

2019-2020 RCC Work Plan: Globally Harmonized System for Classification and Labelling of Chemicals (Workplace Hazards)

Canadian Department: Health Canada – Healthy Environments and Consumer Safety Branch (HECSB)

U.S. Department/Agency: Department of Labor – Occupational Safety & Health Administration (OSHA)

Regulatory Cooperation Statement:

Health Canada and the United States (U.S.) Department of Labor will continue to collaborate on implementing updates to the Globally Harmonized System of Classification and Labelling (GHS) in their respective jurisdictions.

The objective of this collaboration is to ensure that the Canadian and U.S. requirements for hazard classification and communication remain aligned to the greatest extent possible with each other and with the GHS as it is updated. Where possible, the objective is to have one label and one safety data sheet (SDS) that would be acceptable in both countries, while respecting the legislative and regulatory requirements of each country and without reducing the level of safety or protection to workers.

This work is in line with the 2018 Memorandum of Understanding (MOU) between Health Canada and the U.S. Department of Labor.

Work Plan:

Initiative	Desired outcome(s)	Activities	Reporting
1. Develop guidance for stakeholders	A joint guidance supporting the implementation of the GHS and interpretation of technical issues and requirements in both Canada and the U.S.	- Coordination, to the greatest extent possible, of Canada and U.S. updates to guidance, including those to align with the publication of revisions to the UN Globally Harmonized System of Classification and Labeling (GHS Purple Book). (Ongoing)	
		- Issue joint compliance promotion materials as needed such as joint guidance on the preparation of specific section of the SDS (sections 2, 3, 8 and 9), and how to comply with requirements of the <i>Hazardous Products Regulations</i> (HPR) and the Hazard Communication Standard 2012. (Ongoing)	

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		<ul style="list-style-type: none"> - Issue ad hoc materials to support interpretations on regulatory and technical issues to increase compliance on issues related to GHS implementations in both countries, as may be necessary. (Ongoing) 	
		<ul style="list-style-type: none"> - Host a joint Canada/ U.S. stakeholder meeting to provide progress on collaborative efforts and gain stakeholders input on priorities to guide development (Summer 2020). 	
2. Coordinate common positions and participate at the UN Sub-committee of Experts on the GHS (UNSCEGHS)	Establishment of forward plans, where appropriate to address international issues raised at the UNSCEGHS.	<ul style="list-style-type: none"> - Inform stakeholders of issues prior to the UNSCEGHS international meetings and solicit feedback. (Bi-annual - June and November) 	
		<ul style="list-style-type: none"> - Convene the working group for workplace chemicals in advance of international meetings to create common positions, where appropriate. (Bi-annual - July and December) 	
		<ul style="list-style-type: none"> - Coordinate joint updates to stakeholders on issues that arise from the international discussions. (Annually) 	
3. Maintain alignment on the implementation of the GHS	Having one label and one SDS, where possible, that would be acceptable in both countries, without reducing the level of safety or protection to workers.	<ul style="list-style-type: none"> - Convene meetings between U.S. OSHA and Health Canada to discuss items from the most recent revisions of the GHS Purple Book for proposed adoption in the Canadian and U.S. regulations. (Ongoing) 	
		<ul style="list-style-type: none"> - Communication of GHS updates to stakeholders and potential impacts for Canada and the U.S. related to alignment with revisions of the GHS Purple Book. (Ongoing) 	
		<ul style="list-style-type: none"> - Within the existing working group for work place chemicals, identification of potential regulatory amendments as a result of publication of future revisions of the GHS Purple Book. (Ongoing) 	

Initiative	Desired outcome(s)	Activities	Reporting
		<ul style="list-style-type: none"> - Where variances occur between Canada and the U.S. regarding adoptions of future revisions of the GHS Purple Book, communication of impact and, where appropriate, forward plan to stakeholders. (Ongoing) 	
		<ul style="list-style-type: none"> - Discuss variances and implementation issues – concentration ranges and small packages exemptions. (Ongoing) 	