



March 6, 2017

**Reference: Safety Data Sheets (SDS) for First Aid Kits.**

This letter serves as certification that Unifirst First Aid First Aid Kits (to include):

Green Guard

Medique

Medi-First

Medi First Plus

are "articles" as defined in 29 CFR §1910.1200(c) to which the Hazard Communications requirements of §1910.1200(a) and (b) do not apply, as specifically stated in the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) §1910.1200(b)(6)(v):

*Article* (as that term is defined in paragraph (c) of this section - means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.

The kit itself may contain other articles and/or drugs. Drugs are defined in 21 CFR Part 301 et seq., and are exempt from the Hazard Communications requirements of §1910.1200(a) and (b), as specifically stated in §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)."

Accordingly, no SDS exists for First Aid Kits or their contents.

*Debra A. Lehnus 3-6-17*

Debra A. Lehnus

Quality Assurance / Regulatory Manager