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## Safety Data Sheets (SDS)

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The U.S. Occupational Health & Safety Administration's (OSHA) Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards.

The vast majority of ACCO Brands products are considered to be "Articles" as specified by the HCS. As defined in 29 CFR 1910.1200(c), an "Article" is "...a manufactured item other than a fluid or particle:

- which is formed to a specific shape or design during manufacture;
- which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- 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.

Products that are manufactured or fabricated into an "Article" typically are whole units that do not and cannot pose a risk in that they cannot be ingested, inhaled, or absorbed into the body through the skin, eyes, or mucous membranes under normal conditions of use. By definition, this means that they are not classified as dangerous products and that there is also no intended release of dangerous substances during normal conditions of use.

In addition, products that are non-hazardous do not need an SDS.

As such, the products requested are either articles and/or non-hazardous, and are exempt from SDS requirements.

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