How does OSHA’s Hazard Communication Standard (HCS) define a Label?
To be more consistent with the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), OSHA defines a label in the requirements of the HCS, revised in 2012. A “label” is “an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.”

How are labels comprised under HCS?
Classification
A chemical manufacturer or importer is required to classify the hazard of the chemical product. The HCS defines classification as a “means to identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.”

Once classified, the chemical manufacturer or importer is required to use a category or set of categories with standardized label elements for each hazard class assigned to the chemical. Label elements are “the specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.” Standardized elements cannot be varied on a label but OSHA has provided label preparers some flexibility in the use of the precautionary statements on the label (e.g., combining for readability). The aim of the harmonized system is to present the information in a manner that the intended audience can easily understand.

Label Requirements
All labels are required to have:
- a product identifier
- the name, address and telephone number
- pictogram(s)
- signal word
- hazard statement(s), and
- precautionary information.

Supplemental information (such as directions for use, the net contents, etc.) can also be provided on the label as needed.

Each of the required label elements has been defined.

The “product identifier” is “the name or number used for a hazardous chemical on a label and in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross references to be made among the required list of hazardous chemicals, the label, and the SDS.”

The “Name, Address, and Telephone Number” is required of the chemical manufacturer, importer, or other responsible party.

A “pictogram” is defined as a “composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.” An example of a pictogram is the health hazard pictogram.
The “signal word” is “a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in the HCS are ‘Danger’ and ‘Warning.’ Danger is used for the more severe hazards while ‘warning’ is used for the less severe.”

A “hazard statement” is “a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.” A label displays all the hazard statements associated with the product/chemical. An example of an acute effect hazard statement is “Causes serious eye damage.” An example of a chronic health effect hazard statement is “May cause damage to the liver through prolonged or repeated exposure by inhalation”.

The “precautionary statement” is “a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.” An example of a precautionary statement is “Wear protective gloves.”

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The information contained in this sheet is believed to accurately represent HCS 2012 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.

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