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WHMIS 2015 - Labels

Important Information

Canada has aligned the Workplace Hazardous Materials Information System (WHMIS) with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

This document discusses the WHMIS requirements after the alignment of WHMIS with the GHS. Information in this document is based on the federal legislation – the amended [Hazardous Products Act](http://laws-lois.justice.gc.ca/eng/acts/H-3/) (<http://laws-lois.justice.gc.ca/eng/acts/H-3/>) and the new [Hazardous Products Regulations](http://laws-lois.justice.gc.ca/eng/regulations/SOR-2015-17/index.html) (<http://laws-lois.justice.gc.ca/eng/regulations/SOR-2015-17/index.html>) (HPR).

Health Canada is the government body responsible for making the required changes to the overall federal WHMIS-related laws. Note that WHMIS-related occupational health and safety regulations for the provinces, territories and federally regulated workplaces will also require updating.

While much is known with the federal legislation updates, legislative updates for each provincial or territorial jurisdiction may affect some of the information in this document.

The WHMIS 2015 legislation is currently in force. "In force" means that suppliers may begin to use and follow the new requirements for labels and safety data sheets (SDSs) for hazardous products sold, distributed, or imported into Canada. However, there is a transition period with various stages. At the outset of the transition period, the supplier must fully comply with either the repealed Controlled Products Regulations (WHMIS 1988) or the HPR (WHMIS 2015) for a specific controlled or hazardous product. The classification, label and (material) SDS must comply fully with the specific regulation chosen by the supplier, and not be a combination of the two.

Please refer to the following other OSH Answers documents for more information:

- [WHMIS 2015 – WHMIS Program \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/program.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/program.html)
- [WHMIS 2015 – General \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/general.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/general.html)
- [WHMIS 2015 – Pictograms \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/pictograms.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/pictograms.html)
- [WHMIS 2015 – Hazard Classes and Categories \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/hazard_classes.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/hazard_classes.html)
- [WHMIS 2015 – Safety Data Sheets \(SDSs\) \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/sds.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/sds.html)
- [WHMIS 2015 – Education and Training \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/education_training.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/education_training.html)
- [WHMIS 2015 – Glossary \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/glossary/\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/glossary/)
- [WHMIS 2015 – Confidential Business Information \(CBI\) \(http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/cbi.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/cbi.html)

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What products require a WHMIS 2015 label?

In Canada, WHMIS legislation requires that products used in the workplace that meet the criteria to be classified as hazardous products must be labelled.

Labels are the first alert to the user about the major hazards associated with that product, and outline the basic precautions or safety steps that should be taken.

Who is responsible for labelling?

In most cases, suppliers are responsible for labelling the hazardous products that they provide to customers.

Employers are responsible for making sure that hazardous products that come into the workplace are labelled and to prepare and apply a workplace label when appropriate.

Are there different types of labels?

Yes. There are two main types of WHMIS labels: supplier labels, and workplace labels.

A supplier label is provided or affixed (attached) by the supplier and will appear on all hazardous products received at a workplace in Canada. If the hazardous product is always used in the container with the supplier label, no other label is required.

A workplace label is required when:

- a hazardous product is produced (made) at the workplace and used in that workplace,
- a hazardous product is decanted (e.g., transferred or poured) into another container, or

- a supplier label becomes lost or illegible (unreadable).

There are two situations when a workplace label is not necessary. When a hazardous product is:

- poured into a container and it is going to be used immediately, or
- "under the control of the person who decanted it". For example, when the person who poured the product into another container will be the only person who will use it, and the product will be used during one shift, a full workplace label may not be required. **However**, the container must still be identified with the product identifier (name).

If the product is not used right away or if more than one person will be in control of the product, a full workplace label is required. Note that a company may have specific rules about labelling containers that are above or exceed the WHMIS requirements.

What information is required on a supplier label?

Supplier labels must be written in English and French. They may be bilingual (as one label), or available as two labels (one each in English and French).

The supplier label must include the following information:

1. **Product identifier** – the brand name, chemical name, common name, generic name or trade name of the hazardous product.
2. **Initial supplier identifier** – the name, address and telephone number of either the Canadian manufacturer or the Canadian importer*.
3. **Pictogram(s)** – hazard symbol within a red "square set on one of its points".
4. **Signal word** – a word used to alert the reader to a potential hazard and to indicate the severity of the hazard.
5. **Hazard statement(s)** – standardized phrases which describe the nature of the hazard posed by a hazardous product.
6. **Precautionary statement(s)** – standardized phrases that describe measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product or resulting from improper handling or storage of a hazardous product.
7. **Supplemental label information** – some supplemental label information is required based on the classification of the product. For example, the label for a mixture containing ingredients with unknown toxicity in amounts higher than or equal to 1% must include a statement indicating the percent of the ingredient or ingredients with unknown toxicity. Labels may also include supplementary information about precautionary actions, hazards not yet included in the GHS, physical state, or route of exposure. This information must not contradict or detract from the standardized information.

* Initial supplier identifier – There are two exceptions to this requirement:

- In a situation where a hazardous product is being sold by a distributor, the distributor may replace the name, address and telephone number of the initial supplier with their own

contact information.

- In a situation where an importer imports a hazardous product for use in their own workplace in Canada (i.e., the importer is not selling the hazardous product), the importer may retain the name, address and telephone number of the foreign supplier on the SDS instead of replacing it with their own contact information.

What is a signal word?

A signal word is a prompt that alerts you about the degree or level of hazard of the product. There are only two signal words used: "**Danger**" or "**Warning**". "Danger" is used for high risk hazards, while "Warning" is used for less severe hazards. If a signal word is assigned to a hazard class and category, it must be shown on the label, and listed in section 2 (Hazards Identification) of the Safety Data Sheet (SDS).

Some hazard classes or categories do not have a signal word assigned to them.

What is a hazard statement?

Each hazard class and category has an assigned "hazard statement". Hazard statements are brief, standardized sentences that tell you more about the exact hazard of the product. The statements are short but they describe the most significant hazards of the product.

Examples of hazard statements are:

- Extremely flammable gas.
- Contains gas under pressure; may explode if heated.
- Fatal if inhaled.
- Causes eye irritation.
- May cause cancer.

The wording of the hazard statement helps to describe the degree of the hazard. For example: "May cause cancer" is more hazardous than "Suspected of causing cancer".

What is a precautionary statement?

Precautionary statements provide advice on how to minimize or prevent adverse effects resulting from exposure to a hazardous product or resulting from improper storage or handling of a hazardous product. These statements can include instructions about storage, handling, first aid, personal protective equipment and emergency measures. Like the hazard statements, the wording of precautionary statements is standardized and harmonized.

There are five types of precautionary statements:

- General.

- Prevention.
- Response (including first aid).
- Storage.
- Disposal.

Examples of precautionary statements are:

- Keep container tightly closed.
- Wear protective gloves/protective clothing/eye protection/face protection.
- If exposed or concerned: Get medical advice/attention.
- Fight fire remotely due to the risk of explosion.
- Protect from sunlight.

Precautionary statements will be consistent with the degree of the hazard associated with the product.

What does it mean if I see "/" or "..." on the label for my product?

The use of the slash (/) or the dots (...) are intended as instructions to the supplier to help them prepare the label and SDS.

For example, the guidance material from GHS lists the following precautionary statement "Wear protective gloves/protective clothing/eye protection/face protection."

The slash (/) means the supplier is to specify the appropriate type of equipment based on their knowledge of the product and how it is used. So, for example, this statement could appear as:

- Wear protective gloves and eye protection.

Or

- Wear protective gloves.

Or

- Wear protective gloves, protective clothing, eye protection, and face protection.

Another example is "Do not subject to grinding/shock/friction/...". In this case, the supplier is to specify the applicable rough handling circumstance to avoid (grinding, shock and/or friction), and the dots (...) mean they are to consider other types of rough handling that should be mentioned.

What will a supplier label look like?

There is no set format for a supplier label. As mentioned, labels must be in English and French. They may be bilingual (as one label), or be presented as two labels (one each in English and

French).

Labels will require the following:

- the pictogram, signal word, and hazard statement are to be grouped together,
- to be clearly and prominently displayed on the container,
- to be easy to read (e.g., you can see it easily without using any item except corrective glasses), and
- to be in contrast with other information on the product or container.

An example of a bilingual label is shown below:

Product K1 / Produit K1




<p>Danger</p> <p>Fatal if swallowed. Causes skin irritation.</p> <p>Precautions: Wear protective gloves. Wash hands thoroughly after handling. Do not eat, drink or smoke when using this product.</p> <p>Store locked up. Dispose of contents/containers in accordance with local regulations.</p> <p>IF ON SKIN: Wash with plenty of water. If skin irritation occurs: Get medical advice or attention. Take off contaminated clothing and wash it before reuse. IF SWALLOWED: Immediately call a POISON CENTRE or doctor. Rinse mouth.</p>	<p>Danger</p> <p>Mortel en cas d'ingestion. Provoque une irritation cutanée.</p> <p>Conseils : Porter des gants de protection. Se laver les mains soigneusement après manipulation. Ne pas manger, boire ou fumer en manipulant ce produit.</p> <p>Garder sous clef. Éliminer le contenu/réceptacle conformément aux règlements locaux en vigueur.</p> <p>EN CAS DE CONTACT AVEC LA PEAU : Laver abondamment à l'eau. En cas d'irritation cutanée : Demander un avis médical/consulter un médecin. Enlever les vêtements contaminés et les laver avant réutilisation. EN CAS D'INGESTION : Appeler immédiatement un CENTRE ANTIPOISON ou un médecin. Rincer la bouche.</p>
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Sample Label

When will a supplier label have to be updated?

A label will be required to be updated when the supplier becomes aware of any "significant new data". According to the regulation, the definition of significant new data is:

"New data regarding the hazard presented by a hazardous product that changes its classification in a category or subcategory of a hazard class, or result in its classification in another hazard class, or change the ways to protect against the hazard presented by the hazardous product." (Source: *Canada Gazette*, Part II, Hazardous Products Regulations, Section 5.12 (1))

Labels will be required to be updated within 180 days of the supplier being aware of the new information. If you purchase a product within this 180 day time period, the supplier must inform you of the changes, and the date they became available, in writing.

It is anticipated that employers will be required to update the existing labels or the information on the containers as soon as the significant new information is provided by the supplier. Watch for confirmation, updates, or changes to these requirements when the WHMIS regulations in your jurisdiction are updated.

What information will be required on a workplace label?

It is anticipated that a workplace label will require the following information:

- Product name (matching the SDS product name).
- Safe handling precautions, may include pictograms or other supplier label information.
- A reference to the SDS (if available).

Workplace label requirements fall under your provincial or territorial jurisdiction, or under the Canada Labour Code if you work in a federally regulated workplace. Again, watch for confirmation, updates, or changes to these requirements when the WHMIS regulations in your jurisdiction are updated.

Are there any other differences in labels allowed?

In specific cases, yes. A WHMIS label can also be a mark, sign, stamp, sticker, seal, ticket, tag, or wrapper. It can be attached, imprinted, stencilled or embossed on the hazardous product or its container. Workers must be trained to be able to identify these alternate systems if they are used in the workplace.

Variations on the supplier label apply for specific situations such as:

- **Bulk shipments** - A labelling exemption exists for products sold without packaging.
- **100 mL or less** - Exempt only from requirement to have precautionary or hazard statements on the label.
- **3mL or less** - Where the label will interfere with normal use of the product, the product would be required to have a label that is durable and legible for transport and storage, but may be removable during use.

However, the two main types that are used most often are the supplier label and the workplace label.

As a worker, what should I do when using a hazardous product?

- Always check to see if there is a label on the product before you use it.
- Read, understand and follow the instructions on the label and SDS. Follow any additional education, instructions, and training as provided by your employer.
- Ask your supervisor if you are not sure about how to use or store it.
- Ask for a new label when the old one cannot be seen or read properly.
- Do not use a product that is not labelled or if the label is unreadable. Ask your supervisor for help (e.g., to replace the label).

During the transition period, how should a hazardous or controlled product be labelled?

The Hazardous Products Regulations were published in *Canada Gazette*, Part II on February 11, 2015. Both the amended Hazardous Products Act and new regulations are currently in force. "In force" means that suppliers may begin to use and follow the new requirements for labels and SDSs for hazardous products sold, distributed, or imported into Canada.

During the transition period, the supplier must fully comply with either the repealed Controlled Products Regulations (WHMIS 1988) or the HPR (WHMIS 2015) for a specific controlled or hazardous product. The classification, label and (material) SDS must comply fully with the specific regulation chosen by the supplier, and not be a combination of the two.

As such, during the transition period, you may receive hazardous products that follow either WHMIS 1988 or WHMIS 2015 requirements.

For more information on the transition period, please see the [WHMIS 2015 - General](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/general.html) (http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/general.html) OSH Answers.

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What's New

Check out our [What's New \(../whats_new.html\)](http://www.ccohs.ca/oshanswers/chemicals/whmis_ghs/whats_new.html) listing to see what has been added or revised.

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(<http://www.ccohs.ca/ccohs/contacting.html>)

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Related Products and Services

You may also be interested in the following related products and services from CCOHS:

Courses

[WHMIS 1988 for Workers \(http://www.ccohs.ca/products/courses/whmiscourse/\)](http://www.ccohs.ca/products/courses/whmiscourse/)

[WHMIS 2015 for Workers \(http://www.ccohs.ca/products/courses/whmis_workers/\)](http://www.ccohs.ca/products/courses/whmis_workers/)

Software

[CANWrite \(http://www.ccohs.ca/products/canwrite/\)](http://www.ccohs.ca/products/canwrite/)

[WHMIS 2015 Pictograms Kit \(Downloads\) \(http://www.ccohs.ca/WHMISpictograms.html\)](http://www.ccohs.ca/WHMISpictograms.html)

Publications

[WHMIS 2015 Participant Workbook \(http://www.ccohs.ca/products/trainingtools/WHMIS2015Workbook/\)](http://www.ccohs.ca/products/trainingtools/WHMIS2015Workbook/)

[WHMIS 2015 Instructor's Toolkit \(http://www.ccohs.ca/products/trainingtools/WHMIS2015/\)](http://www.ccohs.ca/products/trainingtools/WHMIS2015/)

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