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Use of REACH and CLP information for a better chemicals management

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Se Al Cu Ni Pb Sn Zn Au Ag Pt Sb W Be Si Cr Co Mo Ge V Mn Ir Ru Rh Ta

Context

Environmental and occupational safety and health (OSH) legislation applicable to manufacturers and industrial users of chemicals :

- Industrial Emissions Directive
- Chemical Agents Directive
- Carcinogens and Mutagens Directive
- Water Framework Directive
- Seveso Directive
- Product safety legislation
- Applicable national legislation
- ...

REACH Registration entails an extensive information gathering exercise: substance properties, hazards, uses and exposure

Source of information for other legal requirements

Benefit: increased knowledge of the supply chain and of the uses of the substances placed on the market

How can these efforts be used outside REACH?

REACH: an opportunity for enhancing effectiveness of other legislation?

What information can be obtained from REACH & CLP?

Safety Data Sheet

- Section 2: Hazard identification (C&L)
- Section 7: Handling and storage
- Section 8: Exposure controls / personal protection (DNELs, PNECs)
- Section 9: Physical and chemical properties
- Section 11: Toxicological information
- Section 12: Ecological information
- Section 13: Disposal considerations

What information can be obtained from REACH & CLP?

Exposure scenarios

Workplace risk assessment

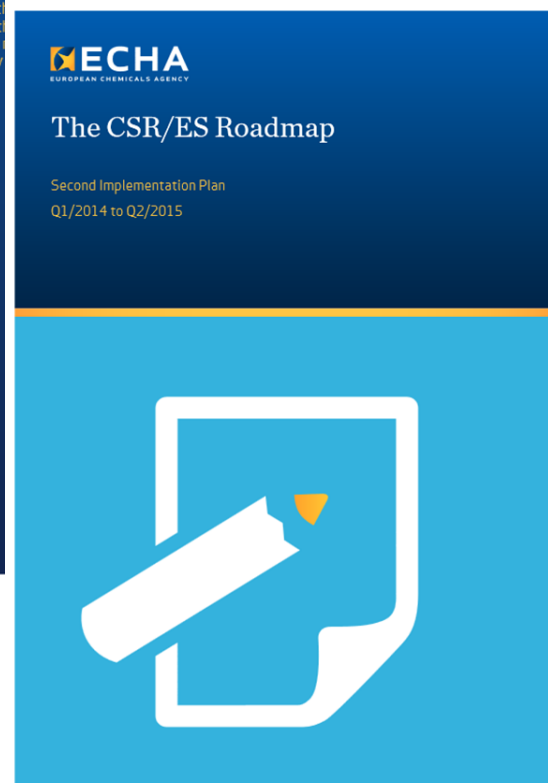
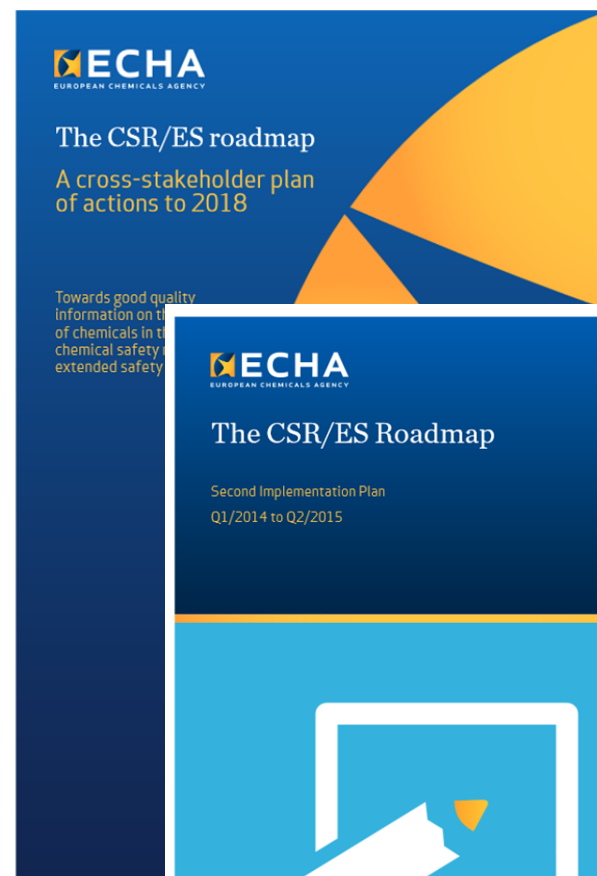
- Process, tasks and activities covered
- Operational conditions
- Technical and organizational measures to limit worker exposure

Environmental risk assessment

- Technical conditions and measures to reduce environmental emissions
- Measures related to treatment of waste for disposal

REACH exposure scenarios

- Exposure scenarios are a **central tool for risk management and communication**
 - Included in the Chemical Safety Report
 - Communicated to DUs in the SDS
- ES describe the operational conditions and risk management measures that allow safe use of a substance for a specific use
- Innovation introduced by REACH
- Format and content not set out by law
 - Templates developed by ECHA with support of industry
- Need for improvement in all industry sectors acknowledged by ECHA and stakeholders:
 - **ENES** network
 - **CSR/ES Roadmap 2013-2018**



Use of REACH & CLP information

Challenges

- Differences in scope: **substances** (REACH and CLP) vs **industrial sites** (environmental and OSH legislation)
- Overlaps: IED emission values, OELs
- ES format or language usually not ideal to help compliance with other legislative requirements
 - Some stakeholders in value chain do not understand language (especially SMEs)

Use of REACH & CLP information

Opportunities

- Improved interactions REACH - other legislation (in both directions) and avoid duplications
- Provide information in a way that can be understood by all stakeholders involved and easily used to comply with site-specific legislation
- Reduce workload and make better use of REACH & CLP information
- Facilitate work of enforcement authorities

Can REACH & CLP 'speak the same language' as other environmental and OSH legislation?

Registrants' perspective

- Registrants' role in supply chain communication:
 - Gather information on hazards and uses
 - Develop ES in CSR
 - Communicate safety information in SDS (including ES)
 - Keep ES up to date according to the relevant information communicated upstream
- Improved interactions of REACH with other pieces of legislation may avoid duplication of efforts and conflicting information, facilitating the understanding and implementation of ES
 - Better management of risks by manufacturers, DUs and end users
- Support better use of efforts made for REACH compliance, and the use of ES information outside of REACH

Improving the use of REACH & CLP information

Proposals to improve the use of REACH and CLP information:

- 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...?

Improving the use of REACH & CLP information

Proposals to improve the use of REACH and CLP information:

- 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

Improving the use of REACH & CLP information

- Appendix 3 of case study on nickel electroplating can be a starting point for the development of practical advice
- To be completed with recommendations or practical hints for suppliers and DUs

Appendix 3: Reference list of suggested information use

This table is a record of where the information contained in the safety data sheet and the exposure scenario has been suggested to be used to support compliance with the legal obligations described in the case study.

When updated information on chemicals is supplied, such a table can help assessing where the changes in the information received needs to be taken into consideration.

Information source	Suggestion of information use
Safety data sheet	IED permit b
First page, heading	Risk management, evaluation of incoming info
SECTION 1: Identification of the substance/mixture and of the company/undertaking	
1.1 Product identifier	IED permit b
1.2. Relevant identified uses of the substance or mixture and uses advised against	IED permit b
1.3. Details of the Supplier of the Safety Data Sheet	
1.4 Emergency telephone number	
SECTION 2: Hazards identification	Risk assessment step 1
2.1 Classification of the substance or mixture	IED permit b IED permit c, e, f, j Risk assessment step 1 Worker's training
2.2: Label elements	Risk assessment step 1 Worker's training
2.3 Other hazards	IED permit b Risk assessment step 1
SECTION 3: Composition/information on ingredients	IED permit b Risk assessment step 1
3.1 Substances	
3.2 Mixtures	
SECTION 4: First aid measures	Risk assessment step 3 Worker's training
4.1 Description of first aid measures	
4.2 Most important symptoms and effects, both acute	

Conclusions

- REACH Regulation is bringing new knowledge on the chemical substances used by industry
- Opportunity 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
- REACH Registrants could benefit from practical advice and examples of good practices to provide the appropriate level of information
- Practical guidance for industrial users would also help identify the information sources to support compliance for other relevant legislation and improve overall chemicals management

In the next 10 years...

- Better alignment of the different legislative requirements related to industrial chemicals
- Recognition of the value of the REACH Registration process and its role in the safe use of chemicals at industrial sites



THANK YOU



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