

# Conclusions and next steps

Use of REACH/CLP information at  
industrial sites

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# Our aims revisited (1)

## Explore

- Efficiency gains through the use of REACH/CLP information to support compliance under other legislations

## Enhance

- Common understanding of interactions
- Information use, reduce unnecessary work

## Initial conclusions

- REACH Regulation is bringing new knowledge on the chemical substances used by industry
- There are opportunities to use this knowledge to improve chemicals management throughout the supply chain
- Importance to promote the use of REACH information and the alignment of REACH with other environmental and OSH legislation
- Practical guidance for industrial users / authorities would help (but written for the target group's need). *Starting points might be: Appendix 3 to case study (modified)? Supplement to eSDS Guide?*

## Our aims revisited (2)

### Identify

- Potential ways to use information
  - Some examples from Workshop:
    - CLP InfoCards; Safe Work Instruction Cards; Seveso Directive safety reports / IED baseline reports
- Barriers to information use
  - Some examples from Workshop:
    - Different terminologies used in the different regimes.
    - Traditional / Established working practices.

# Our aims revisited (3)

## Identify

- Support needs
  - From Workshop:
    - Areas for support identified (compared with proposals from Eurometaux – next 2 slides)
- Opportunities for greater cooperation and integration
  - From the Workshop:
    - More cooperation acknowledged, REACH-OHS and REACH-IED
    - Examples of company approaches to integrate do exist
- Actors for next steps. *See later slide.*

## Proposals to improve the use of REACH and CLP information:

*Similar points have been identified in Workshop's discussion by participants:*

- Identification of overlaps and specific interactions of REACH information (ES in particular) with other pieces of legislation
- Identification of the relevant parts of the SDS and ES which can be used to meet other legal obligations and improve chemicals management on site
- Analysis of the ES format and its relevance to facilitate the use of REACH data for other purposes
  - Do existing formats (e.g. ES annotated templates, ES used in the case study) facilitate the use of REACH data?
  - Which are the most appropriate sections to locate information useful to comply with IED,CMD,CAD...?

## Proposals to improve the use of REACH and CLP information:

*Similar points have been identified in Workshop's discussion by participants:*

- Analysis of the information requirements in REACH vs other environmental and OHS legislation and indication of 'good practices' from an integrated risk management perspective
- Cooperation between ECHA, Competent Authorities for REACH and other legislation, and industry, to develop practical advice:
  - For Registrants to provide more 'readable' SDS/ ES, and more suitable for other regulatory purposes
  - For industrial users to process the REACH information
  - For enforcement authorities, in particular with respect to overlapping legislation
- Maybe a section on ECHA website (CSR/ES Roadmap section?) devoted to inform industry on the efficient use of REACH/CLP data.

# Next steps, actions, actors (1)

What can we do as a group of interested stakeholder parties?

- Workshop has identified a number of opportunities and examples: how best to convert these into something practical?
- Draft Workshop report and share with all participants on conclusions and follow-up:
  - We need partners to follow-up on ideas from this Workshop.
  - Individuals with an interest in integration as part of their own work.
  - Ideas can feed into an on-going ECHA's EHS project and actions under CSR/ES Roadmap.
- Specific follow-up with OHS and IED in relation to REACH data:
  - Dialogue on OHS and REACH is already taking place (ECHA / DG EMPL)
  - Less clear how to carry this out in IED (ECHA / DG ENV / JRC)
  - REACH at work sites – OSH. A more specific future event. How best to follow-up and when?
  - REACH and environment (IED)?



## **Next steps, actions, actors (2)**

- Do you agree with these initial steps and actions?
- Has anything important been overlooked?

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