



OSHA Update of Consensus Standards for Signage Frequently Asked Questions

What is OSHA's consensus update on signage?

The U.S. Occupational Safety and Health Administration's (OSHA) current regulations for workplace safety signs and tags are based on outdated formats. These old formats are not aligned with the latest national consensus standards and their state-of-the-art warnings technology. OSHA's 2013 regulatory agenda includes an update to its rules on safety signs and tags – regulations which have not been updated since their inception in 1971. The proposed new rule will update OSHA's regulations to reference the latest American National Standards Institute (ANSI) Z535-2011 standards, while grandfathering older signs that comply with the current OSHA requirements. Because OSHA must be sensitive to imposing additional costs on facility owners, the ANSI Z535-2011 reference will appear next to the 1967 USASI Z53 and 1968 USASI Z35 standards currently referenced in OSHA's regulations. This will allow employers to use either the old or new standards to be OSHA compliant. Prior to this rule change, facility owners using ANSI Z535 signs or tags would run the risk of being cited for violating OSHA standards because the OSHA standards only referenced the old 1967-68 standards (called a "de minimus situation"). With the proposed changes to OSHA's regulations, such citations will be a thing of the past. OSHA expects to commence rulemaking to effect this change soon.

How was Clarion involved in the update?

Clarion's CEO, Geoffrey Peckham, who also serves as chair of the *ANSI Z535 Committee for Safety Signs and Colors* and chair and delegation head for ANSI to the ISO standards pertaining to safety signs, has led the effort to update OSHA's consensus standards to better align them with the latest advances in safety sign technology. Over the last four years, together with the National Electrical Manufacturers Association, Peckham has lobbied OSHA to recognize that the ANSI Z535 series of standards for safety colors, signs and tags provide an equal or greater level of safety as compared to the 1967-68 USASI Z53 and Z35 standards that are presently referenced in OSHA's regulations.

Why are the latest ANSI standards better than older versions?

The benefits of using the latest ANSI Z535 signs and tags over signs and tags designed with the outdated 1960's-era standards include:

- The new signs and tags typically provide a more substantial level of information so people can make safer decisions (such as the nature of the hazard, the consequence of interaction with the hazard, and how to avoid the hazard).
- The concepts contained in the ANSI Z535 standards are supported by human factors research on effective warnings and by modern risk assessment methodologies.
- The newer formats better accommodate multiple language panels and graphical symbol panels so safety is better communicated to non-English readers.
- The ANSI Z535 standards contain design principles that exemplify current legal criteria for "adequate warnings" as defined by the past thirty years of U.S. case law.

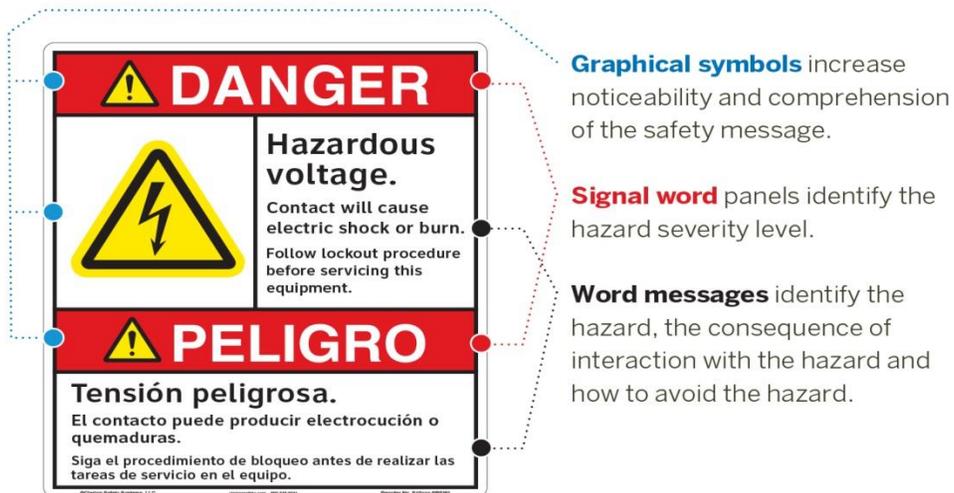
See the examples that follow as a reference.



Example of an old-style OSHA USASI-1967 Z35.1 sign and corresponding USASI-1968 Z35.2 tag.



Example of a new-style OSHA/ANSI 2011 Z535.2 sign and corresponding OSHA/ANSI 2011 Z535.5 temporary safety tag with best practice formatting and more complete content. (Designs ©Clarion Safety Systems.)



A diagram showing the safety communication benefits of the complete information included in a bilingual safety sign using best practice ANSI and ISO formatting. (Design ©Clarion Safety Systems.)

How does this change effect workplace safety signage?

Most employers currently use signs that comply with the older 1967-1968 standards. Because OSHA aimed to avoid creating an economic burden to employers, the older 1967-1968 standards will continue to be referenced in OSHA's regulations, allowing the older signage to continue to be used. However, the corresponding ANSI Z535-2011 reference will be placed next to the older reference. For instance, whenever the OSHA standards reference the 1968 *USASI Z35.1 Standard for Accident Prevention Signs*, the 2011 *ANSI Z535.2 Standard for Environmental and Facility Safety Signs* will also be referenced. In effect, this will allow employers to use safety signs that comply with either the old or the new standards.

Prior to this rule change, employers using the newer ANSI Z535 standards for their signage would run the risk of being cited for violating OSHA standards. The outcome of this violation would not result in a fine because the ANSI Z535 standards are the current version of the document that was used as the basis for OSHA's 1971 safety sign regulations. Called a "de minimus situation," this provision provided little incentive for employers to adopt the latest industry best practices with regards to safety signs, colors and tags.

The proposed new rule that incorporates ANSI Z535 safety sign, color and tag references into OSHA standards eliminates this problem, allowing employers to use the ANSI Z535 standards without the possibility of a citation.

If my organization is not obligated by OSHA to use the latest version of the ANSI standards, why is it important to update our facility signage?

With OSHA's regulatory update, organizations can now utilize the advances in warnings technology established in the ANSI Z535 standards for facility safety signs and tags – and be in compliance with OSHA. This is an opportunity for organizations to rethink and elevate visual safety communication in the workplace.

Most safety signs and tags in use today are based on antiquated, 70-year-old designs that lack the warnings technology incorporated into modern safety sign standards. They also fail to meet the demands of an increasingly global workforce with multiple language needs.

The 2011 ANSI Z535 standards have many safety communication benefits as compared with older versions (see the question above regarding the benefits of the latest ANSI standards). These standards incorporate the past 70+ years of advances that have taken place in safety sign technology. As such, their use in your workplace will be a significant step forward in improving safety and better protecting workers of all backgrounds.

What does this change mean for safety labeling?

The new rule change represents the U.S. government's validation of the ANSI Z535 design concepts that have been defining best practices for product safety labeling for the past 20+ years. For product design engineers and organizations that have put in place a process of risk assessment that has, as one of its results, well-designed ANSI Z535.4 product safety labels, this should result in an even better defense position if an accident occurs, a lawsuit arises, and the product's warning labels are challenged.

What does this change mean for the big picture of visual safety communication?

The OSHA update means that, over time, as employers adopt the newer ANSI Z535 best practice safety tag and sign formats, the U.S. will increasingly have a single, national uniform system of hazard recognition; safety signs installed in facilities and public areas, temporary safety tags placed on equipment, and safety labels placed on products will all be designed using the same formatting principles. The outcome of such consistency is more effective communication. That, in turn, should help achieve the objective of fewer accidents and more lives saved from tragedy.

Why should my organization choose Clarion for its up-to-date, best practice safety signs, tags and labels?

Clarion is helping organizations rethink safety with our new line of facility safety signs, tags and labels that more effectively reduce risk and protect people amid today's heightened regulatory and liability environment.

Companies, states, and municipalities choose Clarion because:

- Clarion has over 20 years of direct experience in the design and production of safety signs, labels, tags, and markings, working with 10,000+ safety and engineering staffs to minimize risk in over 180 industries worldwide.
- Clarion's intelligently configured products are based on an unparalleled knowledge of the national and international standards that define best practices for visual safety communication.
- Clarion is at the leading edge of safety sign technology. In fact, Clarion's CEO chairs the ANSI Z535 committee and chairs the U.S. ANSI delegation to the principle ISO safety sign committee – and he spearheaded the efforts to update OSHA's regulations to today's best practices.
- Clarion's products work. With over 46 million Clarion safety signs and labels in use and not a single instance of a Clarion customer being sued for "failure to warn" or "inadequate warnings," we know our products are doing their job of protecting people from harm.
- Clarion delivers consistent, cost-effective safety sign, label, and tag solutions that meet unique environmental, language and regulatory requirements.