



# Oregon

Kate Brown, Governor

Department of Consumer and Business Services  
Oregon Occupational Safety & Health Division (Oregon OSHA)

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**Issued:** February 10, 2020

Mike Waer  
Executive Director of Operations  
1101 N Broadway  
Estacada, OR 97023  
[waerm@estacada.k12.or.us](mailto:waerm@estacada.k12.or.us)

Dear Mr. Waer:

This is in response to your email of December 18, 2019, requesting information on Oregon OSHA's position on electronic access to safety data sheets (SDS). Oregon OSHA's requirements related to SDS can be found in the Hazard Communication Standard (HCS) – 29 CFR 1910.1200. Specifically, 29 CFR 1910.1200(g)(8), states the following:

*“(8) The employer shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). (Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.)”*

Essentially, as long as there are no barriers to employees accessing the SDS, storing them electronically is acceptable. However, if access to SDS is provided electronically, there must be an adequate back-up system in place in the event of a power outage, equipment failure, or other emergency involving the primary electronic system (e.g. interruption of internet connection). This backup system can also be electronic, but it must be separate from the primary system and not rely on the same services as the primary system, so that SDS may be accessed immediately in the event of an emergency.

Therefore, it is not “mandatory to maintain hardcopies of safety data sheets,” if all the conditions for your electronic system stated above are met. If you are concerned about your SDS maintenance system or wish to have an OSHA representative review your Hazard Communication Program, I recommend contacting [Oregon OSHA's Consultation Services](#). This is a free and confidential assistance program available to all employers in the state of Oregon.

Below are additional resources to assist you:

1. Oregon OSHA's [topic index page for Hazard Communication](#)
2. Oregon OSHA's [fact sheet on safety data sheets](#)
3. Oregon OSHA's [GHS-Aligned Hazard Communication Standard guide](#)

I hope you find the above information helpful. If there is anything else we can do to assist you, please email [tech.web.@oregon.gov](mailto:tech.web.@oregon.gov) or call 503-378-3272.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. J. McLaughlin".

David J McLaughlin, Standards & Technical Resources Manager  
Oregon Occupational Safety & Health Division