

LEHDER Environmental Services

Newsletter

August 2013

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Big Changes in WHMIS are Coming! GHS nears Implementation in Canada

Introduction

Health Canada is proposing that the Controlled Products Regulations (CPR) be repealed and replaced with new regulations to be titled the “**Hazardous Products Regulations (HPR)**”. These new regulations would implement GHS and harmonize closely with the OSHA Hazard Communication Standard (HCS 2012) in the United States.

The proposed HPR would implement changes in the following areas:

- the manner of establishing the classification of hazardous products;
 - classification of physical hazards;
 - classification of health hazards;
 - hazard communication;
 - exemptions.
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What is GHS?

Globally Harmonized System (GHS) of Classification and Labelling of Chemicals refers to the use of a common method of classifying and labelling of hazardous chemicals. GHS is necessary because many countries have different systems for classification and labelling.

The purpose of the GHS is to promote a common, consistent criteria for classifying chemicals according to their health, physical and environmental hazards, and to encourage the use of compatible hazard labels, safety data sheets for workers, and other hazard communication information based on the resulting classifications.

How will WHMIS be Changed with the adoption of GHS?

The key components of WHMIS are: labels, Material Safety Data Sheets (MSDSs) and training. Several changes to WHMIS will be required with the adoption of GHS, including:

- Labels will change to incorporate the new hazard classification system and a new set of warning symbols and pictograms.
 - The hatch border on a supplier label will no longer be required.
 - MSDSs will now be known as Safety Data Sheets (SDSs).
 - SDSs will have a new sixteen-section format with minimum content requirements.
 - All Canadian workplaces will need new training to address these format and classification changes.
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Implementation Status of The GHS in Canada

Canada has gone from being a leader in the GHS process to a laggard and will now have to catch up with the US who adopted the GHS over a year ago. Based on the signed agreement between Health Canada and OSHA, Canada will adopt legislation of GHS by June 1, 2015. Occupational Health and Safety legislation will then require all employers to train their workforce on the GHS by June 1, 2016.

In order to meet these deadlines, it is proposed that the Controlled Product Regulations (CPR) be repealed and replaced with new regulations to be titled the Hazardous Products Regulations (HPR). These new regulations would implement the GHS hazard classification criteria and communication elements – labels and safety data sheets (SDS).

A Government Notice was published in the Canada Gazette on June 29, 2013 requesting the public to provide comments and input into the proposed regulatory amendments before the regulations are pre-published in the Canada Gazette for another round of comment.

Comments are to be directed by September 15, 2013 to:

Workplace Hazardous Materials Directorate Health Canada
427 Laurier Avenue W, 7th Floor
Ottawa, Ontario, K1A 1M3
Telephone: (613) 993-9167; FAX: (613) 993-5016
or email at: whmis_simdut@hc-sc.gc.ca

Implementation of The GHS in Canada will require legislative and regulatory changes at both the federal and provincial/territorial levels. For example, the Alberta Occupational Health and Safety Act and Occupational Health and Safety Code; and the Ontario Occupational Health and Safety Act and O.Reg. 860 WHMIS will need to be amended or replaced.

Web Links, related to Notice:

Canada Gazette Part I Notice June 29, 2013:

<http://gazette.gc.ca/rp-pr/p1/2013/2013-06-29/pdf/g1-14726.pdf>

Health Canada request for comments:

<http://www.hc-sc.gc.ca/ewh-semt/consult/2013/ghs-sgh/index-eng.php>

Health Canada description of proposed amendments:

<http://www.hc-sc.gc.ca/ewh-semt/consult/2013/ghs-sgh/amendments-modifications-eng.php>

What should you do to prepare for The GHS?

LEHDER suggests that in order to prepare for implementation of the GHS, that you:

1. Download and become familiar with the “*Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*” third revised edition, published by the United Nations in 2009. This is also known as the “purple book”.
 2. Familiarize yourself with the new hazard pictograms (symbols) and new prescribed phrases for labels.
 3. Note any additional OSHA hazards adopted by US HCS 2012 that are not in GHS 3rd revised edition. These include:
 - Pyrophoric Gases,
 - Simple Asphyxiants,
 - Hazards Not Otherwise Classified, and
 - Combustible Dusts.
 4. Review any proposed Canadian variations to the US HCS 2012 and the GHS 3rd revised edition. These include:
 - Biohazardous Infectious Materials,
 - Health Hazards Not Otherwise Classified, and
 - Physical Hazards Not Otherwise Classified.
 5. Determine the GHS classification for all of your products (existing and potential). This classification will dictate future documentation and labelling requirements.
 6. Assess what changes will be required to your Safety Data Sheets (SDS) as a result of this classification. [e.g. format of SDS, symbols, phrases, etc.]
 7. Assess what changes will be required to your labels as a result of this classification. [e.g. removal of hatch border, size of label, symbols, phrases, etc.]
 8. Review any pre-labelled packaging to determine what changes will be mandated with the roll out of GHS and implement a plan to phase in the new labelling requirements.
 9. Train your employees! The GHS introduces new hazard classifications and new hazard warning symbols that your employees will need to be able to recognize.
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Helpful Web Links:

GHS Purple Book 3rd Revised Edition:

http://www.unece.org/trans/danger/publi/ghs/ghs_rev03/03files_e.html

GHS Pictograms:

<http://www.unece.org/trans/danger/publi/ghs/pictograms.html>

U.S. OSHA HCS 2012:

<http://www.osha.gov/dsg/hazcom/ghs-final-rule.html>

U.S. OSHA Hazard Communication:

<http://www.osha.gov/dsg/hazcom/index.html>

How can LEHDER assist?

Based on our extensive experience with the classification and labelling of hazardous materials, LEHDER can assess your facility to determine how the GHS will impact documentation and labelling requirements for your products. Further, we can conduct a training needs assessment in order to prepare and deliver customized GHS training applicable to your product line(s). LEHDER has authored numerous GHS compliant Safety Data Sheets.

For further information or questions regarding how the impending Globally Harmonized System will affect your facility, please contact Mark Roehler at (519) 336-4101, Ext 224 mroehler@lehder.com

Mark Roehler has over twenty-five years' experience in environmental management and chemical research and development. The projects he has managed and conducted include: environmental stewardship, industrial site assessments, source emission surveys, personal and area exposure sampling, environmental audits, WHMIS, material safety data sheets and transportation regulations for dangerous goods and wastes. For the last ten years, Mark Roehler has tracked the GHS regulatory initiatives in Canada and the US and presented on their progress at health and safety conferences – most recently at the WSPS Partners in Prevention 2013 Health & Safety Conference & Trade Show. www.lehder.com/roehler

LEHDER GHS Resources

All of the web links in this newsletter are available from this LEHDER web page: <http://www.lehder.com/ghs>

GHS Training

LEHDER provides regularly scheduled GHS training courses in Ontario and Alberta. Customized on-site training is also available for your facility. GHS courses are scheduled for:

September 16, 2013 in Edmonton, Alberta

October 1, 2013 in Point Edward, Ontario

The GHS course will outline the purpose, scope and application of the GHS, what has transpired to date and how to implement GHS in Canada.

Who should attend The GHS Training?

Plant Managers, Warehouse and Distribution Managers / Co-ordinators, Environmental Health & Safety Managers and Co-ordinators and R&D / Laboratory Personnel.

Online registration and training details: www.lehder.com/training

About LEHDER

LEHDER Environmental Services is an environmental consulting company focused on providing Excellence in Industrial Air Quality Services. Formed in 1995, LEHDER is now one of the largest Air Quality Management companies in Canada.

All Air Quality aspects – source testing, emission inventories, air dispersion modeling, data interpretation and approval applications – are managed internally without outsourcing and partnering.

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