



## CPSC vs. OSHA GHS Labeling Q&A

<b>What is the GHS?</b>	The Globally Harmonized System (GHS) is the United Nations System for the classification and labeling of chemicals. It is intended to be used around the world as the universal way to classify chemicals for their hazards and communicate that hazard information to chemical users.
<b>Do all chemicals sold in the US require the new GHS labels?</b>	No – only hazardous chemicals used in the workplace require labeling under the new US Occupational Safety and Hazard Administration (OSHA) Hazard Communication Standard. Certain hazardous chemicals used in the workplace are also exempt from the labeling requirements.
<b>Which workplace chemicals are exempt?</b>	Pesticides, food, food additives, color additive, drug, cosmetic, medical or veterinary devices or products, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), distilled spirits and other alcoholic beverages, consumer products, agricultural or vegetable seeds treated with pesticides.
<b>What is a consumer product?</b>	The Consumer Product Safety Commission (CPSC) defines a consumer product as any product brought into or around a dwelling and related buildings (garages, sheds, etc.). Includes products designed primarily for professional use but available to consumers in retail stores for non-professional use.
<b>What regulations govern consumer chemical labeling?</b>	Unless the product is a cosmetic, food, drug or pesticide, the CPSC regulates the labeling and packaging of hazardous household chemicals.
<b>What is a pesticide?</b>	The US Environmental Protection Agency (EPA) defines a pesticide as: A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. This includes antimicrobials.

<b>What regulations govern pesticide labeling?</b>	The EPA regulates the labeling and registration of all pesticides. The EPA has not adopted the GHS for pesticide labeling.
<b>If a product is also used in the workplace, does it need OSHA labeling also?</b>	No - OSHA exempts consumer products, pesticides and certain other chemicals that are used in the workplace from OSHA labeling. (See 29CFR1910.1200 (b))
<b>Where do workers get the hazard information they need for consumer products and pesticides used in the workplace?</b>	Safety Data Sheets (SDS) that comply with OSHA must be available (unless the product is exempt from the Hazard Communication Program) and workers are trained on the hazards of the chemicals they work with.
<b>When is a consumer product exempt from OSHA Hazard Communication?</b>	When it is used in the workplace in the same way and the same frequency of use as a consumer would use the product.
<b>What about cosmetics?</b>	Cosmetics are labeled under the regulations of the Food and Drug Administration (FDA). The FDA has not adopted the GHS for labeling.
<b>Why not add OSHA GHS labeling to consumer product labeling?</b>	There are several good reasons not to have dual labeling on consumer products. <ol style="list-style-type: none"> <li>1. Consumers are not trained on the meaning of the GHS pictograms and other label elements and may find those confusing.</li> <li>2. The hazard definitions are different under the 2 standards so the hazard information may be conflicting.</li> <li>3. CPSC labels for some chemicals mandate specific label statements and those are very different from the GHS hazard statements for the same hazards.</li> <li>4. OSHA and CPSC use different test methods that result in different classifications and hazard statements.</li> <li>5. Many containers are too small to accommodate dual labeling.</li> </ol>