

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, 2017
Distributors	November 30, 2018
Employers	December 1, 2018

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 Regulations, 2020*. This legislation is available by visiting 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 education to workers	SASWH offers classroom and online WHMIS 2015 education that meets the legislated requirement.
provide training to workers	<ul style="list-style-type: none"> ▪ location of safety data sheets ▪ training on use, storage, disposal, etc., of worksite and job specific products ▪ emergency preparedness and response; spill management and reporting ▪ personal protective equipment, maintenance, donning and doffing ▪ fire extinguisher training and maintenance ▪ other specific training deemed a requirement under legislation as it pertains to WHMIS
securing safety data sheets (SDSs)	<ul style="list-style-type: none"> ▪ SDSs must be kept separate from MSDSs until the transition date (separate binder). ▪ 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
manager/supervisor resources	<ul style="list-style-type: none"> ▪ chemical inventory sheet to record products that require a SDS ▪ checklist/s to use when providing education and training to workers; all education and training provided is documented

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 education 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 Site Leaders OHC co-chairs
April 1, 2017 to Sept 30, 2018	Provision of education to Directors, Managers and workers to aide in preparation for full compliance by October 1, 2018	All managers, directors, supervisors, workers	OH&S OLT 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 Materials Management
April 1, 2017-June 30, 2018	Development of department worksite and job-specific training 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	Delivery of worksite and job-specific training to workers; training is documented	Managers, supervisors, WHMIS leads	OLT, Managers

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(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	Implementation Day 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.