SDS Compliance Audit Checklist

What's Inside:

This checklist is designed to help EHS leaders and safety managers ensure full compliance with OSHA's Hazard Communication Standard (29 CFR 1910.1200). Use this document to audit your SDS management program, identify risks, and plan corrective actions.

• 12-point compliance review

• Access & version control evaluation

• OSHA 29 CFR 1910.1200 references

• Space for notes, action plans, and audit scheduling

12-Point SDS Compliance Review

1. **Do you have an SDS for every hazardous chemical in the workplace?**
   OSHA requires a current Safety Data Sheet for each hazardous chemical. This ensures that workers and emergency personnel can access vital safety and handling information when needed.

2. **Are all SDSs up-to-date and compliant with the 16-section GHS format?**
   Since OSHA adopted the GHS-aligned Hazard Communication Standard, SDSs must follow a standardized format with specific sections. Outdated or non-compliant SDSs can result in fines and confusion.

3. **Are SDSs readily accessible to employees on all shifts and locations?**
   Employees must be able to access SDSs during their work shift—without delay—at each physical location or jobsite where hazardous chemicals are used.

4. **Are paper or digital SDSs organized and easy to search?**
   Disorganized binders or poorly labeled folders slow down access and hinder response during emergencies. Clear naming, search functions, and logical grouping improve usability.

5. **Is offline or mobile access available in remote or field locations?**
   Field teams or satellite facilities often lack internet access. Providing mobile apps or offline SDS backups ensures uninterrupted compliance and safety awareness.

6. **Are SDSs regularly reviewed and updated when new chemicals are introduced?**
   Introducing a new product? An SDS must be reviewed and added immediately. Regular reviews help catch expired or superseded documents.

7. **Is there a designated person responsible for SDS maintenance?**
   Without clear ownership, SDS systems become outdated and disorganized. Assigning responsibility ensures updates and audits are handled proactively.

8. **Are employees trained on how to access and understand SDSs?**
   Merely storing SDSs is not enough—workers must know how to locate them and interpret critical safety information. This is a key part of OSHA's training requirement.

9. **Are supplier-provided SDSs verified for accuracy and currency?**
   Manufacturers may update SDSs without notice. Verifying that the provided document is current and GHS-compliant is critical for liability and safety.

10. **Is SDS data integrated with your chemical inventory system?**
    Linking SDSs to your chemical inventory helps track usage, simplify audits, and ensure labels match hazards in the SDS.

11. **Do you receive alerts when an SDS is outdated or replaced?**
    Some SDS software tools monitor manufacturer databases and flag outdated SDSs. This feature reduces the chance of noncompliance.

12. **Is SDS compliance reviewed during safety audits or inspections?**
    Incorporating SDS checks into your audit schedule ensures ongoing compliance and gives you a chance to catch issues before a regulatory inspection.

Access & Version Control Evaluation

Use this section to evaluate how SDSs are stored, retrieved, and kept current in your system.

Checklist:

- ☐ SDSs are accessible to all employees during every shift and at every site.
- ☐ Employees can retrieve SDSs within 1–2 minutes in an emergency.
- ☐ SDSs are available both digitally and as a physical backup (if required).
- ☐ Offline/mobile access is available for remote teams or job sites.
- ☐ SDS files are labeled with version dates and source/manufacturer info.
- ☐ The system flags outdated versions and alerts compliance personnel.
- ☐ Only authorized personnel can edit or upload SDSs.
- ☐ Version history is logged for each SDS.

💡 Tip: Cloud-based SDS software with access permissions and automated update tracking is highly recommended for robust version control.

OSHA Reference: 29 CFR 1910.1200 – Hazard Communication Standard

Key Requirements:

• Employers must maintain an SDS for every hazardous chemical in the workplace.

• SDSs must be written in English and contain the 16 standardized sections defined by the GHS.

• SDSs must be readily accessible to all employees during their work shift.

• Employers are responsible for ensuring that SDSs are current and updated whenever new hazard information becomes available.

• Employees must be trained to understand SDS content and know how to access them.

• SDS information must align with the chemical's hazard classification and labeling system.

📚 Official Resource:

https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200

Action Plan & Notes

Use the space below to document findings, assign responsibility, and track deadlines.

Action 1: _____

Responsible Party: _____

Due Date: _____

Status/Notes: _____

Action 2: _____

Responsible Party: _____

Due Date: _____

Status/Notes: _____

Action 3: _____

Responsible Party: _____

Due Date: _____

Status/Notes: _____

Action 4: _____

Responsible Party: _____

Due Date: _____

Status/Notes: _____

Action 5: _____

Responsible Party: _____

Due Date: _____

Status/Notes: _____