

# SCC Regulatory Update Meeting

## April 2016

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**Product Safety and Regulatory Affairs Manager**

# Topics

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- **WHMIS 2015 – Implementing GHS**
- **CEPA Updates**
- **Health Canada Updates**
- **Meeting the Challenges**



# What is GHS?

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- The Globally Harmonized System is an international approach to hazard communication, providing agreed criteria for classification of chemical hazards, and a standardized approach to label elements and safety data sheets.



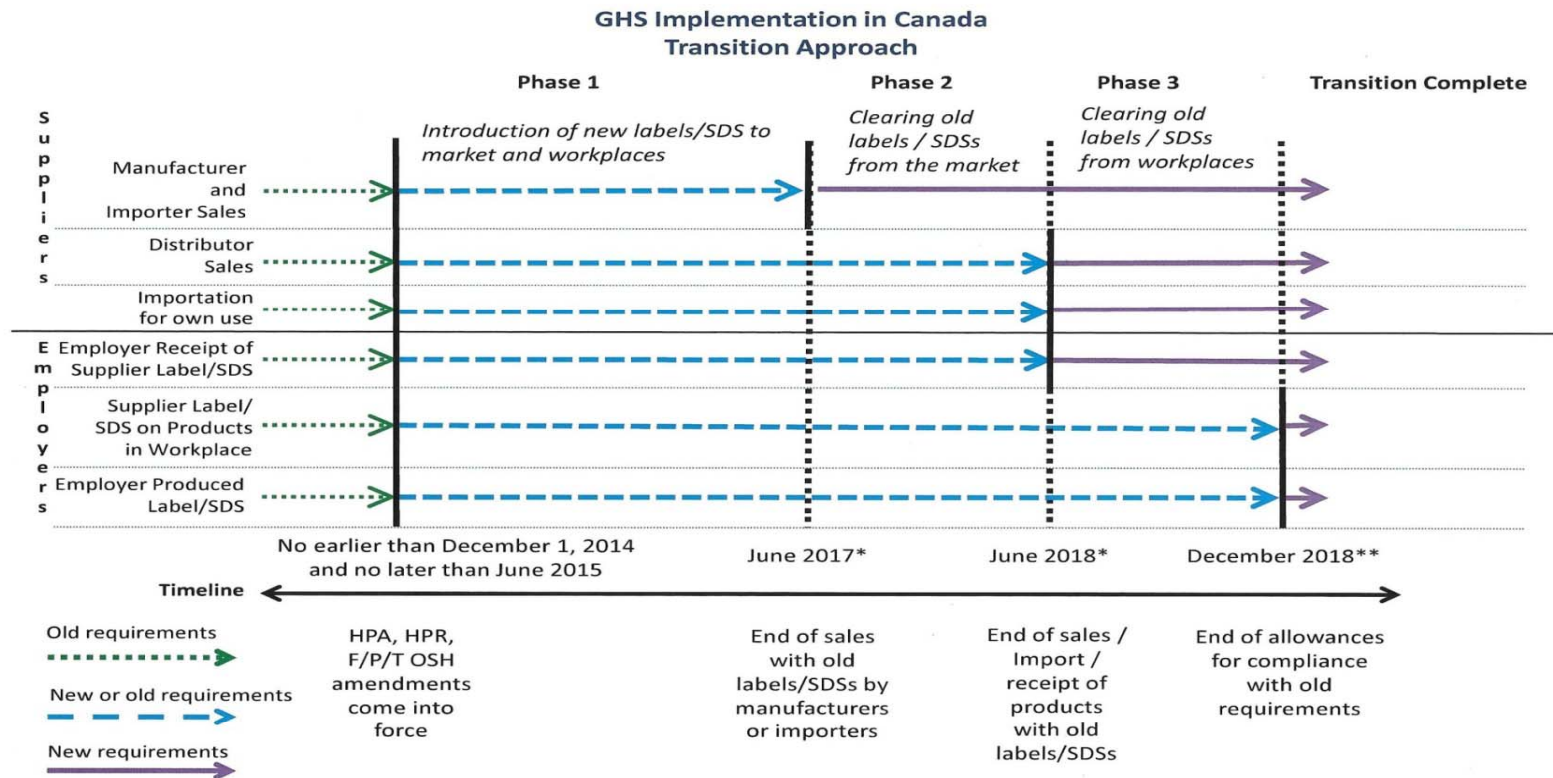
# Why GHS?

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- Improved employee safety
- Improved and consistent hazard information
- Global alignment
  - **SOME** relief from country specific regulations



# Implementation Deadlines



\* The proposed dates have been revised based on comments received.  
 \*\* To be confirmed by FPT OSH jurisdictions.

# Key Changes

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- ✓ Pictographs
- ✓ Classes – identified by name and not an alphabetic letter
- ✓ New classes
- ✓ Use of Categories and Sub-Categories
- ✓ Ingredient Disclosure List no longer used
- ✓ Label element changes
- ✓ Use of standardized statements
- ✓ Safety Data Sheets (SDS)
- ✓ SDS expiry no longer 3 years



# Other Changes

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- ✓ Bridging for classification
- ✓ Concentration threshold cut-offs changed in some hazard classes
- ✓ Units of measure (mg/m<sup>3</sup> – mg/L)
- ✓ Acute Toxicity significantly expanded



# Hazard Classes

| WHMIS 1988                   | 2015 Physical                                     | 2015 Health                       |
|------------------------------|---|-----------------------------------|
| A - gases                    | Explosives  | Acute toxicity                    |
| B - flammables               | Flammables  | Reproductive                      |
| C - oxidizers                | <b>Self-reactive</b>                              | Germ cell mutagenicity            |
| D - poisonous and Infectious | Contact with H <sub>2</sub> O emits flammable gas | Serious eye damage / irritation   |
| E - corrosive                | <b>Self-heating</b>                               | <b>STOT-RE or SE</b>              |
| F - dangerously reactive     | <b>Corrosive to metal</b>                         | Skin corrosion/irritation         |
|                              | Organic peroxide                                  | Respiratory or skin sensitization |
|                              | Gases   | Carcinogenicity                   |
|                              | <b>Pyrophoric</b>                                 | <b>Aspiration toxicity</b>        |
|                              | <b>Simple Asphyxiants</b>                         | <b>HHNOC</b>                      |
|                              | <b>PHNOC</b>                                      |                                   |



# Label Requirements

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- Product Identifier
- **Initial Canadian** Supplier Identifier
- Pictographs
- Signal word – **Danger or Warning**
- General precautionary statements
- Preventative precautionary statements
- Response precautionary statements
- **Storage precautionary statements**
- **Disposal precautionary statements**
- **The % of the mixture consists of an ingredient or ingredients of unknown acute toxicity**

# Pictograms

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Flame Over Circle



Flame



Exploding Bomb



Skull and Crossbones



Corrosion



Gas Cylinder



Health Hazard



Environment



Exclamation Mark



# Sample GHS Label

**INCROQUAT SL-5-LQ-(AP)**  
**HK47827/0205/4S73**



**Warning**  
**Causes serious eye irritation. Toxic to aquatic life with long lasting effects.**  
Wash skin thoroughly after handling. Avoid release to the environment. Wear eye protection/ face protection.  
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/ attention. Collect spillage. Dispose of contents/ container to an approved waste disposal plant.

Additional information is given in the Material Safety Data Sheet.  
In case of emergency call CHEMTREC US: 1-800-424-9300, CHEMTREC WORLD: 1-703-527-3887.

**Other information**  
This product either contains a chemical substance that is not listed on the public TSCA Inventory or the TSCA Inventory status of the product has not been evaluated. For FDA uses only.  
**Storage** Store in original container. Keep container tightly closed in a dry and well-ventilated place.

|              | HMIS | NFPA |
|--------------|------|------|
| Health       | 2    | 2    |
| Flammability | 1    | 1    |
| Reactivity   | 0    | 0    |

Batch No: 123456789  
Date of Manufacture: 06-16-2014  
Made in: USA

**CRODA**  
Croda Inc 300-A Columbus Circle Edison NJ 08837-3907 US  
Tel 1-732-417-0800 Fax 1-732-417-0804

Net Weight: 205.0 KG  
Gross Weight: 221.8 KG  
Item: 1 of 1

# SDS Changes

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- 16 section SDS required
  - Sections 12 to 15 optional
- No longer 36 month expiry date
- 90 day revision for info changes
- SDS must now include
  - Section 1: “recommended use and restrictions on use”
- New Section 2 – Hazard Identification
  - Symbols
  - Class and Category
  - Hazard and precaution statements

# More SDS Changes

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- Ingredient Disclosure List abolished
- LD<sub>50</sub>/LC<sub>50</sub> info moved to Section 11
- Flash point, auto-ignition and UEL/LEL moved to section 9
- Initial BP and boiling range required
- Solubility
- Decomposition temperature, and
- Viscosity
- Exposure limits moved to Section 8

# Sample SDS

## Material Safety Data Sheet

CRODA

### INCROQUAT™ SL-5-LQ-(AP)

Version 0.0 Revision Date 00/00/0000 Print Date 06/11/2014

#### SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : INCROQUAT™ SL-5-LQ-(AP)  
Product code : HK47827

**Manufacturer or supplier's details**  
Company : Croda Inc  
Address : 300 A Columbus Circle  
Edison, NJ 08837-3907  
Telephone : (732) 417-0800  
(732) 417-0804  
Telefax : (732) 417-0804  
Emergency telephone : USA: 24 Hour Emergency Response Information CHEMTREC  
toll free: 1-800-424-9300; direct/international: 1-703-527-3887.  
CANADA: Quantum Murray (spill response)1-877-378-7745.  
CANADA: CANUTEC(collect) 1-613-996-6666. EUROPE: 00  
32 3575 5555.ASIA PACIFIC - excl. China: +65 6542-9595.  
CHINA: +86 21 2315 9344. AUSTRALIA: +61 2 9616 5890.  
SOUTH AFRICA: +32 3 575 55 55. LATAM: 0800 720 8000.  
1-613-996-6666. INDIA: +91 22 3094846778. JAPAN: +65  
6542 9595 (24時間 日本語対応無料通話, シンガポール)

#### Recommended use of the chemical and restrictions on use

Recommended use : Surfactant

#### SECTION 2. HAZARDS IDENTIFICATION

##### GHS Classification

Eye irritation : Category 2A  
Acute aquatic toxicity : Category 2  
Chronic aquatic toxicity : Category 2

##### GHS Label element

Hazard pictograms :



Signal Word :

Warning

Hazard Statements :

H319 Causes serious eye irritation.  
H411 Toxic to aquatic life with long lasting effects

Precautionary Statements :

**Prevention:**  
P264 Wash skin thoroughly after handling.  
P273 Avoid release to the environment.  
P280 Wear eye protection/ face protection.  
**Response:**  
P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.  
P337 + P313 If eye irritation persists: Get medical advice/ attention.  
P391 Collect spillage.

1 / 8

## Material Safety Data Sheet

CRODA

### INCROQUAT™ SL-5-LQ-(AP)

Version 0.0 Revision Date 00/00/0000 Print Date 06/11/2014

**Disposal:**  
P501 Dispose of contents/ container to an approved waste disposal plant.

#### Other hazards which do not result in classification

Ingestion may cause irritation to mucous membranes.  
May cause irritation of respiratory tract.

#### SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

##### Hazardous ingredients

| Chemical Name                                 | CAS-No.     | Concentration [%] |
|---|-------------|-------------------|
| Dihydroxypropyl PEG-5 linoleammonium chloride | 168677-75-6 | 30 - 60           |

#### SECTION 4. FIRST AID MEASURES

If inhaled : If breathed in, move person into fresh air.  
If symptoms persist, call a physician.

In case of skin contact : Take off contaminated clothing and shoes immediately.  
Wash off with soap and plenty of water.  
If symptoms persist, call a physician.

In case of eye contact : Immediately flush eye(s) with plenty of water.  
If eye irritation persists, consult a specialist.

If swallowed : If large quantities of this material are swallowed, induce vomiting immediately, as directed by a physician.

#### SECTION 5. FIRE-FIGHTING MEASURES

##### Flammable properties

Flash point : > 93 °C (> 199 °F)  
Method: closed cup

Ignition temperature : no data available

Upper explosion limit : no data available

Suitable extinguishing media : Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.  
Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media : High volume water jet

Specific hazards during fire fighting : Do not use a solid water stream as it may scatter and spread fire.  
Do not allow run-off from fire fighting to enter drains or water

2 / 8

CRODA

# Ingredient Disclosure

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| WHMIS  | GHS   |
|--|---|
| Chemical name or synonym   | Chemical or synonym                         |
| CAS #  | CAS#  |
| Concentration or prescribed range                                  | Concentration or actual concentration range |
| <b>Confidential Information still requires a HMIRC application</b> |   |

GHS....

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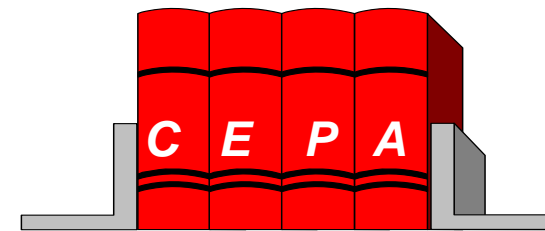
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# CEPA Updates

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- CMP 3 – Planning Underway
  - Stakeholder Engagement Notice Published February 16, 2016
  - 1550 substances of interest
- CEPA Review
  - House of Commons Environment Committee has started review
  - Industry testimony to be heard in May
- ICL Prioritization
  - 3200 of approx. 3500 substances complete
  - Communication expected soon
- Consultation on Implementation of Section 75
  - <http://www.ec.gc.ca/ese-ees/default.asp?lang=En&n=F251F2AB-1>



# Health Canada Updates

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- MI/MCI (Kathon) Update
  - Compliance agreements with possible sell through extension until December 2016
- Consumer Health Product Framework
  - Consultation Report Published April 1st
- GMP for API's
  - Three year implementation period ends Nov. 8<sup>th</sup>
  - Pilot Project for certain consumer products that are on Monograph for Foreign Site Requirements
  - New compliance and enforcement branch launched April 4, 2016



# Meeting the Challenges

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- **Use Reliable Information**
  - Accurate composition information is essential
  - International cooperation is required
- **Stay Informed**
  - Industry Trade Publications
  - Subscriber services
- **Get Involved**
  - Government Workshops
  - Industry Events
  - Supplier relations



# Upcoming Industry Events

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- **CCTFA Regulatory Workshop**
  - April 26<sup>th</sup> – Ottawa, ON
- **Chemical Supply Chain Management Course**
  - May 9<sup>th</sup> to 13<sup>th</sup> – Burlington, ON
- **ICG for CEPA Update Conference**
  - September 19<sup>th</sup> and 20<sup>th</sup> – Toronto, ON



# Resources

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- CCOHS – WHMIS/GHS
  - <http://www.ccohs.ca/topics/legislation/WHMIS/>
- Chemical Substances Web-Site
  - <http://www.chemicalsubstanceschimiques.gc.ca/index-eng.php>
- DSL Search Engine
  - [http://www.ec.gc.ca/substances/nsb/search/eng/cp\\_search\\_e.cfm](http://www.ec.gc.ca/substances/nsb/search/eng/cp_search_e.cfm)
- In Commerce List Web-Site
  - <http://www.hc-sc.gc.ca/ewh-semt/contaminants/person/impact/list/index-eng.php>
- Health Canada – GMP Pilot Project for Foreign Bldg Info
  - <http://www.hc-sc.gc.ca/dhp-mps/compli-conform/info-prod/drugs-droques/actingred-notice-avis-pilot-eng.php>
- Health Canada – Consultation for CHP Framework
  - [http://www.hc-sc.gc.ca/dhp-mps/consultation/natur/consult\\_chpf\\_cpsc-eng.php](http://www.hc-sc.gc.ca/dhp-mps/consultation/natur/consult_chpf_cpsc-eng.php)

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# Acknowledgements

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