



Guidelines for Labeling Secondary Containers

These guidelines specify the procedures endorsed by the UGA IACUC for the proper labeling of secondary (non-manufacturer's) containers for any materials used in the animal facility, whether for research purposes, maintenance of the facility, or administration to animals. The expectation is that IACUC Guidelines will be followed as best practice. They allow the Animal Care & Use Program to attain acceptable performance outcomes to meet the intent of the regulations. As such, any planned variation from the guidelines requires prior IACUC approval and must be based on a scientific rationale.

I. Introduction

Secondary containers are typically used for dispensing diluted chemicals and other materials at the point of use. In order to ensure appropriate, safe and efficacious use, substances used in an animal facility must be properly labeled. When transferring or adding materials to a secondary container, the responsibility of ensuring proper labeling rests with the personnel who filled the container. The extent to which labeling is necessary may vary according to the situation, and guidance is provided below.

II. Immediate Use

- Labeling is not required of secondary containers which are intended **only** for the immediate use of the person who mixes the material or performs the transfer from the original labeled container; however, it is recommended that such containers be labeled with at least the name of the substance.
- *Immediate use* is defined as use in which the material is not left unattended and is discarded immediately following use.
- For labeling guidance applicable to extended use of secondary containers, see sections III and IV.

III. Hazardous Substance Labeling

- When using cleaning supplies or other potentially hazardous chemicals, a blank Chemical Label (see V. Labels, below), or other comparable labeling, must be affixed to the container, with the following information added:
 - Chemical Name: Common name only; chemical formulas should not be used
 - Primary Hazard: The chemical's most significant risk to the user must be identified (e.g., flammable, caustic, etc.)
 - Date Mixed and/or Expiration Date: The date(s) must be clearly identified as either a fill date or expiration date. Perishable items must be labeled with an expiration date.
 - Note that alcohol may or may not be labeled by the manufacturer with an expiration date. Secondary containers of alcohol must be labeled with the expiration date if one is provided by the manufacturer. If no expiration date is available, the secondary container must be labeled with a fill date, and it is recommended that the lab establish a standard shelf life to apply.

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- Initials of Preparer
- Other Comments: Any other pertinent information about the use of the chemical should be included (e.g., Only use in a fume hood)
- It is recommended that secondary containers for hazardous chemicals have a National Fire Protection Agency (NFPA) safety diamond affixed (see [V. Labels](#), below).
- When using an NFPA safety diamond label for hazardous chemicals, the information below should be provided using the appropriate identifying symbols on the label. A definition of the numerical ratings should be made available to all laboratory/facility personnel in the area where the hazardous substance is used.
 - Health Hazard
 - Fire Hazard
 - Specific Hazard
 - Reactivity
- **IMPORTANT NOTE:** Chemical hazard ratings under the NFPA system go from **Class 0** to **Class 4** with a rating of **Class 4** indicating the most severe hazard. The new Globally Harmonized System (GHS) rates chemical hazards from **Category 1** to **Category 4** with a rating of **Category 1** indicating the most severe hazard. Since the numbering scheme used in both systems is different, it is important to make sure that the NFPA **class** system is used when completing the NFPA diamond. New Safety Data Sheets (SDS) will always contain the GHS ratings for a chemical. NFPA ratings are also often listed toward the end of the document. NFPA ratings can generally be located either on the primary chemical container, or on Material Safety Data Sheets (MSDS).

IV. Non-Hazardous Substance Labeling

Secondary containers for non-hazardous substances (e.g., saline, feed, water) must be labeled with the name of the substance, and dated if perishable or sterile. Perishable items must be labeled with an expiration date*. When a container is dated, the date must be clearly distinguished as either a fill date, an expiration date or a milling date, as applicable.

*Certain lab animal feeds arrive with a milling date rather than an expiration date, and have a known, standard shelf life. Secondary containers of such feed may be labeled with the milling date rather than an expiration date provided that the facility accounts for the shelf life in an SOP.

V. Labels

National Fire Protection Agency (NFPA) Safety Diamond



Chemical Label

Chemical Name: _____
Primary Hazard: _____
Date Mixed/Expiration: _____
Initials: _____
Other Comments: _____

VI. References

- National Research Council of the National Academies, *Guide for the Care and Use of Laboratory Animals*, 8th edition
- National Research Council, Institute of Laboratory Animal Resources, *Occupational Health and Safety in the Care and Use of Research Animals*, 1997
- OSHA Laboratory Standard 29 CFR 1910.1450
- OSHA 29 CFR 1910.1200
- UGA Chemical and Laboratory Safety Manual, Version 2016.3.1