WHMIS 2015 – Labels Fact Sheets



WHMIS 2015 – LABELS

Important Information

Canada has aligned the Workplace Hazardous Materials Information System (WHMIS) with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

This document discusses the WHMIS 2015 supplier requirements as regulated by the federal legislation – the Hazardous Products Act and the Hazardous Products Regulations (HPR).

Health Canada is the government body responsible for the overall WHMIS supplier-related laws. Note that WHMIS is also regulated in the workplace by the provinces, territories and federal (for federally regulated workplaces) governments under their occupational health and safety legislation. While these jurisdictions based their WHMIS regulations on the common model, small variations between jurisdictions may exist in how they adopted WHMIS 2015.

Suppliers and employers must use and follow the WHMIS 2015 requirements for labels and safety data sheets (SDSs) for hazardous products sold, distributed, or imported into Canada.

What products require a WHMIS 2015 label?

In Canada, WHMIS legislation requires that products used in the workplace that meet the criteria to be classified as hazardous products must be labelled.

Labels are the first alert to the user about the major hazards associated with that product, and outline the basic precautions or safety steps that should be taken.

Who is responsible for labelling?

In most cases, suppliers are responsible for labelling the hazardous products that they provide to customers. Note: Labels should be affixed to, printed or written on, or attached to the hazardous product or the container and remain legible. Providing a WHMIS 2015 label along with the shipping papers would not be considered to be in compliance.

Employers are responsible for making sure that hazardous products that come into the workplace are labelled and to prepare and apply a workplace label when appropriate.

Are there different types of labels?

Yes. There are two main types of WHMIS labels: supplier labels, and workplace labels.

Suppliers of hazardous products are required to apply a label that meets the requirements of the Hazardous Products Regulations. If the hazardous product is always used in the container with the supplier label, no other label is required.

A workplace label is required when:

- a hazardous product is produced (made) at the workplace and used in that workplace,
- a hazardous product is decanted (e.g., transferred or poured) into another container, or
- a supplier label becomes lost or illegible (unreadable).

There are two situations when a workplace label is not necessary. When a hazardous product is:

- poured into a container and it is going to be used immediately, or
- "under the control of the person who decanted it". For example, when the person who poured the product into another container will be the only person who will use it, and the product will be used during one shift, a full workplace label may not be required. However, the container must still be identified with the product identifier (name).

If the product is not used right away or if more than one person will be in control of the product, a full workplace label is required. Note that a company may have specific rules about labelling containers that are above or exceed the WHMIS requirements.

NOTE that requirements for workplace labels are regulated by your local provincial or territorial jurisdiction. Check with your jurisdiction for more information.

What information is required on a supplier label?

Supplier labels must be in both official languages of Canada (English and French). They may be bilingual (as one label), or available as two labels (one each in English and French). Providing a supplier label in just English or French would not be considered to be in compliance.

The supplier label must include the following information:

1. Product identifier – the brand name, chemical name, common name, generic name or trade name of the hazardous product.
2. Initial supplier identifier – the name, address and telephone number of either the Canadian manufacturer or the Canadian importer*.
3. Pictogram(s) – hazard symbol within a red "square set on one of its points".
4. Signal word – a word used to alert the reader to a potential hazard and to indicate the severity of the hazard.
5. Hazard statement(s) – standardized phrases which describe the nature of the hazard posed by a hazardous product.
6. Precautionary statement(s) – standardized phrases that describe measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product or resulting from improper handling or storage of a hazardous product.
7. Supplemental label information – some supplemental label information is required based on the classification of the product. For example, the label for a mixture containing ingredients with unknown toxicity in amounts higher than or equal to 1% must include a statement indicating the percent of the ingredient or

ingredients with unknown toxicity. Labels may also include supplementary information about precautionary actions, hazards not yet included in the GHS, physical state, or route of exposure. This information must not contradict or detract from the standardized information.

* Initial supplier identifier – There are two exceptions to this requirement:

- In a situation where a hazardous product is being sold by a distributor, the distributor may replace the name, address and telephone number of the initial supplier with their own contact information.
- In a situation where an importer imports a hazardous product for use in their own workplace in Canada (i.e., the importer is not selling the hazardous product), the importer may retain the name, address and telephone number of the foreign supplier on the SDS instead of replacing it with their own contact information.

What is a signal word?

A signal word is a prompt that alerts you about the degree or level of hazard of the product. There are only two signal words used: “Danger” or “Warning”. “Danger” is used for high risk hazards, while “Warning” is used for less severe hazards. If a signal word is assigned to a hazard class and category, it must be shown on the label, and listed in section 2 (Hazards Identification) of the Safety Data Sheet (SDS).

Some hazard classes or categories do not have a signal word assigned to them.

What is a hazard statement?

Each hazard class and category has an assigned “hazard statement”. Hazard statements are brief, standardized sentences that tell you more about the exact hazard of the product. The statements are short but they describe the most significant hazards of the product.

Examples of hazard statements are:

- Extremely flammable gas.
- Contains gas under pressure; may explode if heated.
- Fatal if inhaled.
- Causes eye irritation.
- May cause cancer.

The wording of the hazard statement helps to describe the degree of the hazard. For example: “May cause cancer” is more hazardous than “Suspected of causing cancer”.

What is a precautionary statement?

Precautionary statements provide advice on how to minimize or prevent adverse effects resulting from exposure to a hazardous product or resulting from improper storage or handling of a hazardous product. These statements can include instructions about storage, handling, first aid, personal protective equipment and emergency measures. Like the hazard statements, the wording of precautionary statements is standardized and harmonized.

There are five types of precautionary statements:

- General.
- Prevention.

- Response (including first aid).
- Storage.
- Disposal.

Examples of precautionary statements are:

- Keep container tightly closed.
- Wear protective gloves/protective clothing/eye protection/face protection.
- If exposed or concerned: Get medical advice/attention.
- Fight fire remotely due to the risk of explosion.
- Protect from sunlight.

Precautionary statements will be consistent with the degree of the hazard associated with the product.

What does it mean if I see "/" or "…" on the label for my product?

The use of the slash (/) or the dots (…) are intended as instructions to the supplier to help them prepare the label and SDS.

For example, the guidance material from GHS lists the following precautionary statement "Wear protective gloves/protective clothing/eye protection/face protection."

The slash (/) means the supplier is to specify the appropriate type of equipment based on their knowledge of the product and how it is used. So, for example, this statement could appear as:

- Wear protective gloves and eye protection.

Or

- Wear protective gloves.

Or

- Wear protective gloves, protective clothing, eye protection, and face protection.

Another example is "Do not subject to grinding/shock/friction/…". In this case, the supplier is to specify the applicable rough handling circumstance to avoid (grinding, shock and/or friction), and the dots (…) mean they are to consider other types of rough handling that should be mentioned.

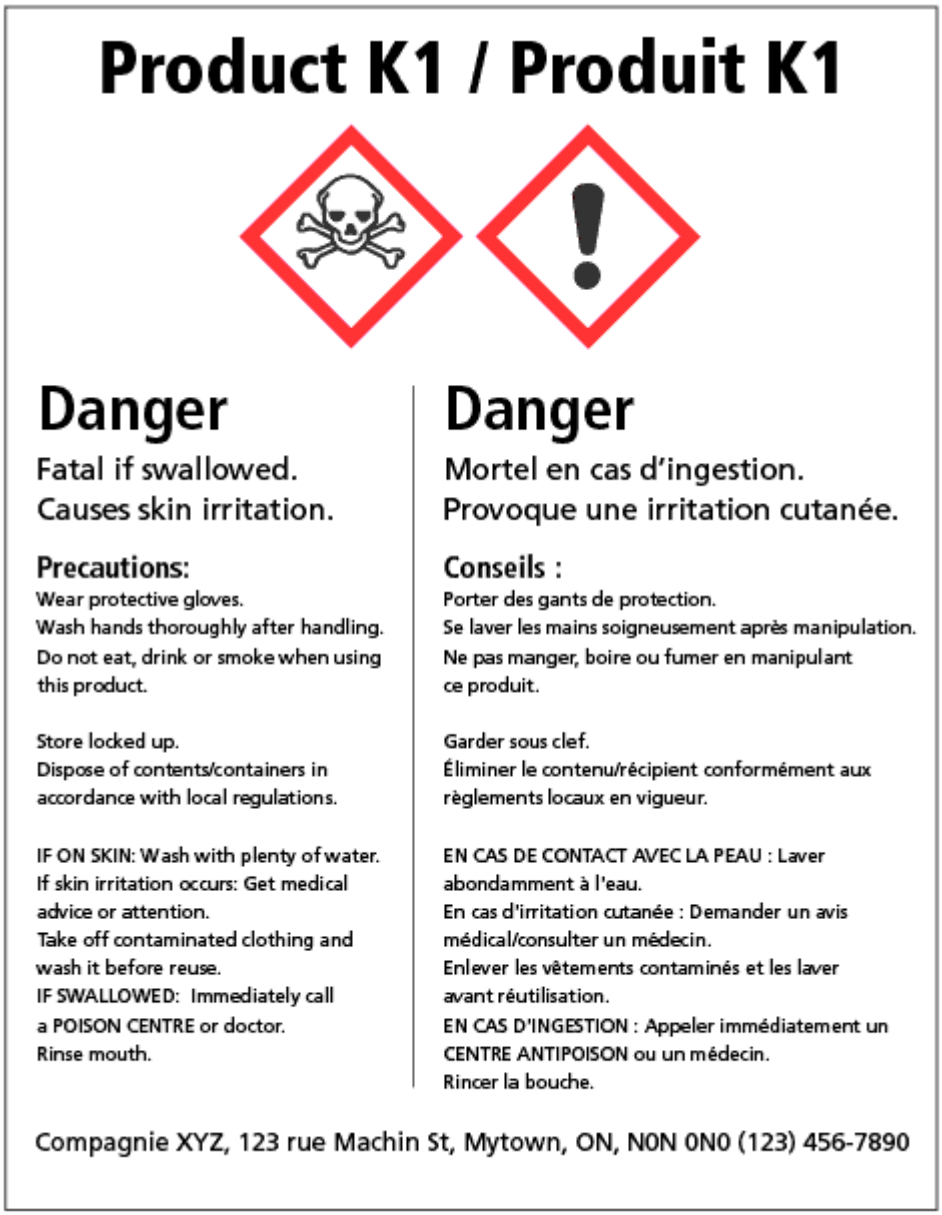
What does a supplier label look like?

There is no set format for a supplier label. As mentioned, labels must be in English and French. They may be bilingual (as one label), or be presented as two labels (one each in English and French).

Labels will require the following:

- the pictogram, signal word, and hazard statement are to be grouped together,
- to be clearly and prominently displayed on the container,
- to be easy to read (e.g., you can see it easily without using any item except corrective glasses), and
- to be in contrast with other information on the product or container.

An example of a bilingual label is shown below:



Sample Label

Note that the hatched border that was required under WHMIS 1988 is not required under WHMIS 2015. However, it is also not forbidden to use the hatched border, so you may see it on a WHMIS 2015 label.

When will a supplier label have to be updated?

A label will be required to be updated when the supplier becomes aware of any "significant new data". According to the regulation, the definition of significant new data is:

"New data regarding the hazard presented by a hazardous product that changes its classification in a category or subcategory of a hazard class, or result in its classification in another hazard class, or change the ways to protect against the hazard presented by the hazardous product." (Source: Canada Gazette, Part II, Hazardous Products Regulations, Section 5.12 (1))

Labels will be required to be updated within 180 days of the supplier being aware of the new information. If you purchase a product within this 180 day time period, the supplier must inform you of the changes, and the date they became available, in writing.

It is anticipated that employers will be required to update the existing labels or the information on the containers as soon as the significant new information is provided by the supplier. Watch for confirmation, updates, or changes to these requirements when the WHMIS regulations in your jurisdiction are updated.

What information will be required on a workplace label?

In general, a workplace label will require the following information:

- Product name (matching the SDS product name).
- Safe handling precautions, may include pictograms or other supplier label information.
- A reference to the SDS (if available).
- Workplace label requirements fall under your provincial or territorial jurisdiction, or under the Canada Labour Code if you work in a federally regulated workplace. Confirm the exact requirements with your jurisdiction.

Are there any other differences in labels allowed?

In specific cases, yes. A WHMIS label can also be a mark, sign, stamp, sticker, seal, ticket, tag, or wrapper. It can be attached, imprinted, stencilled or embossed on the hazardous product or its container. Workers must be trained to be able to identify these alternate systems if they are used in the workplace.

Variations on the supplier label apply for specific situations such as:

- Bulk shipments – A labelling exemption exists for products sold without packaging.
- 100 mL or less – Exempt only from requirement to have precautionary or hazard statements on the label.
- 3mL or less – Where the label will interfere with normal use of the product, the product would be required to have a label that is durable and legible for transport and storage, but may be removable during use.

A fold-out or accordion style label is allowed if there is not enough space on the product to provide a label that meets the legibility requirements of the Hazardous Products Regulations. Note that:

- the required pictogram(s), signal word and hazard statement(s) must be grouped together on the label,
- the label must be clearly and prominently displayed on a surface that is visible under normal conditions of use, and
- the label must, under normal conditions of transport and use, remain affixed to, printed or written on, or attached to the product or its container and remain legible.

How should hazardous products packaged in multiple containers be labelled?

If a hazardous product is packaged in more than one container, each container (e.g., the outer container, the inner container, and any intermediate container, if applicable) must be fully labelled. There are two exemptions that may apply:

1. The outer container does not require a WHMIS label if the label on the inner container is visible and legible through the outer container under normal conditions of storage and handling, or
2. The outer container has a label that meets the requirements set out in the Transportation of Dangerous Goods Regulations. Note that this exemption does not apply if the outer container is the only container.

Note that other exemptions may apply, such as the small capacity container (≤100 mL).

As a worker, what should I do when using a hazardous product?

- Always check to see if there is a label on the product before you use it.
- Read, understand and follow the instructions on the label and SDS. Follow any additional education, instructions, and training as provided by your employer.
- Ask your supervisor if you are not sure about how to use or store the product.
- Ask for a new label when the old one cannot be seen or read properly.
- Do not use a product that is not labelled or if the label is unreadable. Ask your supervisor for help (e.g., to replace the label).

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