

Objectives of Canadian Implementation:

- 1. Harmonization to the greatest extent possible with other sectors and
- 2. Harmonization to the greatest extent possible with the NAFTA partners.

Consider how to address competing objectives.

General Comments:

These recommendations may need to be revisited based on:

- (1) recommendations made in other sectors and
- (2) discussions with the NAFTA partners



GHS Hazard Class	Recommendation	Additional Information
1.0 Acute Toxicity - All routes of exposure except vapours	Agree to adopt categories 1-4 No consensus to adopt category 5	CCSPA - prefer no Category 5 ASMAC - prefer no Category 5 SDAC - wants same outcome as US Labour - prefer to include Category 5
1.4 Acute Toxicity - Vapours	Agree to adopt categories 1-5	
2.1 Flammable Gases	Adopt categories 1-2	
2.2 Flammable Aerosols	Adopt categories 1-2	Agreed to maintain current prohibitions. Agreed to maintain exceptions for fuels and flashback Action re: Products that exhibit flashback: Can consumer chemicals use the GHS labelling requirements where not intended? (K. Headrick) Action re: Pump-spray containers: Can consumer chemicals use the GHS requirements where not intended? (K. Headrick)
2.3 Flammable Liquids	Agree to adopt categories 1-3 No consensus to adopt category 4	CCSPA - prefer no Category 4 ASMAC - prefer no Category 4 SDAC - prefer no Category 4 based on existing cut-offs in Canada and US Labour - prefer to include Category 4 Action: Is there any information from fire safety professionals that would support Category 4 or not? (Cecylia Bilous)
2.4 Flammable Solids	Agreed to adopt categories 1-2	

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2.5 Flammable vapours emitted from a solid, paste or gel	Agree to adopt GHS categories for flammable liquids consistent with eventual agreement on flammable liquids.	Action re: Solids that emit vapours: Can consumer chemicals use the GHS labelling requirements where not intended? (K. Headrick) Action: To check with Transport Canada
		how they deal with this issue, i.e. Class 4.1.
2.6 Spontaneous Combustion	Agree to maintain CCCR, 2001 classification criteria	Action re: labelling: Can consumer chemicals use the GHS flammable symbol and signal word (Warning)? (K. Headrick)
3.1 Skin Corrosion / Irritation	Agree to adopt categories 1-2	Re: Acid/alkali reserve: Agree to allow consideration of acid/alkali reserve or not. Agree to use criteria from CCCR, 2001 for acid/alkali reserve. Agreed to maintain current prohibitions Action re: Glass etchants: Can consumer chemicals use the labelling requirements of GHS Category 1 and maintain existing precautionary label information? (K. Headrick)
	No consensus to adopt category 3	Action: Check position of poison control centres including whether they have data regarding category 3 values. Action: Circulate Quebec poison control study
		 study. Action: Assess impact of category 2 vs. category 3. CCSPA - prefer no Category 3 ASMAC - prefer no Category 3 SDAC - prefer no Category 3, wants to discuss with US Labour - prefer to include Category 3

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3.2 Serious eye damage/ eye irritation	Agree to adopt categories 1-2	Re: Acid/alkali reserve: Agree to allow consideration of acid/alkali reserve or not. Agree to use criteria from CCCR, 2001 for acid/alkali reserve.
	No consensus re: Use of 2A, 2B vs. just category 2	Action: further consider whether 2A and 2B should be combined into one category. CCSPA - prefers 2A, 2B ASMAC - prefer 2A, 2B SDAC - prefer 2A, 2B Labour - noted WHMIS decision to combine 2A, 2B into single category.
4.0 Gases Under Pressure	Agree to adopt GHS hazard class	Actio: review consideration of supplemental information for empty containers.
		Action re: Do research on empty containers and find examples. (Eg. Butane lighters, curling irons) NB. Labour absent for discussion
5.0 TOST - Single Exposure	Agree to adopt category 1 No consensus to adopt category 2	CCSPA - prefer no Category 2 ASMAC - prefer no Category 2 SDAC - prefer no Category 2 Labour - prefer to include Category 2
6.0 Aspiration Toxicity	Agree to adopt category 1 No consensus to adopt category 2	CCSPA - concern that there are no valid animal studies and therefore would not be possible to include category 2 ASMAC - deferred position SDAC - propose bilateral discussion with US
		Action re: Validity of animal studies: Review rationale for category 2. NB. Labour absent for discussion

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7.0 Quick Skin- bonding adhesives	Agree that this is not part of TOST-Single Exposure	Action re: CRC situation in US and EU for quick skin-bonding adhesives
	Agree to maintain existing criteria requirements of CCCR, 2001	Action re: History behind Canadian implementation for CRCs. NB. Labour absent for discussion

Additional Action Items:

Determine where substances of special concern identified in the CCCR, 2001 would fit into the GHS.