

How to Get Missing/Updated/Revised SDSs & WHMIS Labels from Your Suppliers



The Safety Data Sheets (SDS) contained in your current SDS binders and electronic systems may no longer comply with WHMIS requirements. After a 3-year phase-in, the GHS 7 changes to federal [Hazardous Products Regulations](#) (HPR) that first took effect in April 2023 became final on January 1, 2026. **Your mission:** Ensure that you have a proper and up-to-date SDS for each hazardous product that you use, handle, or store in your workplace. Here's how. **Note:** This strategy applies not just to the current transition from GHS 5 to GHS 7 but any time the regulatory requirements for SDSs and WHMIS supplier labels change.

Getting the SDSs & WHMIS Supplier Labels You Need?

Question: Where will you get the new SDSs that you need to comply?

Answer: The same place you've gotten your SDSs and WHMIS supplier labels in the past, namely, your supplier, or the firm that sells you the hazardous product, unless, of course,

you're among the small number of employers that actually prepare these WHMIS materials yourself.

WHMIS rules require suppliers to furnish an SDS and supplier label to their customers when they first ship the product and revise the document every 3 years or within 90 days of discovering new information about the hazardous product or its properties affecting safety (180 days is the deadline for updating supplier labels). Suppliers, too, have to make the transition from the old GHS 5 to the new GHS 7 rules. Timetable:

- **April 4, 2023 to December 31, 2025:** Suppliers may provide either an old GHS 5 or new GHS 7 SDS as long as it's up to date, accurate, and compliant with respective requirements.
- **January 1, 2026:** Suppliers must provide a GHS 7 SDS and only a GHS 7 SDS.

Employer Duty to Seek SDS & Supplier Labels from Supplier

Ideally, all your suppliers will cooperate and send you all the SDS and supplier labels you need when you need them. But if an SDS or label is missing, out of date, inaccurate or otherwise problematic, you can't just sit back and wait. You have to ask the supplier to send the SDS and/or supplier label you need as soon as possible after discovering the problem. If the supplier doesn't respond, you may still be able to store the product for a period (usually 3 to 6 months), provided that you have a documented record showing you made reasonable efforts to get the SDS and/or label from the supplier.

6 Steps to Take

Here's what you need to do to make an effective, timely transition from the GHS 5 to the GHS 7 SDS or any time the

regulatory requirements for SDSs and WHMIS supplier labels change.

Step 1. Inventory Hazardous Products in Your Workplace

Inventory all of the chemicals you use in your workplace and determine if they're "hazardous products" under federal law.

Instructions: Look up a law called the [Hazardous Products Act](#) and scroll down to Schedule 2 on the bottom.

Step 2. Verify that Each Hazardous Product Has a Proper SDS & Supplier Label

Do an inspection to ensure that each hazardous product has a proper SDS and supplier label listing all the required information. **Instructions:** For the current transition to GHS 7, focus on Sections 9 and 14 of the SDS because that's what's changing. Use the [OHS Insider SDS Checklist](#) to vet SDSs and the [Supplier Labels Checklist](#) to vet labels. You can also use the Checklists to vet new SDSs and labels as you receive them from your suppliers.

Step 3. Notify Supplier of Problems You Identify

Contact your supplier as soon as possible if you discover a problem.

Problem	What to Request from Supplier
The supplier doesn't send SDS and/or supplier label with original shipment.	Ask supplier to send the SDS and/or supplier label.

Problem	What to Request from Supplier
You have an SDS or supplier label but discover it's out of date, inaccurate, or otherwise non-compliant.	Ask supplier to send a replacement SDS and/or supplier label that's up to date, accurate, and compliant.
You have an SDS that meets GHS 5 and not GHS 7 on or after January 1, 2026.	Ask supplier to replace SDS with SDS that meets GHS 7 requirements.

Step 4. Send Written Request to Supplier

According to guidance, simply leaving an email request on the supplier's website may not be enough to satisfy the "reasonable efforts" standard. The request must be direct and personally directed **Instructions:** Put whatever [request you make to the supplier in writing](#) so you have a written record and ensure that it lists:

- The date of your request.
- The supplier's name, address, and contact information.
- How you sent the request (e.g. fax, email, regular mail, certified mail).
- The name and title of the person to whose attention the request is sent.
- The name of the product for which you're requesting the SDS and/or supplier label.
- The date you received the shipment.
- The reason for your request, e.g., the SDS meets the GHS 5 rules and must be replaced by an SDS for GHS 7.

Step 5. Document Verbal Request to Supplier

It's okay to alert suppliers of problems verbally or by phone. **Instructions:** Just be sure to create a [written record](#)

documenting the communication which lists:

- The date of the call or contact.
- The name of the product for which you're requesting the SDS and/or supplier label.
- The date you received the shipment.
- The name of the supplier contacted.
- The telephone number contacted.
- The name and title of the person who made the call on behalf of your company.
- The name and title of the person your employee spoke with at the supplier.
- The reason for your request, e.g., the SDS was missing or needs to be replaced by an SDS that meets GHS 7.
- The supplier's response.

Have the employee who spoke to the supplier print and sign their name to the document.

Step 6. Follow Up with Suppliers If Necessary

Take follow-up steps in case you don't get a satisfactory response from your supplier. In Ontario, employers must advise a Ministry of Labour director in writing if, after making reasonable efforts, they're unable to obtain an SDS and/or supplier label from their supplier. **Instructions:** Providing such [notification to a government OHS officer](#) is also advisable in all parts of Canada even where WHMIS laws don't expressly require it.