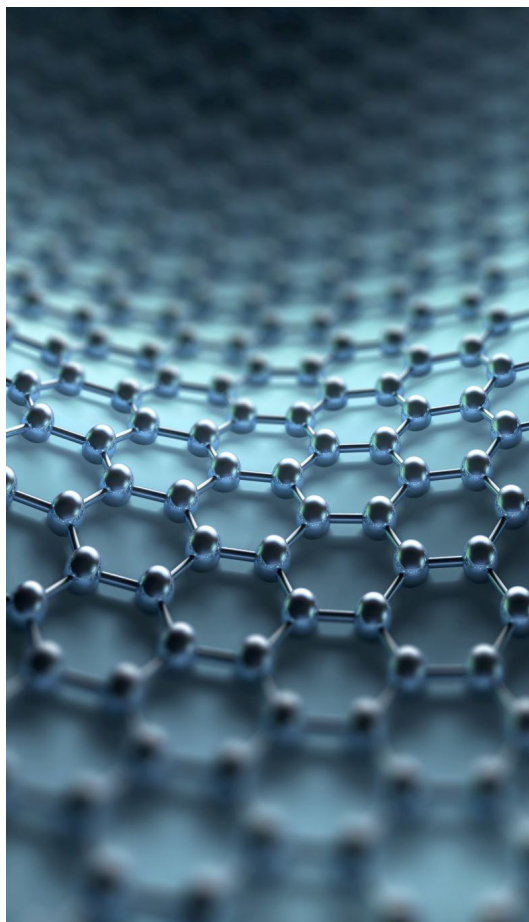




Society for Chemical Hazard Communication



CANADA
VERSUS
UNITED STATES
ADOPTION OF
GHS REVISION
7-8

2

THE BEST REGULATORY ALIGNMENT IN HISTORY



3 SECTIONS OF THE SDS



- Section 1:
 - Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party (In the United States and-or in Canada);
 - ...distributors will not need to make changes to product classifications, labels or safety data sheets because the changes would be made by Canadian manufacturers or importers of hazardous products;
 - Emergency phone number. (May be outside of Canada, language limitation must be indicated as any other limitations)

4 SECTIONS OF THE SDS



- Section 2: Physical Hazard Classes

Explosives (Some under PHNOC, most must refer to the Explosives Regulations 2013 in Canada - HAZCOM 2024 Includes Desensitized Explosives in the United States)

Flammable gases

Aerosols

Oxidizing gases

Gases under pressure

Flammable liquids

Flammable solids

Self-reactive substances and mixtures

Pyrophoric liquids

Pyrophoric solids

Self-heating substances and mixtures

Substances and mixtures which, in contact with water, emit flammable gases

Oxidizing liquids

Oxidizing solids

Organic peroxides

Corrosive to metals

Combustible dusts

Simple asphyxiants

Physical hazards not otherwise classified

Chemicals under pressure



5 SECTIONS OF THE SDS

- Section 2: Health Hazard Classes

Acute toxicity

Skin corrosion/irritation

Serious eye damage/eye irritation

Respiratory or skin sensitization

Germ cell mutagenicity

Carcinogenicity

Reproductive toxicity

Specific target organ toxicity – single exposure

Specific target organ toxicity – repeated exposure

Aspiration hazard

6 SECTIONS OF THE SDS



- Section 2: HNOC
- In Canada:
 - PHNOC (Physical) and HHNOC (Health)
 - ALL MUST BE Category 1 (Serious injury or death)
 - ALL MUST SHOW Danger (Signal Word)
 - ALL MUST SHOW applicable symbol(s)(e.g. Flame, Skull and Cross bones)
 - ALL MUST have a label with H and P applicable statements
 - Some PHNOC are listed in Schedule 4 of the regulation
- In the United States:
 - HNOC MAY be labeled with an Exclamation Mark Symbol + HNOC below the symbol (non-mandatory)

7 SECTIONS OF THE SDS



- Section 2: Biohazardous - Infectious Materials
- In Canada:
 - Keep the WHMIS 2015 SDS and label content
- In the United States:
 - Excluded from HAZCOM 2024 (as it was the case in 2012)

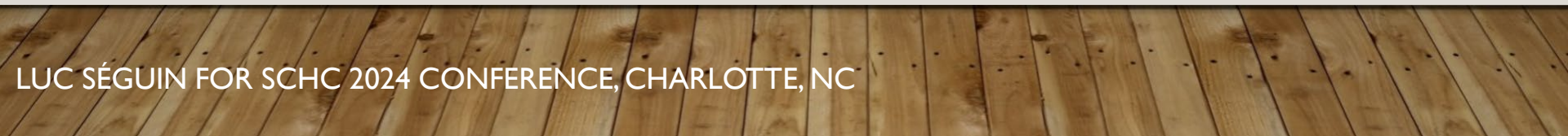


8 SECTIONS OF THE SDS

- Section 3: Trade Secret Ingredients
- In Canada:
 - Still need to file a request, pay a fee (each 3 years)
 - Get a date of enforcement and a number per ingredient

Substance	CAS No.	% (w/w)
Alcohol *	Proprietary *	Proprietary* (10-30%)
Trichloroisocyanuric Acid	87-90-1	0.1%

- * HMIRA RN: 3333 – Decision Granted Date January 1, 2021
- In the United States:
 - Must be disclosed on-demand by health professionals, employees or designated representatives





9 SECTIONS OF THE SDS

- Section 4-5-6-7: Both countries according to the final classification of the product.
- Section 8:
 - Must include ACGIH, and United States and Canadian provincial OEL values.
- Section 9-10-11-12-13: Both countries according to the final classification of the product.
- Section 14: Must include DOT, TDG (Possibly IMDG-IATA)



10 SECTIONS OF THE SDS

- Section 15: May include national inventories (TSCA-NDSL-DSL and various Federal and States Laws, lists).
- Section 16: Must include name, date and often a version number for each issuance of the document.
- Nota Bene: Sections 12, 13, 14, 15 are excluded from compliance requirements of SDSs in both countries.

II OTHER CONSIDERATIONS



- Language(s) of the SDS and Label
 - MUST be in English AND French in Canada
 - Must be in English and other language(s) are possible in the US

12 OTHER CONSIDERATIONS



- Transition period
 - **Canada January 2023 to mid-December 2025**
 - **United States from July 19, 2024:**
 - **24 months for pure substances**
 - **42 months for mixtures**

13 OTHER CONSIDERATIONS



- Transition period
- Hi,
- We were told that the United States adopted the same GHS Revision 7-8 this year July 19th (enforcement) with a long transition period for mixtures, heading for early 2027.
- Is there a POSSIBILITY that Health Canada comes out with a one-year extension say mid-December 2026 so that we do not face a full year of misalignment for SDSs between our 2 countries, or will Canadian companies will have to rewrite all incoming US SDSs during 2026?
- Thanks for anything you can share on that ‘hot and quick coming’ issue.

14 OTHER CONSIDERATIONS



- Transition period
- Dear Luc Séguin,
- Thank you for your inquiry regarding the transition periods for the amended [Hazardous Products Regulations](#) and the U.S. Hazard Communication Standard.
- **We thank you for sharing your concern and bringing your proposal to our attention. This is an issue Health Canada is actively looking into. The Department will be publishing information on this topic in due course.**
- Please do not hesitate to reach out should you have any further questions.
- Thank you again for your inquiry.
- Workplace Hazardous Products Program / Programme des produits dangereux utilisés au travail
- Consumer and Hazardous Products Safety Directorate / Direction de la sécurité des produits de consommation et des produits dangereux
- Health Canada / Santé Canada
- www.whmis.gc.ca / www.simdut.gc.ca



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