



Innovative Products For **Home. Work. Life.**

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via electronic transmission

Lynn Berndt-Weis  
Director, Workplace Hazardous Materials Bureau  
Consumer and Hazardous Products Safety Directorate  
Healthy Environments and Consumer Safety Branch  
Health Canada  
269 Laurier Avenue West  
Address Locator 490B  
Ottawa, Ontario K1A 0K9  
[hc.whmis-simdut.sc@canada.ca](mailto:hc.whmis-simdut.sc@canada.ca)

Subject: Regulations Amending the Hazardous Products Regulations (GHS, Seventh Revised Edition)<sup>1</sup>

The Household & Commercial Products Association<sup>2</sup> (HCPA) appreciates the opportunity to comment on the proposed *Regulations Amending the Hazardous Products Regulations (GHS, Seventh Revised Edition)*, which was published in the Canada Gazette, Part I, Volume 154, Number 51 on December 19, 2020. This letter is in addition to the letter previously submitted on February 26, 2021. HCPA fully supports the comments filed by the Canadian Consumer Specialty Products Association (CCSPA).

HCPA supports Canada's intention to coordinate and synchronize the coming into force of the amended *Hazardous Products Regulations* (HPR) with the coming into force of the updates to the U.S. Hazard Communication Standard (HCS). With this in mind, HCPA requests that Health Canada provide manufactures and importers an additional year to classify and update documents such as labels and safety data sheets under the amended regulations. HCPA has requested that U.S. OSHA provide manufacturers and importers an additional year and similarly requests the same of Health Canada for a few reasons.

The COVID-19 pandemic has disrupted the lives of everyone and created a great need of disinfectants, hand sanitizers and cleaning products. HCPA member companies have been

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<sup>1</sup> *Canada Gazette, Part I, Vol. 154, No. 51* (December 19, 2020) at pp 4236 - 4299

<sup>2</sup> The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

focused on ensuring that consumers and workers have access to the products that they need to maintain a healthy environment in their homes and workplaces. Their resources need to remain on making certain that products are available so that society can recover and are limited in the ability to support additional complex regulatory changes.

HCPA also requests an additional year as not all manufacturers and importers have internal systems in place to evaluate all their products on their own. These companies will have to utilize external resources with the necessary expertise to make the proper evaluations, and with an update to both the HPR and HCS, the people capable of doing such evaluations will be in high demand and likely have backlogs to work through.

For those manufacturers and importers that do have internal processes to handle the classification of their products, most are utilizing software to do much of the work. It'll take months for these software systems to update their codes, which then must be beta tested to ensure that the update properly classifies products and avoid any unintentional errors. By the time the beta testing is completed, and any issues are troubleshooted, months have passed before any actual progress at reclassifying products has been made.

HCPA appreciates the opportunity to provide these comments and fully supports the comments filed by the Canadian Consumer Specialty Products Association. HCPA looks forward to working with CCSPA and other stakeholders to ensure an appropriate implementation to benefit the workers in Canada and the United States.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Nicholas Georges".

Nicholas B. Georges

Vice President, Scientific & International Affairs