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Implementation of the GHS in Canada for Workplace Chemicals

Consumer Product Safety Directorate

Healthy Environments and Consumer Safety Branch

Health Canada

Amira Sultan and Kim Godard

Presentation to the

Society for Chemical Hazard Communication, September 30, 2014



Canada

GHS Implementation in Canada - Presentation Outline

- WHMIS in Canada
- Canada-United States Regulatory Corporation Council (RCC)
- Updates – What's New
- Variances between Canada and the USA
- Transition to GHS in Canada
- Overview of Canadian Guidance
- Key Considerations & Next Steps



Workplace Hazardous Materials Information System in Canada



WHMIS – An Overview

- The Workplace Hazardous Materials Information System (WHMIS) is Canada's national hazard classification and hazard communication standard for workplace chemicals.

Key elements of WHMIS

- Classification criteria;
- Labelling;
- SDSs; and
- Worker Education and Training Programs.



WHMIS Exclusions

- WHMIS covers hazardous materials in all Canadian workplaces with the following exceptions:
- explosives within the meaning of the *Explosives Act*;
 - cosmetics, devices, drugs or food within the meaning of the *Food and Drugs Act*;
 - pest control products as defined in the *Pest Control Products Act*;
 - nuclear substances, within the meaning of the *Nuclear Safety and Control Act*, that are radioactive;
 - hazardous waste;
 - consumer products as defined by the *Canada Consumer Product Safety Act*;
 - wood or products made of wood;
 - tobacco or tobacco products as defined in section 2 of the *Tobacco Act*; and
 - manufactured articles.



A Shared Responsibility - Overview

A shared responsibility:

- WHMIS is implemented in Canada through coordinated federal, provincial and territorial legislation.
- Federal: WHMIS legislation is to require the suppliers of hazardous materials used in the workplace to provide health and safety information about their products as a condition of sale or import.
- Provincial/Territorial: WHMIS legislation is to require employers to obtain health and safety information about hazardous materials in the workplace and to pass this information on to workers.
- Referrals are made between jurisdictions as required.



A Shared Responsibility – Health Canada

- Administers federal legislation governing workplace chemical suppliers
 - The *Hazardous Products Act* (HPA) and its regulations set out supplier labelling and safety data sheet (SDS) requirements, including which ingredients must be disclosed on the SDS.
 - The *Hazardous Materials Information Review Act* (HMIRA) and its regulations set out provisions for the protection of confidential business information.
- Coordinates the WHMIS national surveillance program
 - Includes ongoing engagement of its provincial and territorial partners and representatives of industry (suppliers and employers) and workers.
- Reviews and renders decisions in respect of claims for CBI relating to information required to appear on a label or SDS.



A Shared Responsibility – OSH Agencies

- Thirteen federal, provincial, territorial agencies are responsible for occupational safety and health and have established their own employer WHMIS requirements to ensure that:
 - Hazardous products used, stored, or handled in the workplace are properly labelled,
 - SDSs are made available to workers, and
 - Workers receive education and training to ensure the safe storage, handling and use of controlled products in the workplace.
- All provinces and territories base their WHMIS regulations on the same model, thus ensuring consistency across Canada.
- As a result of an agreement between the federal and provincial governments, OSH agencies enforce both federal and provincial WHMIS legislation.



Changes to WHMIS

- Changes occurred to WHMIS as a result of Health Canada's commitments to:
 - implement the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), as published by the United Nations without loss of current protections and while respecting legal frameworks.
 - harmonize the timelines and WHMIS requirements to the fullest extent possible with the US Occupational Health and Safety Administration, and
 - update WHMIS regulations to include recommendations made by industry stakeholders (i.e., suppliers/importers/distributors and employers), organized labour stakeholders, and the FPT OSH regulatory agency partners.



Canada-United States Regulatory Corporation Council (RCC)



Canada-US Regulatory Cooperation Council Joint Action

- The Regulatory Cooperation Council (RCC) was created in February 2011 to align Canadian and US regulatory approaches in various sectors, where possible, so as to:
 - Increase trade and investment
 - Lower costs for business and consumers
- On December 7, 2011, Prime Minister Harper and US President Obama announced that, as part of the Joint Action Plan for the Regulatory Cooperation Council, Canada and the US have committed to:
 - "align and synchronize implementation of common classification and labelling requirements for workplace hazardous chemicals within the mandate of the US Occupational Safety and Health Administration (US OSHA) and Health Canada (HC)".



Canada-US Regulatory Cooperation Council Joint Action

- On August 29, 2014, the RCC *Joint Forward Plan* was released. The plan sets the stage for fundamental changes in the way regulatory departments and agencies in both countries work together, making it easier for businesses to operate in both countries.

Web link: <http://actionplan.gc.ca/en/page/rcc-ccr/canada-united-states-regulatory-cooperation-1>



RCC Stakeholder Engagement

- A formal RCC stakeholder engagement session will be held on October 8, 2014
 - Confirm that a key outcome of the RCC initiative is to continue to develop lasting regulatory cooperation mechanisms in order to foster ongoing alignment and prevent future unnecessary differences from occurring.
 - Confirm our continued goal of making our regulatory systems more efficient and effective.
 - Demonstrate a continued commitment to engaging stakeholders in the process and provide ongoing opportunities to comment on technical, directional and strategic elements of the Joint Forward Action Plan.



RCC Implementation

- A key objective is to create a system that will, to the extent possible, allow the use of a single North American label and safety data sheet for each hazardous product.
- However, there will be some variances between the Canadian and US systems. Canada and the US are working together to keep variances between the two countries to a minimum.
- Aiming to synchronize Canadian implementation dates with those of the US OSHA (June 2015).



Summer 2013 Consultation Period

- Health Canada launched a formal consultation period seeking written comments from all interested parties on the draft regulatory proposals.
 - Health Canada received 67 submissions from industry associations, suppliers, employers, provincial and territorial governments, worker organizations, health groups, occupational health and safety professionals and individuals.
 - The overwhelming majority of submissions outlined support for the GHS initiative
 - Many submissions referred to the high level of alignment with the U.S. and the ongoing work under the RCC



Updates – What's New



What's New

Government of Canada introduced new legislation (Bill C-31) seeking amendments to the HPA in order to implement

Royal Assent

Publication in the *Canada Gazette* Part I (CGI)

Period for public comment closed

Public Comments

March 28

June 19

Aug 9

Sept 8



Next Steps

- Reviewing the comments on the regulatory proposal.
- Consequential amendments of FPT OSH legislation and regulations.
- Health Canada is developing guidance and supporting the development of worker training materials.
- Health Canada continues to work diligently to implement the GHS in Canada by June 2015 in accordance with the commitment made as part of the Canada-United States Regulatory Cooperation Council Joint Action Plan.



Variances between Canada and the USA



How do we define a variance

A “variance” is a difference between the proposed HPR and OSHA’s Final Rule that would result in one or more of the following outcomes:

- Different classification for a hazardous product in Canada versus the U.S.;
- Different labelling requirements for a hazardous product in Canada versus the U.S.;
- Different requirements in terms of information that must be provided on the SDS for a hazardous product in Canada versus the U.S.; or
- Additional requirements in terms of information that must be either:

(a) obtained or prepared upon importation of a hazardous product in Canada versus the U.S.; or

(b) transmitted to the purchaser upon the sale of a hazardous product in Canada versus the U.S.



Addressing variances

- Approach to identifying and addressing variances:
 - variances will be maintained only where it is essential (e.g., where it is required due to the nature of Canadian criminal law or where required to maintain current worker protections as committed to under the RCC);
 - throughout the regulatory process (and beyond) work will continue with stakeholders and US OSHA to minimize the number of variances;
 - continue to assess (and minimize to the degree possible) the actual on-the-ground impact of any variances that need to be maintained.



Collaboration with stakeholders

- Through our work with the stakeholders, as well as with US OSHA, the number of variances with the US-HCS 2012 in the regulatory proposal has been reduced considerably.
- We continue to work closely with stakeholders to address remaining variances.



Language Requirements for Labels and SDSs

Canadian Requirement

Labels and SDSs must be in English and French.

Rationale

The requirement for bilingual labels and SDSs is in accordance with the *Official Languages Act*.

U.S. Requirement

Labels and SDSs must be in English.



Supplier Identifier

Canadian Requirement

A Canadian supplier identifier must appear on the label and SDS of a hazardous product (except products imported for use in the importer's own work place).

Rationale

A Canadian party must be identified for the purpose of enforcing the regulatory requirements.

U.S. Requirement

- Name, address and telephone number of the manufacturer, importer, or other responsible party must appear on the label and SDS;
- Address does not have to be a U.S. address; however, the telephone number must be a U.S. number.



Precautionary statements

Canadian Requirement

The precautionary statements listed in section 3 of Annex 3 of the GHS (5th rev. edition) are required on labels and SDSs.

Rationale

The proposed HPR references the most up-to-date published version of the GHS (i.e., the 5th revised edition), and it is anticipated that the regulations will be updated in the future as the GHS evolves and more up-to-date versions are adopted by Canada's major trading partners.

U.S. Requirement

Precautionary statements required on labels and SDSs are listed in Appendix C of the HCS 2012, which seems to be aligned with the GHS (4th revised edition).

The wording of precautionary statements in Appendix C of the HCS 2012 may not be exactly the same as the wording in GHS rev. 5; however, the intent is the same.



SDS Requirements – Section 11 (Toxicological Information)

Chemicals considered to be a carcinogen according to US OSHA, the NTP Report or the IARC Monographs

Canadian Requirement

This information is not required to be disclosed on the SDS.

Rationale:

There is no explicit requirement under the proposed HPR to disclose that the chemical is found on these lists to be indicated on the SDS, however, the classification in one of these lists is based on data that would meet the criteria of either 2.1(a) or (b) under the proposed HPR. These lists were not explicitly mentioned in order to ensure that if a substance is not found on any of these lists an assessment for carcinogenicity would still be required.

U.S. Requirement

This information is required to be disclosed under section 11 (Toxicological information).



SDS Requirements – Section 11 (Toxicological Information)

Use of the phrase “not applicable” in section 11 (Toxicological Information)

Canadian Requirement

The phrase “not applicable” must not be used in section 11.

Rationale

The phrase “not applicable” is not permitted to be used in section 11 of the SDS (Toxicological Information) because toxicological information on a substance, mixture, material or product is always applicable and relevant. The phrase “not available” may be used if there are no data available for a particular item under section 11.

U.S. Requirement

No prohibition against using “not applicable” in section 11. If applicable information is not available, the SDS must state this.



Disclosure of all additional hazard information in respect of the hazardous product.

Canadian Requirement

All additional hazard information in respect of the hazardous product or, where applicable and not redundant, information in respect of a similar substance, mixture, material or product is required to be disclosed on the SDS.

Rationale

The requirement to disclose all additional hazard information in respect of the hazardous product or, where applicable and not redundant, information in respect of a similar substance, mixture, material or product maintains the current level of worker protection, as this is a requirement in the current *Controlled Products Regulations* (CPR).

U.S. Requirement

This information is not required.



Updating of SDS and label information

Canadian Requirement

- 90 days allowed for updating SDSs with significant new data (SND).
- 180 days allowed for updating labels with SND.
- If importation or sale occurs within the 90 or 180 day period, a written notice providing the SND must either be obtained or prepared (in the case of importation) or transmitted to the purchaser (in the case of sale).

Rationale

- This provision is a compromise between the U.S. timelines and the need, under Canadian criminal law, to ensure that accurate health and safety information is provided to workers in a timely manner.
- Maintains the current level of worker protection in Canada.

U.S. Requirement

- Three months allowed for updating SDSs with significant new information.
- Six months allowed for updating labels with significant new information.
- No requirement for a written notice providing the significant new information for importation or sale occurring within the 3 month or 6 month period, but it must be transmitted with the next shipment.



Labels on multi-container shipments

Canadian Requirement

In the case of a hazardous product that is packaged in more than one container, each container must be fully labelled, unless:

- (a) small capacity container (≤ 100 mL) exemption applies; or
- (b) an outer container exemption applies.

Rationale

Required to maintain the current level of worker protection in Canada.

U.S. Requirement

Only the innermost container is required to be labelled. The outer container does not need to be labelled.



Labels on kit outer containers

Canadian Requirement

- Outer container of a kit must be labelled.
- Exemption exists whereby the signal words, hazard statements, and precautionary statements relating to prevention, response and disposal do not need to be included on the outer container label, as long as a special statement referring the user to the individual product labels is used.

Rationale

Required to maintain the current level of worker protection in Canada.

U.S. Requirement

Only the inner containers are required to be labelled. The outer container of a kit does not need to be labelled.



Omission of hazard statements

Canadian Requirement

The omission of hazard statements from labels is not allowed.

Rationale

An allowance for the omission of hazard statements would not maintain the current level of worker protection, since risk phrases are not allowed to be omitted from labels under the current CPR.

U.S. Requirement

Hazard statement may be omitted if the chemical manufacturer, importer, or responsible party can demonstrate that the hazard statement is inappropriate to the substance or mixture.



Category 2 carcinogens

Canadian Requirement

Mixtures containing Category 2 carcinogens must be fully labelled [unless small capacity container (≤ 100 mL) exemption applies].

Rationale

The CPR currently requires all mixtures that contain a carcinogenic ingredient at a concentration of 0.1% or more to be labelled. The GHS option to make labelling optional for mixtures containing a Category 2 ingredient at a concentration between 0.1% and 1%, as adopted by US OSHA, would not maintain the current level of worker protection.

U.S. Requirement

A label warning is optional for mixtures containing a Category 2 ingredient at a concentration between 0.1% and 1%



Reproductive Toxicity, STOT - SE and STOT - RE: Hazard Statements

Canadian Requirement

Information relating to relevant routes of exposure, specific effects and affected organs must not be specified on the label unless all applicable routes of exposure, effects and organs are stated.

Rationale

The provision in the proposed HPR was included to avoid the communication of misleading information to workers.

U.S. Requirement

The label and SDS should convey the information that is known to the supplier. For example, if a supplier knows that a hazardous product classified in STOT-SE causes adverse effects on the liver, US OSHA would expect to see that information on the label and SDS, even if it is not certain whether the liver is the only organ affected by the product.



PHNOC/HHNOC versus HNOC - Labelling Requirements

Canadian Requirement

1) Label elements are required for PHNOC and HHNOC.

Required label elements are:

- ✓ an appropriate GHS pictogram,
- ✓ the signal word “Danger”, and
- ✓ appropriate hazard and precautionary statements.

2) For mixtures that contain an HHNOC ingredient at a concentration of 1% or more, the chemical name, common name and synonyms, CAS registry number and any unique identifiers, and concentration or concentration range of the HHNOC ingredient must be disclosed on the SDS.



PHNOC/HHNOC versus HNOC - Labelling Requirements Cont'd

Rationale

Required to maintain the current level of worker protection in Canada.

U.S. Requirement

- 1) No label elements required for HNOC.
- 2) For a mixture that contains an HNOC ingredient at a concentration of 1% or more, there is no requirement to disclose the chemical name or concentration of the HNOC ingredient on the SDS.



Biohazardous Infectious Materials

Canadian Requirement

A hazard class for Biohazardous Infectious Materials (BIM) is included and products that meet the criteria must be classified and appropriately labelled. Also, besides the standard (GHS-style) SDS, an additional SDS that provides information specific to the BIM is required. For a mixture containing more than one infectious material, each BIM is required to have its own additional SDS.

Rationale

Required in order to maintain the current level of worker protection in Canada.

U.S. Requirement

No hazard class for biohazardous infectious materials since these materials in the work place are not regulated by US OSHA.



Water-Activated Toxicants (WAT) – Supplemental Hazard Statement

Canadian Requirement

For products which, upon contact with water, release a toxic gas, a supplemental hazard statement is required on the label and SDS:

“In contact with water, releases gases which are fatal/ toxic/harmful if inhaled”.

Rationale

Required in order to maintain the current level of worker protection in Canada.

U.S. Requirement

A supplemental statement would be required on the SDS if substances which, upon contact with water, release a toxic gas are present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.



Canadian Requirement

- The proposed HPR includes a hazard class for Combustible Dusts.
- The proposed definition of “combustible dust” is “*a mixture or substance that is in the form of a powder that, upon ignition, is liable to catch fire or explode when dispersed in air or an other oxidizing medium*”.
- The proposed Regulations would only regulate products that pose a combustible dust hazard at the time of sale or importation.

U.S. Requirement

- The HCS 2012 includes combustible dust in its definition of “hazardous chemical”.
"Hazardous chemical" means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

The HCS 2012 applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency. Therefore, products which are shipped in a non-dust form but which, when processed in the workplace, would pose a combustible dust hazard are covered under the HCS 2012.



Confidential Business Information (CBI)

Proposal

- Only administrative changes were made to the *Hazardous Materials Information Review Act* (HMIRA).
- No change to the current process.



Transition to GHS in Canada



Purpose of transition

- To allow adequate time for stakeholders to adjust to the new system
- To move old labels and safety data sheets out of the supply chain and workplaces in a predictable and consistent manner across Canada

Key steps before transition can begin

- Regulations come into force
- Guidance on new requirements
- Training for workers and inspectors



What we have heard

- The transition approach was developed based on extensive consultation with WHMIS stakeholders.
- Stakeholders require at least two years between coming-into-force and full implementation to transition to the GHS.
- Need to balance allowing enough time for transition and the cost of training workers on two systems during transition.
- Comments on the timing of transition, as well as specific technical comments submitted on the regulatory proposal, are currently being reviewed.



Proposed Transition Approach

- To give suppliers, employers and workers time to adjust to the new system, the implementation of the GHS will take place gradually, over a four-stage transition period.



Transition – Phase 1 (coming into force to June 2016)

- At the beginning of the transition period, the old system and the new GHS system would be allowed simultaneously.
- Suppliers and employers will be able to use a label and safety data sheet combination that meets the requirements of either the old (*Hazardous Products Act and Controlled Products Regulations*) or the new (amended *Hazardous Products Act and Hazardous Products Regulations*) requirements.



Transition – Phase 2

(June 2016 to December 2016)

- Manufacturers and importers will have to comply with the new HPA and HPR requirements.
- Distributors will still be able to ship products with old labels and SDSs.
- Employers will be able to receive, use and produce labels and SDSs based on the old HPA and CPR.



Transition – Phase 3

(December 2016 to June 2017)

- All suppliers will be required to be in compliance with the new HPA and HPR.
- Employers will still be able to use CPR-compliant SDSs and labels in workplaces.

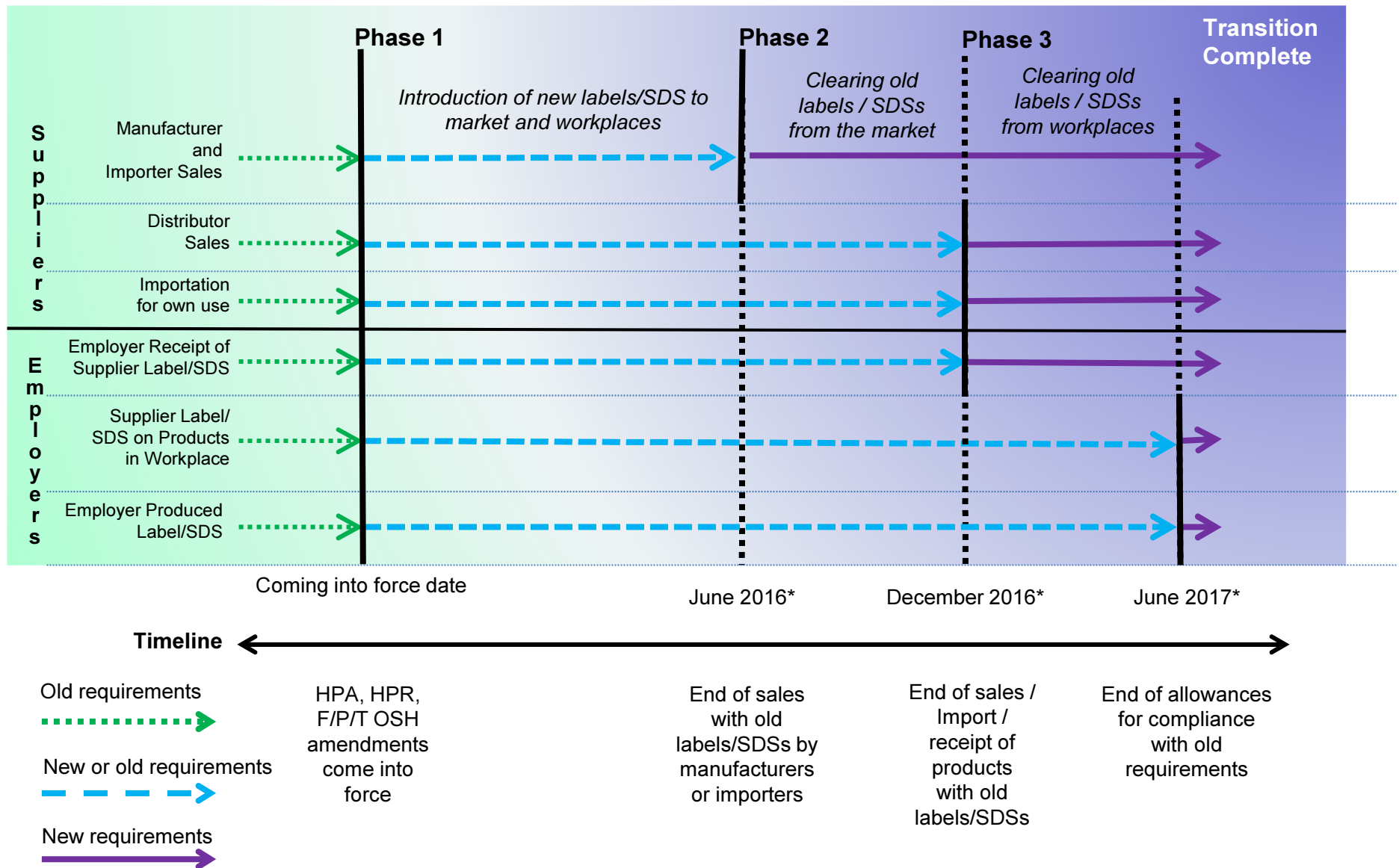


Transition Complete (June 2017 and beyond)

- The GHS will be fully implemented by June 2017.
- All suppliers and employers will be required to use HPR-compliant SDSs and labels.



GHS in Canada - Transition Approach



***These dates are anticipated and subject to change. Phase 1 will begin following the publication of the final *Hazardous Products Regulations in Canada Gazette, Part II*.**

Transition – Compliance and Enforcement

- Focus during the transition will be on communication and education
 - On-line training material
 - Guidance manual
 - Communication of common non-compliance issues
- Health Canada will continue to react to issues of non-compliances
 - Based on complaints, referrals, outcome of a CBI claim for exemption
 - When voluntary compliance with the CPR cannot be achieved, orders will be issued under the HPR.
- Proactive oversight intended to be limited to SDS and label review
 - Review done as part of the Confidential Business Information process



Overview of Canadian Guidance



A priority for Health Canada is to provide useful, broadly-accessible information and guidance on WHMIS and the GHS

Health Canada's approach to guidance will be founded on effective communication with WHMIS stakeholders

- Enhancing awareness and promoting compliance with the new regulatory requirements (GHS)
- Raising awareness of stakeholder roles and responsibilities
- Identifying key milestones during transition
- Bringing stakeholders together to preserve national consistency



Health Canada has worked with US OSHA to identify and reduce variances in each country's implementation of the GHS

June 2013 MOU between Health Canada and the US OSHA establishes collaborative process and a bilateral working group

- US OSHA and Health Canada will consult prior to publication of technical guidance on hazard classification
- Joint development of guidance and awareness materials will occur where possible



Guidance - FPT OSH Roles in Awareness

FPT OSH agencies

- Provide information and guidance to WHMIS employers on their obligations under legislation and regulations enacted in their respective jurisdictions
- Provide information to workers on WHMIS and broader OSH concerns
- Support Health Canada's training of WHMIS inspectors

Canadian Centre for Occupational Health and Safety (CCOHS)

- A federal government agency governed by representatives from workers, government and employers
- Provides authoritative WHMIS and broader occupational-related information, including chemical-specific information
- Supports understanding of WHMIS for all stakeholders
- Collaborates with Health Canada and the FPT OSH agencies to provide educational and/or training products on WHMIS



Progress Update - Awareness

Health Canada, in collaboration with CCOHS, has released several educational products related to the implementation of the GHS in Canada

- Webinar explaining regulatory proposal (March 2014)
- Updated e-course: WHMIS After GHS Introduction (June 2014)
- Updated e-course: WHMIS After GHS How Suppliers Can Prepare (June 2014)
- Fact Sheets reflecting the regulatory proposal (June 2014)

Health Canada, FPT OSH agencies and CCOHS are working via a training working group on awareness and guidance materials for the GHS regulatory requirements

- Products expected to include improved web presence
- WHMIS/GHS information publications, brochures, checklists and web content with many pieces used in multiple jurisdictions



Progress Update - Guidance

Health Canada is developing a new guidance manual for WHMIS suppliers to comply with the new regulatory regime

The manual will:

- Cover the amended HPA (2014) and new *Hazardous Products Regulations* (HPR) requirements
- Provide guidance on WHMIS elements that vary from either the UN GHS or the US implementation of the GHS
- Address the compliance flexibilities provided by the transition period from the existing regime to that implementing the GHS
- Include requirements for safe-guarding confidential business information per HMIRA and HMIRR

The manual is expected to be evergreen

- Working with stakeholders to meet their needs
- Reflecting future GHS revisions captured in the HPR



Progress Update – Worker Training

Health Canada, in collaboration with CCOHS, and with the support of FPT OSH regulators will provide an e-course for Canadian workers on the WHMIS, incorporating the GHS

- Covers training requirement for central WHMIS/GHS concepts
- Free for first 100,000 participants; \$10 per seat thereafter
- Completion certificate obtainable - an exam must be passed
- Core elements of GHS in WHMIS are not expected to change significantly as a result of the ongoing regulatory process
- Participants will be able to retake the course free of charge should changes occur
- E-course has been tripartite reviewed
- E-course to be hosted/administered by CCOHS
- Anticipated release in fall 2014



Next steps - Websites

Redesign of WHMIS.gc.ca

- to better present existing content
- to accommodate both this content and the new regulatory regime during the program transition period

Creation of WHMIS.org and SIMDUT.org

- a central portal to resources across Canada
- a collaboration of Health Canada, CCOHS and the FPT OSH regulators



Next Steps - Awareness

Health Canada anticipates future awareness pieces to include

- revised products (e.g. fact sheets) to reflect the final implementation of the GHS
- general information webinars coinciding with key milestones in program transition



Key Considerations and Next Steps



Key Considerations

- In working to implement the GHS, the alignment of the Canadian and U.S. hazard communication systems continues to be a priority for Health Canada.
- Timing – aiming to synchronize GHS implementation with US full implementation date of June 1, 2015.
- Providing sufficient time for Canadian industry to make necessary system changes and undertake training.
- Ensuring ongoing stakeholder engagement and work with US OSHA.



Next Steps

- Health Canada is currently reviewing the comments received and will be adjusting the regulatory proposal as necessary.
- Publication of final regulations in the *Canada Gazette* Part II;
- Phase-in/transition period;
- Amended HPA and regulations come into force.



Next Steps

Further Work

- Update policies & guidance documents;
- Update Health Canada-GHS Web site;
- Develop public awareness & training programs;
- Develop active compliance promotion



Canadian Regulatory Process - Overview

- Consultation with stakeholders to prepare recommendations for the amendment of the regulations (Summer 2013);
- Pre-publication of draft regulations with Regulatory Impact Analysis Statement (RIAS) in *Canada Gazette, Part I* (August 9, 2014);
- Formal notice and public comment period (30 days);
- Review of comments received, revision of regulation, updating of RIAS;
- Publication of final regulations in *Canada Gazette, Part II*;
- Coming into force of new regulations allowing implementation time.



Contact Information

Website: www.hc-sc.gc.ca

Email: whmis_simdut@hc-sc.gc.ca

**Workplace Hazardous Materials Bureau
Consumer Product and Safety Directorate
Healthy Environments and Consumer Safety Branch
Health Canada**



Information on GHS: Resources

- Health Canada, in partnership with the Canadian Centre for Occupational Health and Safety (CCOHS), developed GHS e-courses which are available on CCOHS website: <http://www.ccohs.ca>
- CCOHS Client Services Contact:
Phone: 1-800-668-4284
Fax: 905-572-2206

