

Article Exemption for Material Safety Data Sheets (MSDS)

Product Groups:	Single Ply Roofing and Accessories, Engineered Membranes, Awning Fabrics, Sign and Digital Print Media	
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To Whom It May Concern:

Thank you for your inquiry regarding a MSDS for Cooley Group products. Please be aware that a MSDS is not required for the above products as they are exempt from the applicable regulations as detailed below.

United States (29 CFR 1910.1200)

A MSDS is not required for these products as they are considered an “**article**” under 29 CFR 1910.1200, Hazard Communication, and are exempt from the MSDS requirement.

An “**article**” as defined in 29 CFR 1910.1200(c) as: “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.” A product meeting this definition is **exempt** from the labeling and MSDS requirements under 29 CFR 1910.1200 (b)(6)(v).

Canada (WHMIS)

A MSDS is not required for these products as they are considered a “**manufactured article**” under the Hazardous Product Act, and are exempt from the MSDS requirement.

A “**manufactured article**”, as defined in Section 11 of the Hazardous Product Act, “means any article that is formed to a specific shape or design during manufacture, the intended use of which when in that form is dependent in whole or in part on its shape or design, and that, under normal conditions of use, will not release or otherwise cause a person to be exposed to a controlled product;” A product meeting this definition is **exempt** from the labeling and MSDS requirements under Section 12(i) of the Hazardous Products Act.

Chemical manufacturers are not required to provide a MSDS for chemicals not covered under the HCS or HPA. OSHA and COSH realizes that manufacturers often provide a MSDS for reasons other than those of meeting the requirements of the HCS or WHMIS, and that this can cause confusion to downstream users.

The raw material formulations and process used in the manufacture of our products are considered proprietary. These standards provides for both the need to protect against potential exposure and the need to maintain confidentiality or proprietary information. These standards provides for the limited disclosure of certain proprietary information upon official request, either in a medical emergency or a non-emergency to a qualified health professional under specific conditions of need and confidentiality. Since these products do not release or otherwise result in exposure to a hazardous chemical under normal recommended conditions of use, disclosure of proprietary materials is only available as described in the applicable sections of the above standards.

Should you have any further questions or need additional information please contact our Customer Service Department at 800-333-3048.