



CCCR vs. WHMIS GHS Labeling Q&A

What is the GHS?	The Globally Harmonized System (GHS) is the United Nations System for the classification and labeling of chemicals. It is intended to be used around the world as the universal way to classify chemicals for their hazards and communicate that hazard information to chemical users.
Do all chemicals sold in Canada require the new WHMIS 2015/GHS labels?	No – only hazardous chemicals used in the workplace require labeling under the new Canadian Workplace Hazardous Material Information System (WHMIS) Regulations. Certain hazardous chemicals used in the workplace are also exempt from the labeling requirements.
Which workplace chemicals are exempt?	Pest control products, explosives, cosmetics, medical devices, drugs, food, wood and consumer products.
What is a consumer product?	Health Canada defines a consumer product as “a product, including its components, parts or accessories, that may reasonably be expected to be obtained by an individual to be used for non-commercial purposes, including for domestic, recreational and sports purposes, and includes its packaging. “
What regulations govern consumer chemical labeling?	Unless the product is a cosmetic, drug, explosive, food, medical device, nuclear substance, pest control product or tobacco product, Health Canada regulates the labeling and packaging of hazardous household chemicals under the <i>Consumer Chemicals and Containers Regulations, 2001</i> (CCCR).
What is a Pest Control Product?	Health Canada defines a pest control product as “any product, device, organism, substance or thing that is manufactured, represented, sold or used as a means for directly or indirectly controlling, preventing, destroying, mitigating, attracting or repelling any pest. Control products include active ingredients used in the manufacture of end-use products and the end-use products themselves. Includes herbicides, insecticides, fungicides, antimicrobial agents, pool chemicals, microbials,

	material and wood preservatives, animal and insect repellents, and insect- and rodent-controlling devices.”
What regulations govern pest control products?	Health Canada regulates the labeling and registration of all pest control products. The Pest Management Regulatory Agency has not adopted the GHS for pest control products labeling.
If a consumer product is also used in the workplace, does it need WHMIS labeling also?	No – Health Canada exempts consumer products, pest control products and certain other chemicals that are used in the workplace from WHMIS labeling. (See Hazardous Products Act Part 12)
If a consumer product is also used in the workplace, does the employer need a supplier SDS?	No – Health Canada exempts consumer products, pest control products and certain other chemicals that are used in the workplace from WHMIS SDS requirements. (See Hazardous Products Act Part 12 and provincial regulations). Employers should provide employees training on safe use of these products. The WD-40 Company makes WHMIS 2015 compliant SDS available for our products on the company website.
What about cosmetics?	Cosmetics are labeled under the Cosmetics Regulations. Health Canada has not adopted the GHS for labeling of cosmetics.
Why NOT add WHMIS 2015 GHS labeling to consumer product labeling?	There are several good reasons not to have dual labeling on consumer products. <ol style="list-style-type: none"> 1. Consumers are not trained on the meaning of the GHS pictograms and other label elements and may find those confusing. 2. The hazard definitions are different under the two standards so the hazard information may be conflicting. 3. CCCR labels mandate specific symbols and label statements and those are different from the GHS pictograms and hazard statements for the same hazards. 4. WHMIS and CCCR use different test methods that result in different classifications and hazard statements. 5. Many containers are too small to accommodate dual labeling.