

Office of Regulatory Management
Economic Review Form

Agency name	Department of Labor and Industry
Virginia Administrative Code (VAC) Chapter citation(s)	16VAC25-90
VAC Chapter title(s)	Federal Identical General Industry Standards
Action title	Updates to OSHA Hazard Communication Standard.
Date this document prepared	May 18, 2026
Regulatory Stage (including Issuance of Guidance Documents)	Exempt Action – Final Regulation

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. **You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.**

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

NOTES:

On May 20, 2024, issued a final rule amending the Hazard Communication Standard (HCS) that became effective July 19, 2024. The Safety and Health Codes Board adopted these federal amendments to the Hazard Communication Standard during the last board meeting held on September 23, 2024, and it became effective in Virginia on November 20, 2024.

On October 9, 2024, OSHA issued a corrections notice and technical amendment to correct errors in that final rule.¹ OSHA made corrections to the regulatory text and appendices to the HCS that mainly include classification of hazardous chemicals and information presented on labels and

¹ Federal Register: Hazard Communication Standard: First Correction

Safety Data Sheets (SDSs).²

When Federal OSHA (OSHA) promulgates a new standard or more stringent amendment to an existing standard, OSHA-approved State Plans must either amend their standards to reflect the new standard or amendment or show OSHA why such action is unnecessary, *e.g.*, because an existing State standard covering this area is “at least as effective” as the new Federal standard or amendment. 29 CFR 1953.5(a).

Following publication of the October 9, 2024 corrections and technical amendments, OSHA continued review and identified additional minor and typographical errors in the regulatory text and appendices. On January 8, 2026, and February 13, 2026, OSHA issued a second corrections notice and technical amendment to correct errors in that final rule.³⁴ OSHA made corrections to the regulatory text and appendices to the HCS that mainly include classification of hazardous chemicals and information presented on labels and Safety Data Sheets (SDSs).

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.	(b) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.

² [Federal Register / Vol. 89, No. 196 / Wednesday, October 9, 2024 / Rules and Regulations](#)

³ [Federal Register: Hazard Communication Standard: Second Correction](#), published 01/08/2026

⁴ [Federal Register: Hazard Communication Standard: Second Correction](#), published 02/13/2026

(3) Net Monetized Benefit	Not applicable	
(4) Other Costs & Benefits (Non-Monetized)	Not applicable	
(5) Information Sources	Federal Register / Vol. 89, No. 196 / Wednesday, October 9, 2024 / Rules and Regulations Federal Register/ Vol. 91 No. 5/ Thursday, January 8, 2026/Rules and Regulations Federal Register/Vol. 91 No. 30/Friday, February 13, 2026/Rules and Regulations	

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Not applicable	(b) Not applicable
(3) Net Monetized Benefit	Not applicable	
(4) Other Costs & Benefits (Non-Monetized)	Not applicable	
(5) Information Sources	Not applicable	

Table 1c: Costs and Benefits under Alternative Approach(es) – FEDERAL IDENTICAL

(1) Direct & Indirect Costs & Benefits	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p>
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Benefits (Monetized)	Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Not applicable	(b) Not applicable
(3) Net Monetized Benefit	Not applicable	
(4) Other Costs & Benefits (Non-Monetized)	Not applicable	
(5) Information Sources	Not applicable	

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do	(b) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do

	not affect or change any existing rights or obligations.	not affect or change any existing rights or obligations.
(3) Other Costs & Benefits (Non-Monetized)	Not applicable	
(4) Assistance	Not applicable	
(5) Information Sources	Federal Register / Vol. 89, No. 196 / Wednesday, October 9, 2024 / Rules and Regulations Federal Register/ Vol. 91 No. 5/ Thursday, January 8, 2026/Rules and Regulations Federal Register/Vol. 91 No. 30/Friday, February 13, 2026/Rules and Regulations	

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.	(b) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.

(3) Other Costs & Benefits (Non-Monetized)	Not applicable
(4) Information Sources	Federal Register / Vol. 89, No. 196 / Wednesday, October 9, 2024 / Rules and Regulations Federal Register/ Vol. 91 No. 5/ Thursday, January 8, 2026/Rules and Regulations Federal Register/Vol. 91 No. 30/Friday, February 13, 2026/Rules and Regulations

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.	(b) No significant impact on employers or employees is anticipated as the rulemaking only corrects errors of a minor, mainly typographical nature and makes a few technical amendments that do not affect or change any existing rights or obligations.
(3) Other Costs & Benefits (Non-Monetized)	Not applicable	
(4) Alternatives	Not applicable	

(5) Information Sources	Federal Register / Vol. 89, No. 196 / Wednesday, October 9, 2024 / Rules and Regulations Federal Register/ Vol. 91 No. 5/ Thursday, January 8, 2026/Rules and Regulations Federal Register/Vol. 91 No. 30/Friday, February 13, 2026/Rules and Regulations
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Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements FEDERAL IDENTICAL

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Net Change
16VAC25-90	Statutory:	0	0	0	0
	Discretionary:	0	0	0	0
	Statutory:				
	Discretionary:				
	Statutory:				
	Discretionary:				
Total Net Change of Statutory Requirements:					0
Total Net Change of Discretionary Requirements:					0

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved*	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Length	New Length	Net Change in Length

*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).