



Streamlining the interface between REACH and OSH

Working together to eliminate occupational cancer

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DG GROW – REACH Unit

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II REACH Review

Legal obligation for the Commission to review the functioning of REACH every 5 years

Information sources

- **Member States reports – June 2015**
- **ECHA reports – June 2016 (functioning of REACH), 2014 and 2017 (alternatives to animal testing)**
- **16 thematic studies carried out between 2014 and 2017**
- **Stakeholder views**
- **Experience gained through implementation**

II REACH Review. Key findings

After 10 years REACH is fully operational and delivers results:

A comprehensive
**data set on
substances**

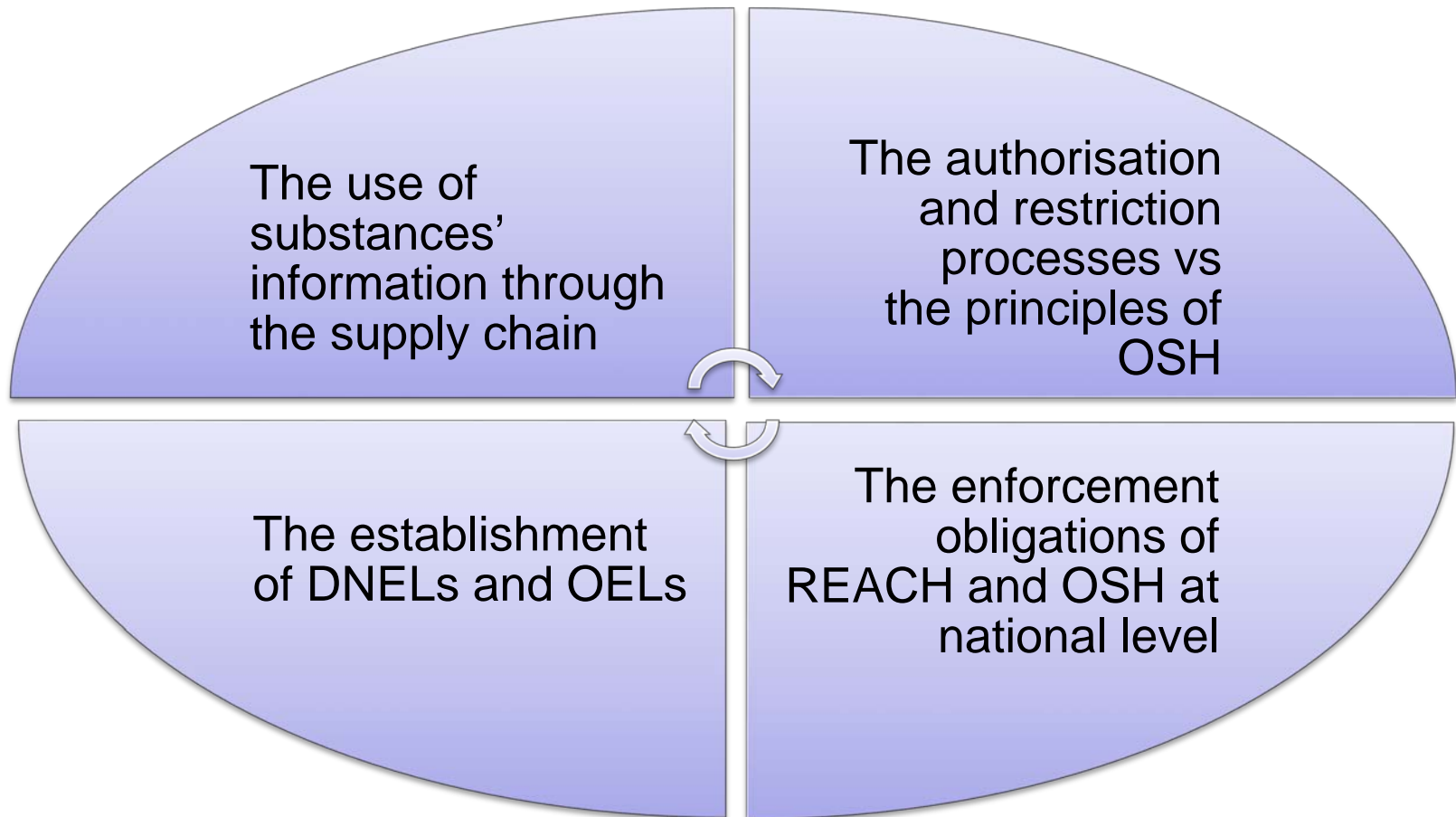
Progress in
**phasing out
SVHC**

Improvement of
the **RMM at the
workplace**

Improvement of
**communication
in the supply
chain**

ECHA plays a key
role on REACH
implementation

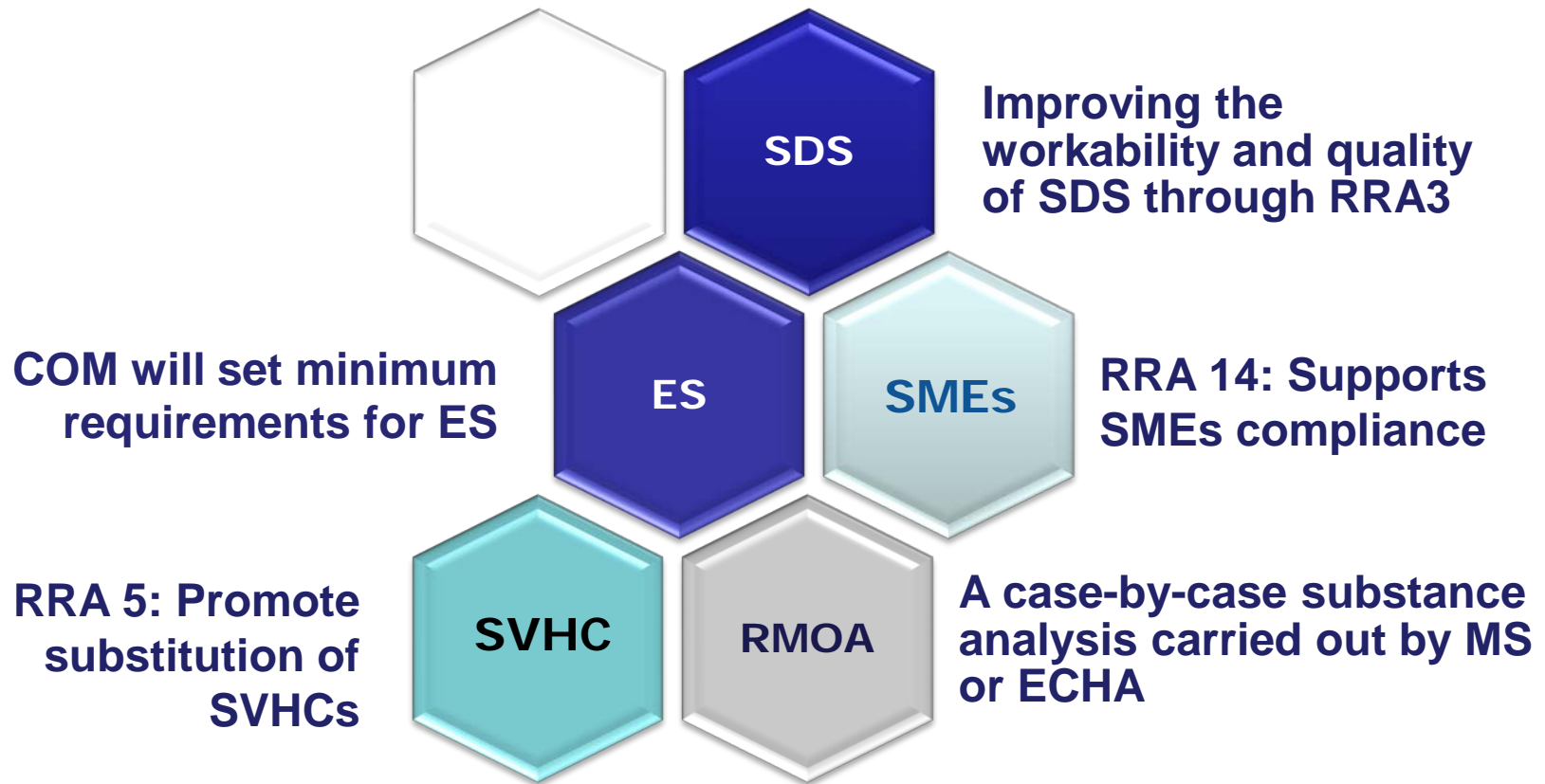
Interface REACH and OSH legislation



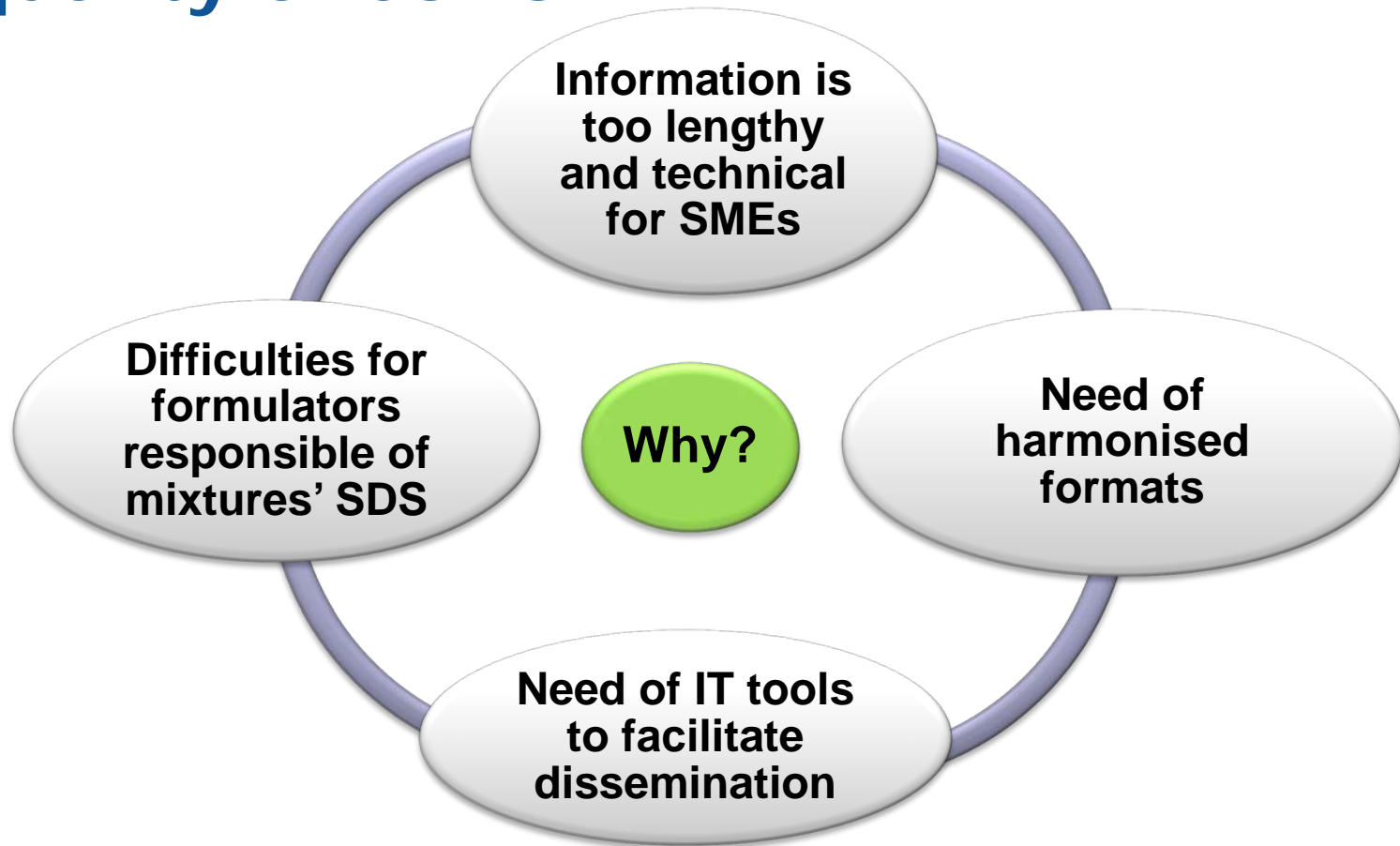
RRA 12. REACH and OSH interface

- (1) How to use REACH tools to enhance the effectiveness of OSH legislation.
- (2) Improve the coordination of national enforcement authorities of REACH and OSH legislation.
- (3) Align methodologies to establish safe levels of exposure to chemicals at the workplace by first quarter 2019.
- (4) Enhance the role of RAC, involving also social partners, to provide scientific opinions under the OSH legislation while respecting the role of the ACSH.

RRA 12.1. REACH tools enhancing OSH effectiveness



RRA 3. Improving workability and quality of eSDS



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(1) COM, ECHA and stakeholders are developing harmonized formats and IT tools to provide more user-targeted information and to facilitate the SDS's preparation and distribution

(2) COM will set minimum requirements for ES in SDS and request ECHA to develop a methodology for mxSDS.

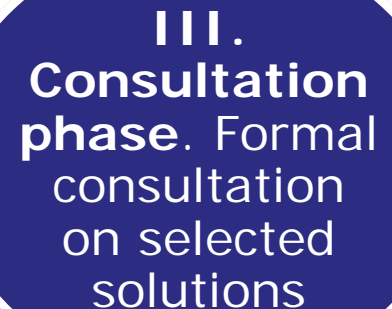
RRA 3. Improving workability and quality of eSDS. Way forward



I. Scoping phase.
To collect potential solutions to improve eSDS



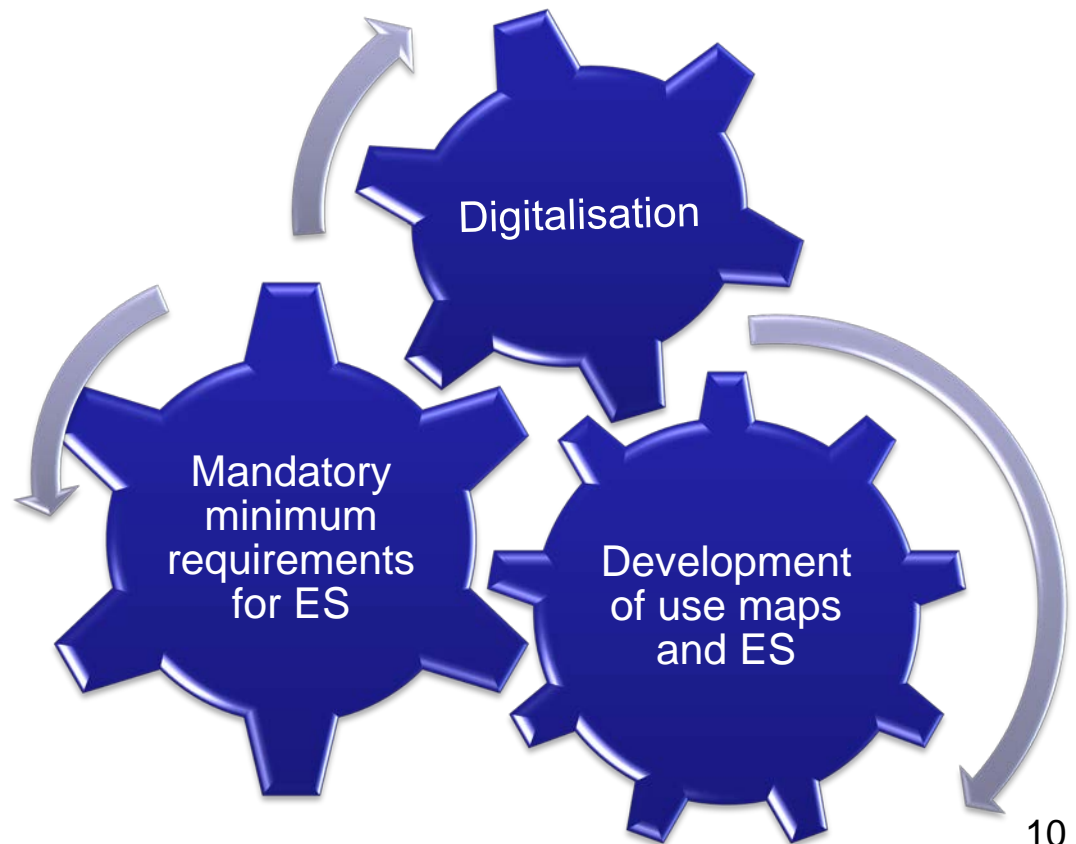
II. Development phase. To develop the basis for the potential new, more efficient and workable solutions



III. Consultation phase. Formal consultation on selected solutions

RRA 3. Improving workability and quality of eSDS. Scoping phase

- ✓ Strong need for digitalisation
- ✓ Requests for mandatory regulatory requirements for exposure scenarios in eSDSs
- ✓ No alternatives identified for the proposed holistic approach
- ✓ Need to match better information with end user needs



RRA 12.2. Improving the coordination of National Enforcement Authorities

WG

- A Forum WG *Survey on OSH-REACH enforcement interactions* was established at the Forum 31 with a mandate to prepare, send and process such survey

Survey

- To support COM in understanding how enforcement is coordinated in MS when there are interactions
- To determine if further actions are needed (i.e. joint training)

Report

- 31 countries have sent their contribution
- The report is under preparation and will be submitted soon to the Forum, SLIC WG CHEMEX and COM for consultation

RRA 12.2. Improving the coordination of NEAs. Survey on enforcement.

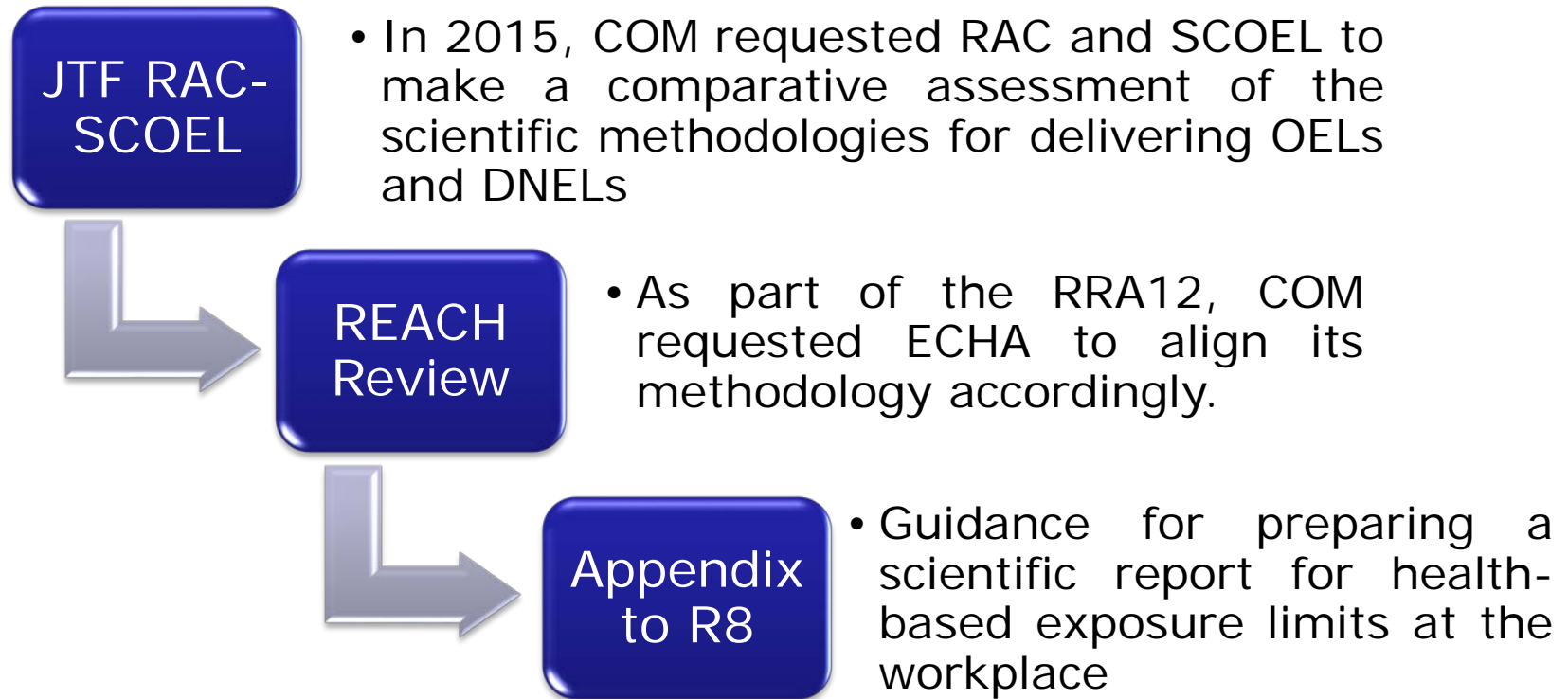
Main challenges at national level

- lack of resources (e.g. lack of inspectors or time)
- lack of knowledge of the other piece of legislation
- different priorities for each authority
- lack of availability of training on REACH/OSH interactions

Good practices for cooperation between inspectors

- joint inspections
- trainings on REACH/OSH interactions
- regular meetings between enforcement authorities
- mentoring between REACH/OSH inspectors

RRA 12.3. Alignment of methodologies



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RRA 12.3. Alignment of methodologies ECHA Appendix to chapter R.8.

Part I. Findings of the ECHA/RAC-SCOEL Joint Task Force on alignment of methodologies related to the exposure of chemicals at the workplace, including the inhalation and dermal routes, and ***in particular carcinogens with or without a threshold.***

Part II. How to prepare a scientific report for health based exposure limits at the workplace in accordance with the Joint Task Force reports.

RRA 12.3. Alignment of methodologies. Synergies found in the JTF

The use of human data in setting workplace limits

The use of uncertainty or assessment factors (UF, AF)

Sensory irritation

Dermal risk assessment and skin notation

Mode of Action based thresholds for genotoxic carcinogens

RRA 12.4. Enhancing the role of RAC to provide OSH scientific opinions

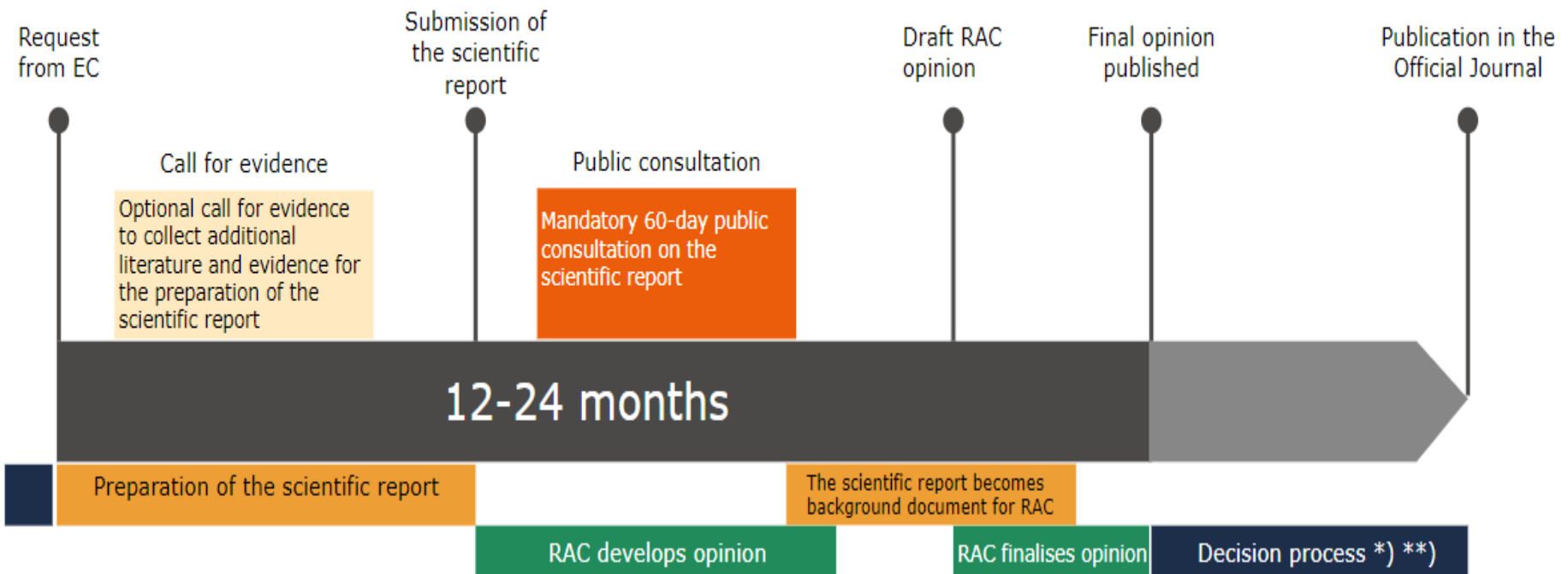
DG EMPL and ECHA have signed a Service Level Agreement for the Agency to provide scientific evaluations of selected substances under OSH.

These scientific evaluations shall, where appropriate, include proposals for OELs, BLV and/or notations.

*The agreement requires ECHA to assess **four to five substances** per year from 2020 onwards.*

ECHA has recently strengthened RAC's expertise on OSH with newly co-opted members.

RRA 12.4. RAC to prepare OSH recommendations



Conclusions and way forward

The **challenges on communication** of safe use of chemicals in the **supply chain** will be tackled by an holistic approach.

The **enforcement interactions** could be tackled at national level by following the recommendations of the Forum WG.

Having **one common source for scientific advice** under REACH and OSH will ensure coherence and transparency.

ECHA will continue playing a key role in the implementation of the two sets of EU legislation ensuring worker's protection to chemicals.

