WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS)

STEPS TOWARDS COMPLIANCE

The following steps are considered necessary to ensure efficient and suitable compliance with the W.H.M.I.S. legislation (Bill l79-Amendments to the Occupational Health and Safety Act - in Ontario).

1. INVENTORY:

Each Department or Division/Section of a Department is required to conduct an "INVENTORY" of all materials in use within that Department or Division/Section that MEETS THE CRITERIA OF BEING A GAS, LIQUID OR GRANULAR SOLID.

The Department shall then acquire "MATERIAL SAFETY DATA SHEETS" on the listed products through the Purchasing Division or from the supplier/manufacturer, if purchasing is done directly.

All items listed on the "PRELIMINARY INVENTORY FORM" (these forms are available on the Corporate e-NET\YOU SHOULD KNOW\Workplace SAFETY and WSIB\FORMS) shall be identified as W.H.M.I.S. products or non-W.H.M.I.S. products by using the list of exemptions, M.S.D.S.'S, Regulation 654, or supplier/manufacturer information available. For further direction in this regard please contact your Corporate Workplace Safety Section.

ONCE THE INVENTORY IS COMPLETED IT SHALL BE PRESENTED TO THE JOINT HEALTH AND SAFETY COMMITTEE FOR REVIEW AND CONSULTATION.

Upon consultation with the J.H.S.C., a copy of the inventory is to be conspicuously displayed at the workplace and another copy is to be forwarded to the Corporate Workplace Safety Section, Human Resources Department, for review and follow-up. COPIES SHALL BE READILY AVAILABLE TO THE LOCAL HES "FIRE DEPARTMENT" AND/OR "MEDICAL OFFICER OF HEALTH" UPON REQUEST.
2. MATERIAL SAFETY DATA SHEETS:

Material Safety Data Sheets are to be made available to all workers required to work with CONTROLLED products. The information provided on an M.S.D.S. is invaluable in the determination of whether a product is hazardous or not. Therefore it is recommended that for all items listed on your Department's preliminary survey form (INVENTORY) that an M.S.D.S. is made available for reference, as and when required.

M.S.D.S.'S should be located in conspicuous areas where products are used and/or stored, within easy access to all workers required to work with the specified products.

M.S.D.S.'S may not be readily available from the supplier/manufacturer for various reasons, even though the law requires their availability. These reasons may be disagreement whether a product is W.H.M.I.S regulated or not and the right of a manufacturer/supplier to withhold the information under "THE TRADE SECRETS SECTION" of the regulation. There are specific steps required to overcome these problems. Please contact your Corporate Workplace Safety Section should you encounter such problems.

3. LABELLING:

There are two basic labeling requirements with respect to W.H.M.I.S. regulated products.

A) W.H.M.I.S. products or products without clear identification shall not be allowed into the work process without a supplier label and the specific information required therein.

B) Any W.H.M.I.S. product that is in the workplace prior to October 31, 1988 or any W.H.M.I.S. product decanted from a supplier container into a workplace container shall have an appropriate workplace label.

The Corporate Workplace Safety Section is equipped to provide your Department with all your workplace labeling needs, at a minimal cost. Upon notification, your request for W.H.M.I.S. LABELS, in any size, containing the required information and in a consistent format, will be provided to you at a minimal, competitive cost.

4. TRAINING:

The employer has the responsibility to train workers so that they understand the WHMIS legislation, information on the labels and M.S.D.S.'S, for all W.H.M.I.S. products with which they work or may be regularly exposed to. This means ensuring that a worker understands procedures for the safe handling, use, storage, disposal of a material and the procedures to be followed in the event of any emergency involving the product.
To accomplish the above, each Department is required to designate one or more competent representatives to undertake the responsibility to ensure that all W.H.M.I.S. related issues are properly addressed within the Department.

These representatives should also be capable of delivering an agreed upon GENERIC TRAINING PROGRAM to workers in their Department who require W.H.M.I.S. training.

Prior to training, each Department is required to conduct a needs survey to determine which workers require W.H.M.I.S. training.

Once the Department has identified its training needs the "NEEDS SURVEY" is to be reviewed by the appropriate Joint Health and Safety Committee. Recommendations from the committee shall be appropriately addressed by the Department and once this consultation has occurred the training of workers can commence.

The "TRAINING PROGRAM" recommended for delivery to all workers is as follows:

A) GENERIC:

The W.S.I.B. sponsored W.H.M.I.S. TRAINING PROGRAM (originally called the "OHSEA PACKAGE" which was endorsed by Labour and Management) which is one (1) day in duration and includes the four modules required by the Legislation:

- W.H.M.I.S. AND THE LAW
- WORKPLACE HAZARD IDENTIFICATION
- AFFECT OF HAZARDOUS MATERIALS
- PRINCIPLES OF CONTROL;

...and is delivered through a joint worker/management training leader approach using department designated W.H.M.I.S. trainers.

B. SPECIFIC:

Workplace Specific Training to be conducted at the worksite with a review of specific M.S.D.S.'S and product information at regular Operations/Safety Meetings with workers and supervisors.

C. EQUIVALENCY:

There are various training programs available. Any of these programs may be utilized by Departments, if found to be more effective for the specific process/operation. A Department may utilize such programs provided the programs meet all legislative requirements, as outlined in the W.H.M.I.S. Regulations, and are introduced only after thorough consultation with the Joint Health and Safety Committee/s, The Corporate Workplace Safety Section and the appropriate Union/s.