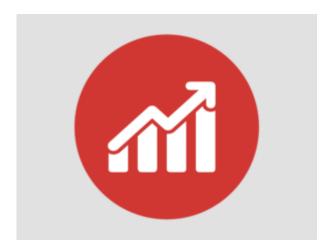
WHMIS 2015 - Variances Fact Sheet



WHAT ARE VARIANCES?

Health Canada and United States (U.S.) Occupational Safety and Health Administration have worked collaboratively to align the implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) in the two countries. However, variances are sometimes necessary in order to maintain the current level of protection for workers or due to the requirements of the respective legislative frameworks. A key objective of implementing the GHS is to create a system that will allow Canadian and U.S. requirements to be met through the use of a single label and safety data sheet (SDS) for each hazardous product.

A "variance" is defined as a difference between the Hazardous Products Regulations (HPR) and the U.S. Hazard Communication Standard (HCS 2012) that would result in a different classification, labelling, SDS or other information requirements for a hazardous product in Canada versus the U.S.

What are some key variances between the requirements for the Canadian HPR and the U.S. HCS 2012?

Bilingual labels and SDSs

| United States |
|------------------------------------|
| abels and SDSs must be in English. |
| - - |

Supplier Identifier

| Canada | United States |
|--------|---------------|

A Canadian supplier identifier must appear on the label and SDS.

A Canadian distributor may change the name of the initial supplier if they list their own identity (name, address and telephone number) instead. A Canadian importer may keep the name of the foreign supplier instead of replacing it with their own identity only if the hazardous product is imported for use in their own workplace.

Mixture containing a Category 2 carcinogen at a concentration between 0.1 - 1.0%

| Canada | United States |
|--|--|
| All mixtures containing a carcinogenic | All mixtures containing a carcinogenic |
| ingredient (whether Category 1 or 2) at a | ingredient (whether Category 1 or 2) at a |
| concentration of 0.1% or more are required | concentration of 0.1% or more are required |
| to have label and an SDS. | to have an SDS. |
| | All mixtures containing a Category 1 |
| | carcinogen at 0.1% or more, or a Category |
| | 2 carcinogen at 1% or more must have a |
| | label. |
| | Mixtures containing a Category 2 |
| | carcinogen at a concentration between 0.1% |
| | and 1% are not required to have a label (a |
| | label warning is optional for such |
| | mixtures). |

Physical Hazards Not Otherwise Classified (PHNOC)/Health Hazards Not Otherwise Classified (HHNOC) vs. Hazards Not Otherwise Classified (HNOC)

| Canada | United States |
|---|---|
| Label elements are required for PHNOC and | No label elements required for HNOC. |
| HHNOC. | The exclamation mark pictogram is |
| For mixtures that contain an HHNOC | permitted (but not required) for HNOCs as |
| ingredient at a concentration of 1% or | long as the words "Hazard Not Otherwise |
| | Classified" or the letters "HNOC" appear |
| | below the pictogram. |
| 1 | For a mixture that contains an HNOC |
| must be disclosed on the SDS. | 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 (BIM)

| Canada | United States |
|--|---------------|
| products that meet the criteria for this | |

Water-Activated Toxicants

| | Canada | United States |
|--|--------|---------------|
|--|--------|---------------|

A supplemental hazard statement is required on the label and SDS indicating that, in contact with water, the product releases gases which are fatal/ toxic/harmful if inhaled.

A supplemental hazard statement is 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.

A supplemental hazard statement is 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.

A supplemental hazard statement is 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.

A supplemental hazard statement is 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.

A supplemental hazard statement is

Updating of SDS and label information

| Canada | United States |
|--|--|
| Suppliers and importers are allowed a | Chemical manufacturers, importers, |
| period of 90 days to update SDSs with new | distributors, and employers are allowed a |
| data and 180 days to update labels. | period of 3 months to update SDSs with new |
| If a hazardous product is sold or imported | information and 6 months to update labels. |
| within 90 days after significant new data | There is no requirement for a written |
| became available, the new data is not | |
| required to be included on the SDS so long | |
| as a written notice providing the new data | occurring within the 3 month or 6 month |
| l l | period. |
| available is transmitted to the purchaser | |
| of the product, or obtained or prepared | |
| where the product is imported. | |
| The same requirement applies also to | |
| labels, except that the corresponding | |
| period of time is 180 days. | |

Labels on multi-container shipments

| Canada | United States |
|--|--|
| For a hazardous product is packaged in | Only the innermost container is required |
| more than one container, each container | to be labelled. |
| must be fully labelled, unless: (a) the | The outer container does not need to be |
| small capacity container (? 100 mL) | labelled. |
| exemption applies; or (b) one of the outer | |
| container exemptions applies. | |

Labels on kit outer containers

| Canada | United States |
|---|---|
| Outer container of a kit (containing at least two different hazardous products) | Only the inner containers are required to be labelled. The outer container of a kit does not need to be labelled. |

Source: © Copyright 1997-2021 CCOHS