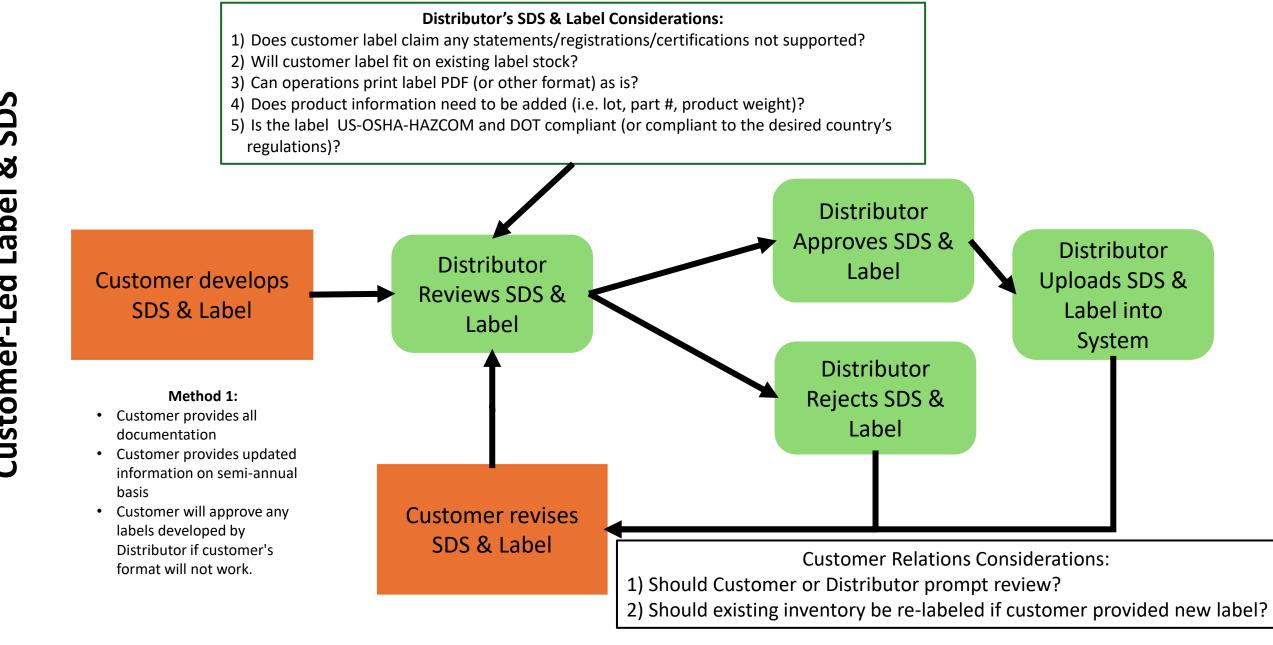
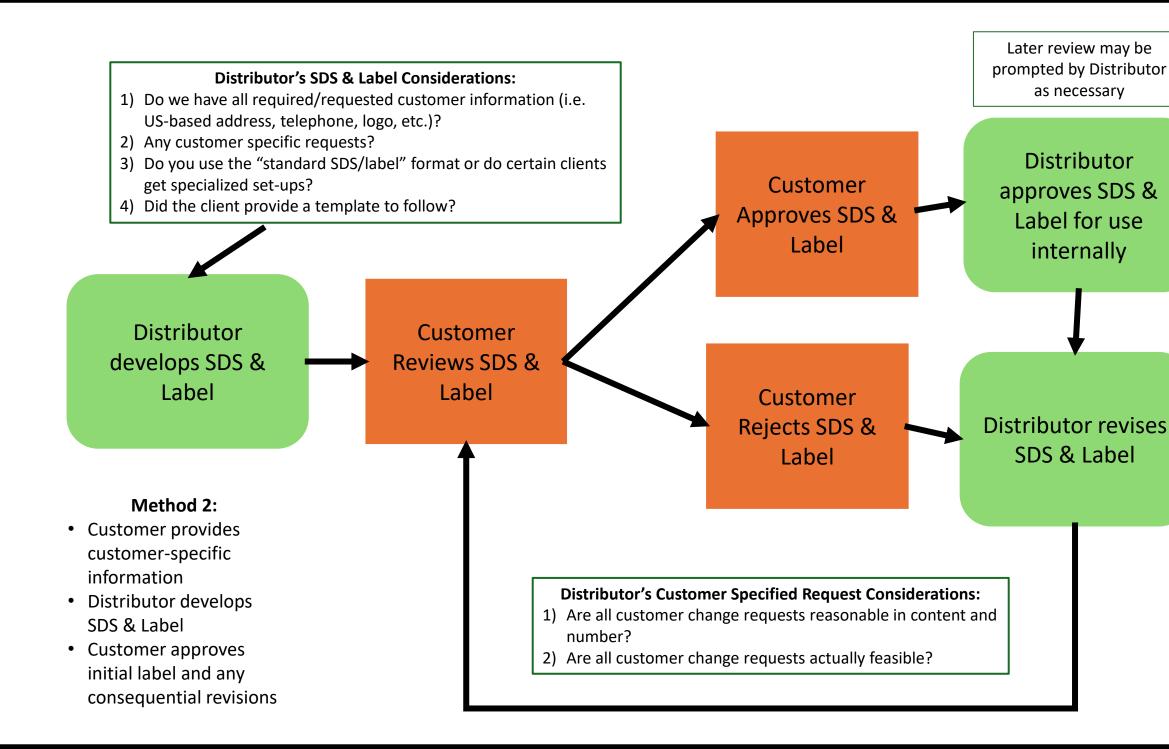
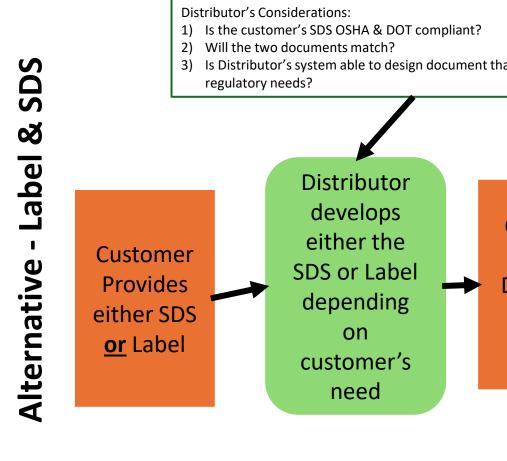
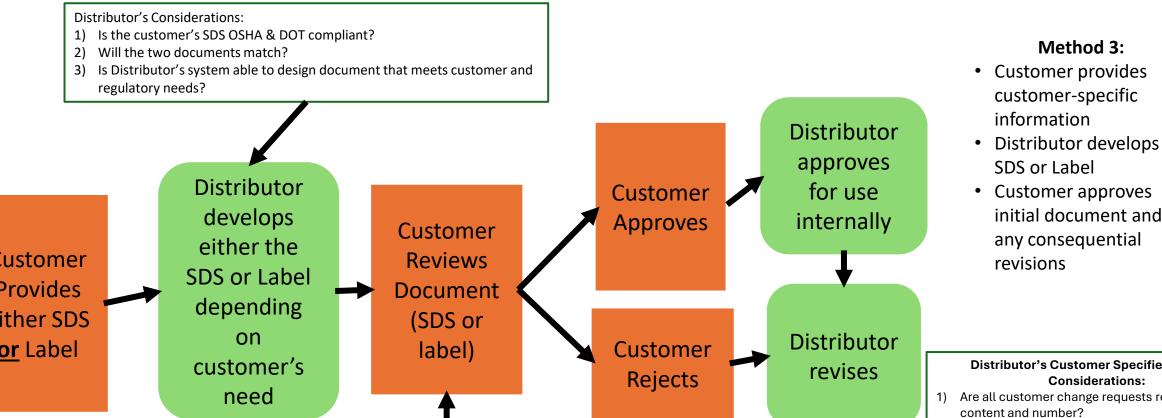
Private Labeling

Company Responsibilities for SDS & Label Creation









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A vital part of the chemical industry is private labeling – marketing an existing product under another company's name. Companies may coordinate with each other or do the work entirely in house. Each style requires careful consideration of best practices, the responsibilities of each company, and the interactions between the parties involved. This poster reviews SDS & Label Creation, Company Responsibilities, and Customer Relation Tactics.

Customer Relation Tactics

Scenario: Customer provided SDS and/or label that has elements that do not match Distributor's. What can the Distributor do and could it change depending on the situation? • Customer takes the responsibility of all Customer has a different GHS/OSHA classification than Distributor information Documentation - the Distributor can inform the customer of the variance and allow the customer to make the decision on how they would like to 1) • Customer handles any product revise the SDS/Label. Document the conversation. registration 2) Refusal - if there is insufficient data to support the customer's classification, the Distributor can refuse to label the product as such. The product Cons could be shipped under the Distributor's name and classification and the customer can private label at their own discretion. Potential GHS OSHA discrepancies Potential Customer has a different DOT classification than Distributor unsupported product Documentation - the Distributor can inform the customer of the variance and allow the customer to make the decision on how they would like to claims revise the SDS/Label. If the customer has documentation/testing that supports the classification difference, keep their DOT classification and • Coordination document the conversation. required for label Refusal - if there is insufficient data to support the customer's classification, the Distributor is to refuse to label the product as such. The product revision 2) Outdated documents could be shipped under the Distributor's name and classification and the customer can private label at their own discretion. used Customer's label PDF Customer makes product claims (product grade or legal status) that are unsupported by the Distributor. (or other forms)does not work in Documentation - customer must clarify the validity of the product claims Distributor's system Management and/or Legal Involvement - customer must sign documentation that releases the Distributor from responsibility and provide or doesn't fit documentation that shows they are taking ownership of the product. container/available Refusal - if there is insufficient data to support the customer's classification, the Distributor can refuse to label the product as such. The product 3) label stock could be shipped under the Distributor's name and classification and the customer can private label at their own discretion. Pros: • Distributor can more easily update SDS/Label with **Relabeled SDS Creation Practices** updated information as necessary Cons: • Distributor **Common Scenario:** Question 1 Examples: responsible for any Your company wants to distribute a vendor's product under your company's hazard classification Eye contact: branding. The composition may or may not be fully known. Rinse immediately with plenty of water, also under the evelids, for at least 15 minutes. Alternatively, rinse immediately changes Diphoterine ®. Get prompt medical attention. • Need to develop Rinse thoroughly with plenty of water for at least 15 minutes, lifting lower and upper eyelids. system for Customer Eye contact Questions: Consult a physician. approval to prevent Distributor making unauthorized changes. Methods and materials for For small spills, quickly contain and remove the spilled 2) Is it best practice to recreate the SDS in your system (if applicable) or to containment and cleaning up material using absorbent pads, socks, kitty litter, sawdust etc, • Need customer then appropriately dispose. Do not leave absorbents to sit modify the vendor's SDS to contain your information? overnight, as they will become hard and difficult to remove. support to receive The remaining residue or film can be treated with dilute - what is the best way to represent this situation? Is it important to note U.S. based address caustic (2%) or dilute liquid bleach (2-5%), allowed to soak for up to one hour, and clean with warm water (between 49C -U.S.-based phone you are the supplier vs actual manufacturer? 54C (120F - 130 F)) or flushed to a sewer using high volumes number and any other of water taking into account local guidelines. 3) When is it appropriate to take the vendor's classification as is or alter it? Keep in suitable, closed containers for disposal customer specific information that may Dike far ahead of liquid spill for later disposal. Soak up with inert absorbent material (e.g. Methods for cleaning up change sand, silica gel, acid binder, universal binder, sawdust). Pick up and transfer to properly changes? labeled containers. Clean contaminated surface thoroughly. After cleaning, flush away Customer may request traces with water • Is the answer different between OSHA or DOT hazard classification? specific phrases and • Should lab testing be required or when is it appropriate? information Question 3 Examples: At what point is SDS customization too much? Manuf nufacturer/Importer/Supplier/Distributor informatio Co Company name Original Manufacture **Not Best Practice** Address Telephone Pros: E-mail 1-123-456-7890 Customer specific data Website has already been Method 3: Original Manufacturer's Information Contact person gathered **Emergency Telephone** Physic Hazard(s) identification • Helpful if an hysical hazards Oxidizing solids Category 2 international label is Acute toxicity, oral Category 4 lealth hazards supplied for Skin corrosion/irritation Category 1C international shipments. Serious eye damage/eye irritation Category 1 Cons: Specific target organ toxicity, repeated Category 2 (Li OSHA/DOT classification Hazardous to the aquatic environment, acute Category 1 nvironmental hazard discrepancy between the initial document and **Rachel Hansen** SDS & Label Hazardous to the aquatic environment, Category 1 long-term hazard • Difference in revision **Senior Quality Systems Specialist** SHA defined hazard history between SDS & Label elements label • Customer requests specific phrases and nformation Distributor's Customer Specified Request • At what point is SDS Considerations: Are all customer change requests reasonable in customization too much? Are all customer change requests actually feasible?

- 1) If vendor has product-specific data/testing/advice, should that be included?

- How much of the formula needs to be known before comfortable making

cturer/Importer/Supplier/Distributor information		
mpany name dress	Customer	
ephone nail bsite	Customer's Information	
ntact person ergency Telephone card(s) identification		
al hazards	Oxidizing solids	Category 2
hazards	Acute toxicity, oral	Category 4
	Skin corrosion/irritation	Category 1B
	Serious eye damage/eye irritation	Category 1
(Specific target organ toxicity, single exposure	Category 1 (Respiratory System)
	Specific target organ toxicity, repeated exposure	Category 1 (Respiratory System, Central Nervous System)
	Hazardous to the aquatic environment, acute hazard	Category 1
mental hazards	Hazardous to the aquatic environment, long-term hazard	Category 1
	Not classified.	
defined hazards		
lements		
nal word	Danger	

