ISSUE: OSHA Adoption of ANSI Z535 Standards

The U.S. Occupational Safety and Health Administration’s (OSHA) current regulations for safety signs in the workplace are based on 71-year-old safety sign formats that are outdated and do not meet today’s safety communication needs. OSHA has an opportunity to build on its efforts to advance safety in U.S. workplaces by updating its regulations to reference the American National Standards Institute (ANSI) Z535 series of standards.

IMPORTANCE

In the late 1930s, the American Standard Association (ASA) began work on a national standard for safety signs and published a standard in 1941 known as ASA Z35.1 Specifications for Industrial Accident Prevention Signs. This standard subsequently was revised in 1959 and 1968, with very little in the way of changes to the format and content definitions for safety signs. OSHA currently requires safety signage to meet the 1968 version of the ASA Z35.1, using color specifications included in ASA Z53.1-1967 Marking Physical Hazards—Safety Color Code.

A lot has changed in America’s workplaces since the original sign design parameters were defined in 1941. A wide range of U.S. industries use sophisticated equipment and technology in their processes and building control systems. New technologies have spawned entire new industries that have multifaceted potential hazards that could not have been imagined in 1941. As a result, safety signs associated with more complex workplaces must attempt to communicate critical—and often more detailed—safety messages to an increasingly multi-cultural workforce.

The American National Standards Institute (ANSI) Z535 Committee on Safety Signs and Colors has, for more than 25 years, worked to develop a national uniform set of industry consensus standards that enable users to clearly communicate safety information. ANSI Z535 standards routinely are cited in litigation as defining the state-of-the-art when there is a question as to the adequacy of a warning. Specifically, ANSI Z535.1-2011 Standard for Safety Colors and ANSI Z535.2-2011 Standard for Environmental and Facility Safety Signs offer the following advantages over the ASA Z35.1-1968 and ASA Z53.1-1967 standards currently reference by OSHA in its regulations:

- better definition for the content of a safety sign
- improved safety sign formats
- differentiation between varying degrees of risk/hazard severity
- consistency leading to improved comprehension
- superior overall guidance on safety sign design

Currently, OSHA allows use of ANSI Z535 standards because they share the same basis document as the present OSHA regulation. However, because this acceptance is accomplished via the “de minimus situation” provision, employers using the current ANSI Z535 standards still are found in violation of the existing OSHA regulations for safety signs, even though no fine is issued. Unfortunately, OSHA’s use of this approach creates obstacles to the use of the more effective, modern signs.

POSITION

NEMA strongly supports OSHA’s adoption of the ANSI Z535 series of standards (particularly ANSI Z535.1-2011 and ANSI Z535.2-2011). OSHA’s incorporation of these standards by reference in its regulations will improve safety, reduce compliance uncertainty, and protect workers of all backgrounds.

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