

200 CROSSING BOULEVARD, BRIDGEWATER, NJ 08807-0911 TEL 908-704-1700 FAX 908-704-8235 BROTHER INTERNATIONAL CORPORATION

Essendant 1 Parkway North Deerfield, IL 60015

July 23, 2018

Re: Inquiry regarding SDS documents for Brother Products:

Intellifax-4100e Intellifax-4750e MFC-8220 Intellifax-5750e

To Whom it may concern,

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 CRF 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