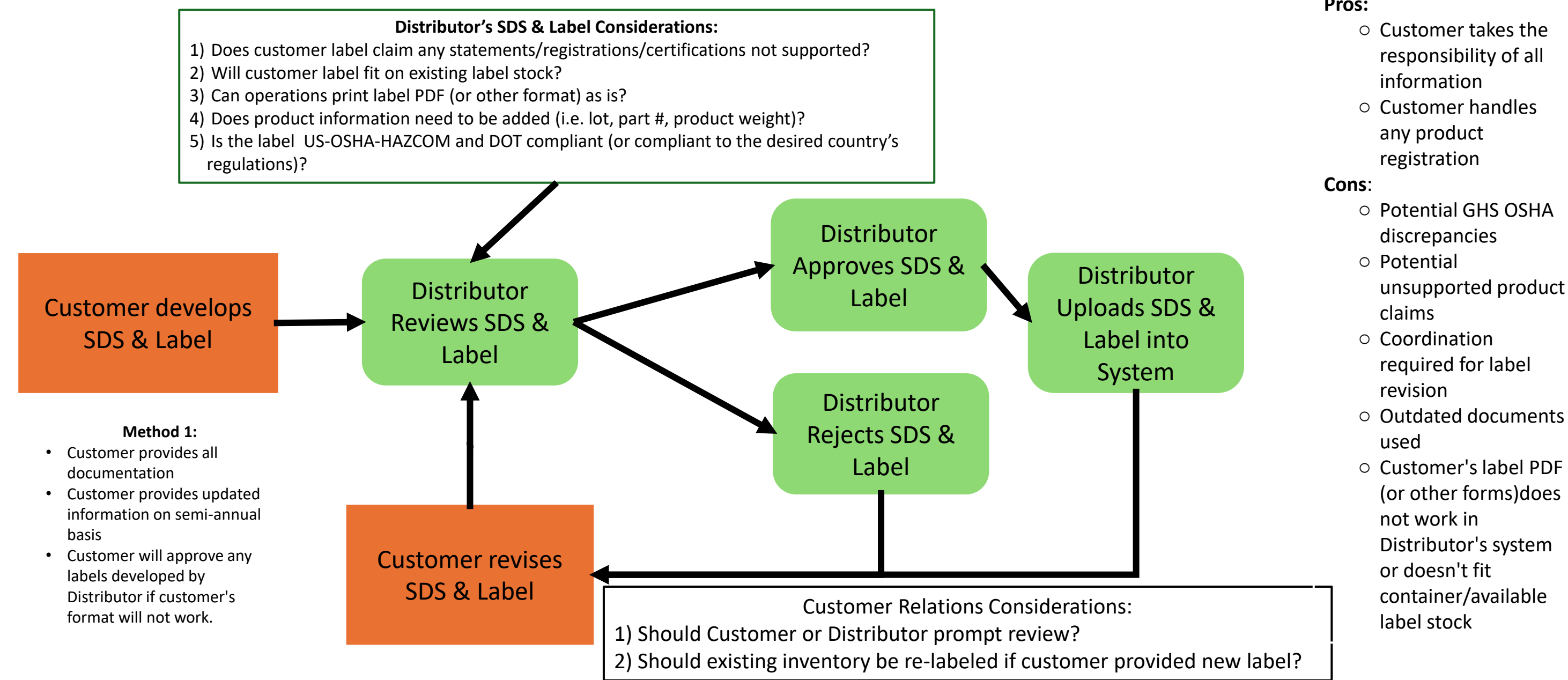


Private Labeling

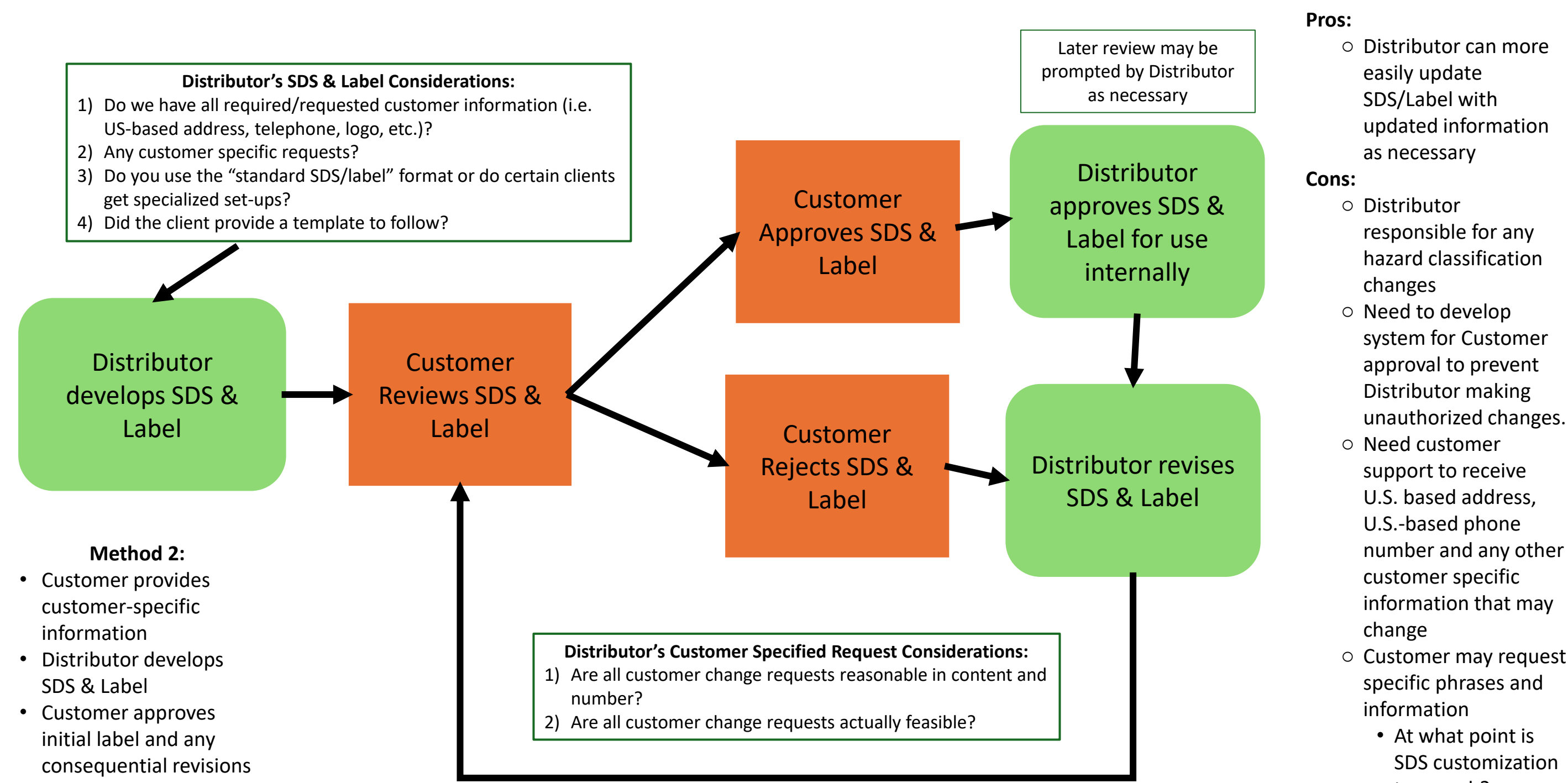
A vital part of the chemical industry is private labeling – marketing an existing product under another company’s name. Companies may coordinate with each other or do the work entirely in house. Each style requires careful consideration of best practices, the responsibilities of each company, and the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

Company Responsibilities for SDS & Label Creation

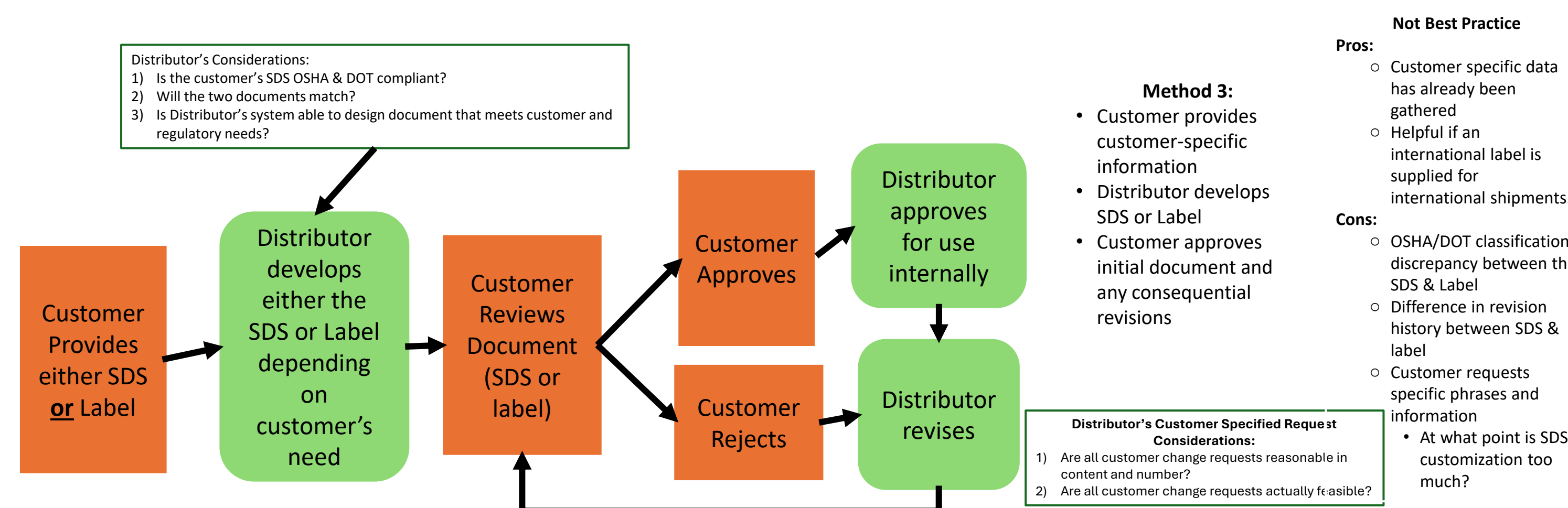
Customer-Led Label & SDS



Distributor-Led Label & SDS



Alternative - Label & SDS



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 has a different GHS/OSHA classification than Distributor

- 1) Documentation - the Distributor can inform the customer of the variance and allow the customer to make the decision on how they would like to revise the SDS/Label. Document the conversation.
- 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 could be shipped under the Distributor's name and classification and the customer can private label at their own discretion.

Customer has a different DOT classification than Distributor

- 1) Documentation - the Distributor can inform the customer of the variance and allow the customer to make the decision on how they would like to revise the SDS/Label. If the customer has documentation/testing that supports the classification difference, keep their DOT classification and document the conversation.
- 2) 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 could be shipped under the Distributor's name and classification and the customer can private label at their own discretion.

Customer makes product claims (product grade or legal status) that are unsupported by the Distributor.

- 1) Documentation - customer must clarify the validity of the product claims
- 2) Management and/or Legal Involvement - customer must sign documentation that releases the Distributor from responsibility and provide documentation that shows they are taking ownership of the product.
- 3) Refusal - if there is insufficient data to support the customer's classification, the Distributor can refuse to label the product as such. The product could be shipped under the Distributor's name and classification and the customer can private label at their own discretion.

Relabeled SDS Creation Practices

Question 1 Examples:

Eye contact:
Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Alternatively, rinse immediately with Diphtherine B. Get prompt medical attention.

Eye contact : Rinse thoroughly with plenty of water for at least 15 minutes, lifting lower and upper eyelids. Consult a physician.

Methods and materials for containment and cleaning up : For small spills, quickly contain and remove the spilled material using absorbent pads, socks, kitty litter, sawdust etc, then appropriately dispose. Do not leave absorbents to sit overnight, as they will become hard and difficult to remove. The remaining residue or film can be treated with dilute caustic (2%) or dilute liquid bleach (2-5%), allowed to soak for up to one hour, and clean with warm water (between 49C - 54C (120F - 130 F)) or flushed to a sewer using high volumes of water taking into account local guidelines. Keep in suitable, closed containers for disposal.

Methods for cleaning up : Dike far ahead of liquid spill for later disposal. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Pick up and transfer to properly labeled containers. Clean contaminated surface thoroughly. After cleaning, flush away traces with water.

Question 3 Examples:

Manufacturer/Importer/Supplier/Distributor information	
Company name	Original Manufacturer
Address	
Telephone	
E-mail	1-123-456-7890
Website	
Contact person	Original Manufacturer's Information
Emergency Telephone	
2. Hazard(s) identification	
Physical hazards	Oxidizing solids Category 2
Health hazards	Acute toxicity, oral Category 4
	Skin corrosion/irritation Category 1C
	Serious eye damage/eye irritation Category 1
	Specific target organ toxicity, repeated exposure Category 2 (Liver)
Environmental hazards	Hazardous to the aquatic environment, acute hazard Category 1
	Hazardous to the aquatic environment, long-term hazard Category 1
OSHA defined hazards	Not classified.
Label elements	
Signal word	Danger

Manufacturer/Importer/Supplier/Distributor information	
Company name	Customer
Address	
Telephone	Customer's Information
E-mail	
Website	
Contact person	
Emergency Telephone	
2. Hazard(s) identification	
Physical hazards	Oxidizing solids Category 2
Health 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
Environmental hazards	Hazardous to the aquatic environment, long-term hazard Category 1
OSHA defined hazards	Not classified.
Label elements	
Signal word	Danger



Rachel Hansen
Senior Quality Systems Specialist