



MEDI-FIRST®



February 1, 2024

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

This letter serves as certification that UniFirst First Aid Corporation 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, in 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. 31 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 manufacture 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 suppliers).”

Our over-the-counter (OTC) 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.

Carolyn Mitchell
Quality Assurance Supervisor





MEDI-FIRST®



February 1, 2024

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

This letter serves as certification that UniFirst First Aid Corporation 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. 31 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 manufacture 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 suppliers).”

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

Carolyn Mitchell
Quality Assurance Supervisor

