

WHMIS Compliance Refresher for Canadian Workplaces in 2026



Why WHMIS refreshers need to change in 2026

For many Canadian workplaces, WHMIS has become a familiar annual exercise. Workers complete a module, review the pictograms, answer a few questions, and return to the job. That routine has value, but it can also create a false sense of compliance. WHMIS is not just a training topic. It is a hazardous product communication system that must connect supplier labels, workplace labels, safety data sheets, worker education, product-specific training, safe handling procedures, emergency response, and supervision.

That connection matters more in 2026 because the transition period for the amended Hazardous Products Regulations has ended. Health Canada published amendments to align WHMIS with the seventh revised edition and selected provisions of the eighth revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals. The amendments came into force on December 15, 2022, with a three-year transition period that ended on December 14, 2025. Health Canada has stated that all hazardous products must now have hazard classifications, safety data sheets, and labels, where

applicable, that fully comply with the amended HPR.

For employers, the practical message is clear. A WHMIS refresher in 2026 should not simply repeat old training slides. It should help the organization confirm that its hazardous product inventory, SDS library, supplier labels, workplace labels, worker training, and product-specific procedures still match current requirements and actual workplace conditions.

The compliance risk is usually in the gap between training and use

WHMIS failures rarely happen because an employer has no training record at all. They happen because the system breaks between the training record and the work. A worker may have completed WHMIS education but not understand the specific solvent, cleaner, adhesive, disinfectant, fuel, compressed gas, laboratory reagent, welding product, aerosol, or process chemical they use every day. A supervisor may assume the SDS is current, even though the product formulation or classification changed. A secondary container may be missing a workplace label. A contractor may bring a hazardous product onto the site without the employer confirming how it will be stored, used, labelled, and controlled.

That is why a strong refresher starts with a different question. Not “Did workers take WHMIS?” but “Can workers use WHMIS information to protect themselves and others during the actual tasks they perform?” The difference is significant. General WHMIS education helps workers understand the system. Product-specific training helps them apply it to the hazardous products, exposure routes, PPE, ventilation, storage controls, spill procedures, and emergency actions in their workplace.

CCOHS notes that all Canadian jurisdictions require employers to develop, implement, and maintain a WHMIS education and

training program, and that workers who work with or may be exposed to hazardous products must receive product-specific training. That is the standard employers should test during refresher planning. The certificate alone is not enough if workers cannot explain the hazards and procedures connected to the products they actually handle.

The 2026 audit should start with the hazardous product inventory

A WHMIS refresher should begin with the product inventory because the rest of the system depends on knowing what hazardous products are actually present. If the inventory is incomplete, the SDS library will be incomplete. If the SDS library is incomplete, training will be incomplete. If training is incomplete, workers may not know the safe handling, storage, PPE, first aid, spill, or emergency procedures that apply to the product in front of them.

Employers should review what has entered the workplace since the last WHMIS review. That includes new chemicals, substitute products, cleaning agents, maintenance products, lab materials, fuels, compressed gases, aerosols, adhesives, sealants, paints, disinfectants, process additives, and products brought by contractors or temporary work crews. This step is especially important when procurement decisions are decentralized. A product purchased by one department may create WHMIS obligations for the whole workplace if workers may be exposed to it.

The inventory review should also identify products that are no longer used. Outdated, abandoned, or unidentified containers create both compliance and emergency response problems. If a container cannot be identified, workers may not know the hazards, incompatibilities, storage requirements, or disposal procedure. A 2026 refresher should therefore be linked to housekeeping, chemical storage, waste disposal, and purchasing

controls, not only classroom training.

Labels need to be checked where the work happens

Supplier labels are one of the most visible parts of WHMIS, but they are also one of the easiest parts of the system to let drift. CCOHS explains that supplier label requirements include the product identifier, supplier identifier, prescribed pictograms, signal words, hazard statements, and precautionary statements, and that supplier labels must be provided in both English and French. Employers are responsible for making sure hazardous products that come into the workplace are labelled and for preparing and applying workplace labels when appropriate.

A refresher should include a physical label check, not just a slide showing the pictograms. Are original containers still labelled and readable? Are labels damaged, stained, peeled, covered, or outdated? Are decanted products, spray bottles, smaller containers, process containers, and temporary workplace containers labelled according to workplace requirements? Are pipes, tanks, vessels, and transfer systems addressed through procedures workers understand?

This is where field verification matters. A central WHMIS binder may look compliant while the maintenance room, janitorial cart, laboratory bench, service truck, production line, or storage cage tells a different story. Supervisors should be expected to walk the work area and confirm that workers can identify the product, understand the label, and access the SDS before use.

SDS access must be current,

practical, and tested

Safety data sheets are not just documents stored for inspection. They are working tools for safe handling, PPE selection, exposure control, storage, spill response, first aid, and emergency planning. CCOHS explains that suppliers must provide SDSs that meet the Hazardous Products Regulations and that SDSs must be accurate at the time of sale. It also notes that an SDS must be updated within 90 days when the supplier becomes aware of significant new data that changes classification or safe storage or handling information.

The end of the amended HPR transition period makes SDS review especially important. In 2026, employers should confirm that current SDSs are available for all hazardous products and that workers can access them during the shift, in the location, and under the conditions in which the product is used. An electronic SDS system may work well until the network is down, the worker is in a remote area, a contractor is on after-hours work, or a spill occurs where no one knows the login. A paper binder may work well until it contains outdated sheets or is stored far from the point of use.

A good refresher should test SDS access in practice. Ask a worker to find the SDS for a product they use. Ask them where to look for first aid measures, incompatible materials, PPE, storage requirements, and spill procedures. Ask what they would do if the SDS is missing, unreadable, or inconsistent with the product label. If workers cannot quickly find and interpret the SDS, the employer has a system problem, not a training problem.

The amended HPR changes should be part of the refresher

The amended WHMIS requirements introduced changes that

employers should now incorporate into refresher training and internal audits. CCOHS identifies changes introduced in December 2022, including new information elements on safety data sheets, a new physical hazard class for Chemicals Under Pressure, a new category for non-flammable aerosols, and new subcategories for flammable gases. Health Canada guidance also identifies changes related to aerosols, flammable gases, oxidizing solids, health hazard class definitions, classification criteria, and precautionary statements.

Most workers do not need to memorize every regulatory amendment. They do need to know that labels and SDSs may look different, that some hazard classes and categories have changed, and that current product information must be used. This is especially important in workplaces that use aerosols, gases, pressurized chemical products, process chemicals, laboratory materials, or specialized industrial products.

The refresher should avoid presenting WHMIS as a static system. WHMIS evolves as hazard communication rules evolve, product information changes, and new significant data becomes available. Workers should understand that if a label, SDS, or procedure looks unfamiliar or inconsistent, they should stop and ask before using the product.

Product-specific training is where WHMIS becomes real

General WHMIS education teaches workers how the system works. Product-specific training teaches them how to work safely with the products in front of them. That second step is where many employers are weakest.

A worker who handles corrosive cleaners needs more than a reminder that corrosion is a WHMIS pictogram. They need to know the correct dilution procedure, splash risk, glove type, eye and face protection, ventilation expectations, storage

requirements, incompatible products, eyewash location, spill response, and first aid steps. A worker who uses flammable aerosols needs to understand ignition sources, storage limits, ventilation, hot work restrictions, and what to do with damaged containers. A worker who works with gases under pressure needs to understand cylinder restraint, regulators, transport, leak response, and emergency escalation.

This is the difference between awareness and competency. A worker may recognize a pictogram and still make an unsafe decision if they do not understand how the hazard appears during the task. A strong WHMIS refresher uses actual workplace products, actual labels, actual SDSs, and actual procedures. It should answer the worker's practical question: what do I need to do differently because this product is hazardous?

Supervisors need WHMIS responsibilities too

WHMIS compliance often sits with the safety department, but supervisors are the people who see whether the system is working. They see unlabeled containers, damaged labels, missing SDSs, poor storage, incorrect PPE, shortcuts during mixing or transfer, and workers using products without reviewing hazard information. If supervisors are not part of the refresher, the employer may have training without control.

Supervisors should know how to verify that workers have received WHMIS education and product-specific training before using hazardous products. They should know how to respond when a label is missing, an SDS is outdated, a new product arrives, a worker raises a concern, or a contractor brings chemicals to the site. They should also know when work must stop until the information is corrected.

This is a due diligence issue. WHMIS documentation may show

that a worker completed training, but if supervisors allow unlabeled containers, missing SDSs, or unsafe handling practices to continue, the paper record will not prove effective control. A refresher should therefore include supervisor field checks and clear escalation expectations.

Common WHMIS gaps that refreshers should target

The most useful WHMIS refreshers focus on the gaps that actually appear in workplaces. The common issues are familiar: old SDSs, incomplete inventories, unlabeled secondary containers, damaged supplier labels, generic training with no product-specific follow-up, workers who cannot find SDSs quickly, storage incompatibilities, contractor products that bypass review, and PPE selected by habit rather than hazard information.

Other gaps are less visible. Workers may not understand that a product can be hazardous through inhalation even if it does not irritate the skin. Maintenance workers may use chemicals outside normal production areas where ventilation is weaker. Cleaners may mix incompatible products because they focus on cleaning performance rather than chemical reaction hazards. Remote or mobile workers may not have SDS access in vehicles or field locations. Workers with limited English or French literacy may recognize symbols but not understand the procedural detail needed for safe use.

A refresher that only repeats the basic WHMIS system may miss these issues. A stronger refresher uses workplace examples, near misses, inspection findings, spill records, first aid reports, procurement changes, and worker questions to target the real failure points.

Emergency procedures must be practical

WHMIS information is only useful in an emergency if workers can apply it quickly. CCOHS identifies emergency procedures as part of WHMIS education and training, including procedures required when a hazardous product may be present in the air and workers may be exposed, and procedures that must be followed in an emergency involving the product.

Employers should test whether emergency procedures are realistic. Do workers know when to evacuate, isolate the area, use spill kits, call emergency response, remove contaminated clothing, rinse exposed skin or eyes, or seek medical attention? Are eyewash stations and showers accessible, functional, and known to workers? Are spill kits compatible with the products used? Are emergency contacts posted and current? Are supervisors trained to escalate significant exposures, releases, fires, or reactions?

This is especially important for workplaces where hazardous products are used outside normal hours, in remote areas, in vehicles, at client sites, or by small crews. The emergency plan should reflect the work, not an idealized version of the work performed during office hours with full support nearby.

Contractors and temporary workers cannot be overlooked

Contractors, temporary workers, students, seasonal workers, and new hires often create WHMIS vulnerability because they may not know the site's products, procedures, or reporting expectations. They may also bring hazardous products into the workplace without going through the same purchasing and inventory controls as regular operations.

Employers should decide how contractor products will be approved, labelled, stored, and documented before the work begins. Contractors should provide SDSs for hazardous products they bring to the site, and site supervisors should know whether those products create risks for the employer's workers. Temporary and seasonal workers should receive WHMIS education and product-specific training before exposure, not after they have already started work.

This is a practical issue in construction, manufacturing shutdowns, maintenance work, cleaning, laboratories, municipal operations, health care, warehousing, and any workplace where products move quickly between employers, departments, or work areas. WHMIS compliance depends on knowing what hazardous products are present, not just what products the employer normally buys.

Recordkeeping should prove more than attendance

Training records matter, but attendance alone is weak evidence if the employer cannot show what the training covered and how it connected to the work. A stronger record identifies who was trained, when they were trained, what topics were covered, what products or product categories were addressed, who delivered the training, how understanding was evaluated, and whether task-specific competency was verified.

The same applies to WHMIS program records. Employers should be able to show their hazardous product inventory, SDS access process, label inspection process, workplace label procedure, product approval process, contractor product controls, refresher schedule, and corrective actions from inspections or audits. If an incident occurs, the employer will need to demonstrate that WHMIS was functioning as a workplace system, not just a training certificate.

The strongest record is evidence that the system was used. A worker reported a damaged label, the supervisor removed the container, the SDS was reviewed, the product was relabelled, and the crew was briefed. That type of record shows prevention in action.

What a strong 2026 WHMIS refresher should include

A strong 2026 WHMIS refresher should begin with the current state of the workplace. It should confirm the hazardous product inventory, review updated SDS and label expectations under the amended HPR, and explain what workers need to know about any changes in product classification, SDS format, label information, or hazard communication. It should then move from the general system to the actual products workers use.

The refresher should cover supplier labels, workplace labels, SDS access, product-specific hazards, safe handling and storage, PPE selection, exposure routes, ventilation, emergency response, spill procedures, incompatible materials, disposal, and reporting. It should include examples from inspections, near misses, incidents, and worker questions. It should also include a field verification component so supervisors can confirm that labels, SDSs, storage, and procedures match the training.

The goal is not to make WHMIS longer. The goal is to make it more useful. Workers should leave the refresher better able to recognize hazardous products, find and use SDS information, follow product-specific controls, identify missing or outdated information, and stop work when WHMIS information is incomplete or unclear.

The better standard for Canadian employers

WHMIS compliance in 2026 is not a once-a-year training exercise. It is an active communication and control system for hazardous products. The employer's job is to make sure workers know what hazardous products are present, what the hazards are, how to protect themselves and others, where to find current information, what procedures to follow, and what to do when something is missing, damaged, outdated, or unclear.

A strong WHMIS refresher should therefore look beyond completion rates. It should test whether the inventory is current, whether labels are correct and readable, whether SDSs are accessible and up to date, whether workplace containers are labelled, whether training is product-specific, whether supervisors are verifying compliance, whether emergency procedures are practical, and whether workers trust the process enough to report gaps.

That is the difference between WHMIS as paperwork and WHMIS as prevention. In 2026, Canadian employers should be aiming for the second standard.