



Examples of *Hazardous Product Act (HPA)* and *Hazardous Products Regulations (HPR)* Non-Compliances

| Preparing and Maintaining Documents | |
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| Non-Compliances | HPA |
| A true copy of the <i>Hazardous Products Regulations</i> label was not prepared and maintained for the following hazardous products: 1. “Name of hazardous product” | 14.3(1)(a) |
| A true copy of the <i>Hazardous Products Regulations</i> safety data sheet was not prepared and maintained for the following hazardous products: 1. “Name of hazardous product” | 14.3(1)(b) |
| The supplier’s purchasing records of hazardous products indicating: <input type="checkbox"/> the person’s name that sold it <input type="checkbox"/> the person’s address <input type="checkbox"/> the quantity of the hazardous product obtained <input type="checkbox"/> the month and year in which the supplier obtained it are not prepared and maintained. | 14.3(1)(c) |
| Supplier’s sales records of hazardous products indicating: <input type="checkbox"/> the locations at which those sales took place <input type="checkbox"/> the period during which they took place <input type="checkbox"/> for each month in that period, the quantity sold during the month | 14.3(1)(d) |



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| are not prepared and maintained. | |
| <p>The following documents were not kept for a period of 6 years after the end of the year to which they relate:</p> <p><input type="checkbox"/> A true copy of the <i>Hazardous Products Regulations</i> label for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> A true copy of the <i>Hazardous Products Regulations</i> safety data sheet for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> Purchasing records for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> Sales records for the following hazardous products: 1. “Name of hazardous product”</p> | 14.3(2) |
| <p>The following documents were not kept at the supplier’s place of business in Canada and did not have an exemption from the Minister:</p> <p><input type="checkbox"/> A true copy of the <i>Hazardous Products Regulations</i> label for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> A true copy of the <i>Hazardous Products Regulations</i> safety data sheet for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> Purchasing records for the following hazardous products: 1. “Name of hazardous product”</p> <p><input type="checkbox"/> Sales records for the following hazardous products: 1. “Name of hazardous product”</p> | 14.3(3) 14.3(4) |



| Cooperation with the HPA Inspector | |
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| Non-Compliances | HPA |
| Upon an order from the inspector, the <input type="checkbox"/> owner (named _____) <input type="checkbox"/> person having possession, care or control (named _____) of the following hazardous products: 1. “Name of hazardous product” refused to <input type="checkbox"/> move it <input type="checkbox"/> not to move it <input type="checkbox"/> restrict its movement | 22 (1)(g) |
| Upon an order from the inspector, the <input type="checkbox"/> owner (named _____) <input type="checkbox"/> person having possession, care or control (named _____) of the following conveyance: 1. “Name of conveyance” refused to <input type="checkbox"/> move it <input type="checkbox"/> not to move it <input type="checkbox"/> restrict its movement | 22 (1)(h) |
| Upon an order from the inspector, the | 22 (1)(i) |



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| <p><input type="checkbox"/> owner (named _____)</p> <p><input type="checkbox"/> person in charge of the place (named _____)</p> <p>refused to establish their identity to the inspector's satisfaction</p> | |
| <p>Upon an order from the inspector, the</p> <p><input type="checkbox"/> owner (named _____)</p> <p><input type="checkbox"/> person having possession, care or control (named _____)</p> <p>of the following conveyance:</p> <p>1. "Name of conveyance"</p> <p>refused to</p> <p><input type="checkbox"/> stop it, so that the inspector can enter it</p> <p><input type="checkbox"/> move it to a place where the inspector can enter it</p> | 22 (1.1) |
| <p>The</p> <p><input type="checkbox"/> owner (named _____)</p> <p><input type="checkbox"/> person in charge of the place (named _____)</p> <p><input type="checkbox"/> person found in the place (named _____)</p> <p>refused to provide the inspector:</p> <p><input type="checkbox"/> reasonable assistance</p> <p><input type="checkbox"/> with any information that the inspector may require for the purpose of exercising the inspector's power or performing the inspector's duties or functions under this section</p> | 22 (2) |
| <p>The following persons:</p> <p>1. "Name of person"</p> | 23 |



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| <p><input type="checkbox"/> obstructed an inspector</p> <p><input type="checkbox"/> provided false or misleading information orally or in writing to an inspector</p> | |
| <p>Upon an order from the inspector, the</p> <p><input type="checkbox"/> owner (named _____)</p> <p><input type="checkbox"/> person having possession, care or control (named _____)</p> <p>of the following seized thing:</p> <p>1. “Name of hazardous product”</p> <p>refused, at their expense, to</p> <p><input type="checkbox"/> store it at the place where it was seized</p> <p><input type="checkbox"/> move it to and store it at another place</p> | 24 (1)(b) |
| <p>Without the authorization of an inspector, the following persons:</p> <p>1. “Name of person”</p> <p><input type="checkbox"/> removed a thing seized by the inspector</p> <p><input type="checkbox"/> altered a thing seized by the inspector</p> <p><input type="checkbox"/> interfered in any way with a thing seized by the inspector</p> | 24 (2) |



| Safety Data Sheet | |
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| Non-Compliances | HPA |
| <p>The supplier is selling the following hazardous product(s) and does not have in their possession a safety data sheet that meets the requirements set out in the <i>Hazardous Products Regulations</i>:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 13 (1)(a) |
| <p>The supplier is selling the following hazardous product(s) and does not provide to the purchaser the corresponding safety data sheet that meets the requirements set out in the <i>Hazardous Products Regulations</i>:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 13 (1)(a.1) |
| <p>The supplier is importing the following hazardous product(s) and does not obtains or prepares, on or before the importation, a safety data sheet that meets the requirements set out in the <i>Hazardous Products Regulations</i>:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14 (a) |
| <p>The supplier is selling the following hazardous product(s) and the corresponding <i>Hazardous Products Regulations</i> safety data sheet contains required information that is false, misleading or likely to create an erroneous impression:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14.2 (2) |
| <p>The supplier is importing the following hazardous product(s) and the corresponding <i>Hazardous Products Regulations</i> safety data sheet obtained or prepared, on or before the importation, contains required information that is false, misleading or likely to create an erroneous impression:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14.2 (3) |
| <p>The supplier is selling the following hazardous product(s) and</p> | 14.2 (4) |



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| communicates information to the purchaser about the hazardous product that is false, misleading or likely to create an erroneous impression with respect to the information required to be included on the <i>Hazardous Products Regulations</i> safety data sheet: 1. “Name of hazardous product” | |
| Non-Compliances | HPR |
| The initial supplier identifier on the <i>Hazardous Products Regulations</i> safety data sheet is not a Canadian manufacturer or Canadian importer. Note: Exceptions applies for importers for own use (section 5.8 and 5.9 of the HPR). | 4 (1) |
| In heading 2 of Schedule 1 of the HPR, the following information elements on the <i>Hazardous Products Regulations</i> safety data sheet does not match the corresponding <i>Hazardous Products Regulations</i> label: <input type="checkbox"/> 2 - Hazard Identification <input type="checkbox"/> symbol <input type="checkbox"/> signal word <input type="checkbox"/> hazard statement <input type="checkbox"/> precautionary statement | 4 (1) |
| The following correct headings were not provided on the <i>Hazardous Products Regulations</i> safety data sheet: <input type="checkbox"/> 1 - Identification <input type="checkbox"/> 2 - Hazard identification <input type="checkbox"/> 3 - Composition/Information on ingredients <input type="checkbox"/> 4 - First-aid measures <input type="checkbox"/> 5 - Fire-fighting measures <input type="checkbox"/> 6 - Accidental release measures <input type="checkbox"/> 7 - Handling and storage | 4 (1)(a) |



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| <ul style="list-style-type: none"><input type="checkbox"/> 8 - Exposure controls/Personal protection<input type="checkbox"/> 9 - Physical and chemical properties<input type="checkbox"/> 10 - Stability and reactivity<input type="checkbox"/> 11 - Toxicological information<input type="checkbox"/> 12 - Ecological information<input type="checkbox"/> 13 - Disposal considerations<input type="checkbox"/> 14 - Transport information<input type="checkbox"/> 15 - Regulatory Information<input type="checkbox"/> 16 - Other information | |
| <p>Required information elements from the following headings were not provided on the <i>Hazardous Products Regulations</i> safety data sheet:</p> <ul style="list-style-type: none"><input type="checkbox"/> 1 - Identification<ul style="list-style-type: none"><input type="checkbox"/> product identifier<input type="checkbox"/> other means of identification<input type="checkbox"/> recommended use and restrictions on use<input type="checkbox"/> initial supplier identifier<input type="checkbox"/> emergency telephone number and any restriction on the use of that number, if applicable<input type="checkbox"/> 2 - Hazard identification<ul style="list-style-type: none"><input type="checkbox"/> classification of the hazardous product<input type="checkbox"/> symbol<input type="checkbox"/> signal word<input type="checkbox"/> hazard statement<input type="checkbox"/> precautionary statement<input type="checkbox"/> other known hazards<input type="checkbox"/> 3 - Composition/Information on ingredients<ul style="list-style-type: none"><input type="checkbox"/> its chemical name<input type="checkbox"/> its common name and synonyms | 4 (1)(b) (Schedule 1) |



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| <ul style="list-style-type: none"><input type="checkbox"/> its CAS registry number and any unique identifiers<input type="checkbox"/> the chemical name of the impurities, stabilizing solvents and stabilizing additives;<input type="checkbox"/> its concentration <p><input type="checkbox"/> 4 - First-aid measures</p> <ul style="list-style-type: none"><input type="checkbox"/> a description of necessary first-aid measures, subdivided according to the different routes of exposure (inhalation, ingestion, skin and eye contact)<input type="checkbox"/> the most important symptoms and effects, whether acute or delayed;<input type="checkbox"/> an indication of immediate medical attention and special treatment needed, if necessary <p><input type="checkbox"/> 5 - Fire-fighting measures</p> <ul style="list-style-type: none"><input type="checkbox"/> suitable and unsuitable extinguishing media<input type="checkbox"/> specific hazards arising from the hazardous product<input type="checkbox"/> special protective equipment and precautions for fire-fighters <p><input type="checkbox"/> 6 - Accidental release measures</p> <ul style="list-style-type: none"><input type="checkbox"/> personal precautions, protective equipment and emergency procedures<input type="checkbox"/> methods and materials for containment and cleaning up <p><input type="checkbox"/> 7 - Handling and storage</p> <ul style="list-style-type: none"><input type="checkbox"/> precautions for safe handling<input type="checkbox"/> conditions for safe storage, including any incompatibilities <p><input type="checkbox"/> 8 - Exposure controls/Personal protection</p> <ul style="list-style-type: none"><input type="checkbox"/> control parameters, including occupational exposure limit values or biological limit values and the source of those values<input type="checkbox"/> appropriate engineering controls<input type="checkbox"/> individual protection measures, such as personal protective equipment <p><input type="checkbox"/> 9 - Physical and chemical properties</p> <ul style="list-style-type: none"><input type="checkbox"/> appearance, such as physical state and colour<input type="checkbox"/> odour | |
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| <ul style="list-style-type: none"><input type="checkbox"/> odour threshold<input type="checkbox"/> pH<input type="checkbox"/> melting point and freezing point<input type="checkbox"/> flash point<input type="checkbox"/> evaporation rate<input type="checkbox"/> flammability, in the case of solids and gases<input type="checkbox"/> upper and lower flammability or explosive limits<input type="checkbox"/> vapour pressure<input type="checkbox"/> vapour density<input type="checkbox"/> relative density<input type="checkbox"/> solubility<input type="checkbox"/> partition coefficient – n-octanol/water<input type="checkbox"/> auto-ignition temperature<input type="checkbox"/> decomposition temperature<input type="checkbox"/> viscosity <p><input type="checkbox"/> 10 - Stability and reactivity</p> <ul style="list-style-type: none"><input type="checkbox"/> reactivity<input type="checkbox"/> chemical stability<input type="checkbox"/> possibility of hazardous reactions<input type="checkbox"/> conditions to avoid, including static discharge, shock or vibration<input type="checkbox"/> incompatible materials<input type="checkbox"/> hazardous decomposition products <p><input type="checkbox"/> 11 - Toxicological information</p> <ul style="list-style-type: none"><input type="checkbox"/> information on the likely routes of exposure (inhalation, ingestion, skin and eye contact)<input type="checkbox"/> symptoms related to the physical, chemical and toxicological characteristics<input type="checkbox"/> delayed and immediate effects and chronic effects from short-term and long-term exposure<input type="checkbox"/> numerical measures of toxicity, including ATEs | |
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| <p><input type="checkbox"/> 16 - Other information</p> <p><input type="checkbox"/> Date of the latest revision of the <i>Hazardous Products Regulations</i> safety data sheet</p> | |
| <p>Required specific information element that is “not available” or “not applicable” was not indicated for the following headings on the <i>Hazardous Products Regulations</i> safety data sheet:</p> <p><input type="checkbox"/> 1 - Identification</p> <p><input type="checkbox"/> other means of identification</p> <p><input type="checkbox"/> recommended use and restrictions on use</p> <p><input type="checkbox"/> emergency telephone number and any restriction on the use of that number, if applicable</p> <p><input type="checkbox"/> 3 - Composition/Information on ingredients</p> <p><input type="checkbox"/> its common name and synonyms</p> <p><input type="checkbox"/> its CAS registry number and any unique identifiers</p> <p><input type="checkbox"/> the chemical name of the impurities, stabilizing solvents and stabilizing additives;</p> <p><input type="checkbox"/> 4 - First-aid measures</p> <p><input type="checkbox"/> a description of necessary first-aid measures, subdivided according to the different routes of exposure (inhalation, ingestion, skin and eye contact)</p> <p><input type="checkbox"/> the most important symptoms and effects, whether acute or delayed;</p> <p><input type="checkbox"/> an indication of immediate medical attention and special treatment needed, if necessary</p> <p><input type="checkbox"/> 5 - Fire-fighting measures</p> <p><input type="checkbox"/> suitable and unsuitable extinguishing media</p> <p><input type="checkbox"/> specific hazards arising from the hazardous product</p> <p><input type="checkbox"/> special protective equipment and precautions for fire-fighters</p> <p><input type="checkbox"/> 6 - Accidental release measures</p> <p><input type="checkbox"/> personal precautions, protective equipment and emergency procedures</p> | 4 (1)(b)(i) |



- methods and materials for containment and cleaning up
- 7 - Handling and storage
 - precautions for safe handling
 - conditions for safe storage, including any incompatibilities
- 8 - Exposure controls/Personal protection
 - control parameters, including occupational exposure limit values or biological limit values and the source of those values
 - appropriate engineering controls
 - individual protection measures, such as personal protective equipment
- 9 - Physical and chemical properties
 - appearance, such as physical state and colour
 - odour
 - odour threshold
 - pH
 - melting point and freezing point
 - flash point
 - evaporation rate
 - flammability, in the case of solids and gases
 - upper and lower flammability or explosive limits
 - vapour pressure
 - vapour density
 - relative density
 - solubility
 - partition coefficient – n-octanol/water
 - auto-ignition temperature
 - decomposition temperature
 - viscosity
- 10 - Stability and reactivity
 - reactivity



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| <ul style="list-style-type: none"><input type="checkbox"/> chemical stability<input type="checkbox"/> possibility of hazardous reactions<input type="checkbox"/> conditions to avoid, including static discharge, shock or vibration<input type="checkbox"/> incompatible materials<input type="checkbox"/> hazardous decomposition products <p><input type="checkbox"/> 11 - Toxicological information</p> <ul style="list-style-type: none"><input type="checkbox"/> information on the likely routes of exposure (inhalation, ingestion, skin and eye contact)<input type="checkbox"/> symptoms related to the physical, chemical and toxicological characteristics<input type="checkbox"/> delayed and immediate effects and chronic effects from short-term and long-term exposure<input type="checkbox"/> numerical measures of toxicity, including ATEs | |
| <p>Additional hazardous information is not disclosed on the <i>Hazardous Products Regulations</i> safety data sheet such as:</p> <ul style="list-style-type: none"><input type="checkbox"/> the chemical name of the hazardous product created as a by-product from a chemical reaction | 4 (1)(c) |
| <p>For Biohazardous Infectious Materials, the 9 headings format of Schedule 2 is not used in addition to the 16 headings format.</p> | 4 (3)(a) |
| <p>The instructions for use of the hazardous product indicated that the hazardous product must be combined with one or more products and the <i>Hazardous Products Regulations</i> safety data sheet did not provide the:</p> <ul style="list-style-type: none"><input type="checkbox"/> nature of the new or more severe hazard<input type="checkbox"/> content of the applicable specific information elements set out in items 4 to 11, column 2, of Schedule 1, for each corresponding heading that is available <p>pertaining to the new material or substance created from the combination of the products.</p> | 4.1 (1) |



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| The product identifier and the initial supplier identifier that are provided on the <i>Hazardous Products Regulations</i> safety data sheet is not identical to those provided on the corresponding <i>Hazardous Products Regulations</i> label. | 4.2 |
| The units used to calculate the concentration percentage is not provided on the <i>Hazardous Products Regulations</i> safety data sheet. | 4.3 |
| The concentration disclosed on the <i>Hazardous Products Regulations</i> safety data sheet <u>per ingredient</u> in the <u>mixture</u> of a hazardous product is not the most hazardous concentration. | 4.4 |
| The actual concentration range of the <u>material or substance</u> in the hazardous product is not provided on the <i>Hazardous Products Regulations</i> safety data sheet. | 4.5 |
| <p>The following replacement information for confidential business information for a material or substance on a <i>Hazardous Products Regulations</i> safety data sheet was not provided:</p> <ul style="list-style-type: none"><input type="checkbox"/> a statement that a claim was filed<input type="checkbox"/> the date that the claim was filed<input type="checkbox"/> the registry number assigned to the claim under the <i>Hazardous Materials Information Review Act</i>. | 5.7 (2) and (3) |
| <p>During the 90 days exemption period:</p> <ul style="list-style-type: none"><input type="checkbox"/> the supplier did not update the <i>Hazardous Products Regulations</i> safety data sheet with the significant new data <p>the supplier did not provide with the <i>Hazardous Products Regulations</i> safety data sheet at the time of sale to the recipient of the hazardous product information in writing regarding:</p> <ul style="list-style-type: none"><input type="checkbox"/> the significant new data<input type="checkbox"/> the date on which the significant new data became available | 5.12 (2) |



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| During the 90 days exemption period, the importer on or before importation, did not append to the <i>Hazardous Products Regulations</i> safety data sheet a document that provides the significant new data with the date on which they became available | 5.12 (3) |
| The information elements provided on the <i>Hazardous Products Regulations</i> safety data sheet is not in both official languages of Canada. | 6.2 |



| Label | |
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| Non-Compliances | HPA |
| <p>The supplier is selling the following hazardous product(s) and does not have a label affixed to, printed on or attached to the hazardous product(s) that meets the requirements set out in the <i>Hazardous Products Regulations</i>:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 13 (1)(b) |
| <p>The supplier is importing the following hazardous product(s) and does not have a label affixed to, printed on or attached to the hazardous product(s) that meets the requirements set out in the <i>Hazardous Products Regulations</i>:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14 (b) |
| <p>The supplier is selling the following hazardous product(s) and the corresponding <i>Hazardous Products Regulations</i> label contains required information that is false, misleading or likely to create an erroneous impression:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14.2 (1) |
| <p>The supplier is selling the following hazardous product(s) and communicates to the purchaser information required to be included on the <i>Hazardous Products Regulations</i> label that is false, misleading or likely to create an erroneous impression:</p> <ol style="list-style-type: none">1. “Name of hazardous product” | 14.2 (4) |
| Non-Compliances | HPR |
| <p>The initial supplier identifier on the <i>Hazardous Products Regulations</i> label is not a Canadian manufacturer or Canadian importer.</p> <p>Note: Exceptions applies for importers for own use (section 5.8 and 5.9 of</p> | 3 (1) |



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| the HPR). | |
| <p>The <i>Hazardous Products Regulations</i> label does not provide the:</p> <ul style="list-style-type: none"><input type="checkbox"/> product identifier<input type="checkbox"/> the initial supplier identifier | 3 (1) |
| <p>The following information elements on the <i>Hazardous Products Regulations</i> label does not match the corresponding <i>Hazardous Products Regulations</i> safety data sheet:</p> <ul style="list-style-type: none"><input type="checkbox"/> 2 - Hazard Identification<ul style="list-style-type: none"><input type="checkbox"/> symbol<input type="checkbox"/> signal word<input type="checkbox"/> hazard statement<input type="checkbox"/> precautionary statement | 3 (1)(c) |
| <p>The supplemental label element “[total concentration in percentage of ingredients with unknown acute toxicity] %” was not provided for the hazardous product classified in a category of Acute Toxicity for which data is not available for all ingredients.</p> | 3 (1)(e) |
| <p>The supplemental label element:</p> <ul style="list-style-type: none"><input type="checkbox"/> In contact with water, releases gases which are fatal if inhaled<input type="checkbox"/> In contact with water, releases gases which are toxic if inhaled<input type="checkbox"/> In contact with water, releases gases which are harmful if inhaled <p>was not provided</p> | 3 (1)(f) |
| <p>GHS alphanumeric codes replaced the required hazard statement or precautionary statement to which they relate on the <i>Hazardous Products Regulations</i> label.</p> | 3 (2) |
| | 3 (2) |



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| GHS or HPR instructions are provided on the <i>Hazardous Products Regulations</i> label. | |
| The correct pictogram associated with a symbol in Schedule 3 was not provided on the <i>Hazardous Products Regulations</i> label. | 3 (3) |
| For hazardous product classified in “Specific Target Organ Toxicity – Single Exposure – Category 3” that causes narcotic effects and respiratory tract irritation, only one hazard statement is provided instead of both. | 3 (4) |
| Information elements provided on the <i>Hazardous Products Regulations</i> label is not as per section 3 of Annex 3 of the GHS. | 3 (5) |
| <p>The exact reproduction of the following pictogram(s) as set out in column 3 of Schedule 3 was not provided on the <i>Hazardous Products Regulations</i> label.</p> <ol style="list-style-type: none">1. “Name of Symbol” | 3.1 |
| Precautionary statements were combined, but do not convey the same information as would have been conveyed by each of the individual precautionary statements. | 3.2 (1) |
| Hazard statements were combined, but do not convey the same information as would have been conveyed by each of the individual hazard statements. | 3.2 (3) |
| The pictogram, signal word and hazard statement were not grouped together on the <i>Hazardous Products Regulations</i> label. | 3.3 |
| The information elements of the <i>Hazardous Products Regulations</i> label are not legible. | 3.4 |
| The information elements of the <i>Hazardous Products Regulations</i> label did not remain legible under normal conditions of transportation and use. | 3.5 |
| | 3.6 (1) |



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| Both the signal word “Danger” and “Warning” were indicated on the <i>Hazardous Products Regulations</i> label. | |
| During the 180 days exemption period: <input type="checkbox"/> the supplier did not update the <i>Hazardous Products Regulations</i> label with the significant new data the supplier did not provide with the <i>Hazardous Products Regulations</i> label at the time of sale of the hazardous product to the recipient in writing regarding: <input type="checkbox"/> the significant new data <input type="checkbox"/> the date on which the significant new data became available | 5.12 (4) |
| During the 180 days exemption period, the importer did not obtain or prepare a document that provides the significant new data along with the date on which the significant new data became available. | 5.12 (5) |
| The information elements provided on the <i>Hazardous Products Regulations</i> label is not in both official languages of Canada | 6.2 |