LRI
The Long-range Research initiative

What Role Has CEMAS in Supporting REACH?

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cefic

REACH Exposure Information Expectations

- **REACH does not explicitly identify the exposure information necessary to undertake a Chemical Safety Assessment (CSA)**
- **The RIP 3.2-1 pilot project explored this**
  - **Evaluated 18 approaches having potential to evaluate workplace exposures under REACH**
  - **Concluded that a tiered (and iterative) approach to EA is required**
  - **And which should be centred upon industry and/or task specific exposure scenarios c.f. COSHH Essentials**
  - **And which should (ideally) align with current practice for evaluating and managing workplace risks**

N.B. There are no formal requirements to report and/or share exposure information under REACH

Basic Exposure Scenario

Basic Scenario (Tier 1)

A basic description of how a substance can be safely used by others in a particular situation. It consists of

- a description of the use(s) covered by the scenario
- a description of what is not covered by the scenario
- a description of handling by workers
- control measures needed for safe handling
- (the exposure levels expected to be achieved by the scenario as described)

Detailed Exposure Scenario

Specific Scenario (Tier 2)

A more detailed description of how a substance can be safely used, etc.. It consists of the basic scenario plus information on :

- exposure duration and frequency
- the likely effectiveness (magnitude of exposure reduction) of the RMMs
- the quantities / amounts in use
- numbers exposed
- maintenance related exposures
- related life cycle steps / stages
- possible relationship between control of workplace exposures and "burden transfer" to the environment

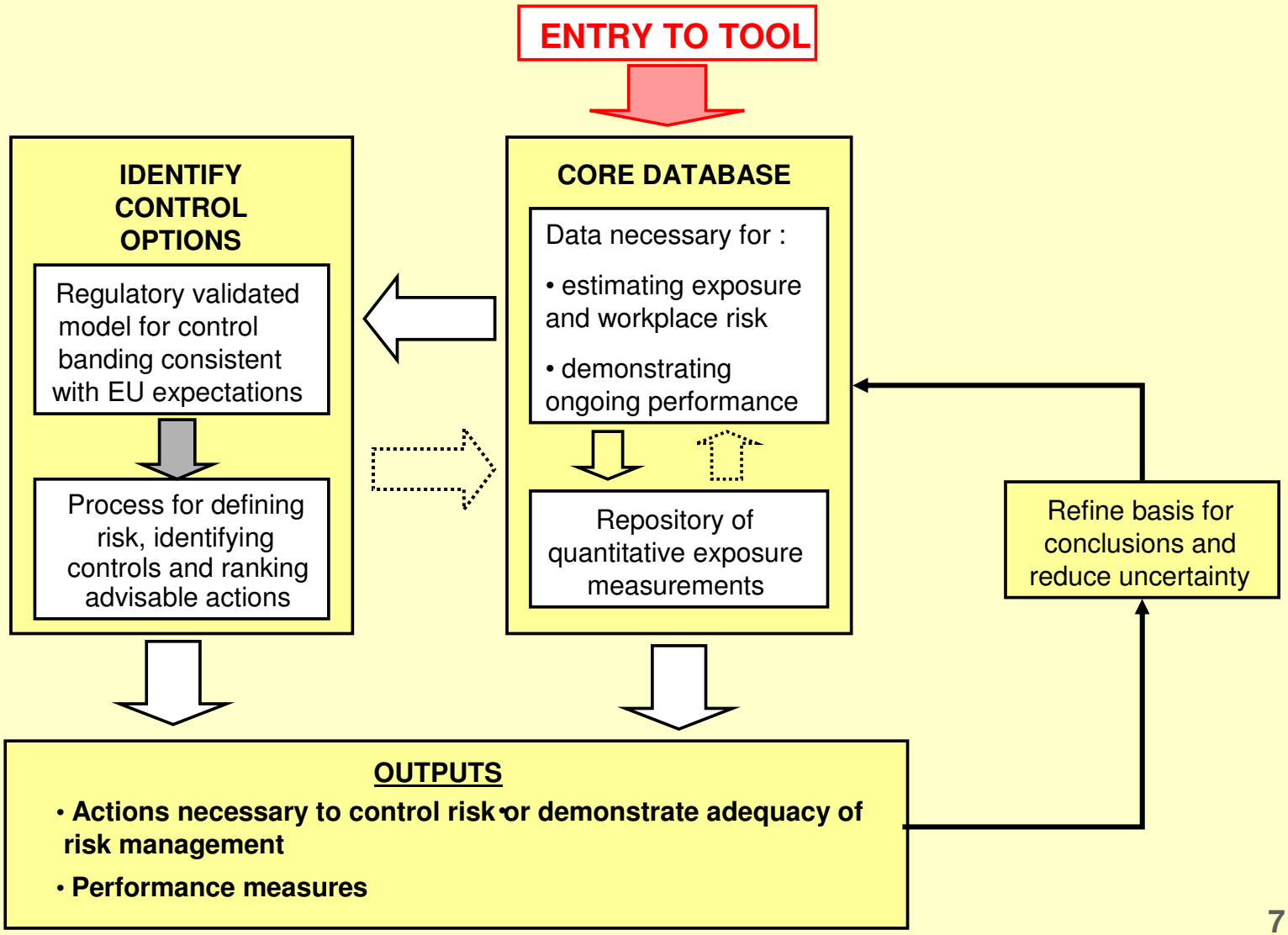
The Challenge REACH Presents for Occupational Hygiene

- Expectations are moving from ‘trust me’ to ‘show me’
  - relevance for IH and OH data collection strategies
- Relevant information does not equal relevant quantitative data
  - the targeting of strategies not only at areas of risk but also at areas where risks are considered to be well-managed
  - the collection of broader health performance indices
  - information collection should use ‘quality systems’
  - better health assurance/surveillance systems to demonstrate successful management of risks
- Occupational hygiene skills need to be applied to both the license to manufacture and sell chemicals if practical solutions are to be identified

CEMAS : Design Specification

- **Provide a PC or web-based guidance tool for SME users of chemicals that :**
  - gathers exposure information as the basis for structured decision-making
  - consistent with ISO 14000 type expectations
    - Audit trail, documentation, consistency, etc
  - provides users with practical advice on the suitability of exposure controls and the need for advisable actions
  - advises users when exposure monitoring (or other actions which verify the adequacy of risk management measures) is required
  - is consistent with prevailing regulatory expectations
  - is free, easy-to-use and future proof
  - provides opportunities both to target and demonstrate chemical industry Product Stewardship activities

Key Elements of CEMAS

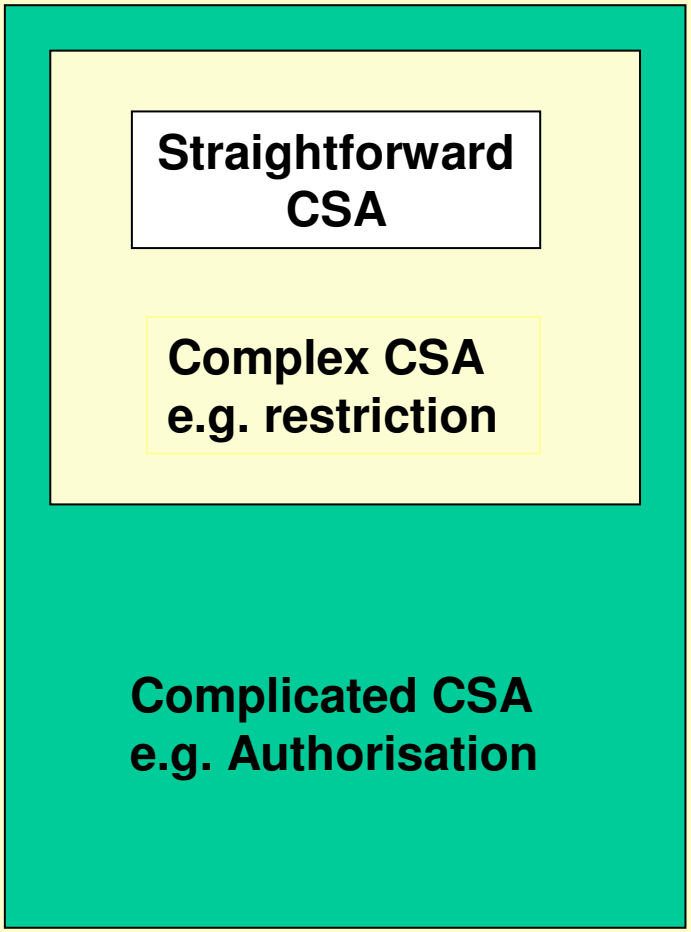


Experiences to Date

- The pilot exercises have shown that its outputs align with ‘good practice’ for the sector
  - It does not ‘over-specify’ risk management measures
- The tool is only really capable of use by medium sized businesses
  - Information demands exceed COSHH Essentials
  - Whilst being ‘easy-to-use’ it still demands a reasonable level of technical understanding
- The value of CEMAS is appreciated by those who invest sufficient time to use the tool
  - Delivers more than just CAD assessments
  - But the time presents a hurdle for wider adoption

REACH Exposure Scenario Information Expectations

REACH Demands



REACH Exposure Scenario Information Expectations

REACH Demands

Straightforward Chemical Safety Assessment (CSA)

Complex CSA e.g. restriction

Complicated CSA e.g. Authorisation

Available Tools

ECETOC TRA

COSHH Essentials

CEMAS

Stoffenmanager

Specific Sector or Activity Templates e.g. CONCAWE

CAD Assessments

A Possible Interface of CEMAS With Users

SMEs

SMEs register for CEMAS. Options to receive further supporting PS materials dependent on chemicals used & activities undertaken

CEMAS use recognised as evidence of delivery of CAD responsibilities

CEMAS capable of being interrogated for relevant exposure information directly by user or via emailed patch that is agreed to by user -> REACH dialogue and information sharing

CEFIC

Web hub supported and populated by relevant Product Stewardship (PS) materials from CEFIC and elsewhere

CEFIC should obtain a more accurate idea of the nature of chemical exposures in SMEs. Data also helps inform and refine REACH obligations.

Provides industry sectors with the opportunity to analyse core exposure information from registered users either on a voluntary basis or as part of any future performance indices for trade association members

Managed Web Hub Site

Conclusions

- **There appears to be no single (or simple) solution to REACH's exposure ambitions**
  - A range of tools will be required covering differing levels of detail and user profiles
  - But such a background highlights the issue of consistency
- **CEMAS presents a strong potential candidate**
  - It represents the tool most able to realistically characterise the true nature of exposure
  - It addresses risk management measures
  - It provides the ability for electronic exposure exchange within the supply chain
  - It creates value across the supply chain
  - **But its demands on user time and technical know-how will inevitably act as a constraint to its adoption**

Back-ups

How the Tool Presents Product Stewardship Opportunities

As a Product Stewardship tool in itself

- a free product which helps firms assess and manage health risks

As a mechanism for facilitating the delivery of solutions specific to sector groups

- targeted advice from sectors on assessing and managing risks from products
- opportunities for sharing proven technologies and good practice identification

As a means of obtaining information on the users of chemicals

- for example hot links from electronic SDSs or the database tool, or
- provision of targeted advice based upon intelligent enquiries

As a tool for delivering performance data for stewarding the responsible manufacture and use of chemicals

- reporting of the status of exposures across the sector (and against time, area, size, etc.)
- with time, demonstrating/underpinning license to sell