

WHMIS 2015 Transition “Update”

Please note the following communication concerning a delay in the deadline for implementation of the WHMIS 2015 requirements relative to SDS and labels announced by Health Canada on May 24, 2017. It is not clear, at this time, whether the current WHMIS 2015 requirement to specify exact concentrations of hazardous components in Section 3 of the SDS will be maintained. It is our understanding that the one-year delay is provided to allow Health Canada to consider and possibly amend the regulation. There has been significant resistance to this requirement for exact concentrations.

We see several options:

- Continue to use the WHMIS 2015 documents you have generated.
- Continue to transition to WHMIS 2015: new deadline is June 2018
- Suspend your transition to WHMIS 2015, continuing to utilize WHMIS 1988 documents for some of your product while maintaining your new WHMIS 2015 library

Phases	Timing	Manufacturers and Importers	Distributors	Employers
Phase 1	From coming-into-force to May 31, 2018	Comply with CPR or HPR requirements	Comply with CPR or HPR requirements	Consult FPT OSH regulator
Phase 2	From June 1, 2018 to August 31, 2018	Comply with HPR requirements	Comply with CPR or HPR requirements	Comply with CPR or HPR requirements
Phase 3	From September 1, 2018 to November 30, 2018	Comply with HPR requirements	Comply with HPR requirements	Comply with CPR or HPR requirements
Completion	December 1, 2018	Comply with HPR requirements	Comply with HPR requirements	Comply with HPR requirements

Questions? Contact The Redstone Group at 614-763-5034 x7007 or jwilliams@redstonegrp.com