

Providing Digital Access to SDSs?



An electronic SDS is OK under WHMIS as long as you ensure the information is 'readily available'.

The Safety Data Sheet (SDS) furnishing essential information about a hazardous product, the dangers it poses and how to use it safely, is a pillar of the WHMIS right to know system. WHMIS laws require employers to make the SDS of each hazardous product used, handled or stored in the workplace 'readily available' to all workers. Back when WHMIS was first created, 'readily available' meant keeping a paper copy of SDS' in a binder that workers could access without the permission or intervention of a supervisor or any other person whenever they needed the information. While paper binders remain both common and highly recommended, many employers have migrated their SDS systems to a digital format. The following scenario illustrates what 'readily available' means in the digital context.

SITUATION

Maintaining a paper binder has become a hassle for a manufacturing plant that has over 1,000 different hazardous products at its site. Every time the plant gets a new or revised SDS from a hazardous product supplier, it has to take apart and then reassemble the SDS binder. So, the plant wants to get rid of the binders and put all of its SDS into a digital format that workers can access using computers located at the workplace.

QUESTION

To ensure that its computerized SDS access system is readily available to workers, the plant must ensure all of the following EXCEPT:

1. All workers have their own personal computer
2. The computers are kept in good working order at all times
3. All workers are properly trained how to use the computer to access the SDS'
4. A hardcopy of an SDS is immediately furnished to any worker that requests one

ANSWER

1. The plant must do each of these things except furnish each worker an individual computer

EXPLANATION

'Readily available' means that workers must be able to access an SDS at any and all times when they're at work. That doesn't necessarily mean that all workers must have their own computers. All that's required is that the worker be able to get access independently and without having to rely on any other person or process. Thus, computerized SDS' aren't deemed readily available if the worker can't use the computer without permission, an unknown password or a key if the computer is in a room or area that's kept locked. So, A is the right answer.

WHY WRONG ANSWERS ARE WRONG

B is wrong because if SDS' are kept only digitally, employer do have to ensure that the computers through which workers can access them are operational at all times. That means making emergency arrangements so that power outages and other computer shutdowns don't result in leaving workers without SDS access for longer than a very brief duration.

C is wrong because for SDS' to be deemed 'readily available,' all workers who need access must be trained to use the computer system to get that access. Workers shouldn't have to ask a supervisor or co-worker to get them an SDS because they don't know how the computer system works.

D is wrong because employers do, in fact, have to make hardcopies of an SDS available to any worker who requests it. In some jurisdictions, employers must also make paper copies available to members of the workplace JHSC upon request. Thus, you can't have a completely paperless system or throw away your SDS binders.