

New Requirements for Supplying Safety Data Sheets for our Feed Products

Background-What Changed, in the past our feeds did not require a safety data sheet?

OSHA proposed treating combustible dust as an “unclassified hazard” Our industry contested the proposed change. The Federal appeals court ruled in favor of OSHA

The Court confirmed that grain dust meets OSHA’s definition of a “hazardous chemical”. Only very recently has OSHA clarified that our feed products require a SDS because of the dangers of combustible dust.

For the grain, feed and processing industry, the primary implication of the court ruling is that, starting June 1, 2015, raw grains and oilseeds shipped to downstream customers will be required to comply with OSHA's requirement to issue a Safety Data Sheet (SDS) for grain dust.

The primary implication of the newly revised OSHA standard for Purina Animal Nutrition is that shipped finished feeds and premixes, as well as raw grains and oilseeds, now must comply with OSHA's requirement to issue a revised safety data sheet (SDS).

Labeling – No Changes required Previous OSHA guidance and recent OSHA discussions to confirm the agency's position indicate that feed and grain products (including those in bulk and bagged form) that are subject to labeling under other federal requirements (primarily the U.S. Food and Drug Administration labeling), are NOT required to be labeled under the HCS. HCS labeling would be required for only for certain products, such as those an ingredient supplier may supply for non-animal feed uses, such as the production of fertilizers.

How often do I need to provide an SDS to a downstream user or customer?

A SDS only needs to be provided with an initial shipment of a product to a customer. Our generic feed SDS sheet is available and can be used for the vast majority of our finished feed products. You won’t need a specific one for every product.

Do I need to provide an SDS for bulk or bagged feeds that I produce and sell to a farm or reseller dealer?

Yes, we need to provide an SDS for that product the first time you ship it to that customer and when the SDS is changed.

Both Bagged and bulk feeds need an SDS that is made available to the dealer with the initial shipment. For feed wholesale or retail dealers selling to customers with commercial accounts, the HCS requires that you place the statement "SDS is available on request" at your operation for customers purchasing feed products.