

SDS Compliance/GRAS Statement

The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012 by OSHA, 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. Effective 6/1/2015 new GHS requirements are needed on Safety Data Sheets.

A hazardous chemical, as defined by the Hazard Communication Standard (HCS), is “any chemical (any substance, or mixture of substances) which can cause a physical or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or **h**azard **n**ot **o**therwise **c**lassified”. **HNOC** is further defined as “an adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes...”

Silva International Inc. produces dehydrated vegetable ingredients, herbs, select fruits and custom blends which are classified as Food/Food Ingredients, and are considered GRAS (**G**enerally **R**ecognized **A**s **S**afe) by the FDA under 21CFR182.1. This GRAS statement applies to the food product being used within the US and any additives into the product. Based on GRAS there are no perceived physical or health hazards associated with handling our products. Furthermore as per the standard only if the company (Silva International Inc.) determines that their product is a hazardous chemical, the downstream users are required to maintain the SDS.

In summary:

- a) There are “no known adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes” under the HNOC clause and Silva’s products.
- b) Silva International Inc.’s products cannot be classified as chemicals or hazardous chemicals.
- c) Silva International Inc. cannot be classified as a Chemical Manufacturer.

It is with this understanding that Silva International products do not require SDS under 1910.1200(g)(1) and do not require labeling under 1910.1200(b)(5)(iii). Please see your product specification(s) for further detail.

Further review of the OSHA requirements can be found with the resources below.

<https://www.osha.gov/Publications/OSHA3514.html>



“Dehydrated Vegetables for the Food Industry”

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22410

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099

Some of Silva’s items may have strong odors (*spicy capsicums, alliums, and citrus*) and may cause irritation when handled in large quantities and closed environments. Silva recommends that proper ventilation be in place and that sensitive handlers utilize dust masks, glove, protective eyewear, or other PPE as deemed appropriate.

We hope you find this information beneficial. If based on the regulation and these definitions you believe that additional information is needed, please contact your account representative.
