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BROTHER INTERNATIONAL CORPORATION

Essendant
Michelle Anderson
1 Parkway North
Deerfield, IL 60015

December 8, 2016

Re: Inquiry regarding SDS documents for Brother Label Makers and Reachable Lithium Ion Battery Packs

Dear Ms. Anderson,

This document is to provide clarification regarding the necessity of Safety Data Sheets (SDS) for the above referenced products that Brother manufactures and distributes in North America.

According to the Hazard Communication Standard of the Occupational Safety and Health Administration, SDS's are required for all hazardous chemicals; however, the Standard specifically exempts all "Articles" from this requirement [29 CFR 1910.1200(b)(6)(v)].

"Articles" by definition of the Standard, "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."

We wish to advise our customers that the Brother products referenced above are "Articles" according to the above definition, and therefore are exempt from the MSDS requirements under OSHA.

If you have any further questions, please contact Brother and we will be happy to assist you in this matter.

Sincerely,

James K. Delahay, Jr.
Sr. Manager, Regulatory Affairs
Brother International Corporation