



March 1, 2017

**Reference: Safety Data Sheets (SDS) for all Over-the-Counter drugs.**

This letter serves as certification that all of Unifirst First Aid OTC drug product brands and supplements (to include):

Green Guard  
Medique  
Medi-First  
Medi First Plus  
Otis Clapp  
Dover

are exempt from the requirements for an SDS found in **29 CFR §1910.1200**.

Specifically, the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) exemption **29 CFR §1910.1200(b)(6)(vii)** states:

"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)."

Our over-the-counter drugs and supplemental products, are prepackaged for retail sale in final dosage forms and are supplied for patient care. Our items do not pose a danger to persons handling the products in the forms in which they are supplied.

**Therefore, our over-the-counter drugs and supplements are exempt from OSHA Hazard Communication Standard requirements (the requirement for an SDS) from the time of packaging regardless of the product's final physical form.**

Unifirst First Aid OTC drug product brands are regulated by the Food and Drug Administration according to 21 CFR § 211.132.

Debra A. Lehnus

Quality Assurance / Regulatory Manager