

Weekly Safety Tip – 3/22/10 – IT’S ON THE LABEL (TRUTH IN ADVERTISING)

I live close to the edge of town. There’s some open space around us. And in the space lives a herd of deer. Deer are nice animals – unless they are eating all the flowers in your yard. If you look in garden centers and nurseries, some plants might have a label with a picture of a deer with a slash through it, meaning it is “deer resistant.” Some online gardening sites have pages of plants that are “deer resistant.” Those of us who live and garden near where deer reside understand that deer do not read, and therefore have not figured out which plants are “resistant.” They eat everything when they are hungry.

Recently I found a plant information website hosted by Rutgers University. Their deer planting labels make a lot of sense to those of us who understand deer feeding habits. The labels are: Rarely Damaged, Seldom Severely Damaged, Occasionally Severely Damaged, and Severely Damaged. That is truth in advertising! And they are labels I can understand. (If you would like to see the site, or need to plan your garden, here’s a link to the site: <http://njaes.rutgers.edu/deerresistance/>.)

OSHA has similar thoughts. They require true advertising on labels – information on the hazards - and they require the information to be consistent. This is found in the Hazard Communication Standard, 29 CFR 1910.1200 (f), linked here: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10099.

We often think of the Hazard Communication Standard as pertaining to Material Safety Data Sheets (MSDSs), but it has more requirements than that. Section (f) of the regulation stipulates that any hazardous chemical in the work place is to be appropriately labeled. Subparagraph (f)(5) states that the label must tell the identity and the hazards of the chemical. The labeling is to be legible and easily understood. Like if it is rarely damaged by deer, or in the severely damaged category. But what if your workforce speaks and reads a language other than English? To ensure that information about the hazards is easily understood, OSHA allows you to translate a label so that your employee can understand it (f)(9). It must be clear to your employees what chemical they have, and the hazards of that chemical.

How will your employees know what the hazards are for the chemicals in your workplace? You must provide training for them – paragraph (h). It’s like in those commercials for medications or household cleaners when you hear the announcer tell about all the side effects. That’s one type of training about a hazardous material. Truth in advertising – training on the hazard.

If you need help with the training portion, we have an online Hazard Communication training program. You can find more information about our online training program at http://www.hazmatschool.com/descriptions/HAZCOM_1291_information.html.

If you are an employee and you work with a product label you don't understand, it is your right, and your responsibility to ask your supervisor for more information in words you can understand. Find out if what you are working with can "Rarely Cause Damage", or "Severely Causes Damage".