



Hazard Communication Information Sheet reflecting the US OSHA Implementation of the *Globally Harmonized System (GHS)* of *Classification and Labelling of Chemicals*

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GHS/HazCom Information Sheet Workgroup

Workplace Labels

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How does OSHA's Hazard Communication Standard (HCS) define Workplace Labels?

A label on a chemical container in a work area provides the most immediate source of information about the hazards of a chemical. The requirements for workplace labels are identified in OSHA's HCS, 29 CFR 1910.1200(f)(6). The current version is HCS 2012. Two labeling systems will be discussed in this Information Sheet: Standard and Alternative.

Employers must ensure that each container of hazardous chemicals in the workplace must be labeled, tagged or marked with either the five (5) required label elements found in paragraph (f)(1)(i-v) [Standard labeling system] for the shipped container requirements or use an alternative label system in workplaces that is specific to that work locations and one that the employees know and understand. The workplace can use in their Alternative labeling system product identifier and words, pictures, symbols or a combination thereof that provide general information regarding the hazards of the chemical. The employer may use batch tickets, process sheets, chemical placards or other such written materials as an alternative labeling system, as long as the required information is conveyed to employees in their work area. The labels must be in English; however, other languages may be used in addition to English at the discretion of the workplace.

Exceptions to the HCS Requirements for the Workplace

There are few exceptions to the standard requirements:

- [This one is the main topic of this sheet]. For individual stationary process containers, the workplace may use signs, placards, process sheets, batch tickets, operating procedures, or other written materials instead of affixing labels. This is permitted as long as the alternative method identifies the containers to which it is applicable and conveys the required information and is readily accessible to workers in their work area throughout each work shift. (See below table.)
 - Example: Posting in employee area the container ID, contents and HCS label information; each container has ID clearly visible.
- Portable containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of that employee during that work-shift who performs the transfer are not required to be labeled.
 - Example: Oil dispensed from a 55 gallon drum into a 1 gallon container to use immediately on maintenance task.
- Drugs that are dispensed by a pharmacy to a health care provider for direct administration to a patient are exempted from labeling.
 - Example: Personal medications of employee.

For chemicals being received into workplace from elsewhere, and providing that the label on the incoming container is compliant with the revised HCS, the workplace can:

- use the same label that came on the containers as it was shipped or:
- use the employer’s alternative labeling system that meet the requirements¹ of the HCS.

Employer Flexibility: Employers have a certain amount of flexibility in that they can choose to label workplace containers with the required (standard) label elements or an alternative labeling system, as shown below.

Hazard Communication Standard Labeling Systems	
STANDARD	ALTERNATIVE
Product Identifier	Product Identifier or Container Identification (ID) Example: Single containers may be used for multiple chemicals. Have a list of containers and their corresponding contents available in worker area, with hazard and precautionary information also readily available.
Signal Word Pictogram	¹ Words, pictures symbols or a combination of these that provide at least general information regarding the hazards Example: Have poster on each pictogram in common area and attach only pictogram to container; ensure employees are familiar with the hazards each pictogram represents through training.
Hazard Statements and Precautionary Statements	¹ Other such written material may include, but is not limited to, signs, placards, process sheets, batch tickets, operating procedures – where identity and hazard(s) must be noted. Examples: Job Safety or Hazard Analyses (JHA/JSA). Work Instruction for handling certain materials. Existing RMP and/or PSM program. Hazards noted on process/batch sheets for each input.

Below is a summary of what additional information is needed when using an alternative label system.

The HCS requires the employer’s alternative label system to communicate the standard information to employees in a written form of some kind. Other written information may include signs, placards, process sheets, batch tickets, operating procedures or other material (for example Postings/Diagrams, JHA, Cross-reference tables, etc.), where the identity, hazard(s) and precautions must be presented. The information must be immediately available to employees throughout each work shift. The information supplied in an alternative labeling system must be consistent with the current HCS (i.e. use same nomenclature, pictograms).

Employers must ensure that their training program instructs employees on how to use and understand the alternative labeling system(s) so that employees are aware of the physical and health hazards (including target organ effects) of the hazardous chemicals to which they potentially are exposed. OSHA requires that ‘hazards not otherwise classified’ (HNOC) be addressed and include information about how employees can properly protect themselves from all types of hazards.

Employers using alternative labeling systems must ensure that their employees are aware of all information required to be conveyed under the HCS.

Another Employer optional labeling system mentioned in the HCS (Appendix C.3 to Section 1910.1200) is a Supplemental labeling system. Although there may be others, including those applicable at the state level, two commonly used in the chemical industry are noted below:

- National Fire Protection Association (NFPA) “Standard System for the Identification of the Hazards of Materials for Emergency Response” (NFPA 704) intended for First Responders, and
- Hazardous Material Information System (HMIS) targeted for the workforce.

However, ‘supplemental’ means ‘in addition to’; NFPA 704 and the HMIS labels, whether shown separately or together on a container, do not meet the requirements of HCS, so they cannot be used ‘in place of’ the required labeling. Their supplemental use is for particular audiences. For example, the NFPA 704 labels are used to help emergency responders quickly assess the chemical issues in an emergency; the NFPA 704 labels do not provide product identifiers nor do they address chronic hazards. Fire Departments may request NFPA 704 labeling in their jurisdiction. Alternatively, HMIS labels pre-date OSHA’s adoption of GHS labeling criteria, and may be very familiar to many workers if used by their employers (their use never has been mandated by OSHA).

To learn more...

- OSHA Hazard Communication Safety and Health Topics page: <https://www.osha.gov/dsg/hazcom/index.html>.
- OSHA GHS Web Page: <https://www.osha.gov/dsg/hazcom/global.html>
- SCHC site: <http://www.schc.org/osha-alliance>

The information contained in this sheet is believed to accurately represent current HCS requirements for hazard communication in the USA. However, SCHC cannot guarantee the accuracy or completeness of this information. Users are responsible for determining the suitability and appropriateness of these materials for any particular application.

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