

Joint OSHA/Health Canada Comparison of Labelling Requirements for Hazardous Products



U.S. Department of Labor



Label comparison for shipped containers

Requirement	United States Hazard Communication Standard (HCS) 2012	Canadian <i>Hazardous Products Regulations</i> (HPR)
Product identifier	Required, and must be identical to the product identifier on the safety data sheet.	
Signal word	Required. If both “danger” and “warning” are attributed to the product’s classification, only “danger” may appear. Repetition of the signal word is not permitted.	
Pictogram	<p>All pictograms attributed to the product’s classification must appear together, with some exceptions as outlined in C.2.1.</p> <p>Pictograms must have a white background with a red border on shipped containers.</p>	<p>All pictograms attributed to the product’s classification must appear as set out in Schedule 3 of the HPR, with some exceptions outlined in subsection 3.6(3).</p> <p>Pictograms must have a white background with a red border, with the exception of the pictogram for Biohazardous Infectious Materials (BIM).</p> <p>The HPR has a required pictogram for BIM that is unique to Canada.</p>
Hazard Statement	<p>The use of the environmental hazard pictogram from the GHS is not prohibited.</p> <p>Pictogram red borders without symbols are not permitted; however, a completely blacked out pictogram is allowed provided that the red border is entirely obscured.</p> <p>Repetition of a pictogram is not permitted.</p> <p>All hazard statements that attribute to the product’s classification must be included.¹</p>	

¹ With some exceptions in Canada.

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Hazard Statement (con't)	<p>The hazard statements must be from the HCS, which is based on GHS Rev. 3 with the addition of simple asphyxiants, combustible dusts, and pyrophoric gases. Hazard statements from GHS Rev. 4 or later may be listed if appropriate as long as the statements do not cast doubt or contradict the required HCS information.</p> <p>“HNOC” is not required to be listed, but may be included as supplemental information.</p> <p>The manufacturer/importer may omit information where it demonstrates it is inappropriate for the product.</p>	<p>The wording of the hazard statement must be exactly the same as the wording in GHS Rev. 5 or Schedule 5 of the HPR for simple asphyxiants, combustible dusts, and pyrophoric gases.</p> <p>The Physical Hazards Not Otherwise Classified (PHNOC), Health Hazards Not Otherwise Classified (HHNOC) and BIM hazard classes do not have prescribed hazard statements, but appropriate statements must be provided by the supplier.</p> <p>Omission of hazard statements attributed to the product’s classification is not permitted unless an exemption applies.</p>
	<p>Hazard statements can be combined if the combination conveys the same information as would have been conveyed by each of the individual statements.</p>	
Precautionary Statements	<p>Appropriate precautionary statements must be included that attribute to the product’s classification.²</p> <p>The precautionary statement(s) prescribed by the adopted GHS revision must be provided. However, minor variations in the wording of precautionary statement(s) that do not affect the intended meaning of the statement(s) are acceptable.</p>	
	<p>Precautionary statements from Rev. 4 or later is permitted, as long as the statements do not cast doubt or contradict the required HCS information.</p>	<p>The non-GHS hazard classes do not have prescribed precautionary statements, but appropriate statements must be provided by the supplier.</p>

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<p>Precautionary statements (con't)</p>	<p>Supplemental precautionary statements are permitted as long as the statements do not cast doubt on or contradict the required HCS information.</p> <p>Where a product has multiple hazards and the precautionary statements are similar, the most stringent must be listed on the label.</p>	<p>Additional precautionary statements are permitted as long as the information is not false or misleading.</p>
	<p>Precautionary statements can be combined or omitted under specific conditions.</p>	
<p>Name, address, phone number, and responsible party [supplier identification]</p>	<p>The name, U.S. address, and U.S. phone number of the manufacturer, importer, or distributor or other responsible party must be on the label.</p> <p>The information for the manufacturer, importer, or distributor or other responsible party on the label must be identical to that on the safety data sheet.</p> <p>Foreign supplier information is permitted as long the U.S. manufacturer, importer, or distributor or other responsible party's address and phone number is also listed.</p>	<p>The name, address, and phone number of the initial Canadian supplier (manufacturer or importer) must be provided.</p> <p>The distributor's name, address, and phone number can replace the initial supplier identifier.</p> <p>Supplier identifying information on the label must be identical to the identifier on the safety data sheet.</p> <p>Foreign supplier identifying information is additionally permitted.</p> <p>Foreign supplier identifying information is permitted as the only supplier identifier if the product is imported for use in the importer's own workplace.</p>
	<p>The address must be either a mailing address (PO Box may be used) or the physical location of the company.</p>	

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Layout	<p>No graphic layout requirements.</p> <p>Required pictogram(s), signal word, and hazard statement(s) must be grouped together.</p>	
Language	All information must be in English.	All information must appear in English and French.
	Other languages are permitted.	
Legibility	The label must be legible without the use of any device other than corrective lenses.	
Application requirements	The label must be clearly and prominently displayed on the immediate container.	The label must be clearly and prominently displayed on a surface that is visible under normal conditions of use.
Durability	Under normal conditions of transport and use, the label must remain affixed to, printed or written on, or attached to the immediate container and remain legible (e.g., not torn, defaced, destroyed).	<p>Under normal conditions of transport and use, the label must remain affixed to, printed or written on, or attached to the product or its container and remain legible.</p> <p>The exemption for small capacity containers (3 ml or less) allows for a removable label in situations where the label may interfere with the normal use of the product. In this case, the label is not required to remain attached to the hazardous product during normal conditions of use.</p>

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Supplemental information	<p>If a chemical mixture is classified as acutely toxic for a particular route of exposure and contains ingredients of unknown acute toxicity for that particular route, then the following statement is required on the label: “X percent of the mixture consists of ingredient(s) of unknown acute toxicity.”³</p> <p>Supplemental information is allowed to be on the label as long as it does not contradict or cast doubt on the required label information.</p>	<p>If the product is classified as an acute toxicant based on ingredient(s) for which the acute toxicity is known and the product contains ingredients of unknown acute toxicity, the following statement is required:</p> <p>“[Insert the total concentration in percentage of ingredients with unknown acute toxicity] % of the mixture consists of an ingredient or ingredients of unknown acute toxicity”. The route of exposure should be included in the statement and the statement is required only for the route(s) of exposure with respect to which the hazardous product is classified.</p> <p>If a hazardous product is classified as an acute toxicant and, upon contact with water, it releases a toxic gas that meets the classification criteria for Water-Activated Toxicity, then a supplemental hazard statement is required to indicate that, in contact with water, the product releases gases which are fatal, toxic, or harmful if inhaled.</p>

³ Classifiers may present the unknown acute toxicity information on ingredients either as a single statement or as multiple statements, where routes are differentiated. If there is acute toxicity by more than one route of exposure and the classifier chooses to provide one statement, then the route with the highest total percentage unknown toxicity from one or more relevant ingredients will be used in the statement.

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Other requirements/ obligations		Sale and import is prohibited if the product or its container has affixed to, printed on, or attached to it information about the product that is false, misleading, or likely to create an erroneous impression, with respect to the information that is required to be included in a label or safety data sheet for that hazardous product.