**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.

<table>
<thead>
<tr>
<th><strong>OSHA</strong></th>
<th><strong>GHS</strong></th>
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<tbody>
<tr>
<td><strong>Purpose</strong></td>
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<tr>
<td>• The label is intended to be an immediate visual reminder of the hazards of the product/chemical.</td>
<td>• To convey information about hazardous chemicals in a harmonized manner.</td>
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<tr>
<td><strong>Requirements</strong></td>
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<tr>
<td>• Must contain the identity of the hazardous chemicals, name and address of responsible party, and appropriate hazard warnings.</td>
<td>• 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).</td>
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<td>• 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.</td>
<td>• 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.</td>
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<tr>
<td><strong>Label Verbiage</strong></td>
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<tr>
<td>• There are no requirements for specific text to be used, as long as the appropriate hazard warnings are included.</td>
<td>• Each hazard has a category, or set of categories, with corresponding pictograms, signal words, hazard and precautionary statements.</td>
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<tr>
<td>• 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).</td>
<td>• Displays all the hazard statements associated with the product/chemical.</td>
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<td>• &quot;May be harmful if inhaled” is an example of a hazard warning.</td>
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</tbody>
</table>

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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)
- A 12-hour training course on the GHS is offered by the Society for Chemical Hazard Communication (SCHC): [http://www.schc.org/training.php](http://www.schc.org/training.php)
- For information sheets on additional GHS topics:

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.

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