How to Comply with New SDS & Other GHS 7 WHMIS Requirements

January 1, 2026 is the deadline to comply with some key WHMIS changes. For most employers, the biggest challenge will be ensuring that the information contained in their Safety Data Sheets (SDSs) conform to the revised requirements affecting Sections 9 and 14. Here's a quick briefing on all the new requirements and what you must do to comply with them.

Which WHMIS Laws Are Changing

WHMIS requirements are contained in the OHS laws of each jurisdiction. Technically, the changes are not to those OHS laws but to the national Hazardous Products Regulations (HPR) on which those WHMIS requirements are based. The dynamic: WHMIS establishes the framework for ensuring that workers are properly informed of the dangers posed by the hazardous products to which they're exposed, such as by requiring labels, SDS, and training. The HPR identify which products are hazardous, how they're classified, and what hazard information workers must know about them.

Why the WHMIS Rules Are Changing

In 2015, Canada revised its WHMIS regulations to align with a

UN standard called the Globally Harmonized System (GHS) designed to coordinate how hazardous products are regulated in industrialized countries around the world. Current Canadian HPR and WHMIS requirements are based on edition 5 of GHS. However, the UN updates GHS every 2 years. The new regulatory requirements are necessary to bring WHMIS into line with the newest rules contained in the seventh revised edition (GHS 7).

The HPR changes officially took effect on April 4, 2023. But as with the original GHS changes in 2015, this latest round of revisions is being phased in over 3 years. During this transition period, employers could have complied with **either** the old GHS 5 **or** new GHS 7 rules. But after January 1, 2026, they must be in full compliance with GHS 7.

Which WHMIS Rules Are Changing

There are 7 GHS 7 changes that employers who acquire, use and store hazardous products at their workplace need to know about. The first 4 changes affect how hazardous products are classified.

1. Revised Classification for Flammable Gases

Under the previous HPR classification, extremely flammable gases were lumped together into one category. The new GHS 7 rules create a new Flammable Gases – Category 1, subdivided into:

- Subcategory 1A including pyrophoric gases and unstable gases.
- Subcategory 1B including flammable gases that aren’t pyrophoric or chemically unstable but have a lower flammability hazard that those of Subcategory 1A.

The revised HPR also includes new definitions of pyrophoric gas and chemically unstable gas.

2. Revised Classification for Aerosols

Aerosols were previously classified as “Flammable Aerosols,” with categories for very flammable and less flammable products. The new GHS 7 rules change the name of the Flammable Aerosols hazard class to “Aerosols” and establish a new Category 3 for non-flammable aerosols.

3. New Chemicals Under Pressure Classification

The GHS 7 rules establish a new “Chemicals Under Pressure” categorization that’s distinct from the “Gases Under Pressure” class. There are also new provisions specifying the hazard symbol, signal word, hazard statement, and precautionary statements that must be listed on the labels of products classified as Chemicals Under Pressure. They also clarify that products classified in the Chemicals Under Pressure hazard class may not be classified in any category or subcategory of the following hazard classes:

- Flammable Gases.
- Flammable Solids.
- Flammable Liquids.

4. Other Classification Changes

Other key changes affecting HPR classification contained in GHS 7:

- The new rules clarify how to identify and classify substances that evolve toxic gases on contact with water, but which aren’t toxic in their original dry condition.
- Corrosives/Irritants to Skin and Serious Eye Damage/Irritant to Eyes substances that are classified based on ingredients without testing can now be classified into subcategories based on the subcategories

of their ingredients.
- There are also new criteria for classification in Specific Target Organ Toxicity – Single Exposure, Category 3.

5. Revised SDS Section 9 Requirements

The remaining GHS 7 changes affect how hazard information is provided to workers who handle or are exposed to hazardous products. **Explanation:** Under the HPR, once a material is classified, the supplier must provide labels and SDSs listing hazard information about the product based on its classification. OHS WHMIS rules require employers that use these products downstream to make that hazard information available to their workers via labels and the SDS.

GHS 7 revises the hazard information that must be listed in Section 9 of the SDS describing the product's physical and chemical properties, as summarized by the following chart:

Current Section 9	Revised Section 9
• Appearance, such as physical state and colour. • Odour. • Odour threshold. • pH. • Melting point and freezing point. • Initial boiling point and boiling range. • Flash point. • Evaporation rate. • Flammability, in the case of solids and gases. • Upper and lower flammability or explosive limits. • Vapour pressure. • Vapour density. • Relative density. • Solubility. • Partition coefficient – n – octanol/water. • Auto-ignition temperature. • Decomposition temperature. • (r) Viscosity.	• Physical state. • Colour. • Odour. • Melting point and freezing point. • Boiling point or initial boiling point and boiling range. • Flammability. • Lower and upper explosion limit or lower and upper flammability limit. • Flash point. • Auto-ignition temperature. • Decomposition temperature. • pH. • Kinematic viscosity. • Solubility. • Partition coefficient – n-octanol/water (logarithmic value). • Vapour pressure. • Density and relative density. • Relative vapour density. • (r) Particle characteristics.

6. Revised SDS Section 14 Requirements

The GHS 7 rules also revise Section 14 of the SDS, which lists transport information about the hazardous product:

Current Section 14	Revised Section 14
• UN number. • United Nations proper shipping name as provided for in the United Nations Model Regulations. • Transport hazard class as provided in the United Nations Model Regulations. • Packing group as provided in the United Nations Model Regulations. • Environmental hazards according to the International Maritime Dangerous Goods Code and the United Nations Model Regulations. • Additional safety and hazard information regarding shipments in bulk. • Special precautions in connection with transport or conveyance either within or outside the premises.	• UN number. • United Nations proper shipping name as provided for in the United Nations Model Regulations. • Transport hazard class as provided in the United Nations Model Regulations. • Packing group as provided in the United Nations Model Regulations. • Environmental hazards according to the International Maritime Dangerous Goods Code and the United Nations Model Regulations. • Special precautions in connection with transport or conveyance either within or outside the premises.

Notice that revised Section 14 no longer needs to list additional safety and hazard information about shipments in bulk.

7. New Combustible Dusts Hazard Statement

Previously, the required hazard statement for combustible dusts was: “May form combustible dust concentrations in air.” Under the new rules, the SDS can use either the original hazard statement or a new version: “May form explosible dust-air mixture.” The point of the change is to align the HPR with U.S. SDS regulations.

What To Do

Hopefully, your suppliers are sending you the GHS 7 version of the SDS with new shipments. They should also send you revised versions of SDSs from previous shipments based on the old GHS 5 requirements well ahead of the January 1, 2026, compliance deadline. But you can’t just sit back and wait. While the suppliers have the duty to update the SDS, employers also have a legal responsibility to make “reasonable efforts” to obtain those materials. Strategy:

- Go through each SDS in your current binder and electronic system to verify that its respective Sections 9 and 14 contain the hazard information required by GHS 7.
- Identify and make a list of any SDSs that don’t conform.
- Decide how long you’re willing to wait for the supplier to send you the revised SDS on its own – remember you can only use non-conforming SDSs through December 31.
- If your deadline passes, you’ll need to go after the supplier and get either the actual document or an explanation and estimate of when it will arrive.
- If the supplier doesn’t deliver, follow up, and press for action.
- Document all of your efforts to obtain the revised SDS from the supplier to avoid being cited for WHMIS violations due to non-compliant SDSs after January 1, 2026.