

This information is provided to highlight the notable differences due to recent regulatory updates regarding GHS in Canada and the United States.

Index	Canada	USA
Known As	WHMIS	HAZCOM, HCS
Governing Body	Health Canada (Federal)	OSHA – Occupational Health and Safety Administration (Federal)
Regulation	Hazardous Products Act and Regulation (R.S.C., 1985, c. H-3 and SOR/2015-17)	OSHA Act and Standard 29 CFR 1910.1200 “Employee right to know”
	HPA, HPR	CFR = Code of Federal Regulations
	Canada Labour Code	OSHA Act and Regulation
Provincial / State	Provincial OH&S Acts, Regs and Codes apply when not a federal employee or specific inter-provincial business	State OS&H Plans (must be as good or better than federal one)
Language	English and French	English
GHS Status	Fully Implemented	Fully Implemented
Previous GHS	GHS Revision 5	GHS Revision 3
Current GHS	GHS Revision 7 and parts of 8	GHS Revision 7 and parts of 8
Transition Period	December 15, 2025, for suppliers to update an SDS and Label	January 19, 2026, for product SDS and Label. July 19, 2026, for mixtures
Section 1 of SDS	Identify Canadian manufacturer, importer or supplier for product sale. A Canadian distributor can omit name of the initial supplier if they list their own contact info instead. Canadian importer can retain the name of the foreign supplier only if the imported hazardous product is to be used only in their own workplace	Identify US manufacturer, importer, or other responsible party with a name, address and telephone number on SDS and Label
Cancer Classification Threshold	Carcinogen cut off at 0.1% for SDS and label	Carcinogen cut off at 1% for label. Carcinogen cut off at 0.1% for SDS
Updates on new hazard info for SDS and Label	Suppliers have 90 days for SDS and 180 days for label. If sold within 90 days a written note needs to be included with the updated SDS- same with labels but within 180 days	Manufacturers, importers, distributors and employers have 3 months to update an SDS and 6 months for the label

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Written Plan	No written plan requirement. Provinces call for exposure control plans, hazard assessments, or codes of practice for specific regulated substances	Written Plan that lists all site chemicals. Hazard Communication Plans
Roles & Responsibilities	Specific roles and responsibilities for manufacturers, suppliers and employers to identify and communicate the hazards of a product, and for the H&S committee or representative	Roles and responsibilities include the manager level and are specified in the Hazard Communication Plan for the following responsibilities: • Checking and maintaining current inventory • Obtaining SDSs • Ensuring labels are in place • Delivering training on chemical hazards • Ensuring chemicals are quarantined until SDS is obtained
Not Otherwise Classified	PHNOC, HHNOC – Physical and Health Hazards Not Otherwise Classified, Associated with the exclamation pictogram	HNOC – Hazards Not Otherwise Classified OSHA’s HCS does not differentiate between PHNOC and HHNOC
Biohazards	Hazard class and pictogram for Biohazardous Infectious Materials. Products must be labelled and an SDS is required. An appendix is also required with information on the BIM	No hazard class for biohazards under HCS, covered under HAZWOPER, Bloodborne Pathogens Standard, and Respiratory Standard
SDS Location	SDS may be electronic and must be readily available to the workers who are exposed	SDS may be electronic; may be kept at the primary workplace facility, needs to be immediately accessible in an emergency
Water Activated Toxicants	Supplemental hazard statement required on SDS and Label	Supplemental hazard statement required on SDS only
Optional info	Optional: Sections 12–15; information stipulated under other agencies	Optional: Sections 12–15; information stipulated under other agencies
		NFPA – National Fire Protection Association, maintains private, copyrighted standards and codes for usage and adoption by local governments
Environment	CEPA – Canadian Environmental Protection Agency	EPA –Environmental Protection Agency “Community right to know”
	CEPA Environmental Emergencies (E2) Plans, Site Emergency Response Plans	EPCRA Section 311, 312 Chemical Hazard Inventory Reporting Tier I and II; 40CFR370
Transportation	Transportation of Dangerous Goods (TDG) Act and Regulation	Hazardous Materials Transportation Law 49 USC and Hazardous Materials Regulations or HMR CFR49