University of Toronto
WHMIS2015 Compliance labels
The Workplace Hazardous Material Information System (WHMIS)

- Ont. Regulation 860
- The WHMIS 1988 version transitioned to the WHMIS 2015 version
- Labs **must comply** with the labeling, SDS, and training requirements
WHMIS 2015 legislation

What products require a WHMIS 2015 label?
• Any products used in the workplace that meet the criteria to be classified as hazardous products must be labelled.

Who is responsible for labelling?
• The UofT suppliers are responsible for labelling the hazardous products that they provide to customers.
• The Employer is responsible for making sure that hazardous products that come into the workplace are labelled.
• The Employer is responsible to prepare and apply a workplace label when appropriate.

Exemption (3 ml and under)

- Labelling required for any container
- Labelling required for a small container
Example of supplier label 1988 vs 2015

<table>
<thead>
<tr>
<th>WHMIS 1988</th>
<th>WHMIS 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product Identifier</td>
<td>Product Identifier</td>
</tr>
<tr>
<td>Supplier Identifier</td>
<td>Supplier Identifier</td>
</tr>
<tr>
<td>Pictogram (black, circle)</td>
<td>Pictogram (red, diamond)</td>
</tr>
<tr>
<td>Risk Phrases</td>
<td>Hazard Statement</td>
</tr>
<tr>
<td>NA</td>
<td>Signal Word</td>
</tr>
<tr>
<td>Precautionary Measures</td>
<td>Precautionary Statements</td>
</tr>
<tr>
<td>First Aid Statement</td>
<td>First Aid is a part of Precautionary Statement</td>
</tr>
<tr>
<td>Hatched border (black)</td>
<td>No border</td>
</tr>
</tbody>
</table>

WHMIS 1988 label

WHMIS2015 label
Containers with WHMIS2015-compliant manufacturer labels

- Standard GHS tag for Acetone; compliant with WHMIS2015 Ontario Regulation 860

- Manufacturer “M” supplier labels in GHS format; compliant with WHMIS2015 Ontario Regulation 860
General *Workplace Label*

A workplace label requires 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

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).

A workplace label *is not necessary* when a hazardous product:
- is poured into a container and it is going to be used immediately
- is "under the control of and is used exclusively by the worker who filled the portable container" and is used only **during the shift**
- **However**, the container must still be identified with the product identifier (name).
Ontario Regulation #860 amendments

• Upon Ontario universities’ request, an amendment (January 21, 2019) to the regulation allowed the University to add a workplace label on any hazardous product or container that was received at a workplace from a supplier on or before August 31, 2018.

• By keeping the supplier label (WHMIS-1988) and applying UofT EHS workplace label, the UofT laboratories can continue using their old inventory of chemicals.

• The UofT Environmental Health and Safety (EHS) Office will provide each laboratory with suitably sized workplace labels.
Example of WHMIS2015 compliant workplace label

- University of Toronto will provide each laboratory with labels of two sizes: Small (S) and Large (L)

- Dimensions

  **Small:** 35 mm X 19 mm
  
  **Large:** 70 mm X 45 mm

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**Generic compliant workplace label**

Source: GLOBAL HazMat Inc.

**Compliant Workplace label approved by UofT**

Source: UofT EHS Office
Additional labeling process in your laboratory

**Step 1** Identify in your inventory chemicals purchased before 2015

**Step 2** Identify number of Small and Large containers to be labeled *

**Step 3** Request needed number of Small and Large UofT workplace labels **

**Step 4** Complete labelling all containers with WHMIS1988 supplier labels

**Step 5** Report to UofT EHS and schedule the inspection ***

**Note *:** If you are not sure, order more than you think you need and return those that are unused.

**Note **:** If you calculated the exact number of labels that you will need, add an extra 10% to the order; return later those that are unused.

**Note ***:** Chose an appropriate time for the inspection using the Label Request Form (Question 10) but please note that the maximum duration to complete the labeling project for each lab is two months.
Step 1: Identify all containers with Non-compliant Labels

- Used items from various suppliers
- New and unopen items

Important !!!
Regardless of whether the product was previously used or unopened, the bottles/containers/vials without WHMIS2015 labels must be additionally labeled with the UofT Workplace Label to comply with Ontario Regulation 860
Step 2: Recognizing Compliant and Non-Compliant labels and the label size needed

- All other items on this picture must be labeled with the UofT Workplace Label provided by EHS

- A few items in this picture are compliant with WHMIS2015 (marked with an arrow “ready”); you do not need to modify or change these items
Step 3: Request WHMIS2015 compliant workplace label (Large and Small)

- University of Toronto will provide each laboratory with labels of two sizes: Small (S) and Large (L)

- **Dimensions**
  - Small: 35 mm X 19 mm
  - Large: 70 mm X 45 mm

- One roll is 100 or 1000

- Order more than you think you need and return those that are unused

- No need to label materials in *Liquid Nitrogen, -150°C* or *-80°C freezers*
Step 4: How to apply the UofT Workplace label on non-compliant containers?

1. Find an unobstructed space on each container
2. Select the appropriate size label for each container
3. Apply self-adhesive label on a clean area

- **DO NOT REMOVE** any original labels *(supplier labels)*
- **DO NOT BLOCK** on an original label:
  a) Name of the material
  b) Concentration of the material(s)
  c) Manufacturer/Supplier name/address
Step 5: What to do after the UofT Workplace labels have been applied?

1. Update your inventory to keep track of the number of items that are still non-compliant
2. Report to EHS via email
3. Schedule a time for the EHS inspection

- You can continue using the items that were manufactured and shipped before 2015 if the UofT Workplace Label is in place
- **Schedule Discard or Removal** of items where the original label ("supplier label") is
  a) Unreadable (fainted, dirty, etc.)
  b) Completely Missing
  c) Damaged so any of the following information is missing: Material Name, Concentration or Manufacturer
UofT EHS on-line resources

https://ehs.utoronto.ca/our-services/chemical-and-lab-safety/

WHMIS 2015 Compliance
- WHMIS & Lab Safety Training
- WHMIS – What You Need to Know
- Memo: EHS Update on WHMIS regulation
- WHMIS Compliance Labels
- WHMIS Compliance Label – U of T samples
- WHMIS2015 Pictograms
- WHMIS1988 Symbols
- WHMIS2015 Fact Sheets
- WHMIS2015 Label Elements
- Label Request Form (on-line)
Contact information

• Andrey Shukalyuk, WHMIS Compliance Officer
  • by e-mail: ehs.whmis@utoronto.ca

• Address: 215 Huron Street, Toronto, Ontario, Canada M5S 1A2
  • 7th Floor

• You can request:
  • Small and Large Labels
  • Training
  • Inspection
  • Additional Information