

July 16, 2025

Matt Jones,
Assistant Deputy Minister
Healthy Environments and Consumer Safety Branch
Health Canada

Dear Assistant Deputy Minister Jones,

Subject: Request for an extension – Coming into Force of the amendments to the Hazardous Products Regulations

We, the undersigned trade associations, respectfully request an extension to the current transition period for the amendments to the *Hazardous Products Regulations* (HPR), in force as of December 15, 2022. The existing transition period is set to conclude on December 14, 2025. We propose this date be extended to align with the United States' implementation timeline of July 19, 2027, for mixtures.

While recognizing the importance of the amendments, alignment between Health Canada and the U.S. OSHA is a priority, including one label and one Safety Data Sheet (SDS) for workplace chemicals. Without alignment, a Canadian company importing a formulated hazardous product from the U.S. may be unable to obtain an updated SDS that reflects the latest classification data. To maintain existing supply chains, Canadian companies would need to incur significant additional costs to have a compliant SDS until U.S. companies transition in mid-2027.

This issue is further compounded by ongoing supply chain disruptions stemming from current trade tensions. Even if a resolution is reached in the near term, as recently suggested during the G7 Summit, recovery across affected supply chains will take time.

We also note that regulatory alignment on the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) implementation has long been a shared goal under the Canada–U.S. Regulatory Cooperation Council (RCC) Work Plans (2016–2017, reaffirmed and expanded in 2019–2020). Key commitments included mutual alignment on labels and SDSs, consistent concentration ranges, and harmonized exemptions. While full alignment has not yet been achieved, extending the Canadian transition period would be a pragmatic and meaningful step in that direction—without compromising worker health or safety.

Finally, in 2015, Health Canada and OSHA hosted valuable educational webinars for employers and employees. We would request that Health Canada and OSHA again coordinate and facilitate education sessions for suppliers to create the one label, one SDS based on the respective jurisdictions. With the alignment of transition timelines and support from harmonized education materials, we can realize our shared goals, increase worker health and safety, and reduce costs.

We appreciate your consideration and would welcome the opportunity to discuss this request further.

Sincerely,

Riaz Zaman,
Sr. Counsel, Government Affairs
American Coatings Association



Rebecca O'Donnell,
Associate Director, Regulatory &
Science Affairs



Beta Montemayor,
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cc:

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