REACH 10 Year Anniversary Conference

June 15th 2017

Spencer Hotel, IFSC, Dublin 1

HEALTH AND SAFETY AUTHORITY

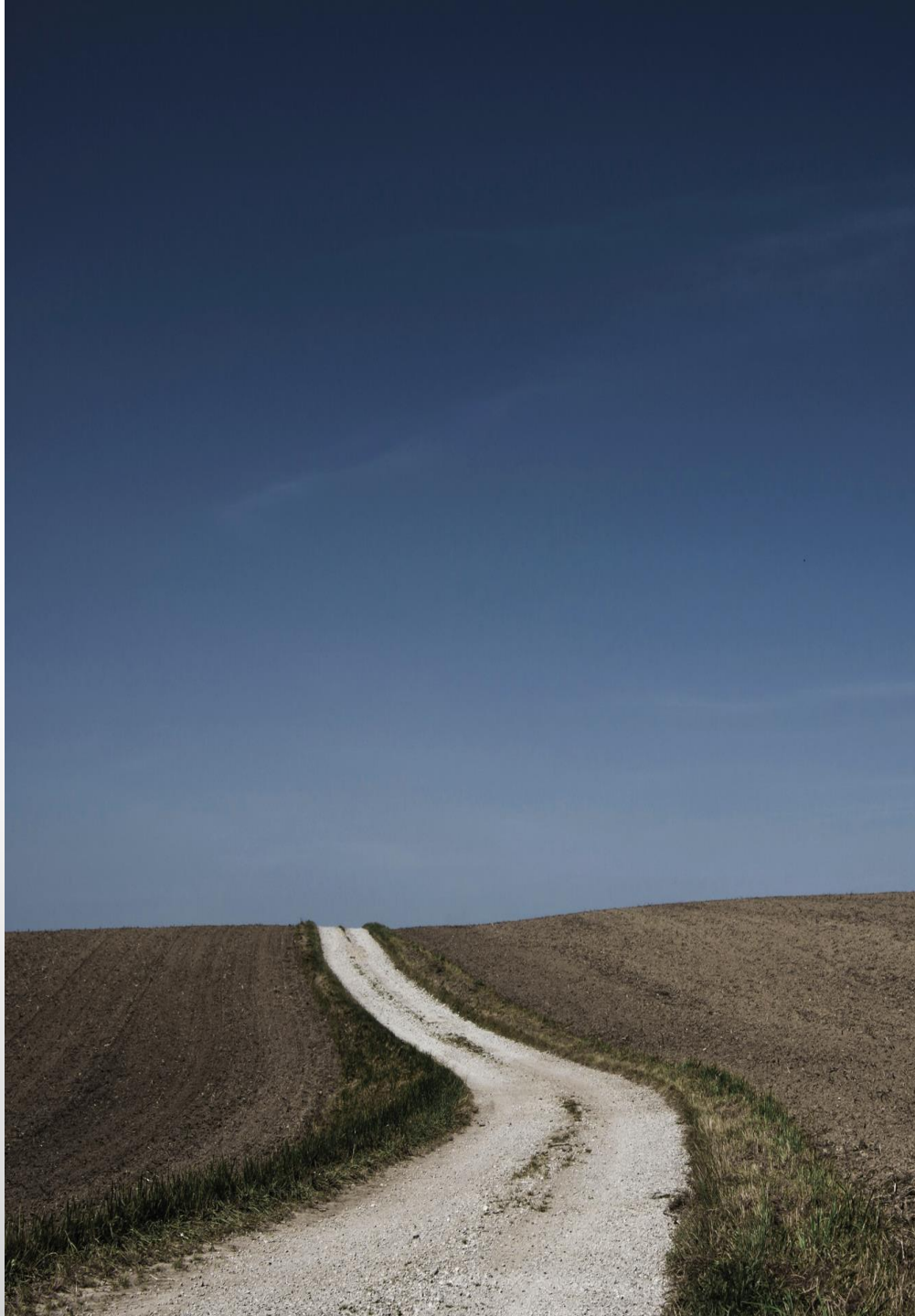
THE GREATEST BENEFITS OF REACH
- AND THINKING OF THE FUTURE

Frida Hök, Senior Policy Advisor, ChemSec

Dublin 15th June 2017

OUTLINE

- ChemSec
- REACH 10 years ago and today
- SIN List
- Greatest benefits of REACH
- Business tools
- The future



ABOUT CHEMSEC

- Swedish based non-profit
- Founded 2002 by four environmental NGOs
- Funding from governments and charity funds

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INTERNATIONAL CHEMICAL SECRETARIAT

WHAT WE DO

POLICY

BUSINESS & INVESTORS

TOOLS

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CHEMSEC BUSINESS GROUP

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INTERNATIONAL CHEMICAL SECRETARIAT

- News 2016
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- Sign up for news alerts
- Press Releases

Parliament approves watered-down REACH-compromise

The European Parliament today gave its support to the compromise deal on the REACH regulation, agreed with the Council on 30 November. At the Parliament's plenary session, a majority consisting mainly of members of the conservative, the social-democratic and the liberal groups, secured the vote for the package presented by the Environment Committee's rapporteur on REACH, Italian MEP Guido Sacconi.

"The losers in this process are not only European consumers, but also large parts of European industry," says Nardono Nimpuno, Chemsec policy advisor. "All those companies using chemicals in their production will continue to lack access to information on dangerous substance. They will still receive products containing hazardous substances without full information, and they will still be in the precarious situation of being liable for their products containing these."

Read the full press release

News 2006

13 December 2006

Parliament approves watered-down REACH-compromise

The European Parliament today gave its support to the compromise deal on the REACH regulation,...

Read More

12 December 2006

ChemSec urge MEPs to support increased information in REACH

The International Chemical Secretariat collaborates with a number of European national and multinational companies using...

Read More

12 December 2006

Council and Parliament REACH a deal on Chemicals

At the informal High-Level Trilogue on REACH, held late Thursday evening on 30 November, representatives...

Read More

25 October 2006

Eureau and Skanska urge Council to back Parliament position on REACH

In an Open Letter from Eureau and Skanska on REACH, EU Ministers

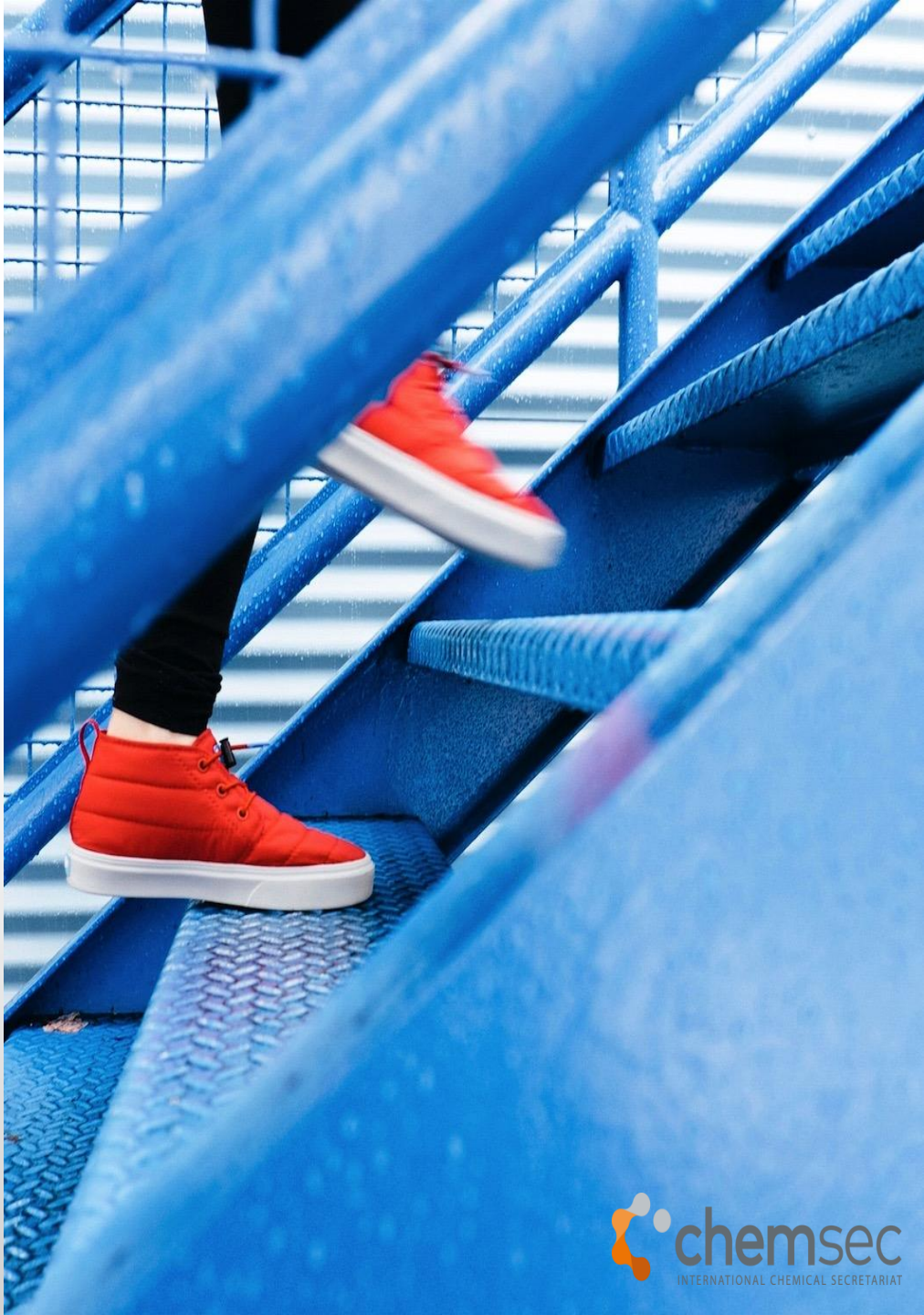
GUIDING PRINCIPLES

- Precaution
- Substitution
- Polluter Pays
- Right-to-know

Identification based on intrinsic properties

BETTER
FASTER
STRONGER

- Use to its full potential
- Quality
- Pace



THE SIN (substitute it now)- LIST

- Guidance for companies and others
- Used the criteria set out in REACH § 57
- Prediction of the Candidate List
- Launched in 2008- listing 309 substances
- Updates in 2011 and 2014
- Now includes 912 entries
- Predicted 94% of the substances on the Candidate List
- Widely used

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SIN LIST

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THE GREATEST BENEFITS OF REACH

BENEFITS OF REACH

- Human Health and the Environment
- Identification of SVHCs - a road to phase out
- Improved knowledge
- Innovation
- Larger market for alternatives
- More information

SUBSTITUTION BENEFITS

- The market for safer alternatives is growing
- Market opportunities
- Stay ahead of legislation
- Avoid extra cost for hazardous chemicals
- Prices of alternatives are not static

“If halogen-free alternatives had the volume that halogenated substances have today, the cost would be reduced by a third. *At that point they would be cheaper than halogenated solutions.”*

Paxymer

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CHEMSEC BUSINESS TOOLS

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SIN LIST

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SIN PRODUCERS

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TEXTILE GUIDE

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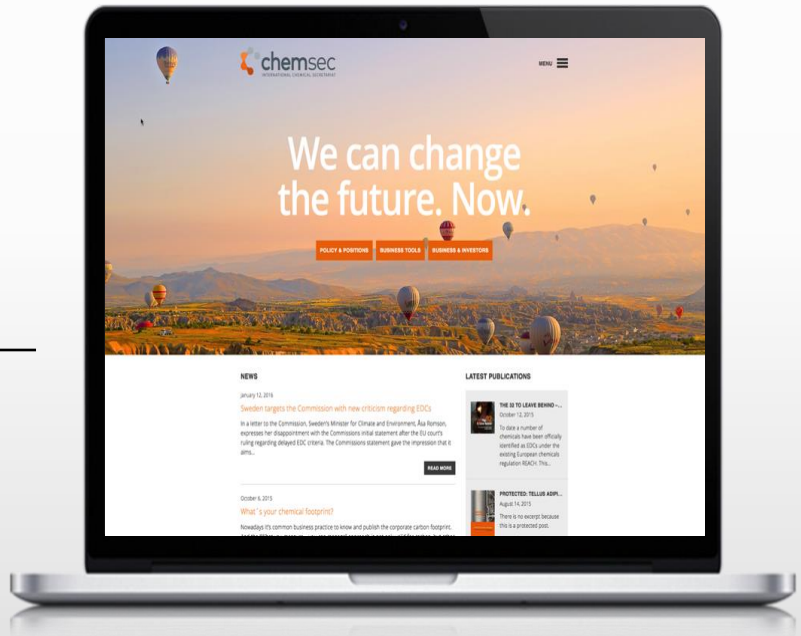
MARKETPLACE



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LIKE SHOE-SHOPPING

Not having to first define the problem or the solution

Not having to forward requests in complex supply chains

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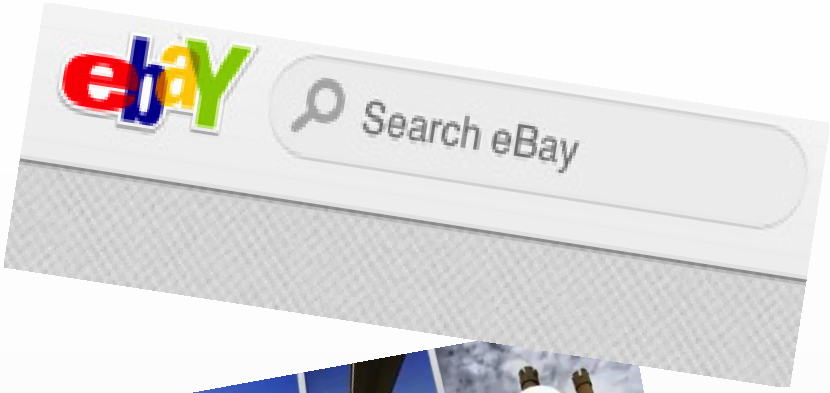
THE MARKETPLACE



Advertisments: both buy and sell

Specify your search

No fee

Point to connect

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MARKETPLACE USERS

PROVIDERS of solutions advertise and look at incoming requests

DOWNSTREAM **USERS** explore the advertisements and put in requests

INDUSTRY **STAKEHOLDERS**: Interested in availability of alternatives

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WHAT IS SAFER?

Criteria: No SVHC properties

Focus: intrinsic hazard

“No” assessment

Third party labels and certifications

User ranking

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MARKETPLACE by chemsec

FAQ Terms & Conditions Login / Register

Search for safer alternatives to hazardous chemicals

I'm looking for an alternative to... SEARCH

Alternatives Request Advanced Search >

Add alternative

Submit request

Account settings

Future-proof your business

Find safer alternatives to hazardous chemicals

Do you want to replace a chemical that is harmful to health or the environment with a better alternative? Search our database to find an alternative product from the suppliers presenting their offerings on the site. A quick and simple way to find the substitute you need.

Do you offer a safer alternative to hazardous chemicals? Show it on Marketplace.

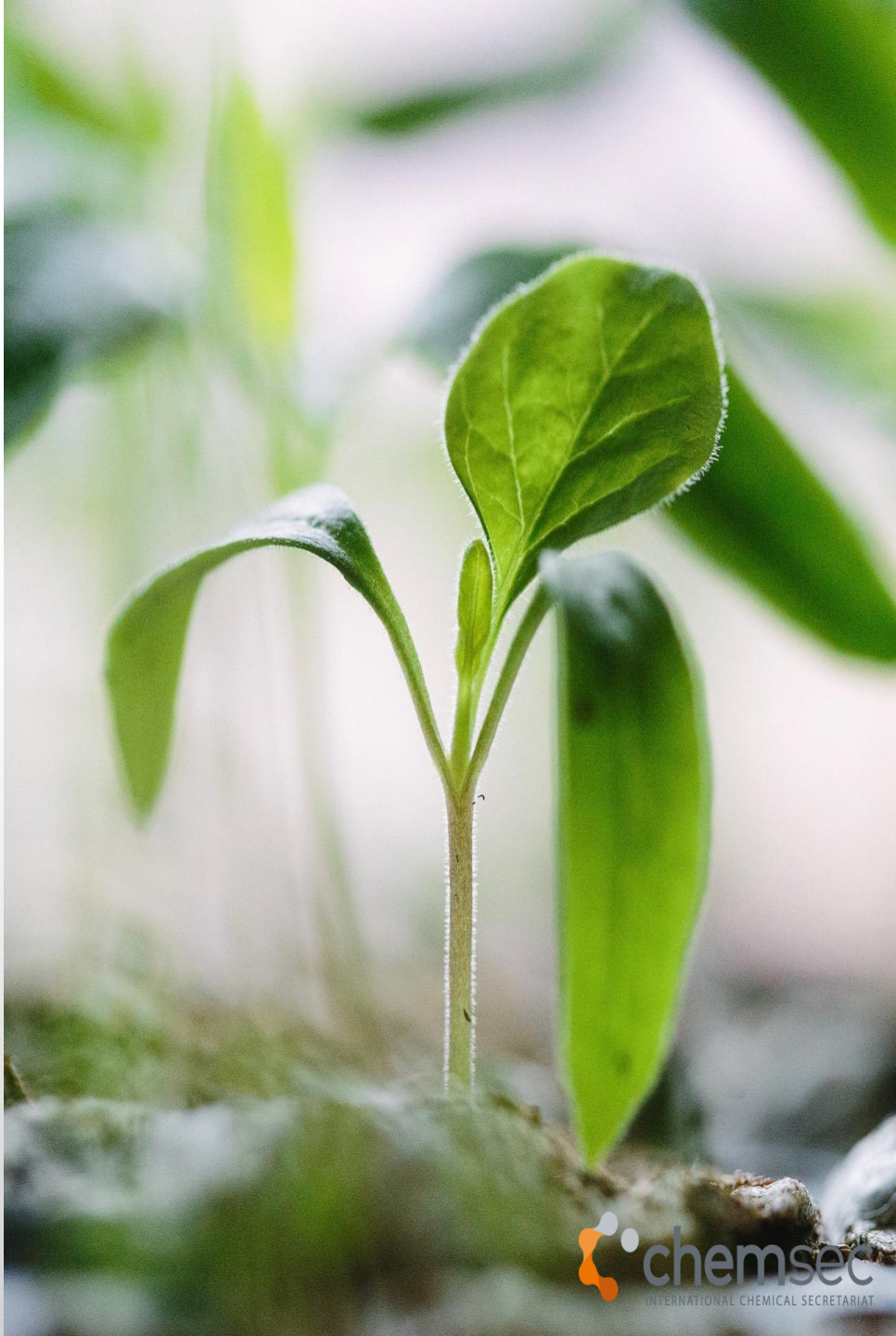
At Marketplace you reach out to customers with an expressed interest in what you have to offer. And get a great opportunity to present your safe alternatives to harmful substances for a better future.

SIGN UP NOW


- THINKING OF THE FUTURE

THINKING OF THE FUTURE

- Strengthen REACH
- Circular economy & REACH hand in hand
- Downstream users want transparency and dialogue
- Man-made hazardous chemicals are increasingly seen as a commercial risk.
- The society is moving towards sustainability



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THANK YOU!

@chemsec

www.chemsec.org

REACH and the downstream user

Tom O Sullivan

15 June, 2017

HEALTH AND SAFETY AUTHORITY

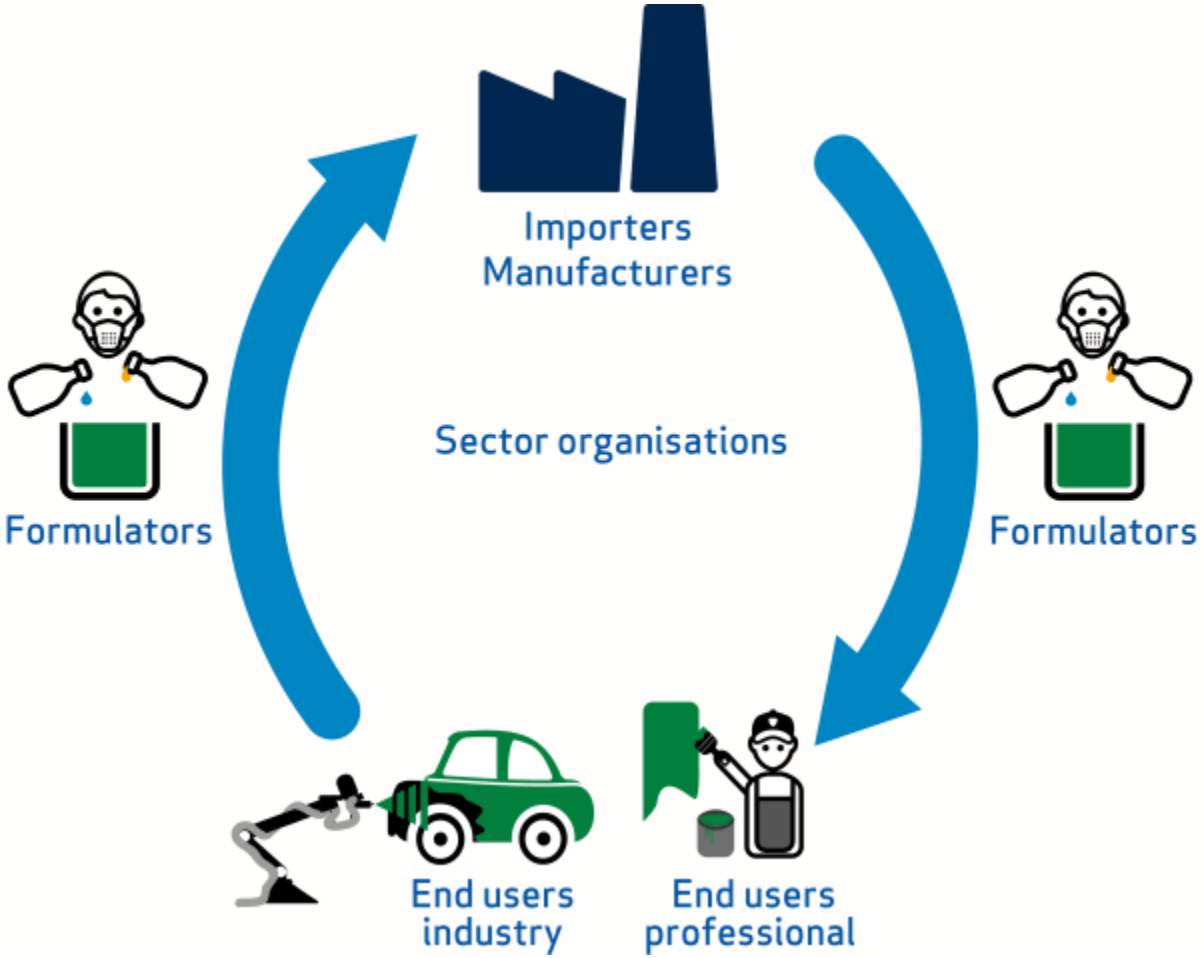
Content

- Who are DU?
- Communication in the supply chain
- Safety Data Sheet
- Authorisation
- Challenges for DU
- Guidance available to DU
- HSA and DU

Who are DU?

- DU: Natural or legal person in EU who uses a chemical in the course of industrial or professional activities
- Pharma / Chemical sector – Solvents, powders
- MVR / woodworking – Glues, Isocyanates
- Engineering workshop –corrosion inhibitor, White Spirits
- Formulator / distributor – paints, solvents, acids, bases
- Cleaners – bleach, solvents, Perck
- Laboratories

Communication in the Supply Chain



HEALTH AND SAFETY AUTHORITY

Safety Data Sheet

- Critical information source for DU to prepare Risk Assessment for control of chemical agents
- REACH compliant (Annex II)??
- Label information??
- Provided on first delivery, update or on request
- Exposure scenario attached as annex?

2007 Methanol SDS Section 8

8 EXPOSURE CONTROLS / PERSONAL PROTECTION

Personal Protection	Wear self-contained breathing apparatus, boots and gloves.
Exposure controls	
LTEL (8hr TWA)	200 ppm; 266 mg/m3 (EH40/2002)
STEL (15 min.)	250 ppm; 333 mg/m3 (EH40/2002)

HEALTH AND SAFETY AUTHORITY

2017 Methanol SDS Section 8.1

SECTION 8: Exposure controls/personal protection

The list of Identified Uses in Section 1 should be consulted for any available use-specific information provided in the Exposure Scenario(s).

8.1 Control parameters

Occupational exposure limits

Product/ingredient name	Exposure limit values
Methanol	**NAOSH (Ireland, 3/2016). Absorbed through skin.** OELV-8hr: 200 ppm 8 hours. OELV-8hr: 260 mg/m³ 8 hours.

Recommended monitoring procedures : If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment. Reference should be made to monitoring standards, such as the following: European Stahdard EN 689 (Workplace atmospheres - Guidance for the assessment of exposure by inhalation to chemical agents for comparison with limit values and measurement strategy) European Standard EN 14042 (Workplace atmospheres - Guide for the application and use of procedures for the assessment of exposure to chemical and biological agents) European Standard EN 482 (Workplace atmospheres - General requirements for the performance of procedures for the measurement of chemical agents) Reference to national guidance documents for methods for the determination of hazardous substances will also be required.

DNELs/DMELs

HEALTH AND SAFETY AUTHORITY

2017 Methanol SDS Section 8.2

8.2 Exposure controls

Appropriate engineering controls	:	Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapour or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

Individual protection measures

Hygiene measures	:	Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
Eye/face protection	:	Use eye protection according to EN 166, designed to protect against liquid splashes. Recommended: Safety glasses with side shields.
Hand protection	:	Wear suitable gloves tested to EN374. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. Recommended : Protective Index 6 / Breakthrough time >480 minutes: butyl rubber 0.7 mm thickness
Other skin protection	:	For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves. Refer to European Standard EN 1149 for further information on material and design requirements and test methods. Wear work clothing with long sleeves. Cotton or cotton/synthetic overalls or coveralls are normally suitable. Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
Respiratory protection	:	Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator. Long Term Exposure / high concentrations : Self-contained respirator (DIN EN 133) or full face mask (DIN EN 136) Short term exposure / Low exposure : Half-face mask (DIN EN 140) Recommended: Type A (Brown): organic gases and vapours with a boiling point higher than 65°C.

HEALTH AND SAFETY AUTHORITY

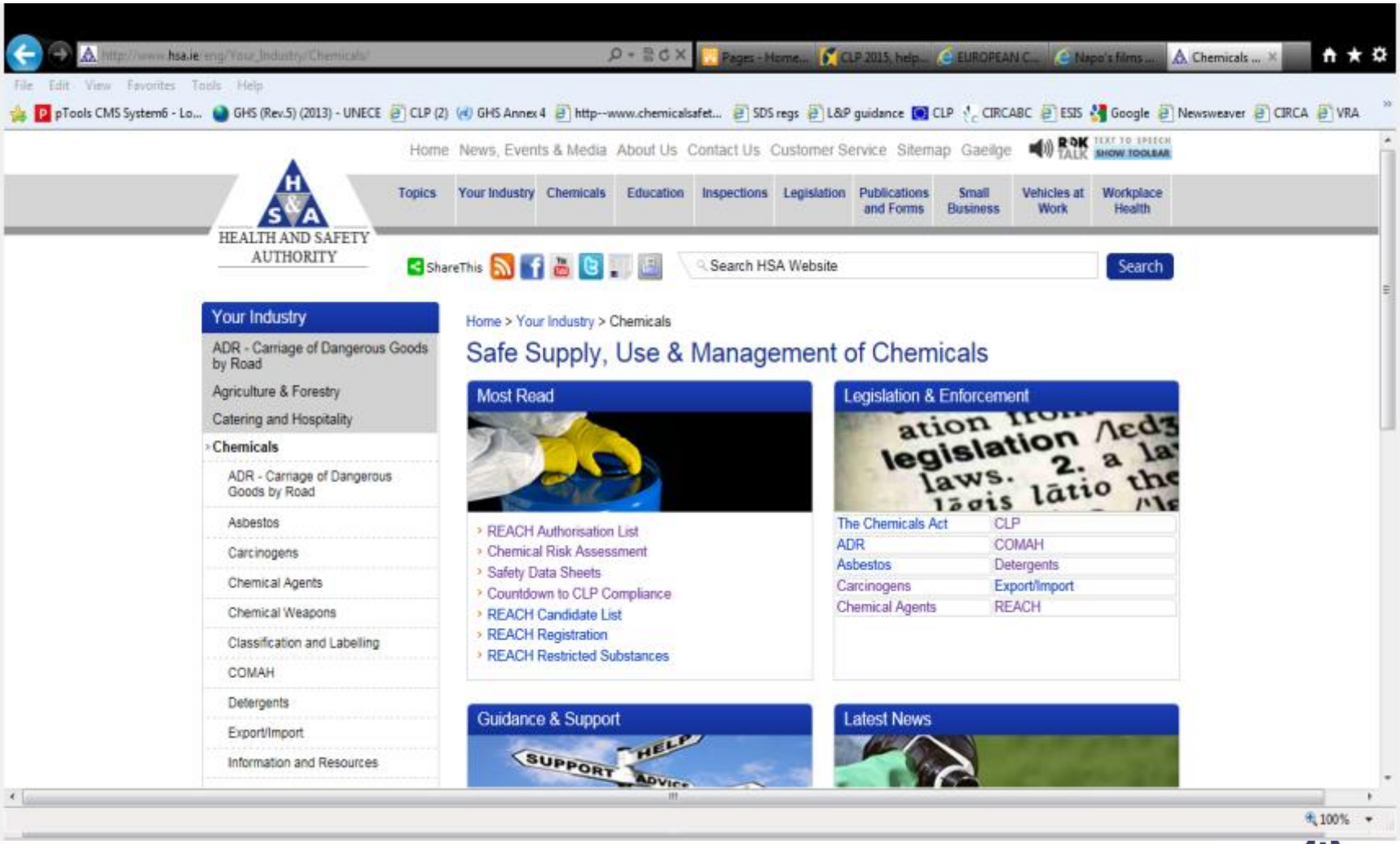
Authorisation

- 31 SVHC identified – Annex XIV
- High hazard, wide use
- Engineering workshop – use corrosion inhibitor (Chromium Trioxide & Pot. Dichromate, both are CMR & Sensitiser)
- Paint Formulator / distributor -Lead sulphochromate pigment (yellow) (Carc.1B, Repro. tox.1A)
- Is use addressed by Authorisation application prepared by upstream M/I/distributor ? / Authorisation No. on label?
- What Options if use NOT covered?

Challenges for DU

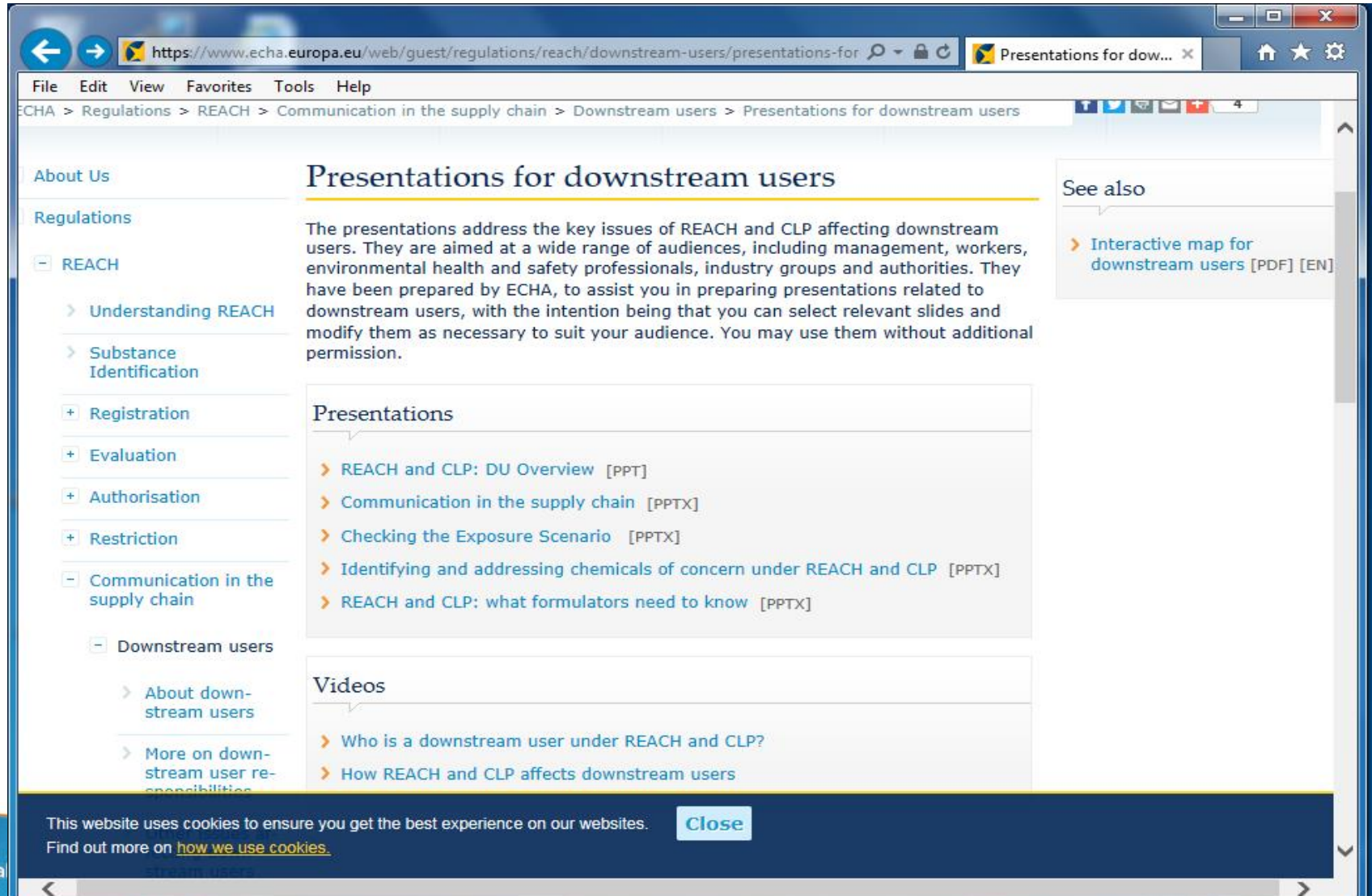
- Overlap of chemical legislation
- Prepare risk assessment based on RMM in SDS for chemical agents appropriate to own use
- Application of Hierarchy of Control measures
- Poor quality SDS
- Complex supply chain leading to breakdown in communication
- Information overload
- Brexit?
- Authorisation – may result in removal of critical substances off market

DU Support



HEALTH AND SAFETY AUTHORITY

DU support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ECHA > Regulations > REACH > Communication in the supply chain > Downstream users > Presentations for downstream users
About Us
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Substance Identification
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Evaluation
Authorisation
Restriction
Communication in the supply chain
Downstream users
About down-stream users
More on down-stream user re-
Presentations for downstream users
The presentations address the key issues of REACH and CLP affecting downstream users. They are aimed at a wide range of audiences, including management, workers, environmental health and safety professionals, industry groups and authorities. They have been prepared by ECHA, to assist you in preparing presentations related to downstream users, with the intention being that you can select relevant slides and modify them as necessary to suit your audience. You may use them without additional permission.
Presentations
REACH and CLP: DU Overview [PPT]
Communication in the supply chain [PPTX]
Checking the Exposure Scenario [PPTX]
Identifying and addressing chemicals of concern under REACH and CLP [PPTX]
REACH and CLP: what formulators need to know [PPTX]
Videos
Who is a downstream user under REACH and CLP?
How REACH and CLP affects downstream users
See also
Interactive map for downstream users [PDF] [EN]
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Close

HSA and DU

- Ca. 7800 REACH related inspections 2007 – 2017
- Inspection activity targeted – Registration, SVHC, CMR, Sensitizers, SDS / Label assessment , Restrictions, etc.
- Hierarchy of control measures used ?
- REACH Enforce (REF) projects
- Guidance – www.hsa.ie/eng/publications
- www.hsa.ie/eng/Your_industry/Chemicals
- Seminars
- Helpdesk – chemicals@hsa.ie

HEALTH AND SAFETY AUTHORITY

Thank you

HEALTH AND SAFETY AUTHORITY

ARRAN

ARRAN An Outline of a Small Chemical Manufacturing Entity

- Manufacturing on current site since 1988
- Sales ~ € 18 M
- Employees 72
- Estimated number of REACH registrations through 2018: 60
- Of which intermediates: 50
- Major business focus: Intermediates for specialty applications

Chemical Industry Regulation

- Chemicals Acts (Control of major accident hazards…..” Seveso”..)
- Chemical Agents Regulations (EC directive chemicals agents)
- ADR (Carriage of dangerous substances/dangerous goods advisors…)
- Chemical Weapons Act
- ATEX (electrical safety in flammable atmospheres …)
- IPPC
- REACH including CLP

REACH: From an SME viewpoint, some positives…..a lot of negatives..

- It was necessary to develop a new approach after NONS/ATP…
- Now much easier to work on development up to 1000 kgs/y…
  BUT…
- Considerable extra burden on limited resources
- Significant costs, not just for registration, but for tests and data sharing, analytical support etc
- Real problems for small companies in dealing with IUCLID and REACH-IT
- Uneven enforcement in EU
- No restrictions on third countries, or any move to multilateral thinking

For SMEs and batch chemical operators in the EU REACH presents an anti-competitive burden not only with respect to manufacturers outside the EU, (not just India and China, where there is much less regulation) but also to those located in member states of the EU where the regulation won't be enforced

Coping with Reality!

- As Bernard Shaw said about sex, REACH also has probably come to stay, so the practical expedient for all of us is to make it work as best we can in the common interest
- Even if, compared to other jurisdictions, the European chemical industry is subject to a greater burden of regulation, we exert our best efforts at all times to comply and safety standards are high
- Today's event is a clear sign of the willingness and openness on the part of industry and regulators to work together to clarify interpretation and find workable solutions, and perhaps dispel some illusions!
- My focus now on aspects of significant concern to SMEs and the fine chemical sector, mainly Intermediates and Authorisation/Restriction, with some thoughts on Innovation

Historical Perspective on Intermediates

- Introductory drafts of REACH, including the use of the phrase " Strictly controlled conditions" for Intermediates
- Early contacts with ECB, focussing primarily on intermediates because of their importance for our sector
- Publication of initial guidance for intermediates
- Issue of new guidance which was much more complicated, and containing in our view some unworkable elements.
- Equation by some regulators of SCC with " closed systems"
- Direct contacts between fine chemical sector and ECHA/European Commission/individual CAs, leading to a better mutual understanding

Intermediates and SCC

- Arran and other companies have a REACH management system in place, incorporating standard risk assessment guidelines
- Intermediates range from 1MT+ to 1000 Mt: one size does NOT fit all!
- Proportionality and flexibility are required in interpretation
- Risk assessment, being the basic approach to other chemical regulation must play its part also in REACH
- PPE is specifically prescribed by other chemical legislation, as a key, but of course not the only element of worker protection. Its relevance can't be neglected or dismissed as it seems by some sections of guidance and some CAs

Authorisation…..(or Restriction?)

- Authorisation is over complicated and expensive especially for SMEs and low volume users of a particular substance (aprotic solvents!)
- Restriction is a commonly used vehicle for limiting applications not just in our business, and could readily be applied with less resources for industry and regulator for a specific industrial application
- Widespread concern across the EU on this topic

Regulation and Innovation

- Regulation doesn't promote or foster innovation…it acts instead to lessen or remove resources which could be deployed to that end
- Our EU chemical industry, and I believe Arran is a typical example, is innovative and inventive, and we have to be to survive intense competition from outside!
- Innovation comes from knowhow and the time and other resources for development
- A simple example from our own experience

Looking to the Future n > n+ 10

- (Some helpful thoughts or suggestions?)
- Continue to develop our really excellent and open discussions to ensure we get the best outcome from REACH with limited resources on both sides
- Could we consider extending the pre-registration system, perhaps for a limited period of validity to allow the useful SIEF type exchanges, and free some resources which would otherwise go into preparation and review of enquiry dossiers?
- Could we plan to use the (simpler) principle of restriction rather than authorisation more in future?
- Can we press for some control of intermediate dossiers submitted by ORs from India and China
- How can we ensure that REACH enforcement across the EU is equitable and real

Need for Balance!

REACH 10th anniversary: Trade union views on achievements & future challenges

Ester Lynch, ETUC confederal secretary

Dublin, 15 June 2017

CONFEDERATION SYNDICAT EUROPEAEN TRADE UNION

European Trade Union Confederation (ETUC)

- ETUC is the European social partner representing workers
- The Maastricht Treaty (1992) guarantees this formal status
- ETUC aims to ensure that the EU is not just a single market for goods and services, but is also a Social Europe

- 89 National member organisations
- 39 European countries
- 10 European industry federations
- 45 million workers

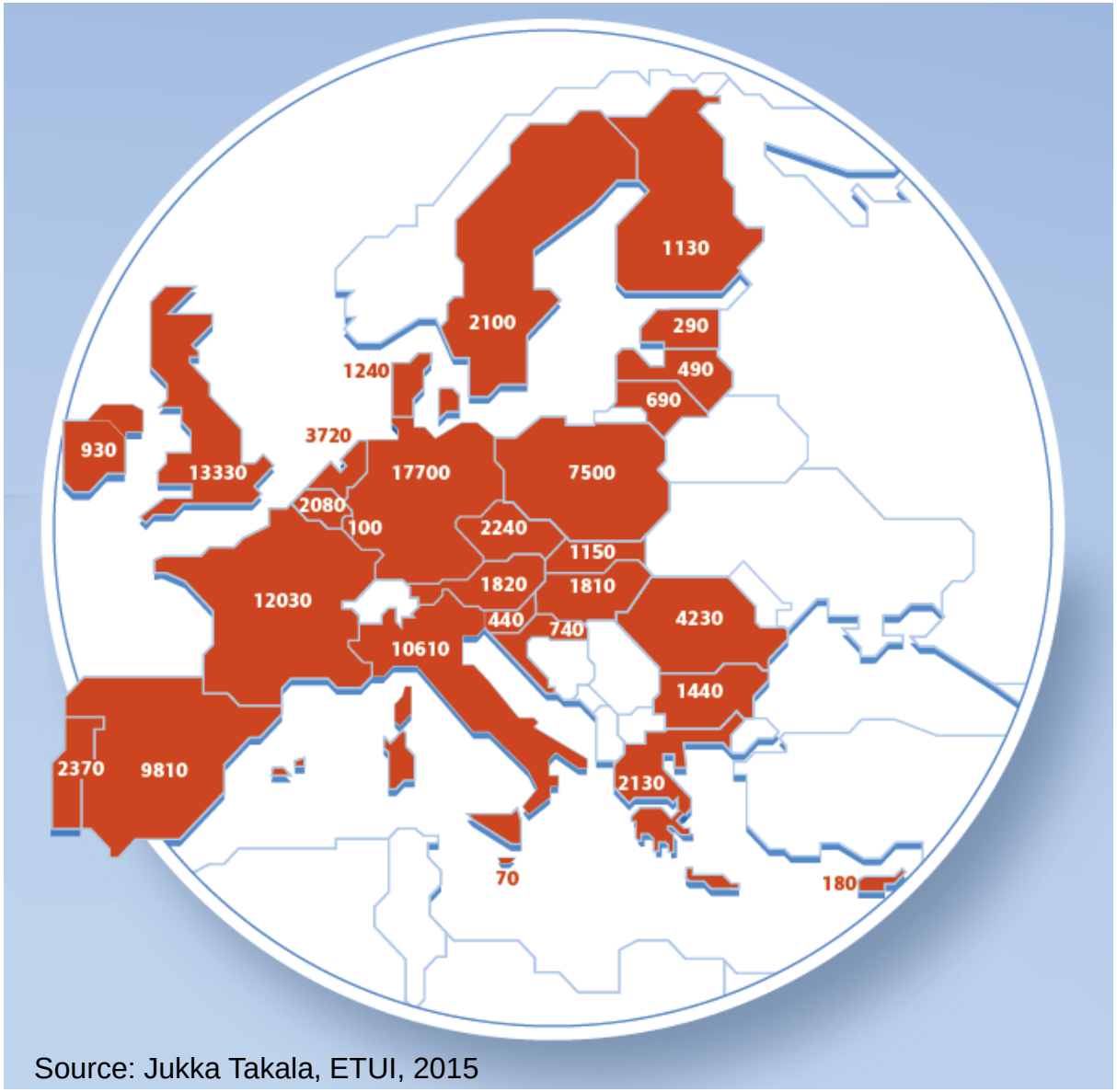
CONFEDERATION SYNDICAT EUROPEAEN TRADE UNION

Overview

- Why do we need REACH/CLP ?
- REACH/CLP achievements
- Future challenges
- Trade Union involvement in ECHA's work
- Conclusions

Why do we need REACH/CLP ?

Cancer is the biggest killer at work in the EU-28



Source: Jukka Takala, ETUI, 2015

102 500 deaths/year due to work-related cancers

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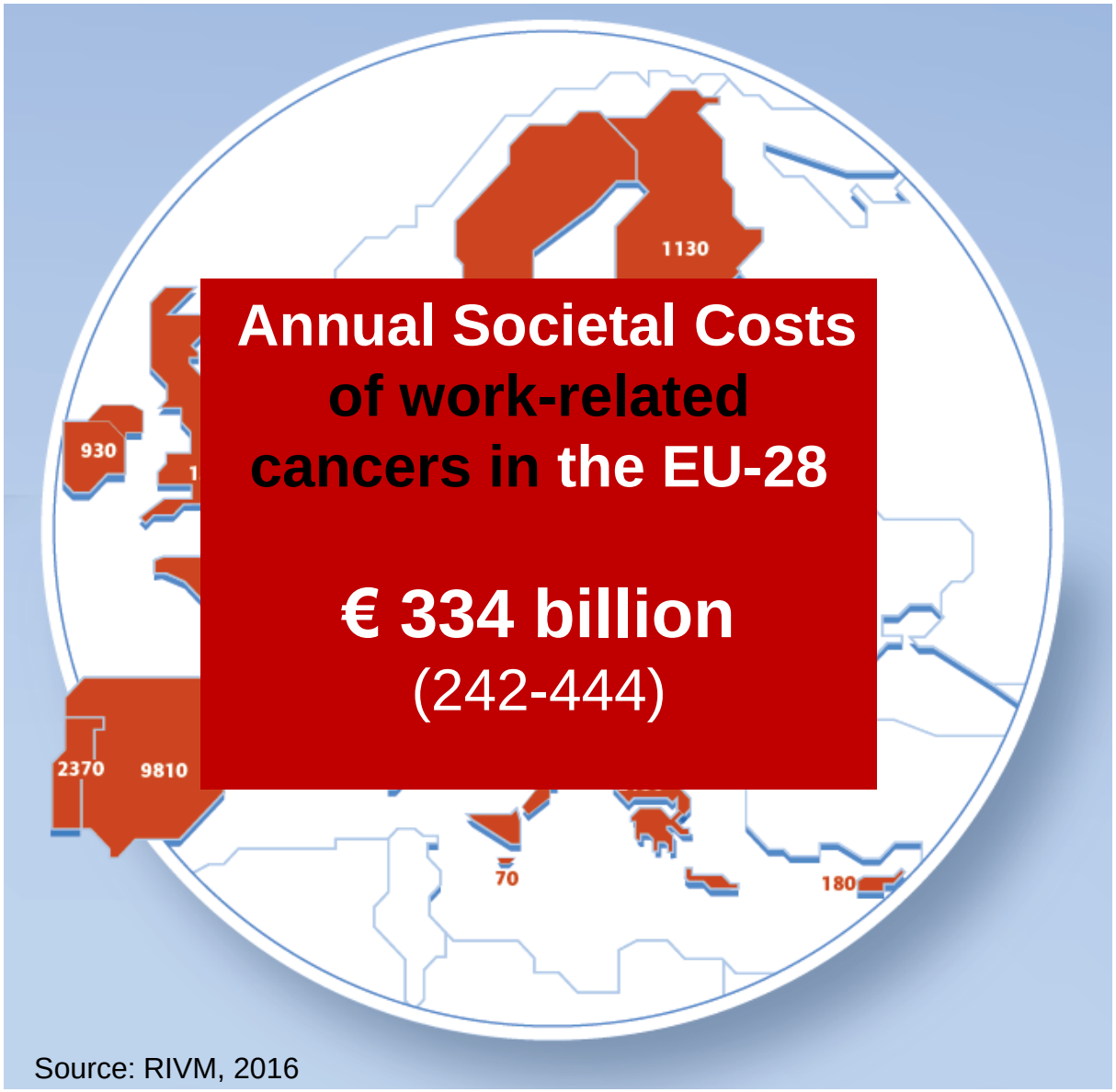
Costs for workers, employers and social-security ?



Source: RIVM, 2016

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The objectives & principles of REACH

- improve the protection of human health (workers + consumers) and the environment from the risks that can be posed by chemicals (→ close the data gap)
- enhance the competitiveness of the EU chemicals

- burden on proof shifted on industry
- no data no market
- progressive substitution of SVHCs with safer alternatives
- precautionary principle

REACH & CLP achievements

- 16 000 substances registered (60 000 registration dossiers) by 12 000 companies
- 130 000 substances notified in the Classification & Labelling inventory
- 173 chemicals identified as SVHC
- 31 SVHCs in the Authorisation list
- 236 opinions on harmonised classifications
- 20 new restrictions
- information on 15 000 substance publicly available and used all over the world (info cards, brief profiles):
  - ✓ users of chemicals for safer uses
  - ✓ authorities for better decision making

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Future challenges for ECHA

- make 2018 registration deadline a success
  - ✓ 25 000 susbtances expected & 60 000 registration dossiers
- improve data quality & compliance of registration dossiers
  - ✓ revocation of registration numbers
  - ✓ naming & shaming
  - ✓ Chemical Safety Report publicly available
- speed up the substitution of SVHCs with safer alternatives
  - ✓ ~1400 SVHCs on the EU market but only 173 on the Candidate List
  - ✓ notification of SVHCs in articles (right to know for consumers)
  - ✓ more restrictions when risks are not adequately controlled
- synergies between REACH & Workers 'protection legislation
  - ✓ Cooperation between RAC & SCOEL for OELs setting

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Other challenges

- Mind-set change in the industry (paradigm shift with the burden of proof reversed onto producers)
- Awareness in companies (incl. SMEs) about their obligations under both REACH/CLP and OSH (Sectorial Social Dialogue also needed)
- Good enforcement with well-resourced inspectorate
- Training on chemical risks for employers & workers
- Coherency between REACH & OSH (reprotoxics should be included in the scope of the Carcinogens & Mutagens Directive)

Trade union representatives involved in ECHA's activities ?

ECHA's body	ETUC / industriAll (2007-2017)
Management Board (+ dissemination advisory group)	**Member**
Member State Committee	**Accredited stakeholder observer**
Risk Assessement Committee	**Accredited stakeholder observer**
Socio-economic Committee	**Accredited stakeholder observer**
Forum	**Accredited stakeholder observer**

CONFEDERATION SYNDICAT EUROPEAEN TRADE UNION

Workers' reps ambassadors for REACH and CLP (1)

REACH 2013 - Call to action

Workers' reps in companies manufacturing, importing or using chemicals

The REACH Regulation requires the registration of all chemical substances that are manufactured or imported into the EU, Iceland, Norway or Liechtenstein in quantities of one tonne or more per year. If information on the hazardous properties of the chemical is unavailable, it should be generated and the safety data sheets should be updated.

Substances already on the market have to follow specific registration deadlines, based on their volumes and on their health and environmental hazards. New substances must always be registered before they are placed on the market.

IS YOUR EMPLOYER READY?

Companies manufacturing or importing chemical substances into the EU in quantities of **100 tonnes or more per year** have to **register them** by the second REACH deadline of **31 May 2013**.

Remember the deadlines

First registration
30 November 2010
≥ 1000 tonnes/year

Second registration
31 May 2013
≥ 100 tonnes/year

Third registration
31 May 2018
≥ 1 tonne/year

- Many companies still unaware of their obligations under REACH and CLP
- ETUC/IndustriAll awareness campaign with ECHA & EU-OSHA
- Objective: use workers' reps to inform employers
- "Call to action" leaflet available in 22 EU languages

CONFEDERATION SYNDICAT EUROPEAEN TRADE UNION

Workers' reps ambassadors for REACH and CLP (2)

Use chemicals? Use them safely!

SAFETY DATA SHEETS AND EXPOSURE SCENARIOS

WHAT WORKERS NEED TO KNOW AND DO

If your company is using hazardous substances registered under REACH, you may soon see new, extended safet data sheets. This is one of the main innovations of REACH, to enable you and other workers to use these substances safely.

WHAT IS NEW IN THE EXTENDED SAFETY DATA SHEETS?

The extended safety data sheets include an annex with exposure scenarios. Exposure scenarios contain practical advice on the conditions under which the chemicals can be used safely, including the necessary risk management and waste management measures. This information comes from the chemical safety assessment that was carried out under REACH for all the uses in the life cycle of the substance.

HOW THE NEW RULES WILL BENEFIT YOU?

The new rules will help to protect your health and the environment. The additional information in the exposure scenarios can be used to enhance the safe use of chemicals, reduce exposure to hazardous chemicals and avoid occupational diseases. The new rules introduced by REACH complement the existing health and safety legislation.

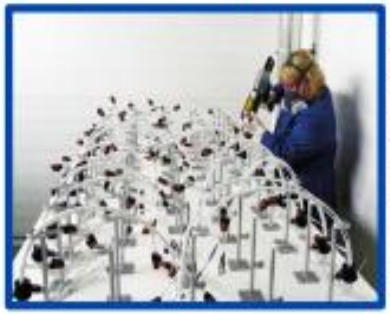
WHY DO YOU NEED TO TAKE ACTION?

It is important for your health. If your company fails to comply with REACH, it may have a significant impact on you, as you may not be using the chemicals safely.

WHAT CAN YOU DO?

Show this leaflet to your employers to make sure they know what they should do when they receive extended safety data sheets. As you are exposed to the chemicals in your company, you are well placed to help your employer fulfil their legal duties.

Make sure that you and other workers in your company understand and apply the measures based on the extended safety data sheets. If you have difficulties in doing so, ask your employers to provide training. This is an obligation under the worker protection law.



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REACH 2018 - Call to action!

Workers' reps in companies manufacturing, importing or using chemicals

The REACH Regulation requires companies manufacturing or importing chemical substances into the EU, Iceland, Norway or Liechtenstein in quantities of one tonne or more per year to register them with ECHA. If information on the hazardous properties of the chemical is unavailable, it should be generated and safety data sheets should be updated if needed.

IS YOUR EMPLOYER READY?

The last registration deadline is on 31 May 2018 and it impacts companies manufacturing or importing existing substances in volumes between 1 and 100 tonnes per year. Registration concerns chemical substances as such, in mixtures or, in specific cases, in articles.

Your employer should start preparing for the REACH 2018 registration deadline now by analysing the company's portfolio from the REACH 2018 perspective and making a plan for managing the 2018 registrations.

WHAT ARE THE DUTIES OF YOUR EMPLOYER?

If your company has to register substances by the last registration deadline of 31 May 2018 your employer has to:

- gather all available information about the properties of the substance;
- share it with other manufacturers and importers of the same substance;
- determine with them if they as co-registrants have all information needed for registration;
- if not, fill in the gaps together; and
- document this in a registration dossier.

In addition, if the volume manufactured or imported is at or above 10 tonnes per year, your employer also has to:

- use the information collected to assess the risks for workers' and consumers' health, as well as for the environment; and
- identify the necessary risk management measures to ensure the safe use of the substance by your company and by your customers.

Conclusions

- REACH/CLP have the potential to improve health & safety at the workplace and reduce the number of occupational diseases and fatalities caused by hazardous chemicals
- Great achievements so far but many challenges still ahead
- Trade unions are committed to make REACH reform a success and they intend to play their role throughout the timetable for REACH implementation

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Thank you, further info on:

http://www.etuc.org > Our activities > REACH

http://www.etui.org/Topics/Health-Safety/Chemicals-and-REACH

CONFEDERATION SYNDICAT EUROPEAEN TRADE UNION

REACH 10 Year Anniversary Conference

June 15th 2017

Spencer Hotel, IFSC, Dublin 1

HEALTH AND SAFETY AUTHORITY