



HEALTH AND SAFETY AT WORK

CONNECTING WORKPLACE RISK ASSESSMENT UNDER OSH WITH REACH EXPOSURE SCENARIOS

ENES 10 MEETING
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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)

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 (draft adopted, under scrutiny)

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 can play a key role.
- Mixed exposures (most common situation) and not only exposure to a single substance must be considered.
- SDS + Exposure Scenario important source of information.

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, ...)

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
- Supporting tools for risk assessment and risk management
- Use of OELs

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.

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 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 legal duties are complied with.

Workers:

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

Enforcers:

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

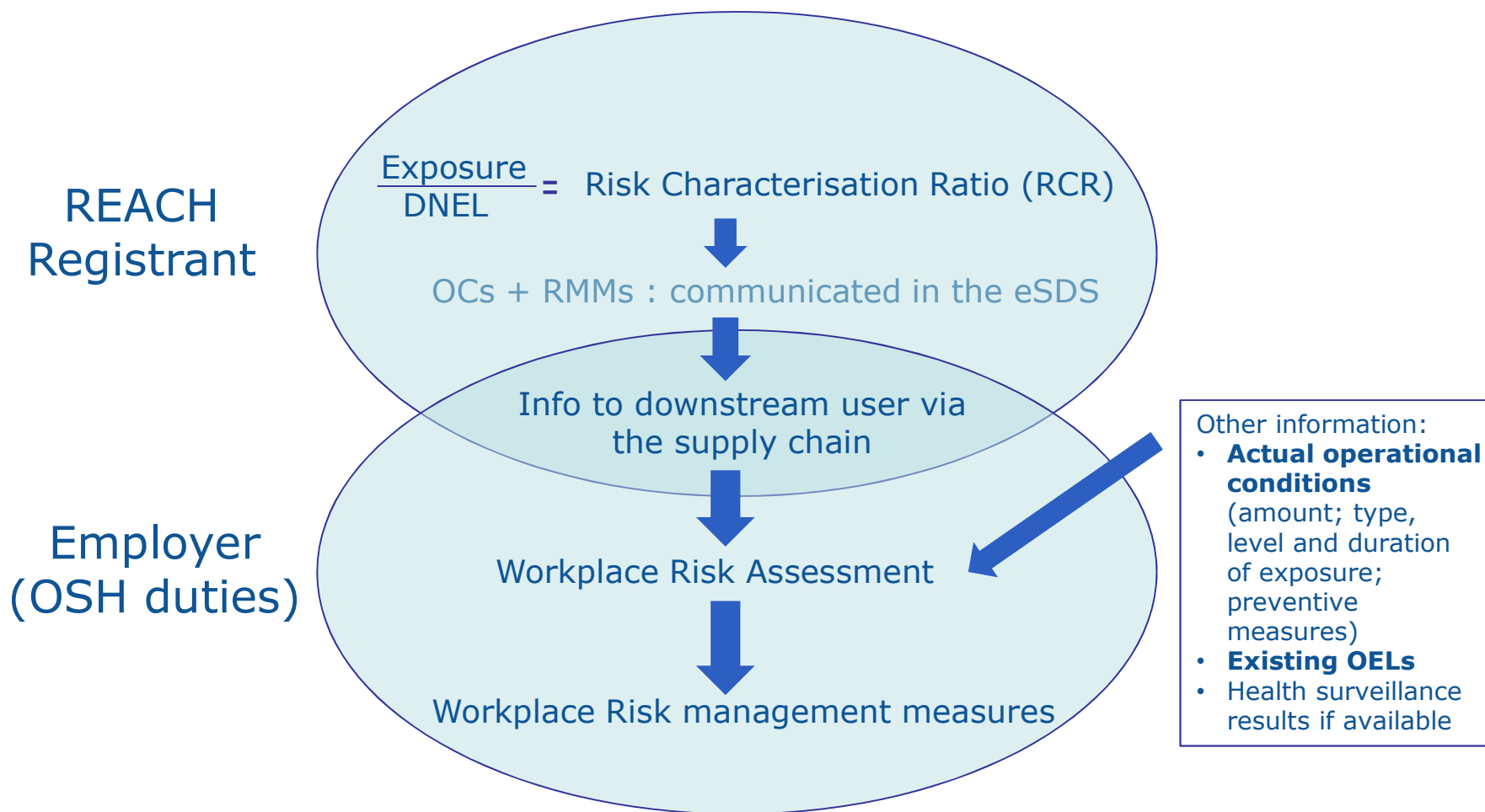


What may be helpful for employers?



- Guidance on the hierarchy of OSH control measures – actually a fairly limited no. of options to be used singly or more often in combination – in practice presents the principles of good occupational hygiene practice.
- eSDSs with a contents list on the front page.
- 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.
- 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 etc.
- Do not forget - OSH covers process generated substances.
- Common guidance for all stakeholders – employers, workers, NLIIs (enforcers)
- Communicate common guidance via ECHA and OSHA.
- A system to allow easy access to information on restrictions/authorisations.

REACH and OSH for users of chemicals



Thank you

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