Hazard Communication (HazCom) and Workplace Hazardous Materials Information System (WHMIS) Program

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1 PURPOSE

The purpose of this program is to ensure information concerning the classified hazards of chemicals is:

- Evaluated to minimize exposure risks to chemicals
- Communicated to workers who use and work around chemicals on Mosaic property through hazard analysis, training, labels and Safety Data Sheets (SDS)

2 SCOPE

This program applies to all operations in the North America Business where chemicals are used or produced.

Note: The term "chemical(s)" used throughout this document refers to both "chemical(s)" as referenced in the OSHA and MSHA Regulations and "hazardous product(s)" as referenced in the Occupational Health and Safety Regulations (Saskatchewan).

3 APPENDICES

The following appendices are associated with this Program:

Appendix	Appendix Title
A	Material Request and Approval Process
B	How to Access SDSs and Print Labels

4 GENERAL REQUIREMENTS

4.1 Chemical Evaluation

4.1.1 Each facility shall evaluate on-site chemicals to ensure hazard information is available to communicate to workers before use.

4.1.2 All requests for chemicals by Mosaic employees and Mosaic Site Contacts/Representatives must follow the Material Request and Approval Process (MRAP). See Appendix A for MRAP requirements.

Reference: MRAP Active Livelink Workflow – User Guide

4.1.3 No chemical shall be used at a facility unless an SDS has been approved via the Material Request and Approval Process (MRAP).

4.2 Communicating Hazards

4.2.1 Each facility shall communicate to employees and contractors, who may be exposed, the chemicals they may be exposed to, and the hazards of any chemical produced or used on-site, by:

- Employees – through job specific training (when applicable), container labelling and 24/7 access to SDSs, all communicated through the training process
- Contractors – provided with applicable SDSs and access to SDS database, communicated through the Mosaic Site Contact

4.2.2 The hazards of any chemical shall be communicated prior to exposure or when new hazards of existing chemicals are identified.

Note: Safety Data Sheets (SDSs), hazard analysis, labeling, and training are the primary means by which communication is accomplished.

Reference: Hazards are also communicated using accident prevention tags or barrier signage as described in the Marking Physical Hazards, Signs, and Tags Program (Phosphates) and the Barricading Program (Potash).

4.3 Site Responsibilities

4.3.1 Each facility must ensure the following requirements are met and sustained:

- Ensure that the list of chemical substances for the facility is readily available and accessible to workers. The list of chemical substances is obtained from the SDS database.
- Sustain legible signage, labeling and container conditions.
- Communicate and train workers on the hazards associated with chemicals used on-site, prior to chemical exposure and annually thereafter.
- Ensure that the process for notification and evaluation of chemicals brought on-site by contractors is followed (see Appendix A – Material Request and Approval Process).

4.4 Spills and Releases

4.4.1 Chemical spills and releases must be reported immediately; any potentially affected employees and/or contractors must also be notified immediately.

4.4.2 Recommendations from the product's SDS shall be used, when applicable and safe to do so, to minimize the spread of a release and prevent harm to human health and the environment.

Reference: Florida/Louisiana Spill Reporting Policies and Saskatchewan Environmental Release Reporting Procedure

5 SPECIFIC REQUIREMENTS

5.1 Safety Data Sheets (SDS)

5.1.1 SDSs for workplace chemicals shall be:

- Available through the electronic SDS database or the site-specific backup file
- Accessible by employees
- Communicated to employees prior to exposure to the chemical

5.2 **SDS Database (List of Hazardous Substances)**

5.2.1 SDSs will be stored in the electronic SDS database.

5.2.2 The SDS database can be accessed in the following ways (see Appendix B):

- Mosaic computer while connected to the network
- Smartphone via the Sphera cloud application (US locations only)

5.2.3 The SDS database must be kept up to date with an accurate inventory of on-site chemicals and their associated SDSs. See Appendix A for Physical List Management requirements.

5.2.4 Each site will determine their best method to provide 24/7 access to SDSs if the website database cannot be accessed (for example, in the event of a power or phone outage). Access methods may consist of a printed book file of all SDSs, a site provided electronic, battery powered device (eg. iPad, laptop), or any other method the site determines most functional.

Note: Quarterly, a reminder for the SDS backup process will be provided to the sites.

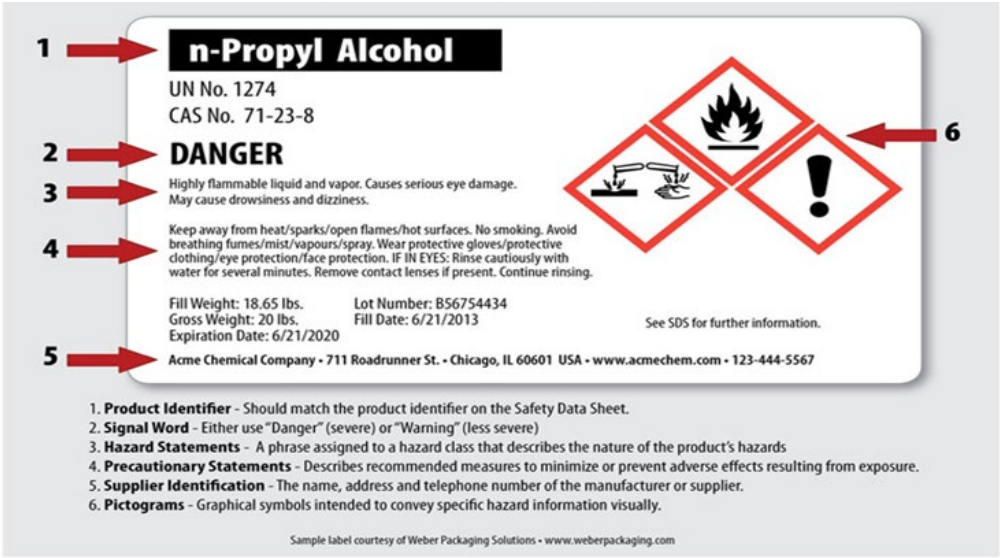
5.3 **Labels and Other Forms of Warning**

5.3.1 All containers in which chemicals are received, used or shipped must be labeled according to jurisdictional requirements under the OSHA Hazard Communication Standard (Hazcom) or the Workplace Hazardous Materials Information System (WHMIS). Containers shall remain labelled from the time of receipt to time of disposal. See Section 11 for exceptions to labelling requirements.

Note: Additional labelling may be required for bulk materials – refer to jurisdictional requirements regarding labelling for storage and transport of hazardous products.

5.3.2 Label elements shall include the product identifier, supplier identifier, pictogram, signal word, hazard statement, precautionary statements and other applicable supplemental information. In Saskatchewan this is known as a "**Supplier Label**".

Example:



5.3.3 In the absence of a label referred to in 5.3.2., a label must be affixed to a container with, at minimum using words or symbols, the product identifier, information for the safe handling of the product including signal words and hazard statements, and a reference to the SDS. In Saskatchewan this is known as a "**Workplace Label**".

Example:

Note: Labels referred to in 5.3.3 can be printed from the SDS database – See Appendix B for instructions.

5.3.4 Labels shall remain legible, accurate and written in English (at minimum).

5.3.5 Labels shall be replaced immediately if missing, if the hazard information on the label is unreadable, or if product information has been updated.

5.3.6 Secondary Container labels - When a chemical is transferred from a labeled container to another container, that container must be labeled with the information referred to in 5.3.3. The person transferring the chemical must ensure that the label is present and legible.

5.3.7 Portable Containers for Immediate Use - When chemicals are transferred from a labeled container to a portable container and intended only for the IMMEDIATE USE of the employee who performs the transfer, a label is not required on the portable container.

The container must remain in the control of the employee that transferred the chemical to the portable container and be emptied at the end of the shift.

Note*:* Marking the container with the product identifier is a best management practice.

6 PERSONAL PROTECTIVE EQUIPMENT (PPE)

6.1 When working with chemicals, the SDS for the product shall be used to determine any additional PPE requirements for safe handling of the product.

7 TRAINING

The following table outlines the training required for HazCom and WHMIS:

Audience	Training Elements / Topics	Frequency	Method
Impacted employees	• Pictograms • Labeling of Chemicals • Safety Data Sheets • Location of the SDS • How to protect against exposure • Emergency response in the event of exposure	• New hire orientation • Annual refresher • When new chemicals are introduced • When new hazards of existing chemicals are identified • When employees perform any non-routine task that have the potential to expose them to hazardous chemicals	CBT / ILT

7.1 Retraining

7.1.1 In addition, an employee shall receive additional training (or retraining) if any of the following conditions exist:

- Program requirements change;
- Changes in the workplace render previous training obsolete;
- Inadequacies in the employee's knowledge is of concern.

7.2 Training records shall be maintained in the Learning Management System (LMS).

8 SELF-ASSESSMENTS

8.1 Site self-assessment shall be conducted in accordance with the MMS requirements.

Note: Recommend any changes to the Mosaic EHS Program Management Office (PMO) via the PMO Change Request form.

9 PROGRAM REVIEW

9.1 The North America EHS team will review this program every seven years and update as required.

10 RECORD RETENTION

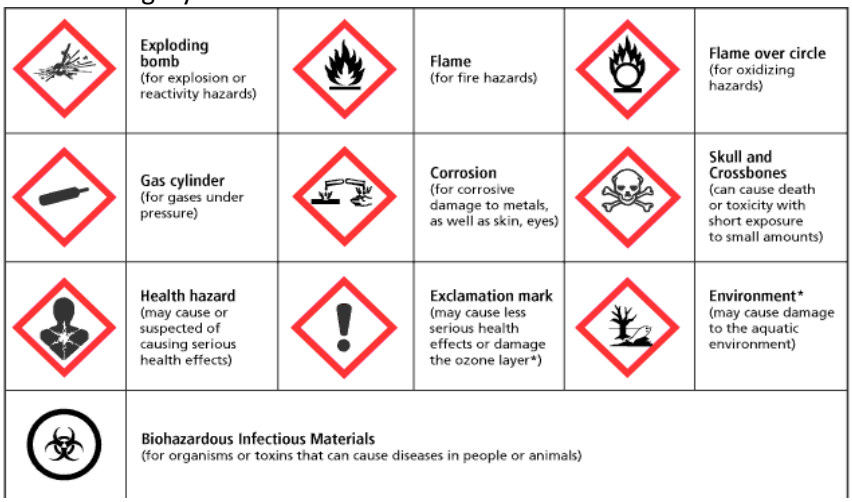
10.1 Refer to the ***Mosaic Document and Record Control*** policy for record retention requirements.

11 DEFINITIONS

Key terms used in this program are defined below.

Term	Definition
Chemical / Hazardous Product	Any element, chemical substance, compound or mixture
Chemical Areas	Areas of the facility/site where chemicals are stored, and as designated within the SDS database system
Containers	**U.S. Sites:** Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a chemical. Pipes or piping systems, engines, or fuel tanks associated with operating systems in a vehicle are not considered to be containers **Saskatchewan Sites:** Includes a bag, barrel, bottle, box, can cylinder, drum or similar package or receptacle, but does not include a storage tank. Pipes, piping systems, vessels, and tank cars/trucks must use color coding, labels, placards or other mode of identification to identify the product within.
Exceptions - Labelling	**U.S Sites:** • Consumer products as per *Consumer Product Safety Act* & *Federal Hazardous Substances Act* • Pesticide as per *Federal Insecticide, Fungicide, and Rodenticide Act*

	• Food, food additive, drug, cosmetic a per *Federal Food, Drug, and Cosmetic Act* **Saskatchewan Sites:** • Consumer product as per *Canada Consumer Product Safety Act* • Explosives per *Explosives Act* • Cosmetic, drug, food as per *Food and Drugs Act* • Pest control products per *Pest Control Products Act*
HazCom	Hazard Communications or "Worker Right-To-Know" CFR 1910.1200, including requirements of 30 C.F.R. Part 47.
Immediate Use	When use of a hazardous chemical is under the control of, and used only by, the person who transfers it from a labeled container to another container and only within the work shift in which it is transferred.
Label	An appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the container of a hazardous chemical.
Mosaic Site Contact	Mosaic employee who contracts for outside services through contractors or vendors, or is responsible for non-Mosaic personnel working in Mosaic facilities
MRAP	Process for approving new chemicals referred to as Material Request & Approval Process (MRAP)
Pictograms	A pictogram is a symbol with other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical. The following pictograms are designated under this standard for application to a

	hazard category: 
Product Identifier	The brand name, chemical name, common name, generic name or trade name of a chemical.
Safety Data Sheets (SDS)	• Sixteen-section fact sheet for chemicals which may pose a physical or health hazard in the workplace • Provides detailed information on each chemical including: ○ Potential hazardous effects ○ Physical and chemical characteristics ○ Recommendations for appropriate protective measures
SDS Database	A computer database to provide electronic access to SDSs
Signal Word	Used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label: ***Danger*** - for more severe hazards ***Warning*** - for less severe hazards
Supplier Identifier	The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
WHMIS Workplace Hazardous Materials Information System	Canada's national hazard communication standard, providing health and safety information on hazardous products in workplaces.
Precautionary Statements	Precautions listed on SDS's to inform personnel of:

	• Safe handling and use • Protective measures during repair and maintenance of contaminated equipment • Procedures for clean-up of spills and leaks
Worker Right-To-Know	The workers right to be informed of the hazardous materials in the workplace

12 ROLES AND RESPONSIBILITIES

The following table contains a listing of responsibilities for specific groups/jobs as required by this program.

Group or Title	Responsibilities
All persons working with chemicals	• Comply with the safety information and work practices provided on Safety Data Sheets, labels, and training • Ensure required labelling is in place on containers and replace if necessary • Label secondary containers when transferring chemicals according to labeling requirements
Supervisors/Leaders	• Identify and communicate chemical hazards and precautions to assigned workers prior to use • Ensure labels (pre-printed or user-defined) for secondary container labeling are available and utilized

Mosaic Site Contact	• Ensure contract workers comply to hazard communication requirements
	• Identify and communicate chemical hazards and precautions to contract workers prior to beginning work in an area with chemical exposure
	• Ensure contracted workers:
	  • Provide and review SDSs for chemical in use
	  • Label secondary containers
	  • Initiate the approval process for any new chemicals brought on-site prior to use (including communicating hazard information to Mosaic employees who work in the area)

	Note: The Site Contact may need to check the SDS database to confirm if the chemical is new to the facility.
Requester	• Use Mosaic's Material Request & Approval Process (MRAP) to request bringing new chemicals onto Mosaic property for use by Mosaic or contract employees • Notifies facility EHS of new chemicals prior to use
Facility SDS Administrator	• Interfaces with Mosaic EHS SDS Administrator • Assigns chemicals to defined Chemical Areas within the SDS database folders • Assists operations with running reports for chemical inventory • Updates the SDS database with site specific information • Maintains quarterly site specific back-up method for all SDS's in their database
Subject Matter Experts (SME) Environmental/Health and Safety	• Reviews environmental/health and safety hazards and appropriate environmental/health and safety controls associated with a new chemical, as designated by the BU SDS Approver or upon request from Site Leadership

13 REFERENCES

References (Number and title)
OSHA 29 CFR Subpart Z, 1910.1200 Hazard Communication
MSHA 30 CFR Part 47 Hazard Communication
The Occupational Health and Safety Regulations, 2020 (Saskatchewan), Part 21 and Part 22
Mosaic Document and Record Control Policy

14 REVISION LOG

Rev. No.	Requested By	Approved By	Revised By	Rev. Date
0	Initial Issue– replaces Phosphates Hazcom; new for Potash	VP EHS	PMO	08/15/2024