



## A combined SDS must meet both the HazCom 2012 and WHMIS 2015 requirements

### SDS Sections of Note

#### Section 1. Identification

The name, address and telephone number of the manufacturer, importer, or other responsible party must appear on the combined US/Canada SDS. If a US supplier, the combined SDS should have a US address, and a valid US emergency telephone number reported.

A combined US/Canada SDS (and label) used by a Canadian supplier requires the supplier's Canadian address. (Exemptions to this provision are listed in Sections 5.8 and 5.9 of Canada's Hazardous Products Regulations.)

#### Section 2. Hazard(s) Identification

OSHA (Occupational Safety and Health Administration) defined hazards (i.e., pyrophoric gas, combustible dust, and simple asphyxiant) are required on both the SDS and label. HazCom 2012 states that Hazards Not Otherwise Classified (HNOCs) are not required on labels but must be disclosed on the SDS.

Include these WHMIS-specific hazards (not based on GHS) on the SDS and label when applicable: Combustible dust, Simple asphyxiant, Physical Hazards Not Otherwise Classified (PHNOC), Biohazardous infectious material, Health Hazards Not Otherwise Classified (HHNOC), Pyrophoric gas .

#### Section 3. Composition/Information on Ingredients

When providing US occupational exposure limits (OELs), the list of constituents in Sections 3 and 8 must be the same. If a constituent does not have an OEL, its exposure limit must be listed as "not applicable (N/A)" or "none." Per WHMIS 2015, only the constituents with available Canadian OELs are required to be listed in Section 8 of the combined US/Canada SDS

As required by WHMIS 2015, the exact percent/concentration or the actual concentration range of each constituent must be disclosed in the US/Canada SDS (unless a constituent is registered as a trade secret with the Canadian government under the HMIRA process).

#### Section 8. Exposure Controls/Personal Protection

Any temperatures reported in Section 9 (and throughout the SDS) should be given in both degrees Celsius and Fahrenheit.

Section 8 of the combined SDS should also indicate the appropriate respiratory protection applicable to the US (i.e., "Ensure an MSHA/NIOSH-approved respirator or equivalent is used.")

#### Section 9. Physical and Chemical Properties

All required endpoints must be reported on the combined SDS, and if no data are available for a specific endpoint, this must be stated (endpoints must not be omitted or left blank).

#### Section 11. Toxicological Information

As required under HazCom 2012, if a hazardous chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen by either the International Agency for Research on Cancer (IARC) Monographs (latest edition) or by OSHA, this should be indicated and the classification/rating should be given.

➤ A US/Canada SDS must be available in **both English and French** as required by WHMIS 2015.  
➤ Providing content in Sections 12 through 15 is not mandatory in a combined US/Canada SDS, but the section headings are required to maintain the 16 section organization of the SDS.

Jeremy Long; Joanne Houck; and Elizabeth Dederick, PhD

### Abstract

The alignment of Canada's Workplace Hazardous Materials Information System (WHMIS) with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) has made it possible for suppliers to generate safety data sheets (SDSs) and labels that meet both the United States' OSHA HazCom (Hazard Communication) 2012 and Canada's WHMIS 2015 requirements. The ability to generate a single SDS and label for a product not only simplifies trade between the US and Canada, but also streamlines and improves the communication of information to employees working with these chemicals. Even though the HazCom 2012 and WHMIS 2015 regulations are both aligned with GHS, there are some notable variations that must be accounted for in a combined SDS or label in order to maintain compliance in both jurisdictions. For example, WHMIS 2015-specific hazard classes not included in GHS must be stated on a US/Canada SDS and label, and it is important to include all other required information from both jurisdictions, such as country-specific occupational exposure limits (OELs). The objective of this poster is to describe the process for authoring a combined SDS and label that is compliant with both HazCom 2012 and WHMIS 2015.

### Important Upcoming Dates to Remember

US timeline for implementation of HazCom 2012		
Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Those responsible: Chemical Manufacturers, importers, distributors and employers	
<b>Present - June 1, 2016</b>		

Canada timeline for implementation of WHMIS 2015			
Timing	Suppliers: Manufacturers and Importers	Suppliers: Distributors	Employers
<b>Phase 1:</b> From February 11, 2015 to May 31, 2017	WHMIS 1988 or WHMIS 2015	WHMIS 1988 or WHMIS 2015	Consult federal, provincial and territorial regulators
<b>Phase 2:</b> From June 1, 2017 to May 31, 2018	WHMIS 2015	WHMIS 1988 or WHMIS 2015	WHMIS 1988 or WHMIS 2015
<b>Phase 3:</b> From June 1, 2018 to November 30, 2018	WHMIS 2015	WHMIS 2015	WHMIS 1988 or WHMIS 2015
<b>Completion</b>	WHMIS 2015	WHMIS 2015	WHMIS 2015

### SDS and Label Update Requirements

- Both HazCom 2012 and WHMIS 2015 regulations allow 3 months to update SDSs with new data/information and 6 months to update labels.

### Combined US/Canada Labels

A US/Canada-compliant label requires the following label elements: product identifier; signal word; hazard statement(s); precautionary statement(s); pictogram(s); and name, address and telephone number of the chemical manufacturer, importer, or other responsible party.



WHMIS 2015 requires that labels must be provided in **both English and French**. The US/Canada label elements may appear either on a single bilingual label (shown here) or two separate unilingual labels.

Remember that the product identifier, pictogram(s), signal word and hazard statement(s) must be grouped together on the US/Canada label as in this example label.

The combined label must take into account these specific **WHMIS 2015** requirements defined in Canada's *Hazardous Products Regulations* (HPR):

- Products containing a carcinogenic ingredient at a concentration of 0.1% or more (Category 1 or 2) require a label. (Under HazCom 2012, a label is optional for a product containing a Category 2 carcinogen at a concentration between 0.1% and 1.0%, provided there are no other hazards.)
- The following classifications must be included on the label if applicable:
  - **Physical Hazards Not Otherwise Classified (PHNOCs) and Health Hazards Not Otherwise Classified (HHNOCs):** these classes require a GHS pictogram on the label representative of the hazard indicated.
  - **Biohazardous Infectious Materials (BIM):** WHMIS BIM pictogram is required on the label and SDS.
  - **Water Reactive Substances:** a product meeting the criteria for this classification requires a supplemental hazard statement on the SDS and label indicating that in contact with water, the product releases gases which are fatal/toxic/harmful if inhaled.

US HazCom 2012 and WHMIS 2015 guidelines allow combined hazard and precautionary statements on labels if the combinations each convey the same information as the uncombined statements. Both jurisdictions also allow the omission of precautionary statements which do not apply to the product. Under HazCom 2012, hazard statements may be omitted if not applicable to the product, but WHMIS 2015 does not allow for such omissions. Therefore, the combined US/Canada label should report all hazard statements.

### References

- Health Canada. *WHMIS 2015 — Variances Between the HPR and the United States Hazard Communication Standard (2012)*. <http://www.hc-sc.gc.ca/>
- Canada Justice Laws. *Hazardous Products Regulations*. <http://laws-lois.justice.gc.ca/>
- Canadian Centre for Occupational Health and Safety. *OSH Answers: WHMIS 2015*. <https://www.ccohs.ca/>
- Health Canada. *Claims for Exemption*. <http://www.hc-sc.gc.ca/ewh-sem/occup-travail/whmis-simdu/hmira-lcrmd/exemption-derogation/index-eng.php>
- US Occupational Safety and Health Administration. *Hazard Communication Directive*. [https://www.osha.gov/OshDoc/Directive\\_pdf/CPL\\_02-02-079.pdf](https://www.osha.gov/OshDoc/Directive_pdf/CPL_02-02-079.pdf)
- OSHA Brief. *HazCom Standard: Labels and Pictograms*. <https://www.osha.gov/Publications/OSHA3636.pdf>