

**WHMIS 2015 Transition**

**Transition** can be defined as the passage from one program to another. The transition from WHMIS 1988 to WHMIS 2015 doesn't happen in the blink of an eye or the snap of a finger. It is a well-laid out, communicated and supported process that may involve all departments and all staff participating to achieve a successful WHMIS program transition.

By December 1, 2018, the transition to WHMIS 2015 will be complete in Canada - a Globally Harmonized System will then be achieved in Canada with regulated, standardized and consistent pictograms, labels and safety data sheets.

The transition involves manufacturers/importers, distributors and employers. Each has a legal requirement to fully implement WHMIS 2015 by a specific date:

|                             |                  |
|-----------------------------|------------------|
| Manufacturers and Importers | May 31, 2018     |
| Distributors                | August 31, 2018  |
| Employers                   | December 1, 2018 |

source: Health Canada <http://www.hc-sc.gc.ca/ewh-semt/occup-travail/whmis-simdut/transition/index-eng.php>  
(extensions granted May 19, 2017)

Until the employer is fully transitioned to WHMIS 2015 they are not legally able to offer both programs - it is either WHMIS 1988 or WHMIS 2015. The transition date can be any date the employer chooses from now until November 30, 2018. A sample transition plan is attached.

Saskatchewan employers are governed by *The Occupational Health and Safety (Workplace Hazardous Materials Information Systems) Regulations* that came into effect August 17, 2016. This WHMIS legislation is available by visiting [www.publications.gov.sk.ca](http://www.publications.gov.sk.ca). The Ministry of Labour Relations and Workplace Safety, Occupational Hygiene Unit, is the designated lead to ensure employers transition according to legislation.

Until the employer determines the date to be fully transitioned to WHMIS 2015, it must continue to be compliant with WHMIS 1988 requirements. During the transition period, employers can commence the work to prepare for full implementation of WHMIS 2015 - such as:

|                                     |  |
|-------------------------------------|--|
| provide <b>education</b> to workers | SASWH offers classroom and online WHMIS 2015 education that meets the legislated requirement.  |
| provide <b>training</b> to workers  | <ul style="list-style-type: none"> <li>▪ location of safety data sheets</li> <li>▪ training on use, storage, disposal, etc., of worksite and job specific products</li> <li>▪ emergency preparedness and response; spill management and reporting</li> <li>▪ personal protective equipment, maintenance, donning and doffing</li> <li>▪ fire extinguisher training and maintenance</li> <li>▪ other specific training deemed a requirement under legislation as it pertains to WHMIS</li> </ul>            |
| securing safety data sheets (SDSs)  | <ul style="list-style-type: none"> <li>▪ SDSs must be kept separate from MSDSs until the transition date (separate binder).</li> <li>▪ some suppliers may already be providing SDSs with their products. The employer must obtain an MSDS (ask the supplier; ask other departments/areas, check with other employers or 3sHealth Contract Management) until the transition date - then at that time all SDSs are made readily available to workers and MSDSs are no longer available/referenced</li> </ul> |
| manager/supervisor resources        | <ul style="list-style-type: none"> <li>▪ chemical inventory sheet to record products that require a SDS</li> <li>▪ checklist/s to use when providing education and training to workers; all education and training provided is documented</li> </ul>   |

**Safety Talk Discussion**

**Be Accountable: Choose safety - work safe - and go home injury free!**

## Sample WHMIS 2015 Transition Plan

(shared by Saskatoon Health Region)

| Key Transition Dates            | Action   | Joint Responsibility Plan   | Communication leads                   |
|---------------------------------|--|---|---------------------------------------|
| Jan 2017                        | SDS vendor secured (Site Hawk)   | OH&S, OHC co-chairs, OLT, Materials Management                    | OH&S                                  |
| Sept 22, 2016 to Sept 1, 2017   | OHC co-chair/member <b>education</b> on our transition plan; OHC education on WHMIS 2015 (classroom or online); provision of tools/checklist for OHC use when inspecting for preparation | OHC Co-chairs to committee members                                | OH&S<br>Site Leaders<br>OHC co-chairs |
| April 1, 2017 to Sept 30, 2018  | Provision of <b>education</b> to Directors, Managers and workers to aide in preparation for full compliance by October 1, 2018   | All managers, directors, supervisors, workers                     | OH&S<br>OLT<br>Managers               |
| April 1, 2017 to Sept 15, 2018  | Compilation of SDSs in preparation for distribution to worksites   | Managers, WHMIS leads for departments, OH&S, Materials Management | OH&S<br>Materials Management          |
| April 1, 2017-June 30, 2018     | Development of department worksite and job-specific <b>training</b> materials, hazardous product inventory updated and documented  | Department managers, WHMIS leads                                  | OLT, OOS Managers                     |
| July 1, 2017-Sept 30, 2017      | SDS Vendor training and implementation of new system   | All managers, supervisors, workers                                | OH&S, Site Hawk                       |
| July 1, 2018-September 30, 2018 | <b>Delivery of worksite and job-specific training to workers; training is documented</b>   | Managers, supervisors, WHMIS leads                                | OLT, Managers                         |

## Sample WHMIS 2015 Transition Plan

(shared by Saskatoon Health Region)

| Key Transition Dates         | Action  | Joint Responsibility Plan   | Communication leads  |
|------------------------------|---|-----------------------------|----------------------|
| August 1, 2018-Sept 30, 2018 | WHMIS 2015 policy and procedure written, approved and implemented in OH&S Policy and Program Manual   | OH&S, OHCs                  | OH&S                 |
| September 2018               | Reinforce/messaging the transition as of Oct 1, 2018 - such as provide Safety Talks/huddles; remind how to access SDSs, use PPE, post CCOHS posters, etc. | OLT, OH&S, Managers, OHCs   | OHCs, OH&S, Managers |
| Sept 30, 2018                | <b>Implementation Day</b><br>SDS binders and WHMIS 2015 materials are switched out in departments, policy in effect                                       | Managers, Supervisors       |                      |
| October 1, 2018 - ongoing    | knowledge of the workers is periodically evaluated using written tests, practical demonstrations, or other suitable means (documented)                    | Managers, Supervisors, OHCs |                      |
| Dec 1, 2018                  | fully compliant with WHMIS 2015   | All employers               |                      |

Any employer or supplier who does not have the WHMIS 2015 in place after December 1, 2018 would be non-compliant and liable for enforcement action by LRWS at the same time.