#### THE INTERNATIONAL CADMIUM ASSOCIATION

**REGULATORY UPDATE**

**July 28, 2020**[[1]](#footnote-1)

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**FEDERAL ISSUES**

**MINING AND MINERAL ISSUES**

**Republicans Urge DOI And USDA To Modernize Regulations For Domestic Mineral Production**

On June 2, 2020, Republicans led by Senator Lisa Murkowski (R-AK) and Representative Rob Bishop (R-UT) [sent a letter](https://www.energy.senate.gov/public/index.cfm/2020/6/murkowski-bishop-lead-congressional-push-for-domestic-mineral-production) to U.S. Secretary of the Interior David Bernhardt and U.S. Secretary of Agriculture Sonny Perdue to encourage them to issue as soon as possible final rules to modernize regulations governing the domestic production of locatable minerals on federal land. The letter states that streamlining authorizations, reducing costs, and improving security of tenure “would help to strengthen domestic supply chains for every facet of the manufacturing economy, which would support the President’s trade policy objectives.” The letter notes that these changes would also be consistent with the spirit of the President’s Critical Minerals Executive Order of December 20, 2017, as well as serving as a “catalyst for investment.”

According to an item in BLM’s spring 2020 Unified Agenda, BLM intended to issue an NPRM regarding locatable minerals in June 2020. The item states that changes to the mining law regulations would generally streamline authorizations under the general mining laws, reduce or eliminate cost recovery associated with mineral examination reports, and improve security of tenure for mining claimants. BLM has not published anything to date.

The Forest Service’s spring 2020 Unified Agenda includes an item regarding a rulemaking to update and clarify the locatable minerals regulations. As reported in our September 28, 2018, Update, the Forest Service published an ANPRM in the *Federal Register* on September 13, 2018 requesting comments regarding the need to clarify its regulations that minimize adverse environmental impacts on National Forest System surface resources in connection with operations authorized by U.S. mining laws. The ANPRM defines “locatable” minerals as base and precious metal ores, ferrous metal ores, and certain classes of industrial minerals that include, but are not limited to, gold, silver, platinum, copper, lead, zinc, magnesium, nickel, tungsten, bentonite, barite, fluorspar, uranium, and uncommon varieties of sand, gravel, and dimension stone. The Unified Agenda item states that the Forest Service intends to publish an NPRM in **November 2020**. The rulemaking would: (1) expedite review and approval of certain proposed mineral operations; (2) increase consistency with the BLM surface management regulations; and (3) increase consistency within the Forest Service’s nationwide regulation of mineral operations.

**Senate Committee Holds Hearing On Impact Of COVID-19 On Mineral Supply Chains**

On June 24, 2020, the Senate Committee on Energy and Natural Resources [held a hearing](https://www.energy.senate.gov/public/index.cfm/2020/6/full-committee-hearing-on-the-impact-of-covid-19-on-mineral-supply-chains) to examine the impact of COVID-19 on mineral supply chains, the role of those supply chains in economic and national security, and challenges and opportunities to rebuild America’s supply chains. The Committee heard from the following witnesses:

* Dr. Nedal Nassar, Chief, Materials Flow Analysis Section, National Minerals Information Center, USGS;
* Mr. Joe Bryan, Senior Fellow, Atlantic Council Global Energy Center;
* Mr. Mark Caffarey, President, Umicore USA, Inc.;
* Dr. Thomas J. Duesterberg, Senior Fellow, Hudson Institute; and
* Mr. Simon Moores, Managing Director, Benchmark Mineral Intelligence.

According to the Committee’s June 24, 2020, [press release](https://www.energy.senate.gov/public/index.cfm/2020/6/murkowski-mineral-supply-chains-critical-to-energy-and-health-economy-and-security), Dr. Duesterberg testified that “China’s growing control over many basic materials, and its history of using that control as leverage for its own economic and political goals, makes this a cause of concern.” Dr. Nassar stated that countries such as the United States “have become increasingly import-reliant for their mineral commodity needs, thereby increasing their exposure to foreign supply disruptions.” According to USGS, the United States imported more than 50 percent of at least 46 different minerals, including 100 percent of 17 of them, in 2019. Bryan noted that the United States is losing ground not only to China, but also to nations in Europe, who are defense allies but also economic competitors.

**TSCA ISSUES**

**EPA Releases Biannual Update To Public TSCA Inventory**

EPA announced on June 1, 2020, the availability of the latest [TSCA Inventory](https://www.epa.gov/tsca-inventory/how-access-tsca-inventory). EPA notes that this biannual update to the public TSCA Inventory is part of its regular posting of non-confidential TSCA Inventory data. EPA plans the next regular update of the Inventory for **early 2021**. According to EPA, the Inventory contains 86,405 chemicals, of which 41,587 are active in U.S commerce. Other updates to the TSCA Inventory include updates to commercial activity data and updated regulatory flags, such as consent orders and SNURs.

**Court Strikes Down Exemption For Importers In Final TSCA Mercury Inventory Rule**

On June 5, 2020, the U.S. Court of Appeals for the Second Circuit issued its [decision](https://www.ca2.uscourts.gov/decisions/isysquery/ae76bd9a-8181-49ab-92c3-f5551cfa3838/8/doc/18-2121_opn.pdf#xml=https://www.ca2.uscourts.gov/decisions/isysquery/ae76bd9a-8181-49ab-92c3-f5551cfa3838/8/hilite/) in a case challenging three exemptions from EPA’s final mercury inventory rule. *NRDC v. EPA*, No. 18-2121. NRDC and Vermont challenged the rule, arguing that EPA unlawfully exempted too many manufacturers and importers to protect human health and the environment effectively. The court found that the exemption for importers of products containing mercury-added components is an unlawful interpretation of TSCA because it lacks a reasoned explanation. The court found that the exemption for manufacturers of products with mercury-added components and the exemption for high-volume manufacturers are lawful in light of Congress’s directive to “not require reporting which is unnecessary or duplicative.”

EPA’s final rule applies to any person who manufactures (including imports) mercury or mercury-added products, or otherwise intentionally uses mercury in a manufacturing process. More information is available in our June 25, 2018, memorandum, “[EPA Publishes Final Reporting Requirements for TSCA Mercury Inventory](https://www.lawbc.com/index.php/regulatory-developments/entry/epa-publishes-final-reporting-requirements-for-tsca-mercury-inventory).”

**MISCELLANEOUS ISSUES**

**CPSC Determines Certain Unfinished Manufactured Fibers Do Not Contain ASTM F963 Elements, Including Cadmium**

CPSC issued a [final rule](https://www.federalregister.gov/documents/2020/06/01/2020-09991/childrens-toys-and-child-care-articles-determinations-regarding-astm-f963-elements-and-phthalates) on June 1, 2020, determining that certain unfinished manufactured fibers do not contain the ASTM F963 elements or specified phthalates that exceed the limits set forth under the CPSC’s statutes and regulations for children’s toys and child care articles. Based on these determinations, CPSC states that the specified unfinished manufactured fibers would not be required to have third-party testing for compliance with the requirements of the ASTM F963 elements or phthalates for children's toys and child care articles. Section 4.3.5 of ASTM F963 requires that surface coating materials and accessible substrates of children’s toys that can be sucked, mouthed, or ingested must comply with the solubility limits of eight elements given in Table 1 of the toy standard. The elements include **cadmium** with a solubility limit of 75 ppm. The rule was effective July 1, 2020.

**IC2 And Clean Production Action Issue Background Report On Chemical Ingredient Transparency In Products**

IC2 and Clean Production Action have launched a partnership to find common ground among key stakeholders on chemical ingredient transparency policies and programs. Their April 2020 background report entitled [*Chemical Ingredient Transparency in Products: Review of Existing Public Policies & An Industry Standard*](http://www.theic2.org/article/download-pdf/file_name/IC2-CPA_ChemicalDisclosure_ReviewPaper_FINAL.pdf) is intended to provide context and summary information to help inform the initiative. IC2 and Clean Production Action reviewed more than ten public policies that require the disclosure of chemicals in products and one industry standard that sets guidelines for disclosure in building products. The report provides context and summary information to help inform this initiative. The report:

* Discusses the purposes of chemical ingredient disclosure initiatives;
* Examines many of the existing state ingredient disclosure initiatives, a voluntary standard, and their reporting requirements with the intent of identifying their similarities and differences; and
* Identifies and discusses key issues regarding existing public and voluntary disclosure programs.

The Appendix provides a matrix outlining key elements of the existing state mandatory disclosure requirements.

**USDA Update On Codex Activities Includes Standards For Cadmium**

USDA’s TFAA published a [*Federal Registe*r notice](https://www.federalregister.gov/documents/2020/06/03/2020-11984/international-standard-setting-activities) on June 3, 2020, informing the public of the sanitary and phytosanitary standard-setting activities of Codex. The notice also provides a list of other standard-setting activities of Codex, including commodity standards, guidelines, codes of practice, and revised texts. The notice, which covers Codex activities during the time periods from June 21, 2019, to May 31, 2020, and June 1, 2020, to **May 31, 2021**, seeks comments on standards under consideration and recommendations for new standards. The 14th Session of CCCF, originally scheduled for April 20-24, 2020, has been postponed due to ongoing concerns related to the COVID-19 pandemic. It is now scheduled for **May 3-7, 2021**. CCCF has the following item that will be considered again by the 43rd Session of the Codex:

* To be considered for adoption Step 5, allowing for further consideration by the next session of CCCF:
* Draft ML for **cadmium** in chocolates containing or declaring <30 percent total cocoa solids on a dry matter basis.
* CCCF will continue working on:
* Proposed draft MLs for **cadmium** in chocolate and chocolate products containing or declaring ≥30 percent to <50 percent total cocoa solids on a dry matter basis; and cocoa powder (100 percent total cocoa solids on a dry matter basis);
* Proposed draft code of practice for the prevention and reduction of **cadmium** contamination in cocoa beans; and
* Discussion paper on MLs for **cadmium** and lead in quinoa.

The notice does not provide a due date for comments.

**INTERNATIONAL ISSUES**

**AUSTRALIA**

**Australia Delays Transition To GHS 7**

A two-year transitional period to GHS 7 was due to begin July 1, 2020. SWA [announced](https://www.safeworkaustralia.gov.au/media-centre/news/update-transition-ghs-revision-7) on June 5, 2020, that it has postponed the start of the transitional period due to the impact of COVID-19. The new start date is **January 1, 2021**. According to SWA, a full two-year transitional period will follow to allow manufacturers and importers time to prepare new classifications, labels, and SDSs for hazardous chemicals to meet GHS 7 requirements. SWA states that to ensure that any importers and manufacturers that had already begun work on implementing GHS 7 are not disadvantaged, state and territory governments will put in place regulatory arrangements allowing businesses to begin classifying and labeling chemicals in accordance with GHS 7 from July 1, 2020. Suppliers and end users will also be able to supply and use GHS 7 labeled chemicals under these arrangements. SWA will publish details of the regulatory arrangements on its website when they become available. Manufacturers, suppliers, and users of hazardous chemicals will be able to continue to supply and use chemicals classified and labeled under GHS 3 in the lead up to and during the transitional period. SWA states that it will “soon” publish guidance to support businesses to transition to GHS 7.

**AICIS Began July 1, 2020**

Chemicals listed on the [Australian Inventory of Chemical Substances](https://www.industrialchemicals.gov.au/search-inventory) are available for industrial use in Australia. If a chemical is on the Inventory and a company’s introduction meets any terms specified in the Inventory listing, the introduction (importation or manufacture) is categorized as “listed.” Beginning July 1, 2020, all industrial chemical importers and manufacturers must categorize their chemical introduction. Australia has posted a [step-by-step guide](https://www.industrialchemicals.gov.au/help-and-guides/guide-categorising-your-chemical-importation-and-manufacture) that takes companies through the process of categorizing their chemical importation and manufacture. Australia also published [decision tools](https://www.industrialchemicals.gov.au/help-and-guides/decision-tools-help-you-categorise-your-chemical-importation-or-manufacture) intended to help businesses categorize their chemical importation or manufacturer under AICIS. The NICNAS website has been retired and replaced by the [AICIS website](https://www.industrialchemicals.gov.au/).

**BANGLADESH**

**Draft E-Waste Management Rules Would Restrict Use Of Cadmium, Cadmium Oxide, And Cadmium Sulphate**

Bangladesh held a public comment period on the draft rule that would restrict the use of 15 substances or groups of substances, including **cadmium**, in certain electrical products. The draft rule would restrict **cadmium**, **cadmium oxide**, and **cadmium sulphate** to $\leq $0.1 percent. The rule would apply to the following electrical and electronic products:

* Household appliances;
* Monitoring and control equipment;
* Medical equipment;
* Automatic machines; and
* Telecommunications equipment.

Comments were due June 30, 2020.

**CANADA**

**HC Posts Summary Of Comments Submitted On Integrated Strategy To Protect Canadians From Exposure To Chemicals**

As reported in our July 28, 2019, Update, on July 11, 2019, HC began a public consultation on an [integrated strategy for the protection of Canadian workers from exposure to chemicals](https://www.canada.ca/en/health-canada/programs/consulting-integrated-strategy-protection-canadian-workers-exposure-chemicals.html). HC identified two potential actions that may help to enhance worker protection in relation to their exposure to chemicals of concern:

* Establish an FPT Committee to coordinate better chemicals management for the protection of workers; and

* Integrate the federal management of the WHMIS Program under CMP.

HC has posted a [summary of the comments](https://www.canada.ca/en/health-canada/services/chemical-substances/consulting-future-chemicals-management-canada/what-we-heard-integrated-strategy-protection-canadian-workers-exposure-chemicals.html) it received. According to HC, many stakeholders welcomed its proposed efforts to enhance the protection of Canadian workers from exposure to chemicals through expanded activities and partnerships with other federal programs and PT governments. HC was encouraged to:

* Share a gap analysis that clearly articulates the issue(s) to address;

* Conduct cost-benefit and impact analyses of the proposed actions;

* Collaborate with FPTs;

* Leverage existing processes and experience (for example, national and international work, existing committees, and existing processes for prioritization); and

* Involve all stakeholder groups, including other government departments, industry, workers, OHS professionals, and academia.

HC states that stakeholders were supportive of the guiding principles, in particular the need to avoid duplication. Some stakeholders identified areas that were missing from the proposal, for example, informed substitution, control banding, and exposure banding. According to the summary, HC “will continue to consult and inform stakeholders as progress is made in determining the Government’s role in the possible development of an integrated strategy to protect Canadian workers from chemicals.”

**Canada Publishes Final Guidelines For Canadian Drinking Water Quality For Cadmium**

On July 11, 2020, Canada published a [*Canada Gazette* notice](http://gazette.gc.ca/rp-pr/p1/2020/2020-07-11/html/notice-avis-eng.html#ne8) announcing the final Guidelines for Canadian Drinking Water Quality for **cadmium**. Canada established a maximum acceptable concentration of 0.007 mg/L (7 µg/L) for total **cadmium** in drinking water, based on a sample of water taken at the tap. The notice states:

**Cadmium** is a metal that can be found in the environment in its elemental form or in a number of different salts. It is often associated with lead, copper, and zinc ores. **Cadmium** may enter drinking water sources naturally (leaching from soil), as a result of human activity (as a by-product of refining or from its use in technological applications) or through leaching from some pipes and well components.

The [guideline technical document](https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidelines-canadian-drinking-water-quality-guideline-technical-document-cadmium.html) reviews and assesses all identified health risks associated with **cadmium** in drinking water. According to the notice, the document incorporates new studies, assessments, and approaches and takes into consideration the availability of appropriate treatment technology.

**INDIA**

**BIS Proposes To Revise Toy Safety Standard On Migration Of Certain Elements In Toys**

BIS is consulting on a proposed revision to its standard Safety of Toys -- Part 3: Migration of Certain Element. The proposal would adopt standard ISO 8124-3:2020 on the migration of certain elements in toys. Changes would include:

* The inclusion of two “detailed” dewaxing methods;
* The addition of a method for determining elements based on inductively coupled plasma optical emission spectrometry (ICP-OES);
* New standards providing for maximum acceptable levels of migration of antimony, arsenic, barium, chromium, **cadmium**, lead, mercury, and selenium;
* An updated method for determining the presence of certain phthalate esters;
* Requirements of test methods for finger painting; and
* Requirements concerning flammability testing.

India’s standard is mandatory and applies to both domestic and foreign toy manufacturers selling toys in India. Comments are due **August 9, 2020**. After considering comments, BIS will issue an official notice revising the current standard.

**OECD**

**OECD Issues “Call To Action” For Responsible Mineral Supply Chains**

The Multi-Stakeholder Steering Group overseeing the implementation of the OECD Due Diligence Guidance for Responsible Mineral Supply Chains adopted a [Call to Action](http://mneguidelines.oecd.org/COVID-19-Call-to-Action-for-Responsible-Mineral-Supply-Chains.pdf) in response to the COVID-19 crisis. The Group calls for “immediate and concerted action” from civil society organizations, governments, financing institutions, international organizations, private sector actors, and others to safeguard gains related to due diligence in supply chains in alignment with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains. Specifically, the Group calls for measures to:

* Activate humanitarian and emergency response networks to reduce the potentially devastating impacts of COVID-19 on ASM communities, particularly those related to health and social and economic well-being, acknowledging that women may be more acutely affected, and maintaining trade needs to be balanced with managing risks from COVID-19. Critical responses may involve working with local mineral-producing governments and international and local NGOs to sensitize mining communities and support the deployment of health and awareness-raising responses;
* Allocate funds for on-the-ground programs and SMEs, with conditions. The crisis necessitates the rapid release of emergency funds for due diligence programs operating in producing areas, and to support SMEs in mineral supply chains through loan guarantee programs and grants;
* Foster the sustainable inclusion of responsible ASM projects into global supply chains, with the support of all stakeholders, in particular but not exclusively, smelters and refineries certified by international industry schemes aligned with the OECD Guidance; and
* Ensure the right balance of maintaining integrity and flexibility in due diligence efforts during this period. Due diligence is an iterative process of identifying, prioritizing, and mitigating risk. Due diligence should always be undertaken in accordance with domestic law. This means in the short term that expectations for assessments and audits will need to take into account government virus containment and mitigation measures.

**THE PHILIPPINES**

**House Committee Approves Bill That Would Regulate Children’s Products Containing Hazardous Chemicals**

The House Committee on Welfare of Children approved the Safe and Non-Hazardous Children’s Products Act, which would regulate the importation, manufacture, distribution, and sale of children’s products containing hazardous chemicals. The Food and Drug Administration would prepare a list of hazardous chemicals to be banned or prohibited from being used in the manufacture, production, and preparation of children’s products.

**SOUTH KOREA**

**South Korea Restricts Heavy Metals, Including Cadmium, In Children’s Products**

The Ministry of Trade, Industry, and Energy has introduced restrictions on and migration limits for certain heavy metals and nitrosamines in children’s products that will take effect in **December 2020**. Manufacturers of paints, coatings, and paper should demonstrate that their products do not exceed the following maximum migration limits for the heavy metals:

* Antimony -- 60 mg/kg;
* Arsenic -- 25 mg/kg;
* Barium -- 1,000 mg/kg;
* **Cadmium** -- 75 mg/kg;
* Chromium -- 60 mg/kg;
* Lead -- 90 mg/kg;
* Mercury -- 60 mg/kg; and
* Selenium -- 500 mg/kg.

Electronic components will also be subject to content limits for lead and **cadmium**, at 100 mg/kg and 75 mg/kg, respectively.

**VIETNAM**

**Vietnam Will Postpone Implementation Of New MLs For Salmonella And Heavy Metals, Including Cadmium. In Feed Ingredients Of Plant Origin**

The Ministry of Agriculture and Rural Development has decided to postpone the implementation of new MLs for salmonella and heavy metals in feed ingredients of plant origin for one year, until **July 1, 2021**, for further review and assessment. In March 2020, the Ministry released a circular, NTR190, referencing MLs in animal feed and aqua feed ingredients, setting a zero tolerance for salmonella, *Escherichia coli*, and renewed tolerances for heavy metals (total arsenic, **cadmium**, lead, and mercury), and mycotoxins for all feed ingredients of plant origin imported and domestically produced. The Ministry postponed the implementation in response to comments from its trading partners, including the United States, to give stakeholders an opportunity to provide comment on the new MLs in feed and feed ingredients. The Ministry is expected to publish an amendment of NTR190 in the **first quarter of 2021**.

\* \* \* \* \*

Unless otherwise noted, if you have questions about any item summarized above, please call or e-mail Lynn L. Bergeson at (202) 557-3801 or lbergeson@lawbc.com, or Carla N. Hutton at (202) 557-3809 or chutton@lawbc.com.

## ACRONYMS

**µg/L** -- Microgram per Liter

**AICIS** -- Australian Industrial Chemicals Introduction Scheme

**ANPRM** -- Advance Notice of Proposed Rulemaking

**ASM** -- Artisanal and Small-Scale Miners

**BIS** -- Bureau of Indian Standards

**BLM** -- Bureau of Land Management

**CCCF** -- Codex Committee on Contaminants in Foods

**CMP** -- Chemicals Management Plan

**Codex** -- Codex Alimentarius Commission

**CPSC** -- Consumer Product Safety Commission

**DOI --** U.S. Department of the Interior

**EPA** -- U.S. Environmental Protection Agency

**FPT** -- Federal, Provincial, and Territorial

**GHS** -- Globally Harmonized System of Classification and Labeling of Chemicals

**HC** -- Health Canada

**IC2** -- Interstate Chemicals Clearinghouse

**ICdA** -- International Cadmium Association

**ISO** -- International Organization for Standardization

**mg/kg** -- Milligram Per Kilogram

**mg/L** -- Milligram per Liter

**ML** -- Maximum Level

**NGO** -- Non-Governmental Organization

**NICNAS** -- National Industrial Chemicals Notification and Assessment Scheme

**NPRM** -- Notice of Proposed Rulemaking

**NRDC** -- Natural Resources Defense Council

**OECD** -- Organization for Economic Cooperation and Development

**OHS** -- Occupational Health and Safety

**ppm** -- Part per Million

**PT** -- Provincial and Territorial

**SDS** -- Safety Data Sheet

**SME** -- Small- or Medium-Sized Enterprise

**SNUR** -- Significant New Use Rule

**SWA** -- Safe Work Australia

**TFAA** -- Office of Trade and Foreign Agricultural Affairs

**TSCA** -- Toxic Substances Control Act

**USDA** -- United States Department of Agriculture

**USGS** -- U.S. Geological Survey

**WHMIS** -- Workplace Hazardous Materials Information System

1. This Update addresses significant federal, state, and international environmental and occupational safety and health regulatory issues and ongoing advocacy efforts pertinent to the ICdA member companies. A list of acronyms used in this Update is provided. [↑](#footnote-ref-1)