNOC) on Labels: Manufacturers may now use the "exclamation mark" pictogram on labels for HNOC, provided they add the words "Hazards Not Otherwise Classified" or "HNOC" below the pictogram.
- Updated Flammable Liquid Definition & Labels: Labels for flammable liquids must reflect revised criteria. For example, the definition is updated, ensuring that boiling points are determined by specific methods, potentially changing the category and hazard statement on the label.
- Updated Precautionary Statements: Precautionary statements on labels are updated to be more specific, particularly regarding safe storage and disposal (e.g., revised phrasing for handling corrosive substances).
- Chemicals Released for Shipment: Labels must be updated within six months of becoming aware of new, significant information about chemical hazards, even if the chemical is already in the supply chain.

Key Compliance Dates (Extended in 2026):

- May 19, 2026: Manufacturers/importers must update labels and SDS for substances.
- Nov 20, 2026: Employers must update workplace labeling/training for substances.
- July 19, 2027 (approx): Similar updates for mixtures are required by this date.



Heat Illness Prevention Standard

still in proposal phase

Employers should take this opportunity to review their workplace safety programs and ensure they have a comprehensive heat illness prevention program in place. The program may include such measures as:

- Providing cool drinking water and shaded rest areas;
- Implementing an acclimatization plan for new or returning workers;
- Conducting regular training on recognizing and responding to heat stress symptoms;
- Monitoring environmental conditions; and
- Scheduling rest breaks during high heat periods.



SUMMARY

- OSHA recordkeeping
- Hazard Communication
- Heat and Illness Prevention