Date: 10/1/19

To Whom It May Concern:

RE: Dixon Ticonderoga Company's products are exempt from Global Harmonized System (GHS) Safety Data Sheets (SDS), previously Material Safety Data Sheets (MSDS), requirements.

The alignment of GHS with the OSHA Hazard Communications Standard (HCS), replaces Material Safety Data Sheet requirements with those for Safety Data Sheets. This right-to-know documentation is required to be shared with employees using hazardous chemicals in the workplace.

Dixon Ticonderoga Company products are exempt from the OSHA Hazard Communication Standard for the following reasons:

- 1. Dixon Ticonderoga Company does not produce hazardous chemicals for use in the workplace.
- 2. Pacon, Canson and Strathmore paper products are exempt from 29 CFR 1910.1200 (b) (5) (iii), 29 CFR 1910.1200 (b) (5) (iv), and 29 CFR 1910.1200 (b) (6) (v) in that the wood and wood products exemption has been interpreted to include paper.
- 3. Dixon Ticonderoga Company products are considered "Articles" under the OSHA Hazard Communications regulations. Articles are manufactured items that do not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.
- 4. Dixon Ticonderoga Company products are considered "Consumer Products" and are therefore regulated under the Federal Trade Commission's Consumer Product Safety Commission rules. "Consumer Products" are exempt from OSHA Hazard Communications regulations.

Due to these exemptions, GHS- Safety Data Sheets / Material Safety Data Sheets are not required for Dixon Ticonderoga Company products.

If you have any questions regarding this please contact me at 800-333-2545 ext. 6297.

Sincerely,

Steve Boyea

EVP-Education Sales & Marketing