



---

## ***What is a label?***

The definition of a 'label' differs slightly between the OSHA Hazard Communication Standard (HCS) and the GHS.

OSHA: "Label means any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals."

GHS: "Label means an appropriate group of written, printed or graphic information elements concerning a hazardous product, selected as relevant to the target sector(s), that is affixed to, printed on, or attached to the immediate container of a hazardous product, or to the outside packaging of a hazardous product."

Below is a comparison between existing OSHA and GHS labeling requirements.

---

### **OSHA**

#### **Purpose**

- The label is intended to be an immediate visual reminder of the hazards of the product/chemical.

#### **Requirements**

- Must contain the identity of the hazardous chemicals, name and address of responsible party, and appropriate hazard warnings.
- Exposure calculations are not permitted in determining whether a hazard must appear on a label. If there is a potential for exposure, (other than in minute, trace or very small quantities), the hazard must be included when well-substantiated<sup>1</sup>.

#### **Label Verbiage**

- There are no requirements for specific text to be used, as long as the appropriate hazard warnings are included.
- OSHA permits the use of graphics: pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical or health hazard(s), including target organ effects, of the chemical(s) in the container(s).

### **GHS**

#### **Purpose**

- To convey information about hazardous chemicals in a harmonized manner.

#### **Requirements**

- Must contain product identifier, name, address and telephone number of the responsible party, chemical identity, hazard pictograms, signal words, hazard statement, and precautionary information (precautionary information is not standardized yet).
- For labels, the hazard symbols, signal words, and hazard statements have been standardized and assigned to each of the hazard categories (depicted in the GHS document, [The Purple Book](#)). These standardized elements should not be subject to variation, and should appear on the GHS label.

#### **Label Verbiage**

- Each hazard has a category, or set of categories, with corresponding [pictograms](#), signal words, hazard and precautionary statements.
- Displays all the hazard statements associated with the product/chemical.
- "May be harmful if inhaled" is an example of a hazard warning.

1) CPL 02-02-038-CPL 2-2.38D-Inspection Procedures for the Hazard Communication Standard

## OSHA

- Hazards are considered for exposures under normal conditions of use or in foreseeable emergencies.

### Signal Words

OSHA believes that the American National Standards Institute's (ANSI) Standard Z129.1 provides much useful information for employers regarding product labels and is generally very helpful in complying with the HCS. ANSI recommends Caution, Warning, and Danger, in order of increasing severity.

### Chronic Health Effects Labeling

Well substantiated chronic health hazards - for example, carcinogenicity, reproductive toxicity, or developmental toxicity – as well as target organ effects must be stated on the label.

### Guidance

OSHA cites the ANSI Z129.1 standard as guidance, but adherence is not required by law.

## GHS

- Provides guidance on using precautionary statements.

### Signal Words

GHS uses Warning and Danger only.

### Comprehensibility

The aim of the harmonized system is to present the information in a manner that the intended audience can easily understand.

### Chronic Health Effects Labeling

GHS has classification criteria for chronic health endpoints and standard statements for those hazard categories. "May cause damage to the liver through prolonged or repeated exposure by inhalation" is an example of a standard chronic health effect statement.

### Guidance

GHS will be the labeling requirement for those countries/regions which adopt the GHS.

---

### **To learn more ...**

- The GHS, in its entirety (including classification criteria and label and MSDS requirements), can be downloaded at: [http://www.unece.org/trans/danger/publi/ghs/ghs\\_rev03/03files\\_e.html](http://www.unece.org/trans/danger/publi/ghs/ghs_rev03/03files_e.html)
- OSHA's Notice of Proposed Rulemaking on the GHS is available at: [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=FEDERAL\\_REGISTER&p\\_id=21110](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=FEDERAL_REGISTER&p_id=21110)
- A 12-hour training course on the GHS is offered by the Society for Chemical Hazard Communication (SCHC): <http://www.schc.org/training.php>
- For information sheets on additional GHS topics:
  - OSHA site: <http://www.osha.gov/dcsp/alliances/schc/schc.html#documents> - go to 'Products and Resources'.
  - or SCHC site: [http://www.schc.org/issues.php?start\\_from=5&ucat=&archive=&subaction=&id=&cat=9](http://www.schc.org/issues.php?start_from=5&ucat=&archive=&subaction=&id=&cat=9) - see 'GHS Information Sheets'.
- The OSHA Guide to the Globally Harmonized System of Classification and Labeling of Chemicals is available at: <http://www.osha.gov/dsg/hazcom/ghs.html>

---

*The information contained in this sheet is believed to accurately represent provisions of U.S. regulations, consensus standards, and current GHS requirements. 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.*

*This sheet was developed through OSHA's Alliance Program for informational purposes only. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor.*