WHMIS Compliance Instructions

What do I need to do?
1. Ensure that all lab members have completed WHMIS training within the last 3 years
2. Ensure that your lab’s chemical inventory is up to date
3. Ensure that all your chemicals are stored properly
4. Affix UofT compliance labels to hazardous chemicals that have old WHMIS supplier labels
5. Affix workplace labels to hazardous chemicals that have been transferred to secondary containers
6. Undergo a WHMIS Compliance Inspection to ensure that items 1-5 have been completed

Why do I need to do this?
All U of T laboratories must comply with the WHMIS 2015 regulation (R.R.O. 1990, Reg. 860).

Can I delegate this?
Although it is the ultimate responsibility of Principal Investigators to ensure that WHMIS 2015 standards are met in their laboratories, you may delegate the task of bringing your lab into compliance to an appropriate lab member.

1. WHMIS Training
All lab members must complete U of T WHMIS training at least every 3 years. First-time trainees should take EHS101. Trainees who have taken EHS101 previously should take the refresher course EHS112. Instructions for accessing these trainings are detailed below.

First-time trainees:
1. Register for “My EHS” Training https://ehs.utoronto.ca/training/my-ehs-training/
2. Once registered, click on the red “Log into My EHS Training” at the bottom of the https://ehs.utoronto.ca/training/my-ehs-training/ page
3. Enter UTORid and password
4. Click on “Select from all available courses”
5. Click on the “Select” button next to the EHS101 WHMIS and Lab Safety (online)
6. Click the “Register for this Course” button (a confirmation box will pop up)
7. Go to your U of T email account and open the Course Registration Notice from EHSA
8. Open the PDF attachment
9. Click on the “Click here to start the course” link (this link will take you directly to Quercus)
10. Click on the “Enroll in Course” button
11. Click on the “Go to the Course” button
12. Follow the instructions to take the online course and the quiz
Trainees who have completed EHS101 previously:

1. Go to https://ehs.utoronto.ca/training/my-ehs-training/
2. Click on the red “Log into My EHS Training” at the bottom of the page
3. Enter UTORid and password
4. Click on “Select from all available courses”
5. Click on the “Select” button next to the EHS112 WHMIS Refresher
6. Follow steps 6-12 above

As part of your WHMIS Compliance Inspection (see Section 6), you will be asked to provide a complete list of your lab members and their UTORids so that training records can be verified.

2. Chemical Inventory
All U of T labs are strongly encouraged to use the HECHMET system for chemical inventory. Contact wen.zhu@utoronto.ca to learn more about this system and to enroll your lab.

3. Chemical Storage
All chemicals must be stored properly in the lab. Refer to the Chemical Storage Flowchart for information on the safe storage of hazardous chemicals. Do not store hazardous materials above eye level. If you have any questions about chemical storage, contact ehs.whmis@utoronto.ca. Chemical storage in your laboratory will be assessed during your WHMIS Compliance Inspection (see Section 6).

4. Compliance Labels
As originally written, the WHMIS 2015 legislation did not allow for the storage/use of chemicals with old WHMIS supplier labels. All old hazardous chemicals would need to be disposed of and re-purchased. It was estimated that this would cost U of T investigators a combined total of ~$90 million. Successful lobbying of government officials by U of T EHS staff resulted in two amendments to R.R.O. 1990, Reg. 860, which allow the storage/use of hazardous chemicals with old WHMIS supplier labels as long as a U of T compliance label is affixed to the chemical.

How can I tell if a hazardous chemical has an old WHMIS supplier label or a new WHMIS supplier label?
Old supplier labels will have either circular WHMIS pictograms (pictured below) or no pictograms. A U of T compliance label must be affixed to hazardous materials displaying these symbols:
New supplier labels have red diamond pictograms (pictured below). Hazardous materials that display these symbols do not require additional labeling.

Non-hazardous chemicals do not require additional labeling. Chemicals that have a consumer label (e.g., Javex, WD-40, etc.) do not require additional labeling. If you have questions, contact ehs.whmis@utoronto.ca.

Where do I get U of T compliance labels?
U of T compliance labels are provided by EHS free of charge. Compliance labels come in two sizes: small (35 mm x 19 mm) and large (70 mm x 45 mm). You can request labels for your lab by clicking on “Request Compliance Labels” at the bottom of https://ehs.utoronto.ca/whmis/.

What should I do with extra compliance labels?
The WHMIS Compliance Officer will collect extra compliance labels at the time of your WHMIS Compliance Inspection (see Section 6).

What if I can’t figure out how to attach the compliance label without covering parts of the original supplier label?
If you have any questions about how to affix compliance labels, please take a photo of the chemical in question and email it to ehs.whmis@utoronto.ca for assistance.
5. Workplace Labels

Hazardous chemicals that have been transferred from their original container to a secondary container must have a workplace label affixed to the new container if it is to be kept for more than one day.

What information needs to be on a workplace label?

By law, workplace labels must contain these 3 pieces of information:

1. The name of the chemical written exactly as it appears on the SDS (e.g., “Ethanol” not “EtOH”)
2. Safe handling instructions (personal protective equipment and other handling information)
3. A reference to the SDS (i.e., “Refer to Safety Data Sheet”)

You are welcome to include other information on the workplace label if you wish. Below are examples of three different workplace labels that all meet the WHMIS regulation criteria.

Workplace Label Example 1: The U of T Workplace Label template can be downloaded from https://ehs.utoronto.ca/whmis/ and is formatted to print on Avery 60506 labels (available at U of T MedStore). Open the template in Adobe (not your web browser), type in the required information for each label and print directly onto Avery 60506.

Workplace Label Example 2: This label has been created with the free “Design and Print” software available at https://www.avery.ca/ using the Avery 60506 template.
Workplace Label Example 3: Workplace labels can be made with lab tape and a permanent marker as long as all three pieces of required information are included. If you are labeling a bottle that will regularly go through a glass washing facility, consider using easily removable labels instead of lab tape.

Are there any exceptions to workplace labeling?

- **Non-hazardous chemicals do not require a workplace label.** Salt solutions, phosphate buffers and broths would typically not be considered hazardous, and therefore would not require a workplace label. If it is unclear whether or not a chemical is hazardous, please send an inquiry to ehs.whmis@utoronto.ca so that the chemical can be assessed.

- **A workplace label is not required** if the worker who decanted the hazardous chemical will use up the chemical on the same day it was decanted.

6. WHMIS Compliance Inspection

The U of T WHMIS Compliance Officer, Dr. Sheila Costford, will contact you (or your lab designate) to schedule a WHMIS Compliance Inspection. This is an informal visit to ensure that your lab is in compliance with the WHMIS 2015 regulation; it is not an inspection from an external regulator. If any noncompliance is observed, Dr. Costford will provide feedback on how to resolve the issue and then follow up with your lab to ensure that the issue has been resolved. The inspection will cover 5 items:

1. U of T WHMIS training for all lab members within the last 3 years
2. Up-to-date chemical inventory
3. Proper storage of chemicals
4. U of T compliance labels on chemicals with old supplier labels
5. Workplace labels on all hazardous materials that have been transferred to another container

For more information, refer to the WHMIS page on the EHS website. Inquiries can be sent to ehs.whmis@utoronto.ca.