

The Globally Harmonized System for the Classification and Labelling of Chemicals (The GHS)

Implementation of the GHS in Canada

Executive Summary

1. This document compares the existing hazard classification and communication systems in Canada with the Globally Harmonized System for the Classification and Labelling of Chemicals (the GHS). In addition, the document considers issues which may need to be considered during the implementation of the GHS in Canada.
2. The GHS provides a common and coherent basis to define and classify chemical hazards and communicate information on labels and safety data sheets. It provides the underlying infrastructure to establish a comprehensive national chemical safety programme. In December 2002, the United Nations Committee of Experts for the Transport of Dangerous Goods and the Globally Harmonized System for the Classification and Labelling of Chemicals adopted the GHS and it is now ready for implementation in countries.
3. At the World Summit on Sustainable Development, Canada committed to the Plan of Implementation, which included: "Encourage countries to implement the new globally harmonized system for the classification and labelling of chemicals as soon as possible with a view to having the system fully operational by 2008." (Paragraph 23 (c))
4. The scope of the GHS includes all hazardous chemicals. Pharmaceuticals, food additives, cosmetics and pesticide residues in food will not be covered at the point of intentional intake but will be covered where workers may be exposed and in transport. Hazardous wastes are not within the scope of GHS.
5. The GHS includes classification criteria for chemicals according to their intrinsic physical, health and environmental hazards. The System also includes labelling provisions, including standardized pictograms, signal words and hazard statements, and safety data sheet requirements. The application of the GHS hazard communication elements may vary by the type of chemical products or stage in the life cycle.
6. Given the scope of the GHS, four sectors in Canada will be directly affected by the System, namely: consumer chemical products, pest control products, the transportation of dangerous goods and workplace chemicals.
7. All systems will need to take decisions regarding which hazard classes to include in their system and which hazard categories to include within each hazard class. Given that needs vary between sectors, the GHS is a collection of building blocks from which a regulatory approach can be developed. As long as the hazards covered by a sector are covered

consistently with the GHS criteria and hazard communication requirements, the sector will be seen to have implemented the GHS.

8. The existing requirements for consumer chemicals in Canada do not include hazard classification and labelling requirements for skin or respiratory sensitization, mutagenicity, carcinogenicity, reproductive toxicity, target organ toxicity. Pest control products in Canada do not include hazard labelling requirements for chronic hazards but are evaluated through a risk assessment approach. The issue of chronic hazards for both consumer products and pest control products may be examined as the GHS is implemented in Canada.
9. The existing labelling requirements for the transportation of dangerous goods focus on acute and physical hazards. The classification criteria and pictograms used in the GHS for physical hazards are based on the *UN Recommendations for the Transport of Dangerous Goods* and therefore, few changes will be required in the *Transportation of Dangerous Goods Act*. The GHS classification criteria for acute toxicity does vary somewhat from existing requirements and harmonization will need to be considered. In addition aquatic toxicity is now being considered by the *International Maritime Dangerous Goods Code* and the UN Sub-Committee of Experts for the Transport of Dangerous Goods.
10. Under the Workplace Hazardous Materials Information System (WHMIS), which details classification and labelling requirements for workplace chemicals, a number of products are excluded, namely: explosive within the meaning of the *Explosives Act*; cosmetic, device, drug or food within the meaning of the *Food and Drugs Act*; control product within the meaning of the *Pest Control Products Act*; nuclear substance, within the meaning of the *Nuclear Safety and Control Act*, that is radioactive; hazardous waste; product, material or substance included in Part II of Schedule I of the *Hazardous Products Act* and packaged as a consumer product; wood or product made of wood; tobacco or a tobacco product as defined in section 2 of the *Tobacco Act*; or manufactured article. Adoption of the GHS in Canada may provide impetus for a review of these exclusions.