



Arbeidstilsynet



Norwegian Labour Inspection Authority's
**Annual National Campaigns
on Chemicals**

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Content

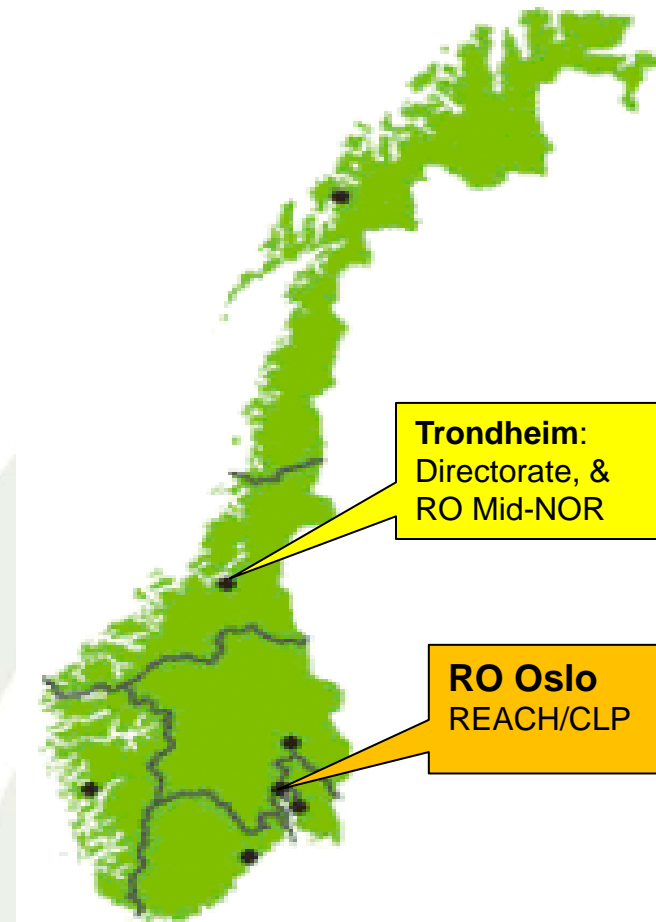
1. Brief on NLIA
2. Objectives of campaigns
3. Method of the campaigns
4. Areas of interest
5. What's done in the last years
6. Challenges
7. Attainments





The Norwegian Labour Inspection Authority

- Directorate and 7 Regional offices;
- 16 District offices;
- Call-centre; ~85,000 enquiries/yr
- 650 employees; ~400 inspectors
- 20, 000+ inspections annually
 - 2500 - 3000 related to chemicals
 - ~ 80% reaction





Objectives

- To reach out to many enterprises in a short duration of time
- Overview of the extent of implementation of relevant regulations
- Identifying suppliers for further follow-up regarding REACH/CLP requirements
- Assess employers' knowledge on existing regulation
- Give guidance to small enterprises systematically





Areas of interest...

- **REACH**

- Quality of SDS (and in some instances ES)
- Accessibility of SDS at workplaces
- Routines for distribution of SDS
- (Restrictions)

- **CLP/DPD**

- Quality of labels information (legibility, content, design...)
- Correct classification and labelling

- **Others (non-REACH/CLP)**

- Follow-up on specific items of national regulations



Method

- Work backwards ...
- Training for inspectors; normally 45-60
- Nationwide inspections; distribute information materials
- NACE codes/sector organisation used to identify enterprises for inspections
- Duration – 1 weeks to 3 months
- Focus on the selected theme
- A short, concise checklist
- SDS, labels, other REACH/CLP requirements
→ Regional Office Oslo (NEA for REACH; CA for CLP)



The last few years...

Year	Theme	Sector/targeted products
2010	<ul style="list-style-type: none">• Quality of SDS• Workers' access to SDS	Automobile (Car-care products)
2011*	Routines for distribution of SDS (Combined with REF1)	Supplier of chemicals (in general)
2012	<ul style="list-style-type: none">• Dichloromethane paint strippers (Restriction Annex XVII, post 59)• Use of information in SDS (RMM)	<ul style="list-style-type: none">• Painters• Cleaning industry (<i>removal av graffiti</i>)
2013	<ul style="list-style-type: none">• Labelling of chemicals;• Follow-up on DCM paint-strippers	<ul style="list-style-type: none">• Surface treatment• Repair of small boats• Repair of machines
2014	<ul style="list-style-type: none">• CLP-labels and their respective SDSs• Workers' access to SDS	<ul style="list-style-type: none">• Laboratories; production sites; workshops; a few printing house...

* *The only campaign that focused directly on suppliers of chemicals*



Some Results...

Year	Theme	# Insp.	Outcomes	Additional information
2010	<ul style="list-style-type: none">• SDS• Access to SDS (Car care)	352	<ul style="list-style-type: none">• 63% SDS pre-dated REACH• 38% Insufficient labelling• 82% Had access to SDS	1508 Products controlled
2011	Routines (Suppliers)	291	52% Did not have routines for (systematic) distribution of SDS	A good number operated from their living rooms
2012	<ul style="list-style-type: none">• DCM Paint-strippers (Painters/Cleaners)• Use of SDS	255	<ul style="list-style-type: none">• ~12% using DCM paint-strippers• 17% didn't have SDS for products they use• >50% could not explain how they use information in SDS	5 Suppliers were reported to the Police (they had together supplied ~15 tons after restriction came into force)
2013	<ul style="list-style-type: none">• Labels• Paint-strippers (Surface treatment)	290	<ul style="list-style-type: none">• 19% insufficient labelling• 5% of inspected still using DCM paint strippers	1011 Products controlled
2014	<ul style="list-style-type: none">• CLP-labels/SDS• Access to SDS (Provisional)	308	~37% CLP labelling with errors	290 CLP-labeled products



Some Challenges...

- Changing nature of suppliers... (e-business and such-like)
- It takes a lot of time to follow-up suppliers...
- Suppliers incompetence in requirement of the regulations
- Different regions have different industries





What have we attained?

- Bring about an increased awareness of the regulations
- Information on elusive suppliers
- A good number of suppliers are followed up – keep suppliers on their toes
- Employers increasingly becoming critical of information they receive from suppliers
- Blanket improvement in implementation of the requirements of the regulations



*Thank you for your
attention!!*