

Regulation of Cleaning Products in Canada

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Regulations and Information Pertaining to Labelling

Canada Consumer Product Safety Act ¹

The Canada Consumer Product Safety Act (CCPSA) was passed in 2010 and replaces Part I of the Hazardous Products Act. The CCPSA applies to all business entities that

- manufacture a consumer product,
- import a consumer product into Canada,
- sell a consumer product,
- advertise a consumer product,
- test a consumer product, or
- package or label a consumer product.

This act requires that companies report product issues (i.e., defects or safety concerns) to Health Canada and the suppliers of the product. This act also deals with subject matter such as product recalls, misleading product claims and information, and packaging and labelling issues such as deficient precautionary information on the product label.

Consumer Chemicals and Containers Regulations (CCCR)

The CCCR falls under the CCPSA (discussed above). The CCCR sets out labelling and packaging requirements for chemical products to inform consumers of the potential hazards that a product may pose during use.

Before importing and/or placing products on the Canadian market, a product must be labelled in the CCCR, using the applicable, mandatory verbiage and hazard symbols. The appropriate precautionary label information is dependent on the hazard categories associated with the consumer product.

The CCCR consumer label requirements are not aligned with the workplace labelling requirements in Canada's GHS-aligned Workplace Hazardous Materials Information System (WHMIS) 2015 standards. For example, the CCCR hazard symbol for a "Toxic" product is not the same as the GHS "Acute toxicity" pictogram.



Household cleaning products sold in retail are exempt from Canada's workplace hazardous chemicals regulations. Therefore, even if used in the workplace, cleaning products do not require a safety data sheet or workplace label.

The CCCR only specifies the minimum labelling requirements for immediate, acute hazards. Unlike the workplace regulatory standards, it does not provide requirements concerning chronic health hazards.

Abstract

Cleaning products consist of a large group of chemicals used for an array of varying functions, from foaming to disinfection. The laws regulating these chemicals vary from country to country, even with the implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Therefore, it stands to reason that Canada has its own standards and guidance for communicating hazards regarding such chemicals. For Canada, cleaning products like detergents are regulated mainly by the following national authorities: Canadian Centre for Occupational Health and Safety (CCOHS), Environment and Climate Change Canada, and Health Canada. Regulations promulgated by these authorities outline the required information needed to bring these cleaning products to market. This poster highlights the needed hazard communication elements and illustrates them through specific chemical examples. It is important for manufacturers and importers to become familiar with these relevant regulations to ensure that their products are compliant with Canadian laws before importing into and distributing in Canada.

Canadian Environmental Protection Act (CEPA) 1999 ²

CEPA 1999 governs the assessment and management of chemical substances. It is considered a "catch all" piece of legislation that addresses potentially toxic substances.

CEPA 1999 gives the government of Canada the authority to assess chemicals used in consumer products in order to determine any potential hazardous properties and the amount of exposure to these hazards people and the environment may experience.



In a 2017 assessment, Environment and Climate Change Canada conducted a screening of two substances, C.I. Fluorescent Brightener 28 (disodium salt) and Fluorescent Brightener FWA-1. These substances are members of the stilbenes chemical group, and are primarily used as whitening agents in powdered laundry and dishwasher detergents. The government's evaluation concluded that substances within the stilbene group are low-hazard ingredients and do not pose risks to human health.

Canadian authorities evaluated the alkyl sulphates and α -olefin sulphonate group in a screening assessment published on October 21, 2017, in order to determine whether these substances may pose any risks to the environment or human health. Chemicals in this group (e.g., triethanolamine [TEA] lauryl sulphate and sodium lauryl sulphate) are used in laundry, dishwasher, and household cleaning products. The assessment was initiated due to a screening report developed by the Organisation for Economic Co-operation and Development (OECD), which identified potential hazards of the chemicals. However, Canada's assessment determined that the current levels of exposure to consumers and the environment are very low, and so these substances were determined not to be harmful.

Chemicals of Concern

Phosphorus

Canadian authorities also regulate the concentration of phosphorous allowed in cleaning products (Phosphorus Concentration Regulations, SOR/2009-178).³ Phosphorus limits in cleaning products are as follows:

- Household laundry detergents: 0.5%
- Commercial and industrial laundry detergents: 2.2%
- Household dishwashing compounds (including hand dishwashing soap and automatic dishwashing detergents): 0.5%
- Household cleaners: 0.5%

Nonylphenol and Nonylphenol Ethoxylates

- Nonylphenol (NP) and nonylphenol ethoxylates (NPEs) are of specific concern with regard to household cleaners. These chemicals are surfactants used in many cleaning products, such as all-purpose cleaners and degreasers. These chemicals are identified as substances of concern by numerous regulatory agencies because NP is persistent in the aquatic environment, moderately bioaccumulative, and extremely toxic to aquatic organisms. NP and NPEs were added to Canada's Toxic Substances List in 2000. Based on this decision, Canada requires users of these compounds to develop and implement Pollution Prevention Plans to reduce concentrations in the environment.

Volatile Organic Compounds

- Volatile organic compounds (VOCs) originating from products such as air fresheners and cleaning products may be present in indoor air. VOCs have been associated with health effects including eye, nose, and throat irritation; headaches; loss of coordination; nausea; and damage to the liver, kidney, and central nervous system. Currently, Canada has not enacted VOC regulatory requirements specific to cleaning products, but future standards will most likely establish VOC concentration limits such as those present in already published regulations pertaining to architectural coatings and automotive refinishing products.

Cosmetics

- It should be noted that hand soaps are regulated as cosmetics under the Food and Drugs Act ⁴. Under the Food and Drugs Act, cosmetics sold in Canada must be manufactured, prepared, preserved, packed, and stored under sanitary conditions. The manufacturer and importer must notify Health Canada that they are selling the product and provide a list of the product's ingredients. Packaging and labelling requirements for cosmetics are outlined in the Consumer Packaging and Labelling Act ⁵. Cosmetics may also be subjected to additional requirements through CEPA 1999.

1. Canada, Canada Consumer Product Safety Act (S.C. 2010, c. 21)
2. Canada, Canadian Environmental Protection Act 1999 (S.C. 1999, c. 33)
3. Environment and Climate Change Canada, Regulations Amending the Phosphorus Concentration Regulations (SOR/2009-178)
4. Food and Drugs Act (R.S.C., 1985, c. F-27)
5. Consumer Packaging and Labelling Act (R.S.C., 1985, c. C-38)