Example Mechanical Ltd.

Hazard Communication

Written Safety Program

Document title	Hazard Communication
Company	Example Mechanical Ltd.
Revision	1
Effective date	2026-08-06
Governing jurisdiction	Ontario

Revision history

Rev 1: Initial issue, 2026-08-06.

1. Management Commitment

Management of Example Mechanical Ltd. is committed to protecting the 38 workers across its shop and active job sites from the hazards of the hazardous products they use, store, and transport. Management provides the resources, authority, and time needed to run this program, takes part in its annual review, and holds supervisors and workers accountable for following it. Because Example Mechanical Ltd. regularly employs more than five workers, the company maintains a written occupational health and safety policy under OHSA s.25(2)(j) and posts it under s.25(2)(k); this hazard communication program supports that policy. The President signs the policy and this program's approval page to affirm that commitment. Day-to-day administration of this program is assigned to the Health & Safety Manager.

2. Purpose and Scope

To inform and protect workers who may be exposed to hazardous products under normal working conditions or in a foreseeable emergency, Example Mechanical Ltd. shall run this written hazard communication program under WHMIS 2015, established federally by the Hazardous Products Act and the Hazardous Products Regulations and carried into Ontario workplaces through O. Reg. 860, and under the general workplace duties of the Occupational Health and Safety Act (RSO 1990, c O.1); O. Reg. 213/91 (Construction) / R.R.O. 1990 Reg. 851 (Industrial). This program covers all 38 workers at the shop and at every active job site, wherever a hazardous product is present, and it applies equally to full-time shop staff and to crews dispatched to client sites.

3. Chemical Inventory

To make sure every hazardous product on site is identified before a worker can be exposed to it, Example Mechanical Ltd. shall keep a written inventory of all hazardous products present at its facilities and job sites. The Shop Foreman is designated to build, update, and audit this inventory. The Shop Foreman shall add a product to the inventory before it is brought into the shop or onto a job site, shall audit the full list at least once a year during the January program review, and shall cross-reference every entry to its current Safety Data Sheet.

4. Safety Data Sheets

To give workers immediate access to hazard information for every product they handle, Example

Mechanical Ltd. shall obtain the supplier's current Safety Data Sheet for each hazardous product before it is first used on site. The SDS library lives in two places: the binder at the shop office SDS station, and the SafetyDocs app loaded on every crew tablet and phone. Crews pull sheets from SafetyDocs on the tablet or their own phone at the job site; the paper binder at the shop stays current for the days a site has no signal. If a sheet is missing, expired, or cannot be pulled up on either source, the Shop Foreman shall pull the product from service until a current SDS is obtained from the supplier.

5. Labels and Warnings

To let a worker recognize a product's hazards at the container before opening it, every hazardous product Example Mechanical Ltd. receives must carry the WHMIS 2015 supplier label bearing the product identifier, pictograms, signal word, hazard statements, and precautionary statements (Hazardous Products Regulations; O. Reg. 860). No one shall remove, deface, or paint over a supplier label. When a product is decanted or transferred into a secondary container, the worker performing the transfer shall apply a workplace label showing the product identifier, safe-handling information, and a pointer to the SDS, unless that worker uses the whole contents immediately and no residue is left in the container.

6. Non-Routine Tasks and Multi-Employer Sites

Before a worker starts a non-routine task involving a hazardous product, for example a one-off solvent flush or an unfamiliar brazing flux, the supervisor shall brief that worker on the specific hazards and controls first. On a shared job site, Example Mechanical Ltd. shall give the constructor, prime contractor, or host employer, and other employers working alongside it, access to the SDSs and labels for the products its crews bring on site, and shall get the same information for products those other employers bring in, consistent with the multi-employer coordination duties of the Occupational Health and Safety Act (RSO 1990, c O.1); O. Reg. 213/91 (Construction) / R.R.O. 1990 Reg. 851 (Industrial).

7. Roles and Responsibilities

The Health & Safety Manager administers this program: the chemical inventory process, the SDS library, the labeling system, and the training records. The Shop Foreman maintains the chemical inventory as set out above. Supervisors shall not let a worker start work with a hazardous product before that worker has received the required WHMIS training. Every worker must follow label instructions and check the SDS before using a product they have not worked with before. The certified Joint Health and Safety Committee, two worker members and two management members meeting quarterly, reviews this program as part of its workplace inspection and consultation function under the Act and raises any gap it finds with the Health & Safety Manager.

8. Training

To make sure workers can recognize and protect themselves from the hazards of the products they work with, Example Mechanical Ltd. shall provide WHMIS training at initial assignment, whenever a new product hazard is brought into the shop, and whenever workplace-specific information changes, in line with the employer's duty to provide information, instruction, and supervision under OHSA s.25(2)(a) and O. Reg. 860. Training covers: where hazardous products are used in the worker's own job, where this written program and the inventory are kept, how to read a supplier label and a workplace label, how to read an SDS, the health and physical hazards of the products in that worker's area, and the protective

measures and PPE required for those products. Each session is documented on a record that captures the company name, the training date, the course name and topics covered, each trainee's printed name and signature, and the instructor's printed name and signature.

9. Document Control

To keep this program current and reviewable as a standalone document, Example Mechanical Ltd. shall review it at least once a year in January, and again whenever the regulation, the company's operations, its equipment, or a client's site requirements change. Superseded versions are pulled from the binder and from the SafetyDocs app so only the current version is in circulation. Any revision is communicated to affected workers before their next shift on the work it touches.

10. Regulatory References

Occupational Health and Safety Act (RSO 1990, c O.1), including ss.25(2)(a), (h), (j), and (k); O. Reg. 213/91 (Construction) / R.R.O. 1990 Reg. 851 (Industrial); WHMIS 2015 under the Hazardous Products Act and the Hazardous Products Regulations (supplier duties); Ontario's WHMIS regulation, O. Reg. 860 (workplace duties).

Approval

This program has been reviewed and approved for implementation on behalf of Example Mechanical Ltd..

Signature: _____ Date: _____

Name / title: _____