# THE PATH TO COMPLIANCE

ANNUAL REPORT 2009-10













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# Message from the President and CEO



Innovation continued to be the driver of HMIRC's activities in 2009-10—evidenced by the development and implementation of new tools and processes that promote proactive compliance and streamline the claim process for companies and Commission staff alike.

In 2009-10, HMIRC pursued its integrated planning initiative based on a results-focused management approach. Through consultations with our Council of Governors and stakeholders, we have identified three strategic directions to guide the Commission's work over the next two years. Endorsed by the Council, these are:

- 1. Enhancing the quality and responsiveness of HMIRC services to emphasize proactive compliance.
- Improving the organization, translation and dissemination of HMIRC's knowledge to better exploit and share the Commission's unique expertise in hazard classification and communication.
- 3. Increasing partnership participation to better address hazard communication challenges.

Related to these strategic directions, the 2010-12 Integrated Plan for HMIRC was defined. Including strategic, operational and evaluation components, the plan links Commission activities to outputs, permitting in turn the definition of outcomes that will benefit Canadians. The evaluation framework will be an important tool for measuring HMIRC's performance.

In 2009-10, HMIRC took steps to identify and share its knowledge with organizations whose mandates have an affinity with ours. We continued to reduce our claim backlog, meeting targets for the second of our three-year backlog elimination program and developing tools and systems that will reduce the possibility of a backlog in the future. This enabled us to work more efficiently and to deliver value for Canadians.

HMIRC saw many key achievements last year. We successfully integrated data from multiple sources into a single, searchable database management system for use by staff. We will continue to digitize paper resources, and are looking at ways of sharing such information with claimants and all our stakeholders.

In an effort to improve general understanding of HMIRC and its role—and also in response to feedback from attendees of our first-ever claimant workshop—we created a new multimedia education tool called HMET that is being piloted and will be launched soon.

For the second year in a row, the MSDS checklist used by claimants continues to show promising results as evidenced by the number of compliant MSDSs we received at initial submission, which exceeded the historical average.

Throughout the year, efficiency remained a primary focus. We provided claimants with a more concise form to expedite the preparation of claims. We moved forward with use of Undertakings as a mechanism to offer feedback to claimants and encourage voluntary MSDS compliance.

Going forward, we will strive to exercise our mandate in creative, collaborative, innovative ways—actively seeking emerging opportunities and anticipating challenges as well as changes in our wider operating landscape. One important area where we will focus our effort in 2010-11 is staff retention and talent management.

Internally, we made efforts to strengthen our organization—instituting a Strong Workplace Action Team (SWAT). As part of this program, I met informally with small groups of employees throughout the year to gather their perspectives on the organization and discuss opportunities for improvement. One area of interest that emerged was workplace wellness. In response, we launched an internal newsletter, opening a new channel of communication to inspire wellness and contribute to overall efficiency and effectiveness.

In closing, I want to thank all of our staff members for their dedication and energy during what was a highly productive year. We will continue to realize the benefits of your hard work over the coming years.

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Sharon A. Watts
President and CFO



# Message from the Chairman of Council of Governors

Last year HMIRC's Council of Governors endorsed three new strategic directions for the Commission, emphasizing proactive compliance, knowledge translation and sharing, and strategic partnerships.

These reflect the ongoing evolution of the organization and the context in which it operates. In 1999, the HMIRC began to move toward a more client-focused approach — emphasizing openness, transparency and accountability — that led to important legislative, regulatory and operational changes. The Commission must continue to pursue this work and position itself in the next decade—continuing to innovate, and adapting to the realities of an increasingly globalized environment.

Implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) will align WHMIS and HMIRC with international standards. The aim of this harmonized approach is to reduce barriers to trade and enhance protection for workers. The tools and mechanisms developed by the Commission in 2009-10 will facilitate the transition to this new system for HMIRC's stakeholders. In addition, elimination of its backlog in 2010-11 and acceleration of its claim review process will prepare HMIRC for the potentially greater volume of claims that could arise in a harmonized environment.

One of my priorities as Council Chair is to strengthen HMIRC international outreach. We must stay abreast of activities within other organizations, such as the International Labour Organization (ILO), World Health Organization (WHO) and others. We have valuable knowledge to contribute to projects in the international arena—as demonstrated by the Commission's contribution to the national GHS committee.

In 2009-10, the Commission made great strides on several fronts—increasing efficiencies, making information more accessible to chemical companies, working more closely with claimants to improve the claim review process, and enhancing its data management approach to ensure evaluators have access to the most current scientific research and information. The Council of Governors thanks the Commission's executive and staff for their dedicated efforts and congratulates them on their impressive achievements.

Looking ahead, I am confident the foundation the Commission has built and the innovations it implemented in 2009-10 position it strongly to remain a vital contributor to workplace safety and Canadian competitiveness in the years to come.

Sincerely,

Dr. Yves Brissette Chairman. Council of Governors



## **HMIRC** at a Glance

## A proactive approach

Chemical products play an important role in Canada's economy—used by industry in goods and services, and to maintain equipment and facilities. To compete successfully, chemical companies need to keep certain ingredients of their chemical products secret. Yet workers require access to dependable information on the chemical products they handle in order to protect their health and safety.

The Hazardous Materials Information Review Commission (HMIRC) ensures the needs of both companies and workers are respected where trade secret protection and chemical ingredient disclosure are concerned.



In 2009-10, HMIRC continued to work closely with chemical companies to help them take a **proactive approach along the path to compliance**—providing complete, accurate information on their products and competitive requirements when they apply for trade secret exemptions.

## The path to compliance

Canada's Workplace Hazardous Materials Information System (WHMIS) requires chemical manufacturers, importers, distributors and employers to produce cautionary labelling for containers of hazardous products made or used in Canadian workplaces, and to provide a material safety data sheet (MSDS) containing detailed health and safety information such as a list of hazardous ingredients, toxicological properties and safety handling instructions.

When a company believes revealing the full details of a specific product may create a competitive disadvantage, it can apply for a trade secret exemption. HMIRC's role is to evaluate such applications. As an independent agency operating under the *Hazardous Materials Information Review Act*, HMIRC registers claims for exemption, determines their validity, and decides whether claimant MSDSs and product labels comply with WHMIS legislation, as depicted in Table 1.

If not for HMIRC's MSDS assessments, workers who handle hazardous chemical ingredients could end up lacking critical information on how to protect themselves—with consequences ranging from injury to health complications and in some cases even death.

## Table 1

	PREPARATION		REVIEW AND DIALOGUE	<u> </u>	DECISION ON  EXEMPTION AND COMPLIANCE	RECOURSE (APPEALS)
APPLICATION FOR EXEMPTION	A company prepares an application for exemption explaining why it believes a particular chemical ingredient should be protected as a trade secret.	The claim is officially registered after the registration fees are collected, allowing the claimant to sell its product in Canada.	An HMIRC screening officer reviews the application to determine if the ingradient in question is secret, has value, and merits an exemption.	If required, HMIRC requests additional information to support the claim.	HMIRC issues a Decision on the validity of the claim for exemption. If valid, the trade secret receives three years' protection. If not, the chemical ingredient must be disclosed.	Claimants and affected parties (such as health and safety professionals for the workplace) have access to an objective, quasijudicial appeal process if they are not satisfied with JUMIDON.
MATERIAL SAFETY DATA SHEET	The claimant provides an MSDS for the product in question.		An HMIRC evaluator assesses the claimaint's MSDS for completeness,	HMIRC provides an <b>Advice Document</b> that summarizes the results of the MSDS review	HMIRC also decides whether the claimant's MSDS is compliant or nor If the MSDS	decision.
440	HMIRC's MSDS checklist tool helps companies prepare complete, accurate MSDSs.	to .	compliance with WHMIS regulations, referring to the claimant's product and ingredient data and publicly	Claimants are given the opportunity to review the Advice Document and the evaluations of the control of the con	is non-compliant, HMIRC issues an <b>Undertaking</b> , for the claimant to voluntarily correct the MSDS.	
		Evaluators ac Chemical Abs secure, confi	available Scientific of Inclusive information.  Evaluators access scientific data through the Chemical Abstracts Service (CAS) and HMIRC's secure, confidential data management system.	discussion. discussion.  augh the d HMIRC's  nt system.	If the claimant does not voluntarily correct the MSDS, an Order requiring the claimant to correct the MSDS is issued.	
				1	4	
	Products with high-hazard ingredients take priority in the evaluation process.	zard ingredients aluation process.	As part of their business case, claimants must estimate the value of the trade secret they wish to protect. The total annual value of Canada's protected trade secrets is in the hundreds of millions of dollars.	ss case, claimants e of the trade secret ne total annual value trade secrets is in the of dollars.	The exemption period for valid claims is three years, after which claimants must refile if they wish to further protect their trade secret.	or valid claims is claimants must her protect their



## Preparation

## Stating the case: The claim for exemption

The chemical product industry is diverse, complex and highly competitive—which is why many companies seek to formally protect their trade secrets. Part of HMIRC's role is to evaluate the business case for withholding a chemical ingredient from disclosure. In 2009-10, the Commission registered 223 claims for trade secret exemptions.

## **Prompt registration**

Every claim must state clearly why exemption is sought—by describing the consequences for a company if its trade secret were to be revealed, including potential financial losses or advantage shifting to competitors. According to its service standard, HMIRC registers claims within seven days of receipt. Last year, the Commission met that target fully.

HMIRC is also focused on expediency in relation to its three-year program of backlog reduction. 2009-10 marked the end of year two. By March 31, the number of outstanding claims had dropped from 257 to 120, keeping the Commission well on track to eliminating its backlog as planned.

HMIRC simplified the claim preparation process for chemical companies last year, providing a concise form for submissions instead of requiring detailed, long-form applications.

## What trade secret exemptions mean for companies

Trade secrets in Canada are protected for a term of three years, after which claimants must refile. This aligns with the period for which an MSDS is valid and accounts for the fact that, over time, changes in a company's competitive context may affect whether an ingredient continues to require protection. Of the claims reviewed by HMIRC in 2009-10, 80 were refilings related to products whose terms of protection had come to an end. All of these received new exemptions.

## PROFILE OF A CHEMICAL INGREDIENT Quartz silica [SiO\_]



A naturally occurring mineral ranging in size from microscopic particles to large crystals, quartz silica is commonly

used as an abrasive, a filler and extender in paints, and an ingredient in the fabrication of ceramic, glass and enamel products.

## Why it's considered hazardous

Inhaling quartz silica dust particles over a period of years can permanently impair lung function and cause lymph node effects, kidney disease, autoimmune disease and cancer.

#### Protective measures

- Respiratory protection
- Regular measurement of silica particles in workplace air

## The MSDS checklist

HMIRC's practical, easy-to-use checklist identifies many of the elements required in a complete and accurate MSDS. A number of claimants have offered positive feedback on its usefulness.

## Towards proactive compliance: Preparing the MSDS

Under WHMIS, every hazardous product made or used in a Canadian workplace must be detailed in a material safety data sheet. When a company files an application for exemption, it must include the relevant MSDS so that HMIRC can ensure it complies with applicable legislation and regulations.

## Streamlining MSDS development

Since it began introducing tools such as the MSDS checklist to help companies prepare more complete and accurate MSDSs and product labels, HMIRC has seen compliance on first review increase steadily. That trend continued in 2009-10, with 55 of the 257 reviewed MSDSs found to be compliant (nearly 25 percent, up from roughly 15 percent in 2008-09). The average number of violations per initial MSDS has dropped from 9 to 4.2 since the checklist was released in 2007.

To facilitate the claim process and encourage proactive compliance, HMIRC provides informal feedback to claimants after its initial review of their MSDSs, giving them the opportunity to make corrections and improvements before proceeding to full and formal review.

## Beyond the claim process

HMIRC created its MSDS checklist to assist chemical companies with the development of any MSDS, not only



those for which trade secret protection is sought. By doing so, it is helping ensure that workers who handle or use controlled products have better, more accurate information to protect their health and safety. This contributes to HMIRC's objective of encouraging *proactive compliance*—by making compliance part of companies' standard operating procedures.

## PROFILE OF A CHEMICAL INGREDIENT Ethanolamine [C\_H\_NO]



Commonly used to remove acidic impurities—for example, carbon dioxide from natural gas—ethanolamine is also used as an additive in some surfactants

and hair dying products, and in certain soluble and synthetic metalworking fluids, antistatic agents, epoxy resins and rubbers.

### Why it's considered hazardous

Ethanolamine is combustible and corrosive to some metals as well as to the skin, eyes and gastrointestinal tract. It can cause blindness and scarring, and prolonged exposure to its vapours may lead to fluid accumulation in the lungs, which could be fatal.

#### Protective measures

- Storage away from heat sources
- Safety equipment such as eye goggles, a face shield, and chemical-resistant gloves and clothing.



## Applying our expertise

## **MSDS Evaluation**

Every MSDS is subjected to a rigorous scientific review by our evaluators, who study the ingredients to understand their behaviours, interactions and hazards. With the help of a vast array of electronic resources and procedural tools, evaluators are carrying out their work more efficiently than ever before.

### Knowledge at the ready

The average MSDS includes between 5 and 10 chemical ingredients—and some upwards of 15. Every year, HMIRC does research on thousands of ingredients. In some cases, processing a single MSDS may require only a few days; in others, the literature review alone might take three months.

To accelerate the process, HMIRC has compiled more than 3,000 Chemical Abstract Service (CAS) files on ingredients for evaluators to consult rather than having to duplicate existing research. In 2009-10, the Commission began developing quick-reference summaries of these. HMIRC further expanded its knowledge base by integrating multiple chemical ingredient databases and digitizing volumes of information within a comprehensive database management system that provides instant, simultaneous access to the information evaluators need.

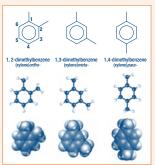
### Prepared to advise

Every MSDS evaluation includes the preparation of an Advice Document, which the evaluator submits to a screening officer. In 2009-10—to enhance Advice Document development—HMIRC rolled out an electronic Advice Document template that offers up observations related to relevant scientific research and provides suggested wording for use in the final document. It increases the information at evaluators' disposal and streamlines the evaluation process by collecting and combining the knowledge and experience of the entire evaluation team. The electronic template enriches the existing Advice Document user guide, a key part of the evaluator's toolkit.

## **Review of Claim Validity**

Screening officers review both the financial and security information contained in each application to determine whether or not it meets the regulatory criteria for exemption.

## PROFILE OF A CHEMICAL INGREDIENT Xylene – [C<sub>8</sub>H<sub>1</sub>O], [C<sub>6</sub>H<sub>4</sub>(CH<sub>2</sub>)<sub>2</sub>], [C<sub>6</sub>H<sub>4</sub>C<sub>7</sub>H<sub>6</sub>]



A clear colourless liquid produced from petroleum and coal tar, xylene is used as an organic solvent in products such as paints, rubber, resins, lacquers, varnishes, inks, dyes and adhesives. It is also used as a degreaser and cleaning agent.

## Why it's considered hazardous

Xylene is highly flammable. Exposure to it may cause depression of the central nervous system and lead to headaches, dizziness, nausea, vomiting and skin irritation. Some evidence suggests it may be toxic to developing fetuses and can result in hearing damage.

#### Protective measures

- Storage in cool, well-ventilated areas away from heat sources
- Safety equipment such as gloves, chemical splash goggles and a respirator to protect against inhalation of vapours

## Engaging constructively: Claimants and HMIRC experts in dialogue

Information sharing and open communication are important all along the path to compliance—leading up to the decision on claim validity or compliance. HMIRC invites direct dialogue between claimants and HMIRC experts to achieve clarity and resolve issues proactively.

## **Compliance and communication**

At this stage of the claim review process—and in fact at all stages—claimants are invited to engage in dialogue with Commission representatives to discuss the validity of their claim. Related to the accuracy and completeness of their MSDS, claimants are given the opportunity to review the Advice Document and HMIRC experts are available to discuss it if needed.



## Distinct perspectives: evaluators and screening officers

HMIRC evaluators review the MSDS from a scientific perspective, drilling into the details. Screening officers, on the other hand, look at the claimant's whole application—from both a technical point of view and in terms of the business case for exemption.

Taking an open, proactive approach ensures workers have access to accurate health and safety information as quickly as possible. Over 85% of claimants took advantage of the opportunity to comply voluntarily—for example, Undertakings—thereby correcting their MSDSs earlier, providing timely access for workers to this critical information.

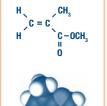
**UNDERTAKING:** A compliance measure provided for in the *Hazardous Materials Information Review Act* giving claimants the opportunity to voluntarily make the necessary changes to the MSDS within a specified period of time.

## Informed advice, informed response

Ongoing dialogue allows claimants and HMIRC to learn from each other's knowledge and expertise. In some cases, companies may have conducted their own studies of chemical ingredients and share the findings with HMIRC. At the same time, HMIRC experts are able to inform claimants about the contents of the Advice Document and other scientific information that has been reviewed.

## PROFILE OF A CHEMICAL INGREDIENT Methyl Methacrylate $[C_5H_8O_2]$ ,

 $[CH_2=C(CH_3)COOCH_3]$ 



This clear, colourless liquid with its telltale pungent odour is used in acrylic resins and plastics, adhesives and polymer concrete and embedding materials.

## Why it's considered hazardous

As a vapour or liquid, Methyl Methacrylate is highly flammable

and potentially explosive. It vaporizes easily, building up concentrations in confined spaces or spreading over long distances (creating a risk of flashback in cases of fire). As a liquid, it floats on water and could spread fire if lit. Methyl Methacrylate can cause headaches, nausea, dizziness and confusion, lack of coordination and severe allergic skin reactions.

#### Protective measures

- Proper engineering controls
- Protective equipment
- Personal hygiene



## Completing the journey: The decision on exemption and compliance

After the claim has been registered, reviewed and the claimant and HMIRC have had the opportunity for dialogue, a decision can now be rendered.

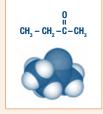
## **Decision: Claim for exemption**

Claims are evaluated against regulatory criteria to determine whether they are valid or not (i.e., whether the trade secret is in fact a secret and has a sound case for protection). If the claim is valid, the claimant is granted a three-year period of exemption. If invalid, the claimant must disclose the full set of hazardous ingredients in its product.

## **Decision: MSDS compliance**

If the MSDS is found to be non-compliant, HMIRC affords the claimant one last opportunity to voluntarily correct it through an Undertaking. If the claimant does not do so, an Order is issued and the claimant has the obligation to correct the MSDS.

## PROFILE OF A CHEMICAL INGREDIENT Methyl Ethyl Ketone [C<sub>2</sub>H<sub>8</sub>O]



A clear, colourless liquid with a sharp, sweet odour, Methyl Ethyl Ketone is used as a solvent in resins, lacquers, varnishes, glues, paint remover and cleaners. It is also used in the production of plastics,

textiles, magnetic tapes, transparent paper and aluminum foil.

## Why it's considered hazardous

Methyl Ethyl Ketone is highly flammable. Exposure to this chemical can cause headaches, dizziness, nausea, vomiting, mild skin and respiratory tract irritations, eye irritations and may affect the development of a fetus.

### Protective measures

- Storage in cool, well-ventilated areas away from sparks or flames
- Safety equipment such as gloves, chemical splash goggles and a respirator



## Resolving disputes: The appeal process

A claimant or an affected party may appeal an HMIRC screening officer's decision or order. It is also possible for an affected party to appeal an undertaking. The appeal must be filed with HMIRC's Chief Appeals Officer within 45 days of the publication of the notice of undertaking, decision or order in the *Canada Gazette*.

An independent appeal board with one representative from each of government, industry, and workers hears the appeal. The appeal board may dismiss the appeal and confirm the screening officer's original decision or order, or may allow the appeal and either vary or rescind the decision or order. In the case of an undertaking, the appeal board may dismiss the appeal or allow it and make any order it feels is appropriate instead.

In 2009, an appeal board rendered its decision with respect to an appeal filed the previous year related to a screening officer's orders on a claim for exemption and related MSDS. The appeal board found the weight of available scientific opinion did not justify the orders under appeal. It allowed the appeal and a notice of decision was published in the *Canada Gazette*, in conformity with the *Hazardous Materials Information Review Act*. Although no new appeals were filed last year, as part of its improvement cycle, the Commission continued to maintain appeal readiness by reviewing its procedures to ensure that legislative and regulatory requirements remain appropriately reflected.

## What happens when a decision is appealed?

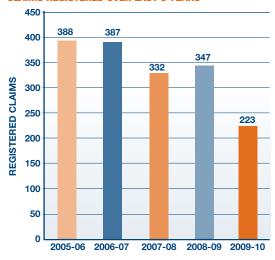
If a claimant wins an appeal, the related product receives three years of protection from the date of the decision of the appeal board. If unsuccessful, the claimant must make the required changes in conformity with the appeal board's decision, and the three-year protection period applies as of the date of the decision of the appeal board, or as of the date specified by the appeal board in conformity with the Hazardous Materials Information Review Act.

## **⊘**—**७**—**७**—**®**—**७**—**® Performance Data**

## **Claim Registration**

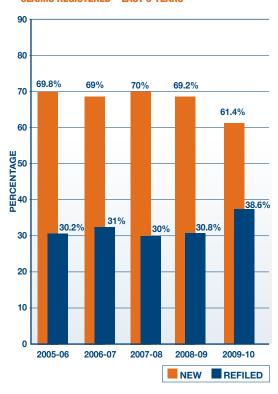
HMIRC registered 223 claims for trade secret exemption in 2009-10: 137 new claims and 86 refilings. All claims were registered within the seven-day service standard.

#### **CLAIMS REGISTERED OVER LAST 5 YEARS**



HMIRC received and registered fewer claims last year than in previous years. Potential factors include: the impact of the global economic recession on the chemical product industry (i.e., on development and commercialization); an overall reduction in trade secret exemption applications by companies operating in both Europe (where fewer trade secrets are held) and North America; an increase in 'green' chemistry; and a lower number of refilings than expected, based on historical data.

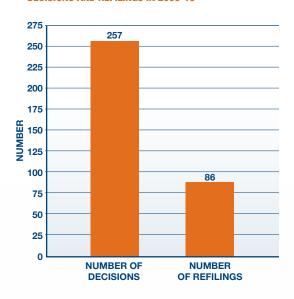
## PERCENTAGE OF NEW AND REFILED CLAIMS REGISTERED – LAST 5 YEARS



The ratio of new to refiled claims was roughly in line with recent years.

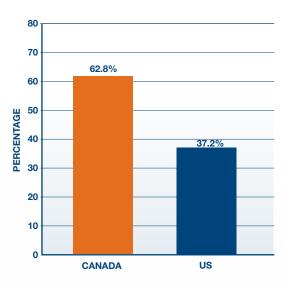


## **DECISIONS AND REFILINGS IN 2009-10**

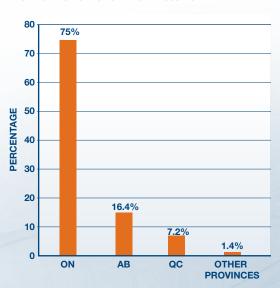


## Geographic Location of Claimants in 2009-10

## **CANADA AND US ORIGIN OF CLAIMS IN 2009-10**

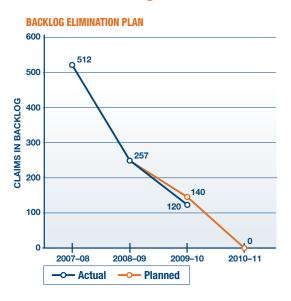


## **PROVINCIAL ORIGIN OF CLAIMS IN 2009-10**



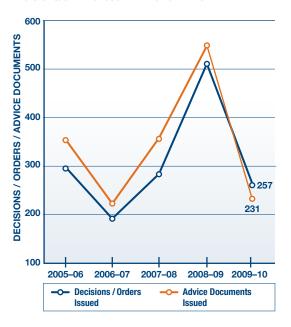


## Claim Processing



HMIRC exceeded its backlog-reduction target for 2009-10, reducing the total number of outstanding claims for processing to 120 (an improvement on the target of 140). The Commission continued to give priority to claims for products that could potentially pose major health risks for workers. Of the 257 Decisions issued, 50.9% were classified as high-hazard and were reviewed without significant delay to ensure workers would have timely access to compliant MSDSs.

## NUMBER OF ADVICE DOCUMENTS AND DECISIONS/ORDERS ISSUED – LAST 5 YEARS



## **Compliance Trends**

The total number of MSDS violations corrected through Undertakings and Orders last year was 1,085.

AVERAGE NUMBER OF VIOLATIONS PER CLAIM 2009-10: 4.2 PER NEW CLAIM 2009-10: 5.0 PER REFILED CLAIM 2009-10: 2.6



In 2009-10, HMIRC continued to see a drop in the average number of violations per claim. The Commission will continue to provide tools and guidance to further increase the level of proactive compliance.

Average r	number of v	violation pe	r claim	
05-06	06-07	07-08	08-09	09-10
8.7	8.3	8.0	5.7	4.2

## Number and percentage of MSDS violations corrected in 2009-10

Violations Category	Number of Violations in 2009-10	%
Toxicological Properties	274	25.3
Hazardous Ingredients	254	23.4
Headings/Format, etc.	160	14.8
First Aid Measures	148	13.6
Physical Data	63	5.8
Fire or Explosion Hazard	46	4.2
Hazard Classification	42	3.9
Preparation Information	38	3.5
Reactivity Data	29	2.7
Product Information	22	2.0
Preventive Measures	9	0.8
Total	1085	100
Number of claims	257	
Average number of violations per claim	4.2	

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## Revenues and Expenses

## **HR Statistics**

Office of the President	2
Operations Branch	37
Corporate Services and Adjudication Branch 1	5
Total	54

Additional information on financial statements can be found in:

Report on Plans and Priorities (RPP) 2009-10 http://www.tbs-sct.gc.ca/rpp/2009-2010/inst/mhi/mhi00-eng.asp

Departmental Performance Report (DPR) 2008-09 http://www.tbs-sct.gc.ca/dpr-rmr/2008-2009/index-eng.asp?acr=1484



## **⊘**—**७**—**७**—**®**—**७** Council of Governors

#### WORKERS

- » Lawrence D. Stoffman United Food & Commercial Workers Union
- » Vacant

#### **SUPPLIERS**

» Gordon Lloyd Canadian Chemical Producers' Association

## **EMPLOYERS**

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- » Alwyn Patrick Child Human Resources and Social Development Canada

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#### YUKON

» Kurt Dieckmann Yukon Workers' Compensation Health and Safety Board

#### **BRITISH COLUMBIA**

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» Dan T. Clarke Alberta Human Resources and Employment

#### **SASKATCHEWAN**

» Rita Coshan Saskatchewan Labour

#### **MANITOBA**

» Dennis Nikkel Manitoba Labour and Immigration

#### **ONTARIO**

» John Vander Doelen Ontario Ministry of Labour

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» Yves Brissette Commission de la santé et de la sécurité du travail

#### **NEW BRUNSWICK**

» Richard Blais Workplace Health, Safety and Compensation Commission of New Brunswick

#### **NOVA SCOTIA**

» Jim LeBlanc Nova Scotia Department of Environment and Labour

#### PRINCE EDWARD ISLAND

» George Stewart Workers' Compensation Board of Prince Edward Island

#### **NEWFOUNDLAND & LABRADOR**

» Sean Casey Department of Government Services, Newfoundland and Labrador

# Contact HMIRC

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