



MEETING LOG

SUBJECT: ANSI Z535.4 Subcommittee for Product Safety Signs and Labels

FY26 OP PLAN ENTRY: Warnings and Instructions

DATE OF MEETING: 4/13/2026

LOCATION OF MEETING: Virtual

CPSC STAFF FILING MEETING LOG: Tim Smith (ESHF)

FILING DATE: 4/17/2026

CPSC ATTENDEE(S): Tim Smith (ESHF)

NON-CPSC ATTENDEE(S): Contact ANSI for the full attendee list.

Summary of Meeting:

The purpose of this meeting of the ANSI Z535.4 Subcommittee for Product Safety Signs and Labels was to discuss a change proposal for the ANSI Z535.4 voluntary standard that would allow for a wordless product safety label format. The format would use a color-coded (red, orange, or yellow) “hazard severity panel,” containing a safety alert symbol only, rather than a “signal word panel,” to communicate the seriousness of the hazard. The format also would allow for wordless “NOTICE” (in blue) and “SAFETY INSTRUCTIONS” (in green) labels.

The meeting began with the subcommittee member who proposed the change presenting possible revisions to the voluntary standard to include this formatting option. The revisions included adding language to the “Applications and Exceptions” section of the standard (section 3) that would allow the use of a wordless format and would point the reader to a new Annex G that provided specific requirements.

There was substantial debate surrounding the proposal. Some of the issues raised and discussed by CPSC staff and other attendees included the following:

- Whether the use of an annex to specify requirements is appropriate, because annexes generally are considered informative rather than normative. CPSC staff expressed particular concern that this situation would effectively permit wordless labels to not meet any requirements.
- Whether removing the signal word removes an important, redundant element that communicates hazard seriousness, especially among readers who are color-blind.
- The fact that the international standard ISO 3864-2, which provides design principles for product safety labels, already allows for wordless labels, and ANSI Z535.4 allows for product safety information to be conveyed by ISO formatted labels in compliance with that ISO standard.
- The degree to which allowing for Z535-style safety alert symbols in otherwise ISO-compliance wordless labels might result in a label that is neither compliant with ISO 3864-2 nor ANSI Z535.4.



- The degree to which there is empirical research that supports the use of wordless labels as an effective alternative.

During the discussions, the chair of the main ANSI Z535 Committee acknowledged that the focus of the ANSI Z535 series of standards is consistent formatting and improving consumer recognizability of safety information, and that the standard is not intended to optimize warning format, in terms of effectiveness. Some attendees disagreed, stating that many of the original requirements were based on the best available research at the time.

After extensive discussions, a slim majority of attendees voted to move forward with a variation of the original proposal, as follows:

- Section 11.2, which specifies when safety symbols can be used in signs and labels without corresponding word messages, would include a subsection stating that when such symbols are used to substitute for the entire word message, the signal word likewise may be omitted. However, this is not permitted in special circumstances that preclude the use of safety colors, as described in section 7.6.3.
- Section 6.1, which specifies panels that are used in a sign or label, would include language similar or identical to that added to section 11.2, stating that when safety symbols are used to substitute for the entire word message, the signal word may be omitted, except in special circumstances that preclude the use of safety colors.
- Section 7.6.3, which describes the special circumstances that preclude the use of safety colors, would include a final sentence stating that under those circumstances a signal word must be included.

The Subcommittee intends to send the draft proposal to the Main Committee prior to the next Main Committee meeting, which is scheduled for April 20, 2026. The proposal will be discussed at that Committee meeting.

Next Steps:

The ANSI Z535.4 Subcommittee will send its draft change proposal to the Main ANSI Z535 Committee prior to the next Committee meeting, which is scheduled for April 20, 2026.