

October 14, 2015

To Our Valued Customers;

VWR is aware that the U.S. Department of Labor’s Occupational safety and Health Administration (OSHA) modified its Hazard Communication Standard (HCS) in March 2012 to align with the United Nations (UN) Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. We have been actively collaborating with those suppliers whose products require compliance to this new standard for several years to drive towards meeting the phase-in effective dates outlined on OSHA’s website as follows:

### Effective Dates

The table below summarizes the phase-in dates required under the revised Hazard Communication Standard (HCS):

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015 December 1, 2015	Compliance with all modified provisions of this final rule, except:  The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors and employers
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

The final OSHA instruction dated July 9, 2015 also states these 2 key rulings specific to distribution of chemicals:

- Before December 1, 2015, distributors with existing stock packaged (e.g., boxed, palletized, shrink-wrapped, etc.) for shipment and containers that are HCS 1994-compliant labeled, may continue to ship those containers downstream. In these instances, there is no requirement to re-label packaged for shipment containers with HCS 2012-compliant labels.
- All containers in the control of a distributor after December 1, 2017, must be HCS 2012-compliant labeled prior to shipping.



For a thorough explanation of GHS with a complete listing of resources to reference, we recommend you refer to US Department of Labor, Occupational Health and Safety Administration's (OSHA) website as follows: <https://www.osha.gov/dsg/hazcom/index.html>

VWR will follow OSHA's prescribed deadlines for compliance with regard to labeling chemicals products and providing SDSs to our customers. GHS compliant SDSs can be found on the associated product page on [www.vwr.com](http://www.vwr.com).

It is important to note that OSHA has exempted a number of product categories from the labeling requirements of the OSHA Hazard Communication Standard, and these exemptions remain the same under HazCom 2012 (1910.1200(b)(5)). Some of the major exemptions to GHS labeling under HazCom 2012 are:

- ✓ Hard surface disinfectants and sanitizers: These products are subject to the labeling requirements of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and EPA registration. EPA has not adopted the GHS.
- ✓ FDA Regulated material as defined in the Federal Food, Drug, and Cosmetic Act (i.e. hand sanitizers, skin care products, medical devices). These products are under the control of the FDA, not OSHA, and the FDA does not require GHS labels at this time.
- ✓ Consumer products or hazardous substances as defined in the Consumer Product Safety Act and the Federal Hazardous Substances Act.

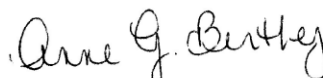
If you have additional questions regarding GHS compliance, please contact us at [GHS@VWR.com](mailto:GHS@VWR.com).

Sincerely,



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Sincerely,



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