



MEMORANDUM

TO: Vice/Associate Deans/Principals Research

FROM: Professor Lori Ferris, Associate Vice-President, Research Oversight & Compliance
Kathy Somers, Executive Director, Research Safety & Compliance, Environmental Health & Safety

SUBJECT: New: Mandatory Requirement to use U of T's Chemical Inventory System

DATE: February 13, 2024

We are writing to notify you of a mandatory change concerning our chemical inventory and to request your assistance in notifying relevant units.

The University's central chemical inventory system has been available to the research community since late 2017, and over 130,000 separate chemical containers have been logged since then. While this is impressive, some parts of the University are not yet using our centralized inventory system.

The chemical inventory system is an essential health and safety requirement. There have been recent changes to the way that UofT conducts its environmental compliance activities under municipal, provincial, and federal legislation (see references below) that have increased the need for up-to-date chemical inventory information.

The UofT-wide reporting and tracking of chemicals is handled jointly by Facilities and Services and Environmental Health and Safety (EHS), but the information used for this reporting needs to come from laboratories themselves. As a result, EHS's Institutional Laboratory Safety Committee has recommended to Professor Ferris that the central chemical inventory system be made a **mandatory requirement** for all labs with hazardous chemicals and she has accepted the recommendation.

At the same time, there is a recognition that laboratories need time to meet this new requirement.

Therefore, all U of T researchers using hazardous chemicals must log them in the HECHMET system by March 1, 2025 and begin the process no later than May 1, 2024.

Please note that EHS pays all support and licensing fees for the system and has dedicated staff to support labs. EHS also provides pre-printed barcode labels, free training, manages access, and can assist with audits and reconciliation.

We ask that you communicate this request as appropriate in your units.

Advantages of Using Central Chemical Inventory:

Advantages to PIs:

- being compliant with applicable legislation;
- saves money, time and space through quick and accurate physical inventory reconciliation;
- eliminates unneeded purchases and chemicals; avoids time wasted by running out of key chemicals through barcode tracking of chemicals from receipt to disposal;
- easily manages chemical inventory; add, view, and update;
- saves time finding chemicals – location is on system;
- tracks chemicals with specific shelf life and when to dispose of or test expired chemicals, e.g. peroxide formers;
- saves time and money through access to ChemWatch for GHS compliant Safety Data Sheets; and
- no more paper SDS.

Advantages to Departments and PIs:

- being compliant with applicable legislation;
- dynamic system accessible to PIs, first responders, EHS, and regulators as required;
- accurate inventory allows emergency response personnel, including the Fire Department, to make crucial decisions about labs based on the chemical information to quickly assess and attack fires. This minimizes delays in the Fire Departments response, potentially minimizing damage and lost research;
- getting labs up and running again quickly after an emergency;
- saving money through an option to share inventory information across collaborators, departments, or even campuses; and
- comprehensive inventory security control.

For further information on joining the system, please contact the University central chemical inventory administrator at hechmet@utoronto.ca.

References - Regulatory Requirements:

Toronto Municipal Code:

- Chapter 423: Environmental Reporting and Disclosure

Ontario Fire Code:

- The Ontario Fire Marshall says (OFM-TG-02-2000) that “the fire department may request a current inventory of materials that are stored and/or processed on site to be retained for reference during an emergency.”

Ontario Environmental Protection Act (EASRs and ECAs):

- The University must track and annually update its emissions of hazardous chemicals per the following regulations:
 - O.Reg 419/05: Air Pollution – Local Air Quality
 - O.Reg 1/17: Registrations Under Part II.2 of the Act

Federal Government:

- Prohibition of Certain Toxic Substances Regulations
- Chemical Weapons Convention