April 15, 2015

Reference: Safety Data Sheets (SDS) for all Over-the–Counter drugs.

This document serves as certification that all of our OTC product brands (to include):
Green Guard
Medique
Medi-First
Medi First Plus
Otis Clapp
Dover

are exempt from the requirements for an SDS found in **29 CFR §1910.1200**.

Specifically, the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) exemption states:

29 CFR §1910.1200(b)

This section does not apply to:

29 CFR §1910.1200(b)(6)(vii):

"Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies)."

Therefore, over-the-counter drugs prepackaged for retail sale are exempt from OSHA Hazard Communication Standard requirements (including the requirement for an SDS) from time of packaging regardless of the product's final physical form.

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