

4.3 Workplace Hazardous Materials Information Systems (WHMIS) Compliance Policy

Intent

This policy is intended to communicate WHMIS procedures and guidelines.

Scope

This policy applies to all employees always and without exception.

Unionized employees shall adhere to their current Collective Agreement for policies governing WHMIS compliance. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

This policy has been developed to incorporate the legislative requirements of Alberta, British Columbia and Ontario and shall be updated accordingly should the employer expand its operations into additional provinces.

Guidelines

The employer values the safety and well-being of its employees, and will work with them to provide every reasonable safety measure possible. WHMS training and education is especially important due to the nature of services the organization provides. In compliance with all relevant legislation and as a duty to its employees to protect their health and safety, the employer will:

1. Meet all legislative standards as outlined in provincial Occupational Health and Safety Acts, and ensure that information and training on hazardous materials is provided to all staff.
2. Ensure that all controlled products are labelled or identified with appropriate WHMIS labels; and that all containers that contain hazardous materials have appropriate labels.
3. Ensure that Material Safety Data Sheets (MSDS) are available for all controlled products in the workplace to provide additional information and detail hazard and precautionary information and that they are no more than three years old.
4. Ensure that all workplace hazardous materials include the appropriate supplier labels and MSDS.
5. Ensure that employees have full access to supplier labels and MSDS information.
6. Ensure that until the supplier container is empty, the supplier label is not deliberately removed, destroyed or changed;

Training and Education

The employer shall provide appropriate WHMIS training and education for all staff members who are exposed or likely to be exposed to hazardous materials in the performance of their regular job duties. WHMIS training and education shall be tailored to the position the employee holds with the company and the frequency with which they are exposed to controlled and hazardous substances.

The employer, in conjunction with the Joint Health and Safety Committee, will review training and education programs and content annually, and revise where necessary. In the event of any changes, staff will be trained and educated regarding the change(s).

Employee Responsibilities and Rights

All employees that are active with products pertaining to this training must participate in WHMIS training and education.

Employees must report any violation of the Act, Code or regulations to management or a Joint Health and Safety Committee representative.

All employees have the right to know about the hazardous materials they are exposed to on the job. This includes:

- The right to review labels and MSDS, to receive instruction and training.
- Employees have the right to be included in discussions regarding the content of the program, the amount of training, who is to receive what training, who delivers the training, etc.

Workplace Hazardous Material Information System (WHMIS)

Both federal and provincial regulation direct employers to establish and enforce specified Workplace Hazardous Material Information System (WHMIS) procedures. The attached WHMIS Program has therefore been incorporated and will apply to all employees.

1. Program Components

The employer's Worksite Hazardous Material Information System consists of the following components:

- Product Classification
- Material Safety Data Sheets (MSDS)
- Labelling
- Handling Procedures
- Emergency Procedures
- Employee Education
- Program Audit
- Responsibility

2. Product Classification

All hazardous materials classified as controlled products under the Federal Hazardous Products Act (HPA) and provincial Occupational Health & Safety Acts (OHSA) shall be handled in accordance with the employer's WHMIS Program.

In general, controlled products are any product, material or substance identified, classified or categorized under the HPA or OHSA as:

- Compressed Gas
- Flammable or Combustible Material
- Oxidizing Material
- Poisonous or Infectious Material
- Corrosive Material and
- Dangerously Reactive Material

3. Material Safety Data Sheets (MSDS)

A Material Safety Data Sheet is a technical document, produced and distributed by the supplier of a controlled product, which provides detailed and comprehensive information on the controlled product regarding:

- Health effects of overexposure to the product
- Hazard evaluation regarding the product's handling, storage or use
- Measures to protect workers at risk of overexposure
- Emergency procedures

Material Safety Data Sheets are dated and valid for three years, after which time they must be replaced with an updated edition. It is the responsibility of the Joint Health and Safety Committee to ensure all MSDS' are up to date.

4. Labelling

All controlled products will have a supplier label identifying the following product information:

- Product identifier
- Supplier identifier
- Availability of Material Safety Data Sheet
- Hazard symbol
- Information for safe use of the product and risk phrases
- Precautionary measures
- First aid measures

Labels are a source of information on a controlled product designed to alert employers and employees in an easily understood way to the hazards of the product and the precautions to be taken. A label may be a mark, sign, stamp, device, seal, sticker, ticket, tag or wrapper and must be attached to, or imprinted, stencilled or embossed on the controlled product or a container of the product. Labels may be:

1. Provided by the product supplier; or
2. Produced locally by the workplace for materials manufactured/produced locally, by-products, or bulk materials that are repackaged or rebottled.

Should the label be necessarily small, labels will have as a minimum:

- Product identifier
- Hazard symbol
- Precautions to be taken
- Availability of Material Safety Data Sheet

5. Handling Procedures

In the event that a Material Safety Data Sheet does not detail adequate handling information for the employer's use, storage or handling of a controlled product and/or the use of protective equipment or clothing associated with the controlled product, written instructions and procedures will be created and will be made readily accessible for workers.

6. Emergency Procedures

In the event that a Material Safety Data Sheet does not detail adequate emergency information for the containment, cleanup and disposal of a spill or emission release of a controlled product, or for the first aid and health and safety response for an overexposure to the controlled product, written instructions and procedures will be created and will be made readily accessible for workers as appropriate.

7. Employee Education

All employees who work with or in the proximity of a controlled product will receive WHMIS education, which will consist of:

- Introduction to WHMIS regulations.
- How to read and understand the meaning of symbols and terminology on Material Safety Data Sheets and Labels.
- Use, handling and storage of each controlled product used by the employee.
- Use of protective equipment and clothing associated with the handling of each controlled product.
- Safety/emergency measures associated with each controlled product, including containment, clean up and disposal of spills or emission releases, plus first aid measures and health & safety responses (including the use of any equipment or technique) in the event of overexposure or potential for overexposure to a controlled product.

8. Program Audit

- Each property will be audited once a year to verify ongoing applicability and compliance with each component of the WHMIS Program.

9. Responsibility

- Each manager is responsible for administering and enforcing all components of the WHMIS program throughout their scope of operation and responsibility.
- Managers will have their employees undertake appropriate WHMIS education prior to working with or near a controlled product.
- All employees are responsible for learning and applying relevant components of the WHMIS program.

For more Information regarding WHMIS:

Alberta:

http://employment.alberta.ca/documents/whs/whs-pub_ch007.pdf

Ontario:

http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900860_e.htm#BK5

British Columbia:

<http://www2.worksafebc.com/topics/whmis/RegulationAndGuidelines.asp>