

Health Canada Steps Up CCCR Labeling Recalls

Article By:

Sheila A. Millar

Antonia Stamenova-Dancheva

Anushka N. Rahman

Manufacturers and distributors of household cleaners and similar chemically-based consumer products sold in Canada should be aware of an uptick in recalls by Health Canada for violations of the labeling requirements of the [Consumer Chemicals and Containers Regulations, 2001](#) (CCCR) under the Canada Consumer Product Safety Act (CCPSA). The CCCR establishes detailed product classification criteria and labeling and packaging requirements for potential hazards in certain consumer products.

In just the last three months, Health Canada has issued nine recalls for products from various countries, with goods ranging from stain removers to tire coatings. These include recalls of [PURE RESIN Brand Epoxy Resin Kits](#) (China), [Quicksilver Corrosion Guard and Quicksilver Light Gray Primer Spray Paint](#) (USA), [“Salt Eraser” salt stain remover](#) (also cited for lack of child-resistant packaging) (Canada), [Flikrfire personal Firepots](#) (USA), and [Bubble Angel Kettle Cleaner](#) (Japan). According to Health Canada’s website, mislabeling constitutes a potential hazard since “the lack of appropriate labelling information could result in unintentional exposure to the products and lead to serious illness or injury.”

It is worth noting that labeling requirements under the CCCR differ from labeling requirements under the U.S. Federal Hazardous Substances Act (FHSA), so compliance with one set of requirements does not guarantee

compliance with the other. While a compliant FHSA-labeled product should not result in mishandling the product or unintentional exposure to hazardous substances, these recent actions underscore the importance of understanding the differing regulatory requirements and taking steps to confirm that products introduced into Canada are labeled in accordance with the CCCR.

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