

Monthly Compliance Briefing for Québec OHS Coordinators



November was an active month on the OHS regulatory front highlighted by the looming WHMIS GHS 7 compliance deadline and CNESST's newly proposed OHS regulations on respiratory protection and sexual violence prevention. Here's a look at the key developments that may affect the OHS program of Québec companies along with Action Points for dealing with them.

WHMIS & Hazardous Products

January 1, 2026 is the final deadline to comply with [GHS 7 WHMIS rules](#). For most companies, the biggest changes relate to the hazard information that must be listed on Safety Data Sheets (Sections 9 & 14). In addition, there are new GHS 7 classification rules for flammable gases, aerosols, chemicals under pressure, and STOT-SE Category 3 chemicals. Combustible dust hazard statement requirements are updated to allow either the original statement or "May form explosible dust-air mixture."

Joint Health and Safety Committees

Bill 101, passed in October, introduces sector-specific rules for the establishment and functioning of safety committees and safety representatives in education and health/social services. These amendments emphasize the allocation of

sufficient time for members to perform safety functions effectively.

Respiratory Protection

CNESST closed on comments on OHS draft regulations for respiratory protection and bioaerosol exposure. Employers will need to provide CSA Z94.4-compliant respirators and control visible mold contamination.

Lighting & Illumination

CNESST proposed OHS lighting regulation updates. Designed to modernize workplace illumination standards, the draft regulations cover VDU work and minimizing glare or strobe effects, reflecting broader attention to ergonomic and environmental factors that influence worker safety.

Transportation Safety

New legislation (Bill 4) revises *Highway Safety Code* vehicle registration rules. Québec is also eliminating certain exemptions for electronic and hybrid vehicles. Meanwhile, mandatory training for Class 1 driver's licenses take effect on December 15.

Sexual Violence & Psychological Harassment

CNESST proposed draft regulations establishing employer duties for preventing workplace sexual violence and psychological harassment (SCV). Effective October 29, 2026, employers must notify workers of risks, provide SCV training at least every 3 years, and maintain reporting and investigation procedures. These rules reinforce the expectation that employers proactively address both on-site and domestic risks

that may impact workers.

Cases

There were a pair of notable cases this month that OHS coordinators in Québec should take note of.

In *9033-5878 Québec inc. v. CNESST*, a worker died when the forklift tire he was repairing exploded. The employer blamed the accident on the victim for using improper and dangerous procedures. But Québec's highest court, the Court of Appeal, rejected the employer's due diligence, noting that he wasn't adequately trained and reasoning that it was reasonably foreseeable that an untrained worker would use dangerous methods to inflate a forklift tire.

In *Union of Health and Social Services Workers v. Integrated Health and Social Services Centre of the Lower St. Lawrence*, an arbitrator upheld a workplace cell phone ban covering not just use but possession of phones during work hours as a reasonable measure necessary to prevent distractions in a high-risk care environment.

Action Points

Here's a Checklist of Action Points for Québec OHS coordinators to take away from these developments.

1. WHMIS GHS 7 Compliance

- Conduct an [SDS inspection](#) to assess whether your current SDSs meet the new GHS 7 requirements for Sections 9 and 14.
- If the current SDS isn't compliant, [get an updated version of the SDS from the](#) supplier of the product.
- Find out more about [the new SDS standards](#) and the

6 things you must do to comply, along with [templates of written requests](#) and [other records you'll need to document compliance](#).

2. Sexual Violence & Psychological Harassment

- Update domestic-violence and workplace sexual-violence prevention plans to meet CNESST draft regulations.
- Find out how to implement an effective [Workplace Violence and Harassment Compliance Game Plan](#) at your site.
- Recognize that domestic violence can extend into the workplace and implement an effective [Workplace Domestic Violence Prevention Plan](#) to protect your own workers.

3. Joint Health and Safety Committees

- Review Bill 101 requirements for education and health/social services committees and ensure adequate time allocation for safety responsibilities.

4. Respiratory Protection

- Implement an effective Respiratory Protection Equipment Compliance Game Plan aligned with CNESST draft regulations on bioaerosols and mold control.

5. Lighting&Visual Ergonomics

- Adjust workplace lighting systems to comply

with proposed Division XIV updates and emergency lighting standards.

- Learn how to comply with OHS emergency lighting requirements.

7. Material Handling & Machine Safety

- Strengthen forklift, tire, and heavy-equipment training programs.
- Implement a Tire, Wheel, & Rim Servicing Safety & Compliance Game Plan.

8. Distraction Management

- Consider implementing mobile device restrictions in high-risk areas.
- Develop an effective Mobile Devices in the Workplace Policy.