



September 2, 2025

The Hon. Amanda Wood Laihow,
Acting Assistant Secretary of Labor for
Occupational Safety and Health
Occupational Health & Safety Administration (OSHA)
200 Constitution Avenue, N.W.
Washington, D.C. 20210

**Re: Docket No. OSHA–2025–0009; Safety Color Code for Marking Physical Hazards;
Textiles; Sawmills; Safety Color Code for Marking Physical Hazards for Shipyard
Employment**

Dear Ms. Wood,

The International Safety Equipment Association (ISEA) represents the PPE and safety equipment industry, which protects over 125 million American workers, supports 350,000 jobs, and pays state and federal taxes of \$9 billion. ISEA is accredited by the American National Standards Institute (ANSI) as a Standards Development Organization, and is secretariat for a number of ANSI standards, including Z87.1 (safety eyewear); Z89.1 (head protection); 107-2020 (high visibility safety apparel) and more. The full list of standards for which ISEA serves as secretariat can be found [here](#).

ISEA appreciates the opportunity to offer comments in response to the notice of proposed rulemaking published in the July 1, 2025 issue of the Federal Register. Specifically, ISEA opposes the proposed rescission of OSHA’s Safety Color Code for Marking Physical Hazards Standard, 29 CFR 1910.144 and any references to it in standards related to specific industries such as textiles, sawmills, and shipyards. We believe the safety color code standard and its references are critical components to maintaining safe workplaces and its rescission would therefore compromise worker safety.

Safety color coding for both signs AND objects

According to OSHA’s explanation for the proposed rescission of 29 CFR 1910.144, the rule is redundant to existing federal regulations; and OSHA’s Specifications for Accident Prevention Signs and Tags Standard, 29 CFR 1910.145 adequately addresses safety color coding in the workplace. This is incorrect, as CFR 1910.144 relates to safety color coding for *physical objects* rather than *signage and tags*. Specifically, CFR 1910.144 states that the color red should be the identifying color for “*fire protection equipment and apparatus*”, “*safety cans or other portable*

containers of flammable liquids”, “*table containers of flammable liquids*”, “*emergency stop bars on hazardous machines*”, and “*stop buttons or electrical switches*”. While CFR 1910.145 also speaks of red (and yellow) safety color coding, it does so in the sole context of the specifications of ***signage and tags*** that may appear either near or attached to various objects, not the color coding of the ***objects themselves***. Though they appear similar, these two separate standards are both critical to protect workers with hazard warnings through either written labeling or through the physical appearance of the object itself. Without separate rules governing safety color coding for physical objects, there is nothing stopping manufacturers of these kinds of hazardous equipment from utilizing other colors (e.g. purple, blue, green, etc.) to denote danger or caution on them. Such utilization of non-established object color coding would confuse both workers and the public and inherently increase risk of injury or death. To maintain consistency across all work settings, OSHA must continue to emphasize that both signage *and* objects must meet the same established safety color coding norms.

Protecting all American workers, regardless of ability

OSHA additionally cites concern for color blind workers as rationale for rescinding CFR 1910.144, stating that “*identification of hazards by color alone may be ineffective for those individuals with color vision deficiency (i.e. color blindness).*” We agree with OSHA’s concern for the safety of such workers but believe that concern would be better addressed by maintaining CFR 1910.144 as a necessary safeguard to protect workers with all kinds of disabilities or literacy levels. While the hazard signage and wording specifications in CFR 1910.145 help protect color blind workers who must rely on written warnings, it is the color coding rules of CFR 1910.144 that protects workers who cannot read or comprehend written warning language such as those who exhibit illiteracy or learning disabilities and instead rely on standardized hazard color coding. In contrast to other kinds of protections or equipment that safeguard a worker regardless of their level of understanding, safety warnings and labels are only as effective as the worker’s level of literacy. America’s workforce is strong and vibrant, but that requires protections that account for critical differences among workers. CFR 1910.144 ensures no worker suffers greater risk on the job due to illiteracy or other barriers

Industry and public recognition

Safety color coding is widely recognized as a critical component of occupational safety and health by both the regulated community and the public at large. ANSI has established widely adopted standards related to safety color coding in ANSI Z535.1-2022 for Safety Colors, which OSHA itself incorporates by reference in CFR 1910.145¹. By maintaining its own safety color coding standard, OSHA ensures that it aligns with consensus industry standards. Additionally, while OSHA states in the notice of proposed rulemaking that the low rate of citations issued relating to CFR 1910.144 (“*about 4 times (on average) since 2012*”) highlight the futility of maintaining a safety color code standard, we believe it conversely demonstrates the effectiveness and widespread

¹ 29 CFR 1910.145 references the ANSI Z535.1-2006 (R2011) version.

acceptance of these rules by industry and in the public consciousness. The fact that this standard is infrequently cited does not show that the standard is unneeded or unimportant for worker safety. Rather, it demonstrates that the agency is in tune with its regulated community and that such employers see the safety value delivered by CFR 1910.144. ISEA believes this is the reason compliance with CFR 1910.144 is nearly universal. Its high rate of compliance is a regulatory win OSHA can celebrate and one that both employer and worker groups can get behind.

Please contact me at cmackey@safetyequipment.org with any questions you or your colleagues may have. Thank you for your consideration.

Sincerely,

s/ Cam Mackey

Cam Mackey
President & CEO
International Safety Equipment Association