



Canada Finalizes GHS Revisions to WHMIS

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On Feb. 11, 2015, Canada has published a final rule that revises the Workplace Hazardous Materials Information System (WHMIS) to be consistent with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). The modified WHMIS is now referred to as WHMIS 2015.

SDSs and Labels. The good news: The labeling and SDS provisions of WHMIS 2015 are virtually identical to those of the OSHA Hazard Communication Standard as revised by GHS (referred to as HazCom 2012). Moreover, Canada has made it permissible for companies to begin to comply with the WHMIS 2015 SDS and label provisions effective Feb. 11, 2015, the date of publication of the new regulation. That means that U.S. companies shipping chemical products into Canada may immediately begin to use GHS compliant labels and SDSs.

A copy of WHMIS 2015 (also referred to as the Hazardous Products Regulations) is available online at: <http://gazette.gc.ca/rp-pr/p2/2015/2015-02-11/html/sor-dors17-eng.php>.

Effective Dates. Canada is phasing in WHMIS 2015 over several years, and has different mandatory effective dates depending on the type of company.

In general, manufacturers and importers of chemical products, as well as employers, may begin complying immediately with WHMIS 2015. That means manufacturers and other suppliers may begin to use GHS compliant labels immediately in Canada, including labels on products shipped into the country.

While compliance with WHMIS 2015 is permissible now, effective June 1, 2017 manufacturers and importers must be in compliance with the new SDS and labeling requirements as revised by the GHS. Effective June 1, 2018, distributors must be in compliance with WHMIS 2015. And as of Dec. 1, 2018, employers must also be in compliance with the new law, except that employers will be able to use products with old labels and SDS that are in the workplace as of Dec. 1, 2018 until June 1, 2019.

Labels. For the most part, Canada has aligned its GHS labeling provisions to be consistent with those of the U.S. so that for the majority of cleaning chemical products, a GHS label that complies with the U.S. requirements will also comply with the Canadian requirements, except

for the bilingual labeling component required in Canada. Please note that Canada has eliminated the requirement of a “hatched border” under WHMIS 2015.

This close alignment of the U.S. and Canadian GHS labeling provisions will provide relief for manufacturers and other suppliers who previously had to develop 2 separate labels to comply with each country’s different labeling requirements.

Under WHMIS 2015, the label of covered chemical products must include the following elements: product identifier; supplier identifier; pictogram; signal word; hazard statement; and precautionary statement, consistent with the new OSHA HazCom 2012 labeling requirements. Thus, it is now possible to develop a single label and SDS that complies with both the U.S. OSHA HazCom 2012 and WHMIS 2015.

Additional Information. ISSA is still in the process of reviewing WHMIS 2015, and will provide additional details regarding this revised regulation in the coming weeks. In the meantime, we encourage you to review the text of the rule which can be found at: <http://gazette.gc.ca/rp-pr/p2/2015/2015-02-11/html/sor-dors17-eng.php>.

In addition, Canada has developed a number of online training programs around WHMIS 2015 that are provided on a complimentary basis. Please visit the following URL for more info: http://www.ccohs.ca/products/courses/whmis_workers/.

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