
Proposal to Address Certain Human Health Hazards of Concern in Consumer Chemical Products

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Workplace Hazardous Products Program multi-stakeholder workshop

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Presentation Overview

Legislative Information: *Canada Consumer Product Safety Act (CCPSA)* and the *Consumer Chemicals and Containers Regulations, 2001 (CCCR, 2001)*

Overview: Notice of Intent (NOI) for consumer chemical products under the CCPSA

Proposed new regulatory framework for consumer chemical products regulated under the CCPSA, including rationale

Recent updates and upcoming stakeholder consultations

Background Information: *Canada Consumer Product Safety Act (CCPSA)*

- The Consumer Product Safety Program at Health Canada is responsible for the administration and enforcement of the CCPSA (or the Act) and its regulations.
- The purpose of the CCPSA is to protect the public by addressing or preventing dangers to human health or safety that are posed by consumer products in Canada.
- The Act sets out a general prohibition on consumer products that are a danger to human health or safety. The Act includes several product specific regulations.

Background Information: CCPSA, continued

- Consumer products subject to the CCPSA and its regulations are those that may reasonably be expected to be obtained by an individual to be used for non-commercial purposes.
 - Some examples of consumer chemical products include certain household cleaning products, adhesives, paints and lubricants.

Existing Requirements Under the CCPSA for Consumer Chemical Products

- The *Consumer Chemicals and Containers Regulations, 2001* (CCCR, 2001) under the CCPSA set out safety requirements that address **acute human health and physical hazards** associated with consumer chemical products, including:

- acute toxicity (lethal or serious but non-lethal effects);
- corrosivity (chemical burns and eye damage);
- flammability (chemicals that catch fire);
- pressurized containers (containers that may explode if heated or punctured); and
- quick skin-bonding adhesives (adhesives that bond skin instantly or nearly instantly).



Toxic



Corrosive



Flammable



Explosive
(pressurized container)

- Requirements under the CCCR, 2001 include:
 - prohibitions and restrictions for dangerous consumer chemical products;
 - labelling requirements; and
 - container requirements (e.g., child-resistant containers).

Notice of Intent Under the CCPSA

- Current regulatory requirements set out in the CCCR, 2001 do not address certain human health hazards of concern (HHHOCs) associated with consumer chemical products. The Consumer Product Safety Program considers HHHOCs to include the following:
 - carcinogenicity (induction of cancer);
 - germ cell mutagenicity (heritable gene mutations);
 - reproductive toxicity (adverse effects on sexual function, fertility, or developmental toxicity in offspring);
 - specific target organ toxicity (adverse effects on target organs after single or repeated exposure); and
 - respiratory or skin sensitization (allergic reactions or hypersensitivity).
- On July 11, 2023, Health Canada published a [notice of intent](#) (NOI) to consult stakeholders on a proposal to introduce requirements, under the CCPSA, for HHHOCs linked to substances found in consumer chemical products.

Proposed New Requirements

- In the NOI, Health Canada proposed introducing the following requirements for consumer chemical products regulated under the CCPSA:
 1. Classification criteria for HHHOCs based on those set out in the Globally Harmonized System of Classification and Labelling of Chemicals (GHS);
 2. Information disclosure requirements for HHHOCs based on GHS label elements, including:
 - i. hazard symbols;
 - ii. signal words (i.e., "Danger" or "Warning");
 - iii. hazard statements (e.g., "May cause cancer");
 - iv. precautionary statements (e.g., instructions for safe use and first aid); and
 - v. ingredient disclosure requirements; and
 3. Additional protections, such as prohibitions, restrictions, or child-resistant container requirements, where deemed necessary.

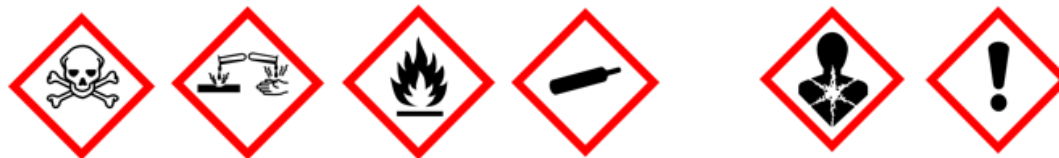
Regulatory Approaches

- The NOI presented a proposed and an alternative regulatory approach to manage the risks associated with certain HHHOCs. Both approaches would continue to manage the risks associated with acute human health and physical hazards.

- **Proposed regulatory approach:** hybrid classification and labelling system merging existing requirements of the CCCR, 2001 and the GHS

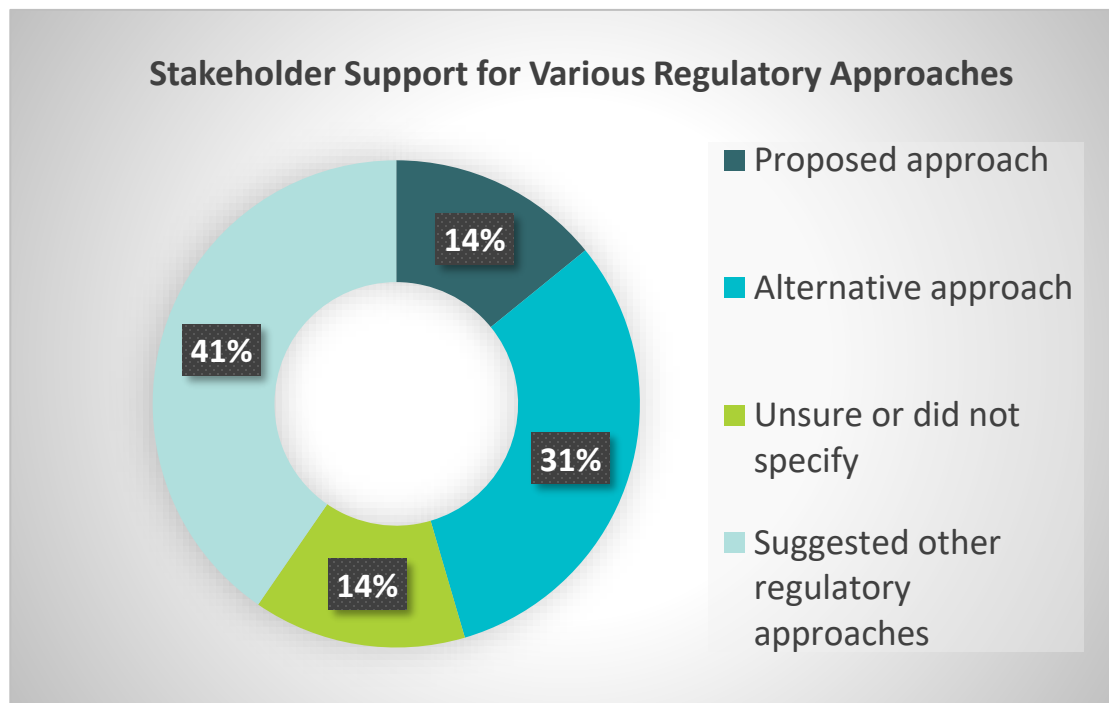


- **Alternative regulatory approach:** full replacement of the CCCR, 2001 with a risk-based GHS framework



Stakeholder Feedback on the NOI

- Most stakeholders (71%) indicated that the GHS is reasonable and effective for addressing HHHOCs.
- Several industry stakeholders emphasized the importance of establishing a risk-based approach for labelling chronic health hazards (e.g., carcinogens, reproductive tox, specific target organ toxicants – repeated exposure)



Other Approaches Suggested by Stakeholders

- **Alignment with the United States *Federal Hazardous Substances Act (FHSA)*** – this is not appropriate for Canada given that the FHSA does not emphasize the use of hazard symbols
- **Status quo regulatory approach** – this would not address the risks posed by HHHOCs

Public Opinion Research

- To help support the development of proposed new labelling requirements for consumer chemical products, Health Canada contracted Ipsos Reid to complete a public opinion research (POR) project.
- The survey was conducted at the end of 2023 and the final report for the POR has been available since June 3, 2024 through [Library and Archives Canada](#).
- The objectives of the POR were to assess:
 - survey participants' knowledge and preference of certain hazard symbols;
 - effectiveness of hazard statements; and
 - general importance of risk/hazard information.

Public Opinion Research Results

- The POR results support the continued use of labelling requirements for consumer chemical products to provide safety information to people in Canada.
 - The vast majority (92%) of survey respondents indicated that hazard symbols are useful for hazards that can cause injury or death.
- When knowledge was tested for corrosive hazard symbols, similar proportions of respondents correctly identified the CCCR, 2001 or GHS corrosive symbols (61% and 57%, respectively).
 - A potential full transition to GHS hazard symbols and labels is not expected to negatively impact a user's understanding of the corrosivity, acute toxicity, and flammability hazards posed by a consumer chemical product.
 - Comparative knowledge of the acute toxicity and flammable hazard symbols was not tested due to their similarity.



- Overall, the knowledge level for the two GHS hazard symbols representing HHHOCs (i.e., the health hazard and exclamation mark symbols) was low at only 41% and 18%, respectively.

Regulatory Path Forward

- Upon reviewing and carefully considering stakeholder feedback received on the NOI, and the results of the public opinion research, Health Canada is pursuing a new regulatory framework for consumer chemicals regulated under the CCPSA:
 - a full replacement of the *Consumer Chemicals and Containers Regulations, 2001* with a risk-based framework based on the Globally Harmonized System of Classification and Labelling of Chemicals.
- The framework would manage risks associated with acute and physical hazards and certain HHHOCs.
- Health Canada is considering the adoption of certain guidelines for risk-based labelling for chronic hazards, such as Annex 5 of the GHS, “*Consumer Product Labelling Based on the Likelihood of Injury*”. Certain risk-based exclusions from the CCCR, 2001 may also be retained.

Rationale for the Proposed New Regulatory Framework for Consumer Chemical Products under the CCPSA

Enhance health and safety protections for certain consumer chemical products supplied in Canada

- **Labelling requirements:** Alert users about acute human health hazards, physical hazards, and HHHOCs (e.g., hazard symbols and signal words) and provide precautionary statements on labels as prescribed by the GHS.
- **Other protections:** Applying prohibitions and child-resistant container requirements, where deemed necessary.

Provide opportunities to explore enhanced alignment between regulatory regimes for consumer chemical products (under the CCPSA) and workplace hazardous products (under the Hazardous Products Act).

- Potential for reduced burden for industry supplying chemical products to the consumer and commercial markets.
- Additional safety information on labels may enhance protections for workers that use consumer chemical products in the workplace.

Support the Government's commitments for mandatory labelling of chemicals in consumer products

- The proposed labelling requirements would enhance safety and ingredient information on labels of consumer chemical products supplied in Canada.

Rationale for the Proposed New Regulatory Framework for Consumer Chemical Products under the CCPSA, Cont'd

Continue to apply a consistent risk management approach for classifying/labelling hazards

- The GHS is used to classify and label chemicals in a consistent and scientifically accepted way, that minimizes any undue harm to animals.
- Certain safety information would be standardized for chemicals marketed for use in domestic or workplace settings.

Help to support Canada's commitment to global harmonization of chemical classification and labelling

- Canada would be in closer alignment with the European Union, United Kingdom, and several other jurisdictions that have already adopted the GHS for consumer chemical products.
- Alignment with the United States FHSA was considered in the analysis. However, the FHSA does not emphasize the use of hazard symbols. The results of the public opinion research support the continued use of hazard symbols for communicating the hazards of consumer chemical products to people in Canada.

October 23, 2024 Stakeholder E-mail Notification

- On October 23, 2024, Health Canada distributed an e-mail to stakeholders that included a link to an information bulletin informing of future stakeholder consultations and instructions on how to participate.
- The bulletin provided an outline of the consultation plan and tentative timelines.
- The bulletin also provided links to:
 - A document summarising the feedback received on the NOI and the analysis regarding the selected regulatory approach; and
 - A short questionnaire that stakeholders can complete to indicate their interest in participating in one or more of the consultation sessions.
- To receive the e-mail distributed on October 23, 2024, with the link to the bulletin, attachments, and instructions, please send an e-mail request to ccpsa-lcspc@hc-sc.gc.ca.

Future Stakeholder Consultations

Topic Areas for the Proposal	Tentative Timelines*
1. Overview of: <ul style="list-style-type: none"> • stakeholder feedback received on the NOI under the CCPSA, • public opinion research summary, and • analysis for the selected regulatory approach – i.e., a full replacement of the CCCR, 2001 with a risk-based framework based on the GHS 	Information session with opportunity for questions and answers – January to March 2025.
2. Consumer chemical product scope, exclusions, definitions, record-keeping requirements, and other general provisions	Consultations held June to September 2025
3. Hazard classification and risk characterization of consumer chemical products	Consultations held October to December 2025
4. Information disclosure requirements including labelling	Consultation held January to March 2026
5. Additional protections (e.g., prohibitions, restrictions, child-resistant containers, etc.)	Consultations held April to June 2026

*Timelines are subject to change based on Departmental priorities.

Thank you!

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