

WHMIS 2015 vs. HazCom 2012

This information is provided to highlight the notable differences due to regulatory adoption of GHS in Canada and the United States.

Index	Canada	USA
Known As	WHMIS 2015	HAZCOM 2012, HCS 2012
Governing Body	Health Canada (Federal)	OSHA – Occupational Health and Safety Administration (Federal)
Regulation	Hazardous Products Act and Regulation (R.S.C., 1985, c. H-3 and SOR/2015-17)	OSHA Act and Standard 29 CFR 1910.1200 “Employee right to know”
	HPA, HPR	CFR = Code of Federal Regulations
	Canada Labour Code	OSHA Act and Regulation
Provincial / State	Provincial OH&S Acts, Regs and Codes apply when not a federal employee or specific inter-provincial business	State OS&H Plans (must be as good or better than federal one)
Language	English and French	English
Implementation	Final Phase completed, Dec 1, 2018	Final Phase completed, June 1, 2015
GHS Status	Fully Implemented	Fully Implemented
Current GHS Revision Number	GHS Purple Book Revision 5	GHS Purple Book Revision 3
Future GHS Status	Coming soon: Purple Book Revision 7	Coming soon: Purple Book Revision 7
Section 1 of SDS	Identify Canadian manufacturer, importer or supplier for product sale. A Canadian distributor can omit name of the initial supplier if they list their own contact info instead. Canadian importer can retain the name of the foreign supplier only if the imported hazardous product is to be used only in their own workplace.	Identify US manufacturer, importer, or other responsible party with a name, address and telephone number on SDS and Label.
Cancer Classification Cut off	Carcinogen cut off at 0.1% for SDS and labels.	Carcinogen cut off at 1% for labels. Carcinogen cut off at 0.1% for SDSs.
Updates on new hazard info for SDS and Label	Suppliers have 90 day for SDSs and 180 days for labels. If sold within 90 days a written note needs to be included with SDS with new data - same with labels but within 180 days.	Manufacturers, importers, distributors and employers have 3 months to update SDSs and 6 months for Labels.
Written Plan	No written plan requirement. Provinces call for exposure control plans, hazard assessments, or codes of practice for specific regulated substances	Written Plan that lists all site chemicals. Hazard Communication Plans.

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Roles & Responsibilities	Specific roles and responsibilities for manufacturers, suppliers and employers to the hazardous product, and to the H&S committee or representative.	Roles and responsibilities include the manager level and are specified in the Hazard Communication Plan for the following responsibilities: <ul style="list-style-type: none"> • Checking and maintaining current inventory. • Obtaining SDSs. • Ensuring labels are in place. • Delivering training on chemical hazards. • Ensuring chemicals are quarantined until SDS is obtained.
Not Otherwise Classified	PHNOC, HHNOC – Physical and Health Hazards Not Otherwise Classified	HNOC – Physical and Health Hazards Not Otherwise Classified (effect below cut off value or GHS category wasn't adopted)
Biohazards	Hazard class and pictogram for Biohazardous Infectious Materials. Products must be labelled and an SDS is required. An appendix is also required with information on the BIM.	No hazard class for biohazards under HCS, covered under HAZWOPER, Bloodborne Pathogens Standard, and Respiratory Standard.
SDS Location	SDS may be electronic and must be readily available to the workers who are exposed	SDS may be electronic; may be kept at the primary workplace facility, needs to be immediately accessible in an emergency
Water Activated Toxicants	Supplemental hazard statement required on SDS and Label.	Supplemental hazard statement required on SDS only.
Optional info	Optional: Sections 12-15; information stipulated under other agencies	Optional: Sections 12-15; information stipulated under other agencies
		NFPA – National Fire Protection Association, maintains private, copyrighted standards and codes for usage and adoption by local governments.
Environment	CEPA – Canadian Environmental Protection Agency	EPA –Environmental Protection Agency “Community right to know”
	Environmental Emergencies CEPA E2 Plans, Site Emergency Response Plans	EPCRA Section 311, 312 Chemical Hazard Inventory Reporting Tier I and II; 40CFR370
Transportation	Transport Canada	Department of Transportation DOT
	Transportation of Dangerous Goods TDG Act and Regulation	Hazardous Materials Transportation Act and Regulations

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Labels on Multi- container shipments	Where a hazardous product is packaged in more than one container, each container must be fully labelled unless: a) the small capacity container ($\leq 100\text{ml}$) exemption applies; or b) one of the outer container exemptions applies	Only the innermost container needs to be labelled. The outer container does not need labelling.
Labels on kit outer containers	Outer container of a kit (contains at least two different hazardous products) must be labelled. Exception allowing reduced information on outer container label, as long as statement refers to individual product labels for signal words, hazard statements and precautionary statements is provided on the outer container.	Only the inner containers need to be labelled. The outer container of a kit does not need labelling.