WHMIS Training – Compliance Game Plan



Take 6 steps to ensure workers exposed to hazardous substances get proper WHMIS training.

Many if not most workplaces contain chemical, biological and other substances (called ‘hazardous products’) that pose health and safety risks to workers. OHS laws require employers to use a special system to ensure that workers who work with, near or are otherwise exposed to hazardous products understand the dangers they face and how to protect themselves. That system is called WHMIS, short for the Workplace Hazardous Materials Information System. Delivering proper training is a central element in WHMIS compliance. Here’s a 6-step game plan for complying with WHMIS training requirements.

Step 1: Determine Which Workers Need WHMIS Training

There’s a common misconception that employers must provide WHMIS training must be provided to all workers. The truth is that workers need WHMIS training only if they are or may be exposed to a hazardous product at work, i.e., they:

- Work with a hazardous product(s);
- Work near a hazardous product(s);
- Are involved in the manufacture of a hazardous product.

Step 2: Deliver Initial WHMIS Training

Workers who need WHMIS training must receive it **before** they're exposed to a hazardous product. That may be a new worker's first day of work or a current worker's 1,000th day if they're assigned to a new position or location involving exposure. **Example:** An office maintenance worker who's not exposed to any hazardous products is reassigned to cleaning duties in a chemical storage area.

Step 3: Verify Effectiveness of WHMIS Training

Simply delivering WHMIS training isn't enough. Before exposing them to a hazardous product, you must also verify that workers understand their training and are capable of applying it to protect their health and safety. Methods of verification include making workers pass a written test and/or demonstrate what they learned. Periodic evaluation of workers' knowledge via written tests, practical demonstrations and other 'suitable means' is also a specific regulatory requirement in BC, New Brunswick, Newfoundland, Prince Edward Island and Saskatchewan and a recommended best practice in all other jurisdictions.

Step 4: Provide New or Refresher WHMIS Training as Necessary

Although the phrase is frequently used, 'annual WHMIS training' is a misnomer. OHS rules don't say that WHMIS training is required every year. In fact, WHMIS training has no pre-determined shelf life. It lasts as long as the training remains timely and reflective of current conditions and hazards. New training is required only when and if:

- Work conditions change in a way that alters the exposure risks covered in the previous training;

- New and significant hazard information about the hazardous product becomes available after training takes place;
- Periodic evaluations indicate that workers don’t have adequate knowledge to apply their training; and/or
- There are other indications that the previous training isn’t effective and needs refreshing.

> ***The Difference between Annual WHMIS Training & Annual WHMIS Review***
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> *There is one thing that WHMIS laws say you must do at least once a year: Review your entire WHMIS program, including worker training and education. During this review, you must determine whether the most recent WHMIS training workers received is appropriate and suitable to current conditions or, conversely, whether work conditions, new information or other changes make refresher or retraining necessary. Annual WHMIS review must be done in consultation with the workplace joint health and safety committee (JHSC) or health and safety representative. Although not specifically defined in OHS regulations, government guidance from Alberta, BC and other jurisdictions clarify that ‘consultation’ means giving the JHSC or representative a chance to review and comment on the effectiveness, content, structure and means of delivering WHMIS training.*

Step 5: Ensure WHMIS Training Covers the Right Information

WHMIS training is general in scope. Its aim is to teach workers how the WHMIS system works and how to use it to ensure their health and safety, as well as about the general policies and procedures in place to protect them from exposure to hazardous products and substances. Required elements:

- Information that must be on a Safety Data Sheet (SDS)

and the significance of that information;
- How to access the workplace SDS binder or system;
- Information that must be on a WHMIS supplier or workplace label and the significance of that information;
- Placards or other alternative methods used to communicate required safety information about hazardous products;
- Procedures for safe storage, handling, use and disposal (and, if applicable, manufacture) of hazardous products; and
- Procedures for hazardous product emergencies and exposure to so-called fugitive emissions.

Step 6: Ensure Workers' Access to 'Hazard Information' about Each Hazardous Product

In addition to general information about the WHMIS system and how it works, OHS rules require employers to ensure workers receive hazard information about the specific hazardous product(s) to which they're exposed. OHS directors can get into trouble if they confuse these things. 'Hazard information' means information about the safe use, storage, handling and disposal of a particular hazardous product to which the worker is exposed, including information about its health and physical hazards and how to deal with emergencies involving the product. The source of that information is the company that supplies the hazardous product and you'll need to let workers know if and when the supplier provides you new or updated hazard information about the product.