



HEALTH AND SAFETY AT WORK

CONNECTING OSH WITH REACH ON WORKPLACE RISK ASSESSMENT AND RISK MANAGEMENT

REACH & CLP HELPDESK CONFERENCE
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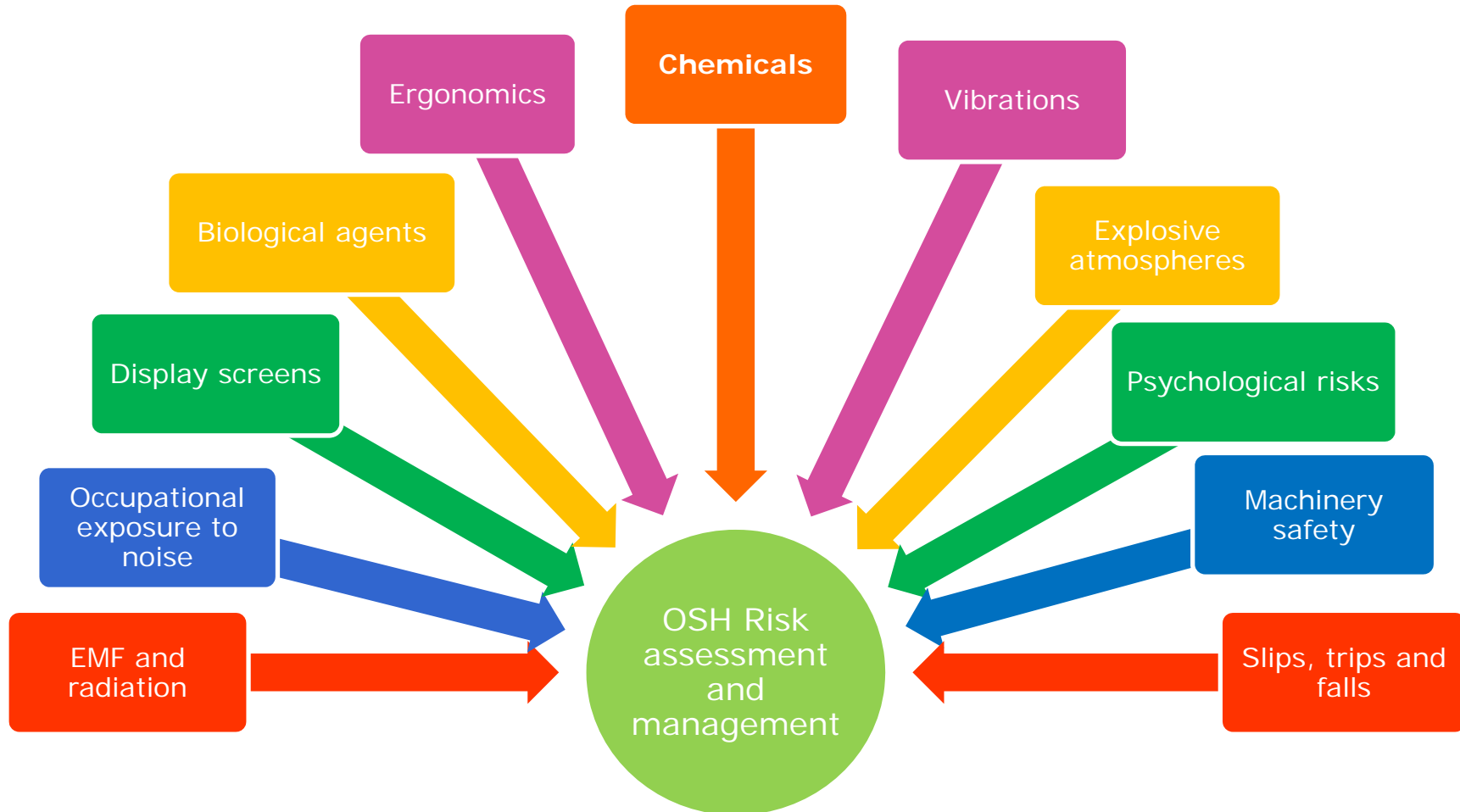
EUROPEAN COMMISSION – POLICY UNIT DEALING WITH OSH IS BASED IN LUXEMBOURG WITH A MISSION TO:

DEFINE AND IMPLEMENT ACTIONS FOR THE IMPROVEMENT OF THE WORKING ENVIRONMENT TO PROTECT WORKERS HEALTH AND SAFETY.



- Luxembourg -

Collective approach to risk assessment and risk management



Requirements apply in all sectors of employment



Key actors in social policy

- with a focus on chemicals.



DG Employment, Social Affairs and Inclusion

- Health and Safety Unit, Luxembourg.
- Develops and manages EU OSH policy on behalf of the Commission services including over 25 Directives covering all OSH topics.

Scientific Committee on Occupational Exposure Limit Values (SCOEL)

- 21 independent scientific experts.
- Develops scientific Recommendations and Opinions to support the work of DG EMPL.
- Risk Assessment Committee of ECHA provide additional scientific support.

Working Party on Chemicals (WPC)

- 3 Interest Groups (IG): Member States, Employers and Workers.
- 4 members per IG = 12 members.
- Mandated by plenary of ACSH to carry out identified tasks, including preparation of draft Opinions on candidate substances for future OELs and other chemical related issues.

Tri-partite Advisory Committee on Safety and Health (ACSH)

- One member per Member State per IG = 84 members.
- Provides advice and formal Opinions to support the work of DG EMPL.

Committee of Senior Labour Inspectors (SLIC)

- CHEMEX working group- defines common principles of labour inspection, improved knowledge and mutual understanding, exchanges of information.



EU OSH legislation



Overall

- Framework Directive (89/391/EEC)

Workplaces, equipment, signs, personal protective equipment

- Workplace requirements (89/654/EEC)
- Use of personal protective equipment (89/656/EEC)
- Safety and/or health signs (92/58/EEC)
- Risks from explosive atmospheres (1999/92/EC)
- Use of work equipment (2009/104/EC)

Worker related provisions

- Pregnant workers (92/85/EEC)
- Young workers (94/33/EC)
- Fixed-duration or temporary employment relationship (91/383/EEC)

Sector specific provisions

- Mineral-extracting industries (92/104/EEC)
- Mineral-extracting industries – drilling (92/91/EEC)
- Medical treatment on board vessels (92/29/EEC)
- Temporary and mobile construction sites (92/57/EEC)
- Work on board fishing vessels (93/103/EC)
- Prevention from sharp injuries in the hospital and healthcare sector (2010/32/EU)

Exposure to chemical agents

- Chemical agents at work (98/24/EC)
- Carcinogens or mutagens at work (2004/37/EC) (including phased programme of amendments to introduce new or revised binding OELs).
- Asbestos at work (2009/148/EC)
- Lists of indicative occupational exposure limit values
 - 0th list (91/322/EEC)
 - 1st list (2000/39/EC)
 - 2nd list (2006/15/EC)
 - 3rd list (2009/161/EU)
 - 4th list (2017/164/EU)
 - 5th list (under development)

Exposure to biological agents

- Biological agents at work (2000/54/EC)

Exposure to physical agents

- Vibration (2002/44/EC)
- Noise (2003/10/EC)
- Artificial optical radiation (2006/25/EC)
- Electromagnetic fields (2013/35/EU)

Provisions concerning specific risks

- Manual handling of loads (90/269/EEC)
- Display screen equipment (90/270/EEC)

The employer is required 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

- Occupational exposure limit values and personal exposure monitoring can play a key role.
- Mixed exposures (most common situation) and not only exposure to a single substance must be considered.

3) Implement risk management measures

- Eliminate exposure (e.g. substitution/replacement)
- 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, ...)
- Safety Data Sheets + Exposure Scenarios are an important source of information.

Chemical risk assessment: Key issues to consider

Which chemicals are being used or generated ?

Where does exposure occur?

Additional/complementary measures under OSH

- Health surveillance.
- Information instruction and training.
- Communication with workers.

Who is affected and how?

- Amount of chemical in use and how it presents itself at the workplace; type, level and duration of exposure; preventive measures in place

Options for effective control

- Well known set of risk management options that can be used singly or, more often, in combination following the hierarchy of control measures.
- Supporting tools for risk assessment and risk management
- Use of OELs

Key issues to reflect upon:

Risk Assessment can be perceived as a complex process.

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 the REACH terminology used in the descriptor-list for process categories for Exposure Scenarios (PROCs – REACH Guidance R.12-3).

In conclusion:

Needs to be confident that they are doing the right thing and that workers are effectively protected and the legal duties are complied with.

Workers:

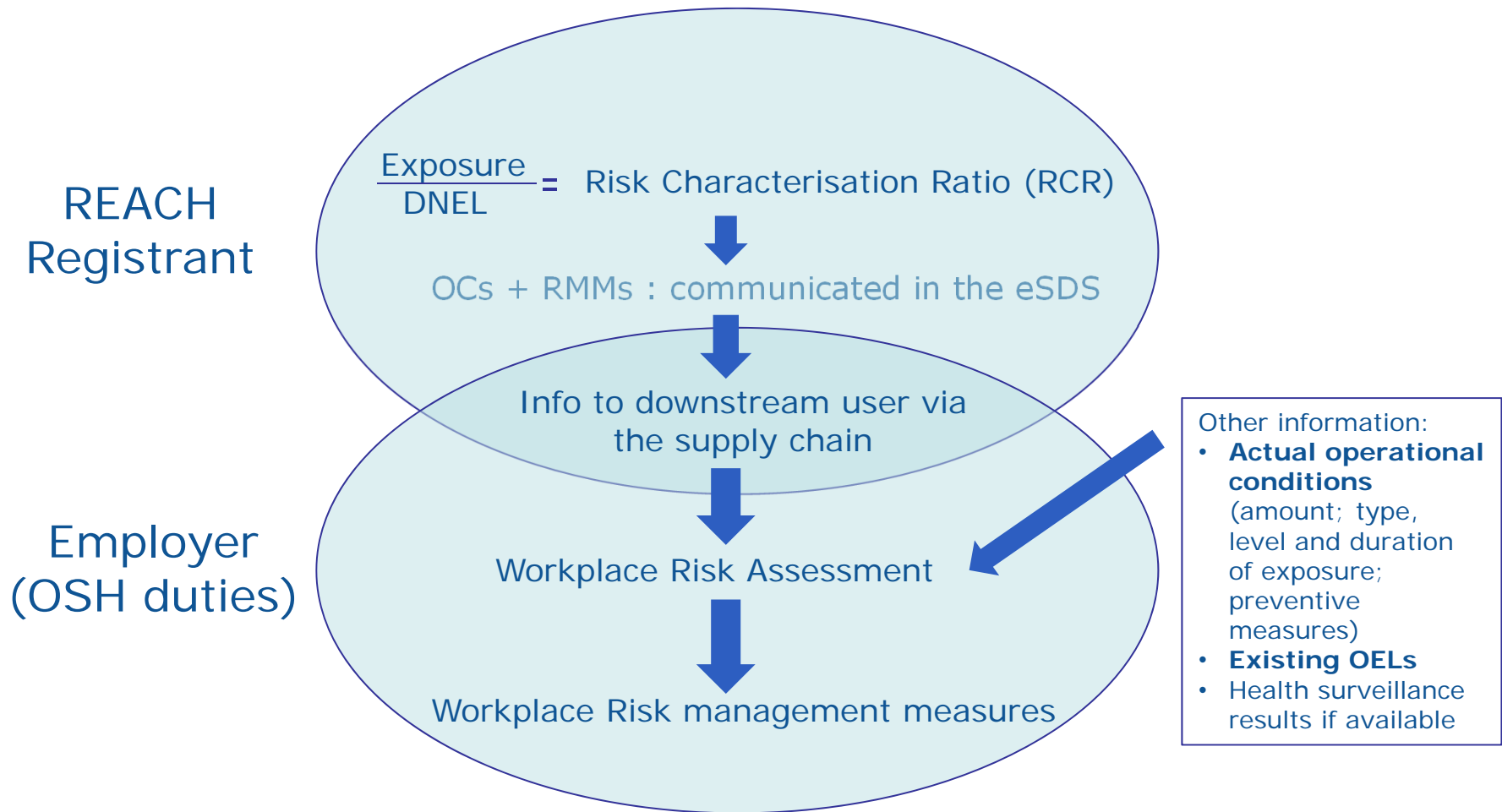
- Need to be confident that RMMs in place are 'correct' and adequately protective of their health and safety.
- Should receive training on correct working procedures.

Enforcers:

- Need to be able to identify what represents compliance and to take appropriate action in cases of non-compliance.



REACH and OSH for users of chemicals

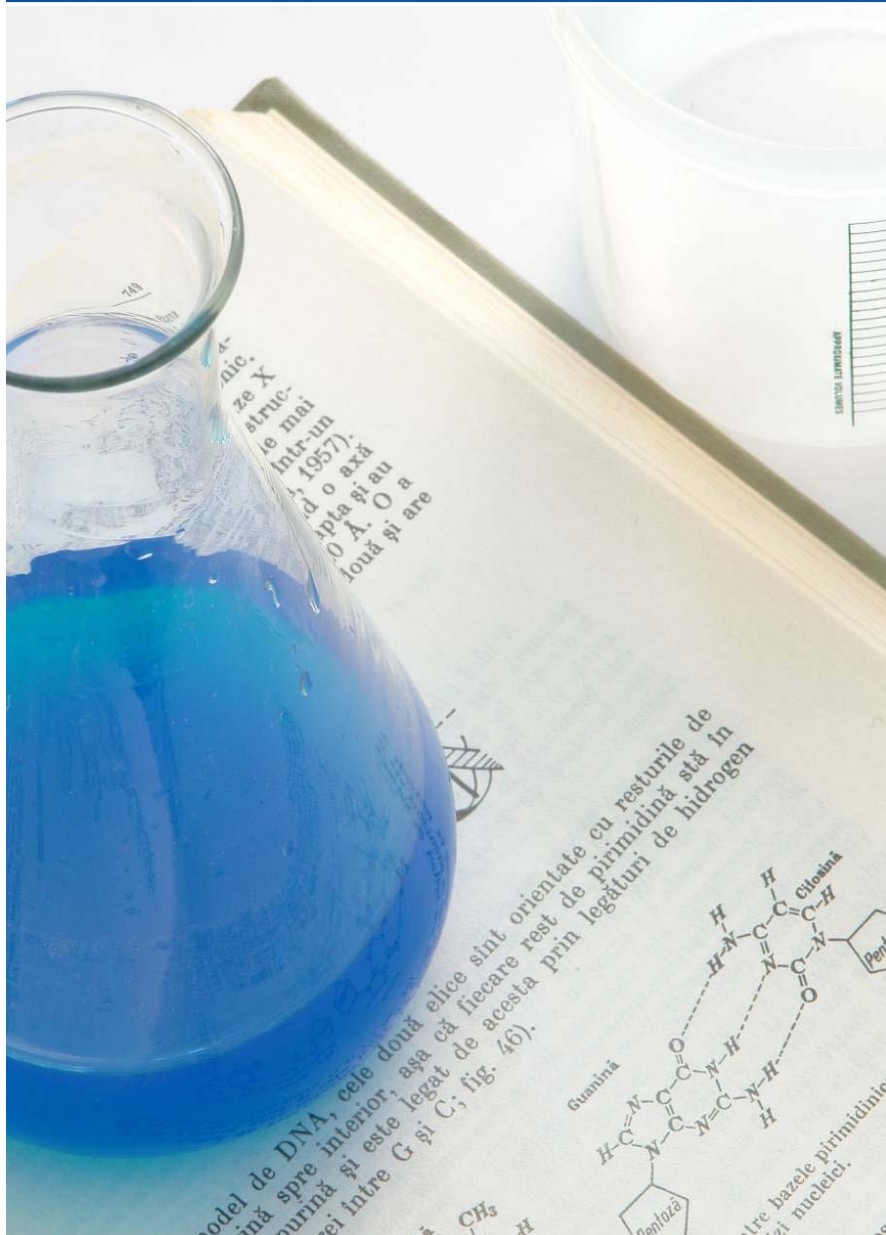


What may be helpful for employers?

- looking to the (near) future



- REACH and OSH have a common objective of a high level of protection of workers from risks due to exposure to chemicals at the workplace.
- Guidance on the hierarchy of OSH control measures – actually a fairly limited number of options to be used singly or more often in combination – in practice presents the principles of good occupational hygiene practice (recognition, evaluation and control).
- Enhanced extended SDSs with a contents list on the front page.
- Develop IT tools to enable employers to select only eSDS relevant sections.
- Comprehensible and well communicated RMMs in the Exposure Scenarios – e.g. in simple pictorial representations as used in some existing e-tools.
- Consistency/coherency of terminology within OSH & REACH.
- Change the presentation/communication of the good information currently being developed under REACH and OSH to make it more relevant to employers – e.g. OSH duty holders do not understand PROC etc.
- To remember that OSH covers process generated substances.
- Common guidance for all stakeholders – employers, workers, NLI (enforcers)
- Communicate common guidance via ECHA and OSHA.
- Introduce a system to allow easy access to information on restrictions/authorisations.



Thank you

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