

CONSISTENCY AND YOUR LABELS

By Erin Earley

This month, read our interview with Angela Lambert, Clarion's head of standards compliance, to look at practical applications related to the importance of consistent use of best practices for your product safety labels.

To give context, tell us about your work with the ANSI and ISO standards and with product safety engineers.

As a company, Clarion has been involved on the U.S. (ANSI) and international (ISO) standards committees in our field for decades. In the past several years, I've become a member of the ANSI Z535 Committee for Safety Signs and Colors and the U.S. TAG to ISO/TC 145. With our company's passion for safety and commitment to being a resource for standards and warnings, the role is more than just contributing to committee work. I act as a liaison to bring expertise back to our company, to our partners and to the safety engineers and workplace safety professionals that rely on our products. In terms of our work with product safety engineers, there's not a one-size-fits all or prescribed way to create the best product safety labels possible. It's a process. We listen to the specific needs, goals and challenges at hand, and then recommend solutions that fall within the framework of today's best practices. It's a relationship that centers on education and partnership.

Why is consistency important for product safety labels?

The reason we standardize visual safety communication, including the design principles and symbols that make up product safety labels, is to have consistency. The best practice ANSI and ISO standards provide a common ground, an industry baseline for expected function, performance and safety. That includes the content and format of safety labels as well as their materials. The end goal is that these efforts to drive consistency will result in greater recognition and understanding of safety messages.

In a typical engagement with a client to assess a specific label, we communicate about the importance of following best practices consistently across product lines, company divisions and even markets. But the client may be focused

solely on an immediate need at hand and not ready to look at updating other labels, even on that specific product, let alone their full label program. Unfortunately, this could put both the users of their product and their company at risk; with inconsistent warnings comes a greater potential for miscommunication and accidents. To avoid safety incidents, you want to give your users the best possible chance to see, understand and heed your warnings.

What are the liability implications of inconsistency?

The legal theory of a manufacturer's duty to warn says that when you have reasonably foreseeable potential hazards associated with your product, you have a duty to warn people about those hazards so they aren't injured or killed. From a legal perspective, manufacturers have to meet or exceed the current standards relevant to their products, such as ANSI Z535.4-2016. Keep in mind, it only takes one deficient label to have a lawsuit. If an accident occurs and your warnings are challenged in a product liability suit, if you have one out-of-date label in your program, an argument could be made that your warnings are inadequate. Labels aren't just single entities, and looking at them that way could jeopardize your product's safety. Labels are an element of your overarching product safety and compliance program. It all comes down to consistently using the best practices.

Can you be more specific about the most common types of inconsistency issues you see?

Some of the issues we see on a daily basis (and these scenarios are even seen with product engineers and companies who feel they have safety 'covered') are:

- **A "wallpaper" of labels on a product:** A hodgepodge of varying types of warnings is a common outcome when labels are treated on a one-off basis, not as a

complete program. See Figure 1. Complex messaging equates to complex comprehension. When these situations are assessed to look at best practice alternatives, the final outcome is often a single, multi-message safety label. In other instances where more than one label is required, such as when there are multiple points of potential interaction with a hazard, each label has clear, uniform design principles and the messages work together to reinforce each other. See Figure 2.

- **Non-standardized or inconsistent use of symbols:** This is especially a concern when different manufacturers produce labels. The annex in ANSI Z535.3 tells us that, “Individual safety symbols should be designed, whenever possible, as elements of a consistent visual system.” Right now, as an example, we’re seeing a lot of varying arc flash symbols when there’s a new standardized ISO symbol that can be used.
- **Issues with conveying complex messages:** There are many different types of label designs that can be used in situations where there’s a complex safety message
- at hand. It’s important to lean on the ANSI and ISO standards for guidance on the best method for your situation, and to use that approach consistently.
- **Varying colors:** ANSI Z535.1 safety colors are tightly defined and should be adhered to across all of your safety labels for proper color-coding. Again, this can be a concern when different manufacturers are used to produce labels. Uniform color can help to speed visual recognition.
- **Substandard materials:** According to ANSI Z535.4, “Product safety signs or labels shall have a reasonable expected life with good color stability, symbol legibility, and word message legibility when viewed at a safe viewing distance... Reasonable expected life shall take into consideration whether the safety sign is permanent or temporary, the expected life of the product and the foreseeable environment of use.” It’s important to understand your label’s environment and surface conditions, as well as the latest high-quality material options available, to achieve your durability objectives.



Figure 1: Example of a ‘wallpaper’ of product safety labels, using different formats, colors and design principles.

Do you have any concluding recommendations for today's product manufacturers?

When it comes to safety, it's best not to assume you're doing things adequately. And don't downplay the value of your labels; they're a critical component of product safety and meeting your legal duty to warn. Every day, whether it's out in the field or working directly with clients, we see numerous instances of labels that are not up to today's standards. Look at your program holistically and regularly. Stay up-to-date on the ANSI and ISO standards, as well as any relevant regulations for your specific product area.

If you don't think you have the information or resources needed, turn to a credible source for help – one that's knowledgeable in helping product manufacturers create legally adequate warnings that use the latest standards-based criteria. ⁶⁴



Figure 2: Example of multiple labels on a machine using a system approach and consistent best practices.

Erin Earley, head of communications at Clarion Safety Systems, shares her company's passion for safer products and workplaces. She's written extensively about best practices for product safety labels and facility safety signs. Clarion is a member of the ANSI Z535 Committee for Safety Signs and Colors, the U.S. TAG to ISO/TC 145, and the U.S. TAG to ISO 45001. Erin can be reached at earley@clarionsafety.com.