



# Interplay REACH & OSH for users of chemicals

## REACH2SDS Online-Workshop

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# REACH & OSH – working together to protect workers' health and safety

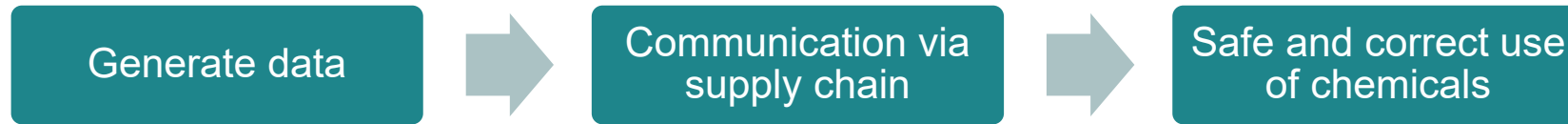
EU strategic framework on Health and Safety at Work 2021-2027: Occupational safety and health in a changing world of work (28.6.2021 COM(2021) 323 final) .

Three key objectives:

- anticipating and managing change in the new world of work brought about by the green, digital and demographic transitions;
  - improving prevention of workplace accidents and illnesses;
  - increasing preparedness for any potential future health crises.
- It recognises that hazardous substances can be found in nearly all workplaces, and millions of workers in the EU are exposed to these substances every day.
  - Comprehensive OSH legal requirements via Framework Directive, CAD, CMD and other directives.

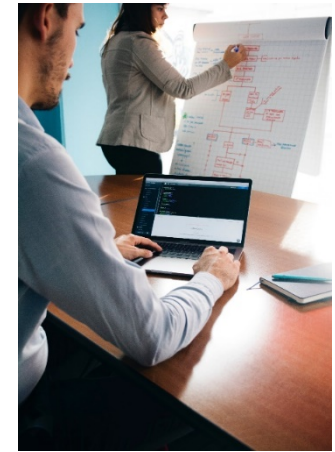
# REACH & OSH – working together to protect workers' health and safety

REACH, from an eSDS perspective:



- It is all about risk management communication.
- REACH generates lots of data – how can we use this to achieve the correct use of chemicals?
- The supply chain is complicated – primary manufactures and importers, formulators, distributors, end users etc.
- Many end users do not have the scientific and technical capability to fully understand all of the information they receive, though some do – in reality can already identify the target audience who will benefit the most from receiving high quality eSDSs.
- REACH Review action 3 recognises the need to improve supply chain communication.
- Work by ENES and other stakeholders including current REACH2SDS project have sought to address this issue.

# OSH requires the employer to assess and manage the risks to workers health and safety



## 1) Identify the chemicals present in the workplace:

- All chemicals: supplied chemicals, intermediates, by-products, etc.

## 2) Assess the risks arising from the identified chemicals

- Who is exposed, how does it occur, level and pattern of exposure (inhalation/dermal routes, long versus short duration, peaks etc.)
- Occupational exposure limit values can play a key role.
- Mixed exposures is the most common situation - not only exposure to a single substance. Need to consider exposure to multiple substances/mixtures.
- SDSs + Exposure Scenarios are an important source of information.
- CLP communicates additional hazard and safety information via packaging and labelling.

## 3) Implement risk management measures

- Eliminate exposure (e.g. substitution)
- Control exposure (use only in closed systems, local exhaust ventilation, personal protective equipment...)
- General principles for risk management (training and information of workers, health surveillance, ...)

# Some key issues

Risk Assessment can be perceived as a complex process.

*Reality is complex – need to simplify, demystify the process and outcome for the non-technical end user*

## The employer:

- May not have the technical knowledge and skills to assess in detail the workplace and to identify what is necessary to control risk.
- Will rely on information from a variety of sources, including supply chain information generated by CLP and REACH. This will not always be available – process generated substances.
- May not understand information received, e.g. PROC category system in the Exposure Scenario.
- Needs to be confident that they are doing the right thing and that workers are effectively protected and the OSH legal duties are complied with.



## Workers:

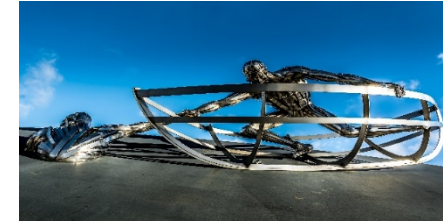
- Need to be confident that RMMs in place are 'correct' and adequately protective of their health and safety.

**'workers should not be harmed by their work'**

## Enforcers:

- Need to be able to identify what is/is not compliance.

# What may be helpful for employers?



- Guidance on the hierarchy of OSH control measures – actually a fairly limited number of options to be used singly or more often in combination that apply the principles of good occupational hygiene practice.
- eSDSs with a contents list on the front page.
- IT tools to enable employers to select the most relevant and helpful sections of the eSDS.
- Comprehensible and well communicated RMMs in the Exposure Scenarios – e.g. in simple pictorial representations as used in some existing e-tools. Easy to understand = easier to implement.
- Look for consistency/coherency of terminology within OSH & REACH.
- Take the good information currently being developed under REACH but change its presentation/communication approach to make it more OSH useful – OSH duty holders do not understand PROC categories etc.
- Do not forget - OSH covers process generated substances.
- Common REACH/OSH guidance for all stakeholders – employers, workers, NLIs (enforcers) = ensures consistency/coherency of information to support practical implementation of legal requirements.
- Communicate common guidance via Commission services, ECHA and OSHA.
- Introduce a system to allow easy access to information on Restrictions/Authorisations.

# Where are we now and looking to the future

## Today:

- REACh2SDS – focusses on data availability and quality between REACH and occupational safety.

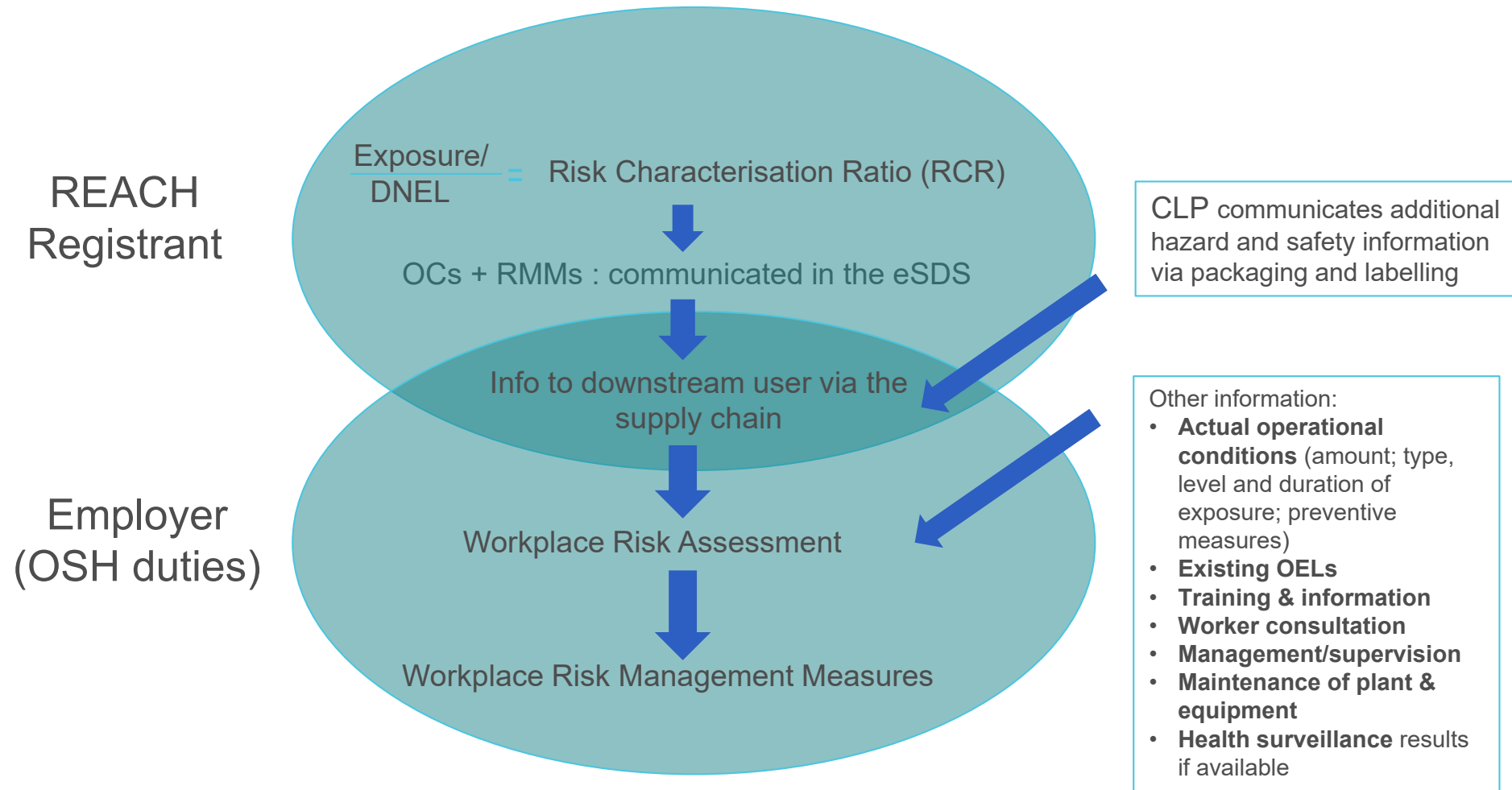
## Some conclusions from earlier work:

- Can build on existing successes - ENES started in 2011 – developing practical tools.

**'it is a long road but if we do not start walking we will not get there'**

- Key stakeholders – main players already actively engaged. Perhaps we are missing some others – the less technically aware and possibly smaller employers and representatives of workers' organisations.
- It is important that eSDS recipients are able to recognise/demonstrate compliance.
- Communication – much of the information still technically detailed – how can we simplify the content without losing the message?
- More effective risk communication to end users –digitalisation/video.
- Make improvements to the IT tools so that they can 'speak to each other'.
- Do we need a common Communication Strategy?

# REACH and OSH for users of chemicals



Safer and healthier workplaces = decrease in burden of occupational ill-health



# Thank you

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