

Subject: Product Safety & SDS Requests

Technical Bulletin No.: TB-2025-11-003

Date: Tuesday, November 25, 2025

Summary

LDI Textiles is providing this Technical Bulletin to clarify why coated upholstery fabric does not require Safety Data Sheets (SDS) under OSHA's Hazard Communication Standard. Customers, specifiers, and compliance teams frequently request SDS documentation; however, upholstery fabrics qualify as "articles" and are therefore exempt from SDS requirements.

Background

- LDI Textiles manufactures upholstery fabrics engineered for healthcare, senior living, commercial interiors, and other high-performance environments. These products consist of a textile substrate which can be combined with a fully cured polymeric coating and or backing.
 - Under the OSHA Hazard Communication Standard (29 CFR 1910.1200), materials that meet the definition of an article are exempt from SDS requirements. An article is defined as a manufactured item that:
 - Is formed to a specific shape or design during manufacture,
 - Has end-use functionality dependent on that shape or design, and
 - Does not release hazardous chemicals under normal or reasonably foreseeable conditions of use.
 - All LDI upholstery fabrics meet this definition. As a result, no SDS is required, and none are issued for these products.
 - This approach is consistent with common industry practice across coated fabrics and performance textiles.
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Findings

Regulatory Status

- LDI upholstery fabrics are classified as articles under OSHA HCS.
- Articles are exempt from SDS documentation requirements.
- No hazardous chemical exposure occurs during normal handling, installation, or use.
- Fabrication activities (cutting, sewing, upholstering) do not release hazardous substances.

Material Safety Profile

- Coatings used in LDI products are fully cured and inert.
- No volatile components are present that could be released during normal use.
- No hazardous emissions are generated during handling or installation.

LDI can provide the following documentation in place of an SDS:

- Technical Data Sheets (TDS)
 - Regulatory declarations (Proposition 65, REACH, RoHS)
 - VOC compliance statements
 - AB 2998 compliance statements related flame retardants
 - AB 2771 compliance statements related to PFAS
 - Care & maintenance guidelines, including SDS-based cleaner compatibility review methods
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Customer Impact

This bulletin clarifies that an SDS is not required and does not exist for upholstery fabrics because they qualify as articles. This update may allow customers to:

- Satisfy internal compliance requirements using this Technical Bulletin and the appropriate TDS.
- Confidently specify LDI materials without concern over SDS availability.
- Communicate regulatory compliance clearly to EH&S teams, designers, procurement groups, and facility managers.

This update does not change product specifications, warranties, or performance expectations. Customers can be confident LDI coated fabrics maintain high performance standards suitable for demanding healthcare, senior living, and commercial environments.

Action Required

No immediate action is needed from customers, dealers, or specifiers. For bid submissions or compliance documentation, LDI Textiles can provide complete test reports upon request.

Outlook

LDI Textiles is developing an online library of documentation that may be used in place of an SDS.

For More Information:

Email: customercare@lditextiles.com

Phone: (866) 332-0700