



REACH2SDS-Workshop Report

baua: Report

Conference documentation

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REACH2SDS-Workshop Report

Dortmund/Berlin/Dresden 2022

This publication is a documentation of the REACh2SDS workshop, which took place on September 27th–28th, 2021. The responsibility for the content of this publication lies with the authors.

Diese Veröffentlichung ist eine Dokumentation anlässlich des REACh2SDS-Workshops, der am 27. und 28. September 2021 stattfand. Die Verantwortung für den Inhalt dieser Veröffentlichung liegt bei den Autorinnen und Autoren.

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Cover figure: Vitalii Gulenok/iStock.com

Cover design: Christiane Zay
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doi: 10.21934/buaa:bericht20220802 (online)

<https://doi.org/10.21934/buaa:bericht20220802>



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REACH2SDS-Workshop Report

Abstract

On September 27th and 28th in 2021 the German Federal Institute for Occupational Safety and Health (BAuA) hosted the REACH2SDS workshop named after the research study “From REACH registration to safety data sheets and workplace risk assessment” (F 2415). The focus was to discuss problem areas that were identified among others in the project and exchange potential solutions on improving the flow of information along the supply chains for chemicals. The keynote presentations are available for download on the BAuA website.¹

Over 130 participants discussed with several national and international experts regarding the benefits, quality and potential for improvement of the extended safety data sheet (eSDS) to be used also in the communication of occupational safety and health (OSH). Presentations by experts from the European Commission, the European Chemicals Agency (ECHA), industry and the competent authorities emphasised the great importance of the information flow in the supply chain.

In workshop sessions, the individual steps of the information flow were considered in detail and highlighted on the basis of case studies and practical experiences of the participants. It was realised that the communication through the supply chain is not properly working. During the workshop, a number of problems were identified, some of which made it difficult for practitioners to implement chemical regulatory information in occupational safety and health. For example, there is a different understanding of central terms among the participants. The generic exposure scenarios generated via REACH often do not adequately reflect the practice in the companies. Information on personal protective equipment is often not specific enough.

Finally, the safety data sheets especially when extended with exposure scenarios were often perceived as too complex and extensive. The desire for harmonized digital formats was frequently expressed. They should contain binding minimum standards and improve access to the individually required information by means of content details and a clear structure. In conclusion, improvements in the eSDS are helpful and desired as well as the mutual recognition of exposure scenarios and workplace risk assessments.

Key Words: REACH, supply chain communication, safety data sheet, workplace risk assessment

¹ www.baua.de/DE/Angebote/Veranstaltungen/Dokumentationen/Gefahrstoffe/REACH2SDS-Workshop-2021.html

Kurzreferat

Am 27. und 28. September 2021 veranstaltete die Bundesanstalt für Arbeitsschutz und Arbeitsmedizin den REACH2SDS-Workshop, welcher im Rahmen des Forschungsprojektes „Vom Registrierungsossier über das Sicherheitsdatenblatt zur Gefährdungsbeurteilung am Arbeitsplatz – Datenverfügbarkeit und Qualität zwischen REACH und Arbeitsschutz“ durchgeführt wurde. Im Mittelpunkt stand die Diskussion zu Problemfeldern, die unter anderem im Projekt identifiziert wurden, und der Austausch von Lösungsansätzen zur Verbesserung des Informationsflusses entlang der Lieferketten für Chemikalien. Die Impulsreferate stehen auf der Website der BAuA zum Download bereit.¹

Über 130 Teilnehmende diskutierten mit nationalen und internationalen Expertinnen und Experten über den Nutzen, die Qualität und das Verbesserungspotenzial der erweiterten Sicherheitsdatenblätter (eSDB), die auch bei der Kommunikation von Sicherheit und Gesundheitsschutz am Arbeitsplatz verwendet werden sollen. Die Vortragenden der Europäischen Kommission, der Europäischen Chemikalienagentur (ECHA), der Industrie und der zuständigen Behörden betonten in ihren Präsentationen die große Bedeutung des Informationsflusses in der Lieferkette.

In Workshop-Sessions wurden die einzelnen Schritte des Informationsflusses im Detail betrachtet und anhand von Fallbeispielen und praktischen Erfahrungen der Teilnehmenden beleuchtet. Dabei zeigte sich: die Kommunikation in der Lieferkette funktioniert nicht richtig.

Während des Workshops wurden eine Reihe von Problemen identifiziert, die es in der Praxis schwer machen, chemikalienrechtliche Informationen im Arbeitsschutz umzusetzen. So zeigte sich bei den Teilnehmenden beispielsweise ein unterschiedliches Verständnis zentraler Begriffe und das die über REACH generierten generischen Expositionsszenarien die Praxis in den Betrieben oft nur unzureichend widerspiegeln. Auch die Informationen zu persönlicher Schutzausrüstung sind oft nicht spezifisch genug. Schließlich wurden besonders die erweiterten Sicherheitsdatenblätter als zu komplex und zu umfangreich empfunden. Auch wurde von den Teilnehmenden häufig der Wunsch nach harmonisierten digitalen Formaten geäußert. Sie sollten verbindliche Mindeststandards enthalten und durch inhaltliche Details sowie eine klarere Struktur den Zugang zu den benötigten Informationen verbessern. Zusammenfassend sind Verbesserungen im eSDB hilfreich und wünschenswert, ebenso wie die gegenseitige Anerkennung von Expositionsszenarien und Gefährdungsbeurteilungen für den betrieblichen Arbeitsschutz.

Schlagwörter: REACH, Lieferkettenkommunikation, Sicherheitsdatenblatt, Gefährdungsbeurteilung

¹ www.baua.de/DE/Angebote/Veranstaltungen/Dokumentationen/Gefahrstoffe/REACH2SDS-Workshop-2021.html

Abbreviations

BAuA	Federal Institute for Occupational Safety and Health (Bundesanstalt für Arbeitsschutz und Arbeitsmedizin)
CCH	Compliance Check
SLIC CHEMEX WG	Senior Labour Inspectors' Committee Working Group on Chemicals
CLP	Classification, Labelling and Packaging
CSA	Chemical Safety Assessment
CSR	Chemical Safety Report
DG	Directorate-General
DNEL	Derived No-Effect Level
EC	European Commission
ECHA	European Chemicals Agency
EMKG	Einfaches Maßnahmenkonzept Gefahrstoffe EMKG Workplace & Chemicals (Easy-to-use Workplace Control Scheme for Hazardous Substances)
ERC	Environmental Release Category
eSDS	Extended Safety Data Sheet
ES	Exposure Scenario
EU	European Union
EU-OSHA	European Agency for Safety and Health at Work
GHS	Globally Harmonized System of Classification and Labelling of Chemical
IUCLID	International Uniform Chemical Information Database
OC	Operational Condition
OEL	Occupational Exposure Limit
OSH	Occupational Safety and Health
PNEC	Predicted No-Effect Concentration

PROC	Process Category
RCR	Risk Characterisation Ratio
RMM	Risk Management Measures
SCED	Specific Consumer Exposure Determinant
SDS	Safety Data Sheet
SU	Sector of Use
SLIC	Senior Labour Inspectors' Committee
SUMI	Safe Use of Mixture Information
SPERC	Specific Environmental Release Category
SWED	Specific Worker Exposure Description
TRGS	Technical Rules for Hazardous Substances

1 Introduction

The European chemicals regulation (EC) No 1907/2006 (REACH) has led to a significant improvement in scientific data to assess health and environmental risks of chemicals. However, this information must also be available in a practicable form for risk assessment in the workplace in order to protect workers from hazardous substances. The central communication tool is a safety data sheet (SDS) which industrial and professional users automatically receive for hazardous substances and mixtures due to legal obligations. In specific cases these SDS must be extended by exposure scenarios that indicate safe uses.

On September 27th and 28th in 2021 the Federal Institute for Occupational Safety and Health (BAuA) hosted the workshop “From REACH registration to the safety data sheet” (REACH2SDS).¹ The aim was to exchange ideas and experiences how the flow of information along the supply chains for chemicals can be improved. Over 130 participants discussed with several national and international experts from the European Commission, the European Chemicals Agency (ECHA), industry and the competent authorities the benefits, quality and potential for improvement of the REACH exposure scenarios and the SDS for the information flow from manufacturer to distributor down to the end user and their usage in workplace risk assessment. Background to the event is the research study F 2415 “From registration dossier via safety data sheet to workplace risk assessment – data availability and quality between REACH and occupational safety and health” of the BAuA. The study analyses the data availability in REACH registration dossiers regarding workplace exposure and risk management measures, the quality of the information flow from the registration dossiers to the SDS with respect to the occupational exposure and risk assessment and subsequently in terms of their usability for the workplace risk assessment.

The workshop was held online due to the COVID19 pandemic. It was supported by systemkonzept – Gesellschaft für Systemforschung und Konzeptentwicklung mbH, who accompanied the workshop with technical support as well as two moderators and a chat keeper.

The workshop design allowed speakers and participants from all over the world to join the event, follow all presentations, ask questions, and discuss them live with the speakers and each other even during breaks or after the plenary sessions. In addition, several virtual rooms were arranged to present surveys and create space for exchange on different topics.

The results of both the discussions and surveys are included in this documentation and make part of the BAuA research project together with the study mentioned above. This information will be further evaluated by BAuA and integrated in project results that will be published at the end of 2022.

¹ www.baua.de/DE/Angebote/Veranstaltungen/Dokumentationen/Gefahrstoffe/REACH2SDS-Workshop-2021.html

2 Findings and Discussion

2.1 Setting the Scene and Introduction of the REACH2SDS project

Nicoletta Godas, Rüdiger Pipke

Nicoletta Godas, scientific officer at the Division 4 “Hazardous substances and biological agents” of the BAuA, and Rüdiger Pipke, Head of the Division 4 welcomed the participants to the online REACH2SDS workshop. In his introduction Mr Pipke outlined the political, regulatory, and scientific context in which the project is embedded. Ms Godas highlighted the preliminary findings of the REACH2SDS study.

The study analysed the quality of the information flow from REACH registration dossiers into safety data sheets (SDSs) for registered substances of the medium tonnage band between 100 and 1000 tons per year with regard to their usability for workplace risk assessment. At the time of the workshop about 600 chemical safety reports (CSRs) were analysed and about 200 safety data sheets received to compare them with the provided information by the registrants. The EMKG Workplace & Chemicals was used to examine whether the necessary input variables for the workplace risk assessment are available in the SDS and whether they lead to protective measures, which are consistent with the exposure scenarios in the registration dossier. In addition, a questionnaire was used to analyse which tools and information are used by registrants to prepare (extended) safety data sheets (eSDSs).

It was found that in several cases the translation of exposure information from the registration dossier to SDS and to the risk management measures (RMM) is not sufficient for the employer to perform a reliable workplace risk assessment. This is also true for the CSR, including RMM and operational conditions (OCs) incorporated in the eSDS. These findings were discussed with experienced and well-known experts from the European Union, its Chemical Agency and the German REACH Assessment Unit for Occupational Safety and Health of Workers in the first session “Data availability, communication & workplace risk assessment/management”.

2.2 Importance of Supply chain communication

Veronika Jezso

In her presentation Veronika Jezso from the Unit GROW of the General Directorate for Internal Market, Industry, Entrepreneurship and SMEs of the European Commission started with a glimpse to the framework of the European Unions “Green Deal” and its chemical strategy for sustainability as it will also impair the risk assessment of chemicals. In fact, it targets the revisions of legislation including REACH and the Classification, Labelling and Packaging (CLP) Regulation EC No 1272/2008 to ensure the production and use of chemicals that are safe and sustainable by design. Consequently, it subjects a reform of the authorisation and restriction that will allow to ban most harmful chemicals in consumer and professional products.

The revision of the provisions for control should promote a comprehensive assessment of the impact for the environment as well as a simpler communication within the supply chains. Among others, the last REACH review report in 2018 revealed deficiencies on the given information in the exposure scenarios. In general, the information is too lengthy and not practical. In 2020 a multi-layer Development Plan by the European Chemicals Agency (ECHA), with ENES+, the European Commission and Member State representatives was designed.^{2,3} Since the ECHA Management Board decision at the end of 2020 that ECHA's input for supply chain communication is paused the whole plan is more or less on hold although the other stakeholders are encouraged to move on. In the meantime, the European Commission is trying to find a way to get ECHA involved again. Furthermore, the European Union did an inception impact assessment from May to June 2021 and will publish another one for public consultation at the beginning of 2022 that should be finalised in September 2022.⁴

Key elements regarding a simplified communication in the supply chain are a language easy to understand and minimum standards for the exposure scenarios, taking mixtures into account, and harmonising the electronic formats.

2.3 Data availability of use & exposure information

Annika Mälkiä

Annika Mälkiä, head of ECHA's Data availability unit, introduced in her presentation the use description, the CSA and the CSR as important parts of REACH and its registration process. She shared first impressions of the newly introduced manually completeness checks of CSRs by ECHA since 2021. In the first six months of operation 1160 CSRs were checked; 33 % of them were found incomplete. Another important finding was that the exposure assessment and risk characterisation do not follow the structure driven by the exposure scenario (ES) title (as foreseen in Annex I of REACH). As an effect, various life cycle stages and user groups are combined in one ES and do not fit into the international uniform chemical information database (IUCLID) format. Consequently, the use description in the dossier is not clear or conflict with life cycle stage and/or the CSR were not maintained (updated) with the IUCLID dossier and do not match registrant's uses. Under REACH service life must also be assessed but exposure scenarios for the article service life are often missing in the CSR, although the use has been reported in the IUCLID dossier.

The learnings so far were that registrants need to review uses and make sure that the CSR matches the requirements under REACH as the CSR structure is an important pre-requisite to generate a meaningful ES. For the communication among registrants of the same substance CSRs based on latest hazard and use information are needed.

² echa.europa.eu/documents/10162/17220/caracal_202011_rra3_dev_plan_en.pdf/39a16c07-c4d8-a4ed-20d1-94564763a7b5

³ echa.europa.eu/documents/10162/17220/caracal_202011_rra3_dev_plan_annex_en.pdf/8000529d-02ef-16f9-f3ce-1a281d85961c

⁴ ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12959-Chemikalienrecht-Uberarbeitung-der-REACH-Verordnung-ls-Beitrag-zur-Schaffung-einer-schadstofffreien-Umwelt_de

Finally, the assessment of the service life stage requires attention both by authorities (methodology, guidance) and industry (clear documentation).

2.4 Chemical Safety Assessment & Safe Use in the Supply Chain

Kevin Pollard

In his presentation Kevin Pollard, Head of ECHA's Exposure and Supply Chain Unit, showed the importance of proper information on substance properties and conditions of use for a good CSA. The information provided in the REACH registration and in the classification inventory can help to provide and find relevant information. The registrant of a substance is obliged to prepare the registration dossier, and for substances that are manufactured or imported exceeding 10 tonnes per year, this also includes a chemical safety report. Manufacturers and certain importers need to gather information on the use of their substance in the supply chain, for example from customers and documented exposure scenarios or conditions of a safe use. Introduced as an integral part of REACH (Annex II) and taking into account the Globally Harmonized System of Classification and Labelling of Chemical (GHS) rules, the SDSs are the vehicle to communicate information regarding the safe use to the user of a substance, either on its own or in a mixture in industrial or professional activities. Vice versa, better information to registrants from formulators or distributors that blend or re-fill substances or mixtures as well as end-users results in better description of a safe use. "Use maps" of specific worker exposure description (SWED), specific consumer exposure determinants (SCED) as well as specific environmental release categories (SPERC) may adequately describe the most common uses. However, there is quite some evidence that the communication through the supply chain is not properly working. There seems to be a limited explicit demand for safe use advice from the bottom of the supply chain often due to the unawareness of downstream users of their duties. Complex supply chains, a too broad and too unspecific description leads to confusing and not sufficiently targeted information and consequently results in an unclear value of ES information. Associated with that, the communication on a substance's safe use in the eSDS does not trigger response. Regarding exposure scenarios there is a need for harmonisation but current legal requirements as well as the inertia of existing SDS systems and their underlying IT make it difficult to enforce such a harmonisation.

Before working out potential minimum requirements for exposure scenarios and a methodology for extending safety data sheets for mixtures (with exposure scenarios and DNEL/PNEC information) ECHA wants to simplify and harmonise the reporting of chemical safety assessments, chemical safety reports and exposure scenarios by further promote the use of the Chesar application. Concluding his presentation, he also mentioned that chemical safety assessments and supply chain communication contributes to the key policy objectives for safer and more sustainable use of chemicals.

2.5 Workplace risk assessment

Melanie Berghaus

Melanie Berghaus, scientific officer at the Division 4 “Hazardous substances and biological agents” at BAuA, gave an overview of the German legal basis, strategy and certain instruments for workplace risk assessment. She identified several information sources that can be used like Technical Rules for Hazardous Substances (TRGS), sector- or activity-specific assistance from the accident insurance institutions or federal states, sector- or activity-specific assistance from associations or trade unions and of course safety data sheets. She also mentioned example questions for checking the plausibility of a SDS:

- Are there sections missing?
- Are the label elements on the label the same as in the SDS?
- Is the information in sections 7 and 8 complete?
- Do the H-phrases match the information in section 14?
- Are the specifications of different suppliers the same for an identical substance or mixture (e. g. classification, labelling, OEL)?

Regarding the eSDS, the BAuA opinion is that exposure scenarios for substances provide a specific level of protection, but they always have to be adjusted with company-specific solutions depending on the actual workplace situation.

2.6 Interplay REACH & OSH for users of chemicals

Alick Morris

Alick Morris, officer at the unit Social Affairs and Inclusion Health and Safety at Work of DG Employment, presented the EU Commission’s framework on health and safety at work (OSH), the so-called project of OSH in a changing world of work. This project was launched 2021 and will work until 2027, intertwined with REACH, towards a safer environment for all employees working with chemicals.

As REACH generates a huge amount of data, concerned with risk management communication, the question arises how to correctly use the chemicals, as the supply chain is exceedingly complicated. Not all chemical workers may have the required technical skills and knowledge to identify risks and take measures to prevent that particular risk. Employers rely on information from a variety of sources, including supply chain information gathered by CLP and REACH, they cannot always evaluate or check. Either many end users do not have the scientific and technical capability to fully understand all the information they receive.

REACH review action 3 acknowledges this need for improvement in the supply chain communication. Safety data sheets, exposure scenarios and the CLP hazard and

safety information are important information resources to pass on relevant and additional safety information. Risk management measures can include the complete elimination and substitution of the exposure, the controlling of the exposure by for example using an exhaust ventilation and suiting equipment, or general principles for risk management, which includes training and additional safety information. As this information may not be received and understood by everyone, it is not only crucial for the employer to be confident that his or her employees are doing the right thing while obeying the OSH legal duties, but the employees need to trust in the RMMs in place and their adequate protection.

Mr Morris also gave insight into helpful measures for employers, for example providing guidance in the given hierarchy of OSH measures and supplying eSDSs with a contents list on the front page. Additionally, IT-tools should enable employers to select the most relevant and helpful sections of the eSDS. In given exposure scenarios RMMs should be well communicated and easy to comprehend. Furthermore, employers should be enabled to look for coherent terminology within REACH and OSH, taking useful information developed within REACH and adapting the approach for OSH, as OSH covers process generated substances.

Not only the employers and employees, but also the stakeholders should receive proper guidance via Commission services, ECHA and the European Agency for Safety and Health at Work (EU-OSHA), which should ensure consistency and coherency of information to support practical implementation of legal requirements.

2.7 Enforcement perspective on supply chain communication

Abdulqadir Suleiman

Abdulqadir Suleiman, chief specialist of the Norwegian Labour Inspection Authority, shared the experience of the national inspection regarding the quality of information in safety data sheets and attached exposure scenarios. Due to their findings, for varied product types often similar (but inadequate) measures were given, substance-based generic information were frequently incorrect and hardly any information on substance restrictions or authorisation were given. Hence, they started a project to further examine SDSs and their fitting in the inspectors work in companies.

It could be seen that even if inspectors were well informed about an ES, they seldom use it in their advice or communication with companies because they find it challenging to check the ES content against workplace measures or to find identifiable minimum requirements in it. However, a prerequisite is the development of close-to-reality exposure scenarios, and redundancies and inconsistencies in safety data sheets must be avoided so that essential information for carrying out the risk assessment can be better identified. To achieve this goal a new SDS enforcement project REF 11 has been initiated and will be operational in 2022 and 2023.

2.8 Industrial users of chemicals: how to deal with REACH & workplace risk assessment

Evelyn Tjoe Nij

Evelyn Tjoe Nij, occupational hygienist and REACH risk assessor at Dow Chemical Company, provided information about industrial end-users of chemicals and the regulatory requirements. Employers are responsible to assess hazardous chemical usage and need to determine whether chemical agents should be substituted or which other safety measures should be taken. Although REACH had led to more information that in turn improves the quality of safety data sheets and labels, REACH and exposure scenarios still face challenges. ESs are only developed per activity for substances manufactured above a certain volume (10 tonnes per year) and are intended to describe safe use in a generic way. REACH vocabulary is not easy to comprehend and there are still significant administrative duties to be met. REACH also overlaps with OSH, especially where OSH regulation is concerned with workplace risk assessment. In this case it might be helpful to mark safety measure equivalent to the REACH requirements and adjust or justify them with reference to the risk assessment. This is also reflected in the SLIC CHEMEX WG guidance for national labour inspectors on the interaction of REACH and OSH.⁵

2.9 The Challenge: How to choose & communicate RMM

Marco Borgmann

Marco Borgmann of Follmann Chemie Group gave insight into the key competences of his company, which are the development, manufacturing and sales of specialty chemicals for the processing industry. At Follmann over 3,000 raw materials are being used, most of them possess a safety data sheet. It was explained how incoming SDS or eSDS information is processed. This information is used to support workplace risk assessment and figure out what kind of RMMs are needed and consequently used to prepare safety instructions for the workers, but also to prepare the companies own SDSs for their products. For example, by using a self-prepared document it is checked if the information regarding the sector of use (SU), process category (PROC) or environmental release category (ERC) is correct. Furthermore, it is examined in which conditions the materials are, what the maximum concentration is and how to use the recommended personal protective equipment. In addition, it is checked if the (combined) risk concentration ratio (RCR) is below 1. This is calculated by using information from the incoming SDS or eSDS and exposure level information derived from e.g. specific worker exposure descriptions (SWED) or safe use of mixture information (SUMI). Using SWED and SUMI information helps to get a result faster and more easily. The workplace should then be examined to proof that (legal and/or company-specific) workplace limit values are met. The combined use of company-

⁵ [5 circabc.europa.eu/rest/download/8905c619-a5b1-4e65-9a98-2b5e9719473c?ticket=](https://circabc.europa.eu/rest/download/8905c619-a5b1-4e65-9a98-2b5e9719473c?ticket=)

specific workplace information and incoming (e)SDS information enables to find solutions for safe use within the company and communicating it into the supply chain.

In a current project Follmann examines if this assessment process, especially by the use of the EMKG Workplace & Chemicals scheme, can be proceeded in an automatic process per production area. Concluding Mr Borgman highlighted how important it is for the supply chain that an eSDS can easily be understood without additional information and research. Consequently, a good structure, qualitative data and an easy-to-understand language will beneficial contribute to occupational safety and health.

2.10 How long does it take to translate changes into legislation or guidance

Lilia Medvedev

In her presentation Lilia Medvedev from the Federal Office for Chemicals (BfC) at BAuA, raised the question how long it takes to translate changes into EU legislation. The answer to the question is – it depends. It depends on the type of the legal act to be adopted, the procedure for adopting the legal act and the complexity of the content of the legal act. After a short description of the different types of EU legal acts a practical example was given. As example she chose the amendments of Annex II of REACH and the subsequent changes of the guidance on the compilation of safety data sheets.

2.11 eSDS & OSH Risk Assessment: Experiences from a VCI Expert Workshop

Stefan Engel

Stefan Engel, director of the industrial hygiene department of BASF SE, presented findings from a VCI expert workshop on the use of extended safety data sheets for workplace risk assessment. The participating experts came from both the REACH and occupational health and safety domains and the aim of the workshop was to determine the extent to which an eSDS contains the information needed for workplace risk assessment in a practically applicable form and which possibilities for improvement exist. For selected activities eSDSs, photos of the workplaces and activities and their descriptions were provided. Based on this and guided by key questions, the experts prepared a risk assessment and evaluated the usefulness of the information in the eSDS. The workshop was described by the experts as an eye opener for building mutual understanding. Furthermore, the participants noted that the eSDS provides relevant information ideally complemented with the analysis of on-site practices, like work processes and other hazards not caused by chemicals. The OSH risk assessment needs information that is as practical as possible, which an ES can only provide to a limited extent, as a large number of individual workplace situations must

be covered. Relevant information can be found in the main part of the SDS, mainly in chapter 2, 7 or 8, or in the ES as soon as suitable PROCs are identified. But the presentation of the information is not harmonized between the ES in different eSDSs. For improvement companies should avoid duplications and contradictions between the information given in the SDS and its ES extension. Furthermore, an improved communication between company internal REACH and OSH experts and the exchange with key customers or sector organizations along the supply chain could also contribute to an enhanced understanding as well. For an increased acceptance for the use of an ES in daily practice respecting established good practices, e. g. complying with the hierarchy of controls (STOP principle) in the ES, would be beneficial. Additionally, an ES must specify certain information compared to the main body of the eSDS to provide added value. The key to success for an ES is the comprehensibility and applicability of its measures in the plant. To illustrate this, Mr Engel explained this with two practical examples.

Finally, he recommended that an up-to-date, robust and documented OSH risk assessment should be recognized as compliant also with the user obligations under REACH. If the ES clearly covers the workplace situation and the task at hand, it can replace the documentation of the risk assessment (of substance-related hazards) based on an expert judgement.

In conclusion information from the REACH registration in the eSDS is helpful for the OSH risk assessment and required expertise and instruments can complement each other. Improvements in the eSDS are helpful and desired, as noted above, as well as the mutual recognition of ES and OSH risk assessments.

3 Workshop-Sessions: Input and participation

The workshop's "breakout sessions" gave all participants the opportunity to discuss three topics in detail:

- Data basis – the registration dossier
- Communication via eSDS
- Workplace risk assessment

These three topics were provided by different presenters from the Division 4 "Hazardous substances and biological agents" at BAuA. The participants stayed in their designated breakout rooms, while the presenters rotated between these rooms. In total there were three rotations so that the participants were able to experience and work on all three workshop topics.

At the end of the second day of the workshop, the results of all three rounds were summarized and presented.

3.1 Data basis – the registration dossier

Gudrun Walendzik, Urs Schlüter

In this breakout sessions Ms Walendzik and Mr Schlüter from BAuA discussed the registration dossiers as an important starting point to remarkably improve safety data sheets and exposure scenario quality. A statistical data overview shows that more than 80 % of the registrations granted by ECHA were registered by large companies, small and medium-sized companies only make up about 13 % (see Figure 3.1).

Registrations*	Substances	Companies
99 464	22 646	15 498

*All Countries *Data as of: 31/07/2021 Overall Summary REACH registrations by companies from 1st June 2008

Breakdown by Registrant Company	Registrations	Substances	Companies
Registered by Large company	82 682	20443	10 614
Registered by SME	13603	4963	4883
Medium company	7008	3364	1720
Small company	4379	2272	1737
Micro company	2216	846	1426
NONS notification	3179	1878	
Total	99464		https://echa.europa.eu/de/registration-statistics

Fig. 3.1: Currently valid registrations granted by ECHA.

This shows that the quality of the source of information along the supply chain is with large companies as they are the main source of this information. Smaller companies play a less relevant role. However, the use and further distribution of this information is the responsibility of different companies in the supply chain.

In a live survey the workshop participants were asked to assess which type of data are difficult to provide for registration (see Figure 3.2).

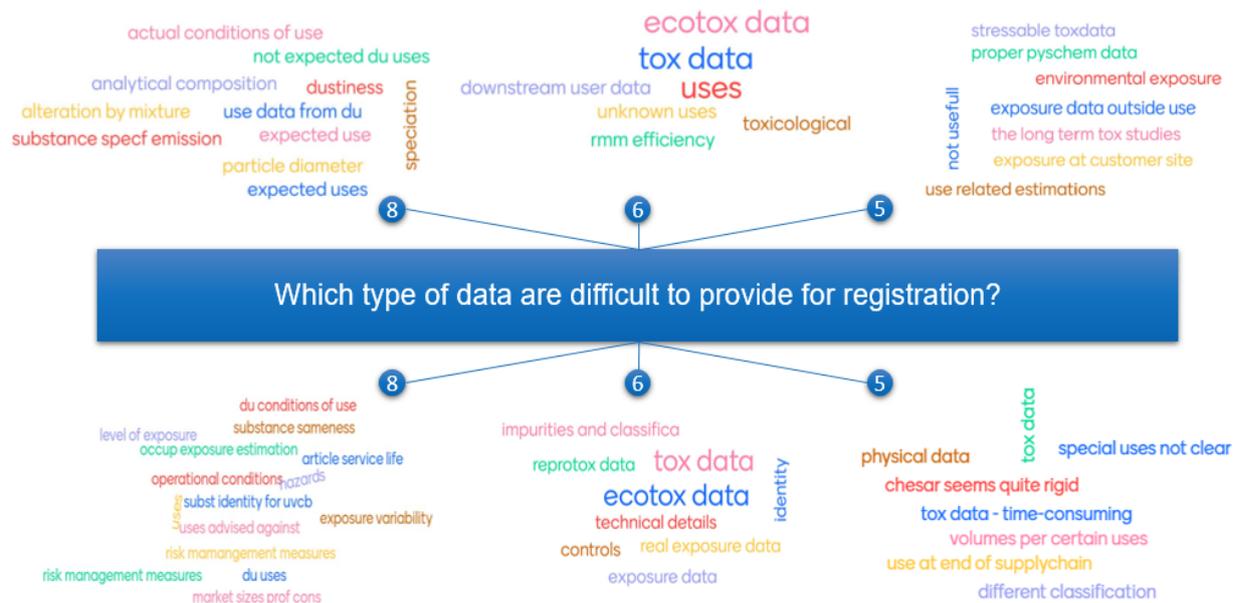


Fig. 3.2: Workshop survey: Type of data – difficult to provide for registration.

Toxicological and ecotoxicological data were often mentioned as were emission or exposure data. But not only in terms of completeness some types of data were challenging, but also in terms of accuracy. When registrants consider the dossier as a 'living document' that requires regular updates the quality of the dossiers may improve enormously. Any new and relevant information about the registered substances should be made available with undue delay. The focus of the updates should be the substance's identity, its classification and labelling, as well as its use and information about exposure. Adaptions to information requirements or alternative methods should be justified appropriately.

The maximum deadlines for updating the data are included in the COM Implementing Regulation of the European Union 2020/143533, in connection with the REACH Article 22 (1). Following an ECHA or a Commission decision, registrants are required to update the registration dossiers, due to the evaluation procedure, but also after any decision made within the authorisation and restriction processes. Again, this follows the above COM Implementing Regulation. Registration dossiers and improved data quality may help ECHA and MS authorities to prioritize as well as deprioritize the hazardous substances, which in turn helps with regulations.

The risk management based on REACH and OSH helps to assess the risks of handling (hazardous) substances at the workplace (see Figure 3.3). This generates a risk characterization for safe use. If a safe use cannot be guaranteed a new risk management is implemented with possible exposure reduction. The safe use assessment follows a documentation of the substance and its risks in the CSR and the eSDS. If possible, this information is used in a workplace risk assessment. The eSDS communicates into the supply chain and helps downstream users, where the information needs to be verified and adapted for the workplace situation at hand. Additional information from different sources can be added here and must be adapted to the workplace.

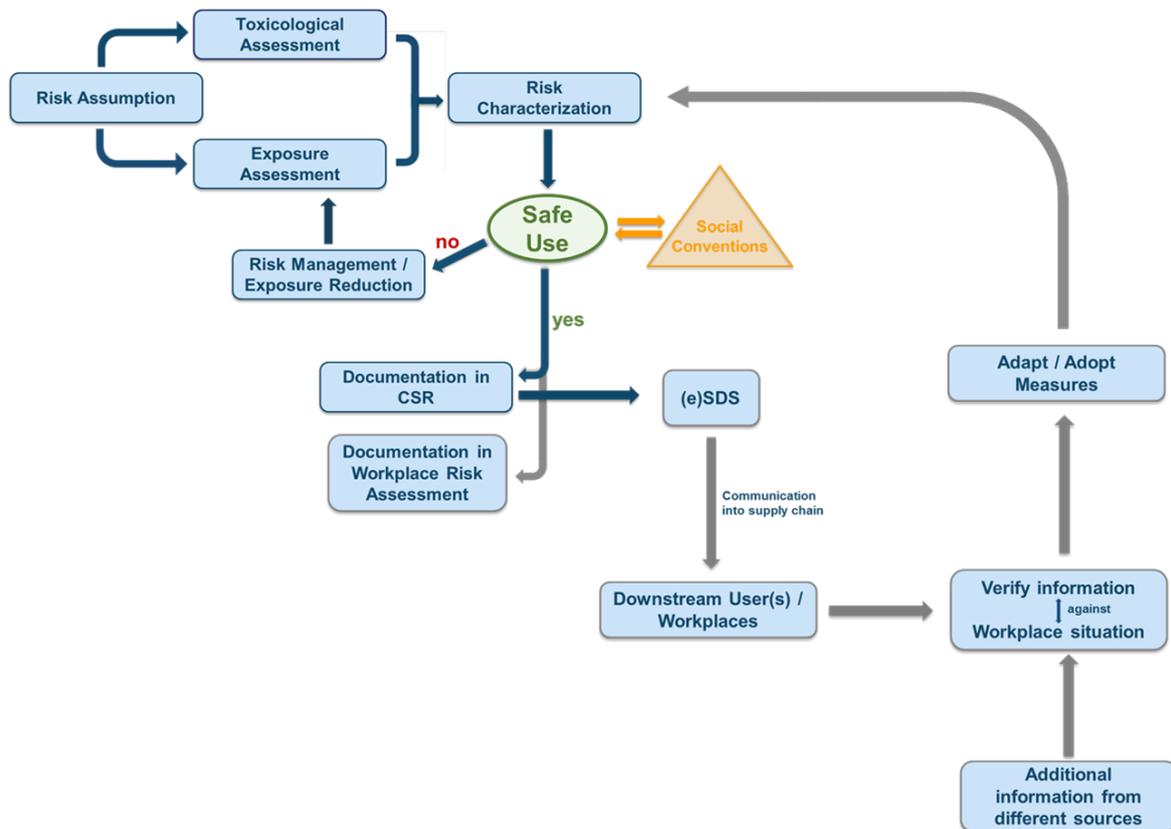


Fig. 3.3: Risk management: REACH & OSH.

The workshop also named known deficiencies of registration dossiers. Nearly half of them (47 %) need improvement regarding toxicology, 22 % regarding ecotoxicology or environmental behaviour, 22 % due to the substance identity and physico-chemical properties and 9 % are deficient with regard to the exposure assessment (see Figure 3.4).

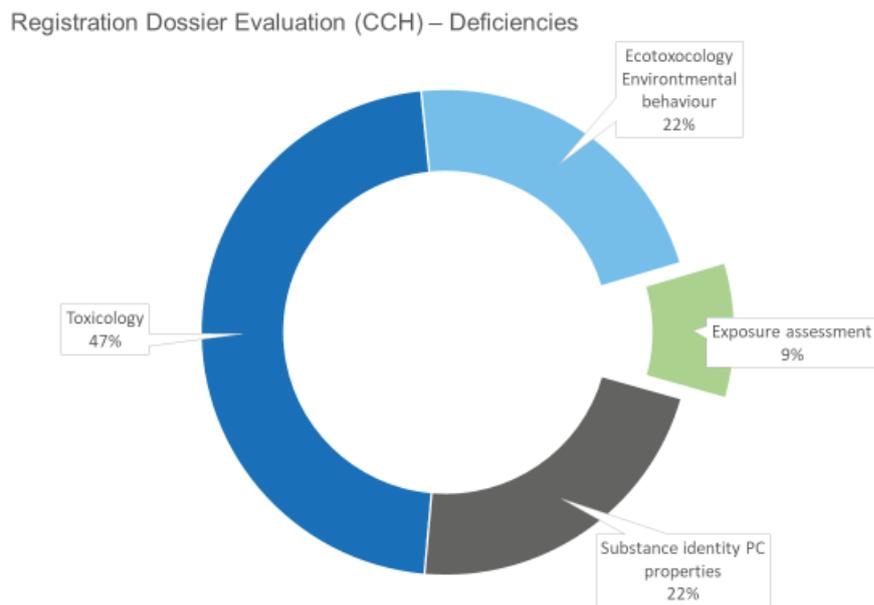


Fig. 3.4: Registration dossier evaluation (CCH) – Deficiencies
(Evaluation of the dossier evaluation decisions 2015 – 2017 by ANSES).

The German federal authorities developed a concept for a cursory check that should be carried out as completeness check before each compliance check carried out by ECHA. The following basic checks included

- Check whether basic data are available for all uses in the dossier
- Abstract result yes/no
- Test areas are:
 - General information on uses and tonnages
 - Basic information on RMM/OC for each use

The question arose, what mainly causes the misapplication of exposure assessment models (see Figure 3.5). The workshop participants gave numerous reasons, primarily insufficient information about the workplace that was assessed and included in the risk management process, as well as exposure models that are not fitting the workplace situation at hand. Deficient knowledge about the exposure assessment models and time pressure for the assessment were named as further possible answers for misapplications.

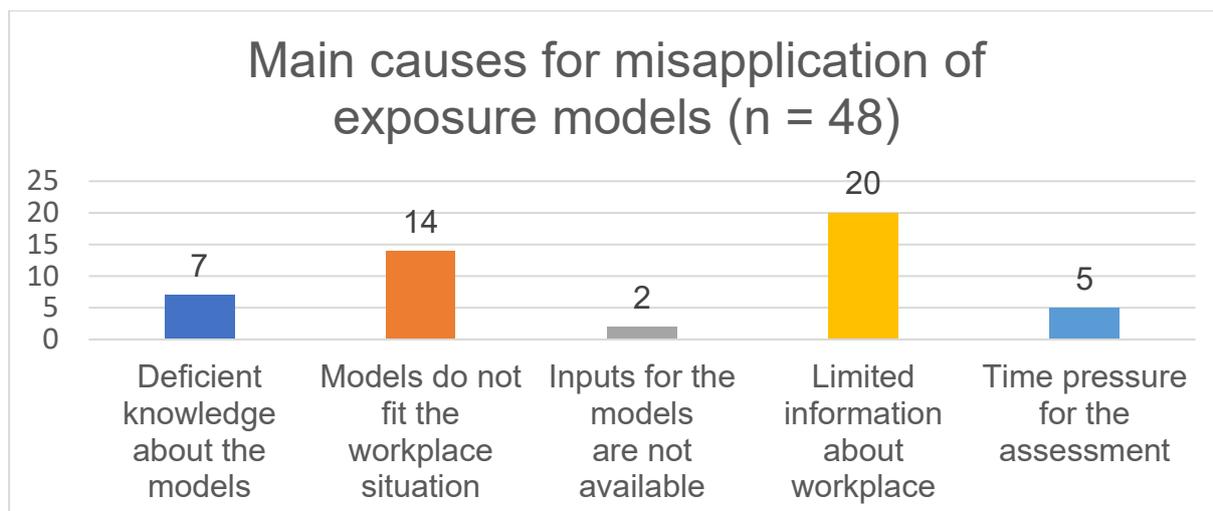


Fig. 3.5: Workshop survey: Main causes for misapplication of exposure models.

The discussed experiences and evaluations led to the following primary conclusions:

- ECHA focuses deliberately on hazard properties of substances
- Exposure evaluation and use information from an OSH perspective would need to be strengthened for risk-based regulatory proposals
- By means of compliance checks (CCHs) the quality of dossiers has improved remarkably
- 2/3 of the dossiers no longer depict any risk-relevant deviations from the REACH Regulation in worker exposure after a CCH
- Nevertheless: a critical look into the dossiers after the update is necessary in order to correct any final discrepancies in the CRS's
- There is little scope for Member states to exert influence

The provision of high-quality data is more costly of course, but it is also associated with increased benefits for the companies concerned. Providing customers with high-quality data is beneficial in a way that it enables them to better protect themselves from risks and also to achieve better regulatory compliance. Another benefit is that more appropriate and transparent information about a substance can lead to deprioritization of regulatory action.

To be more explicit: precise information creates clarity. Advantages of delivering good quality data are:

- Sufficiently specific conditions of use and RMM
- Workers can be protected better
- Legal compliance
- More planning certainty for applications for authorisation, resulting in longer review periods

The breakout session “Data basis – the registration dossier” resulted in several main outcomes for supply chain communication. First, information on use and exposure is difficult to obtain for manufacturers/importers. Second, these problems get bigger with a longer supply chain. Third, this leads to deficient application of exposure assessment models because of missing information about the workplaces. Additionally, the bottom – up communication about risk management at the workplace (e. g. concerning personal protective equipment) is difficult in the supply chain.

3.2 Communication via eSDS

Nicoletta Godas and Thea Hammerschmidt

Led by Ms Godas and Ms Hammerschmidt from BAuA, this workshop session aimed at discussing extended safety data sheets (eSDSs), major difficulties and the need for improvement.

Before entering the discussions, the participants were asked in which role they work with extended safety data sheets (see Figure 3.6). The composition of the participants was an interesting factor for the focus of the following discussions.



Fig. 3.6: Workshop survey: Working with (e)SDS – participants role ($n = 49$).

As a matter of fact, eSDSs still seem to be unknown to some extent. A BAuA evaluation of EMKG workshops (see Figure 3.7.) with participants who were familiar with hazardous substances shows that all of them knew SDS, but only 46 % knew eSDS and only 13 % of them in fact worked with eSDSs. This finding was expected by most participants in the sessions, because in practice mixtures are mainly used.

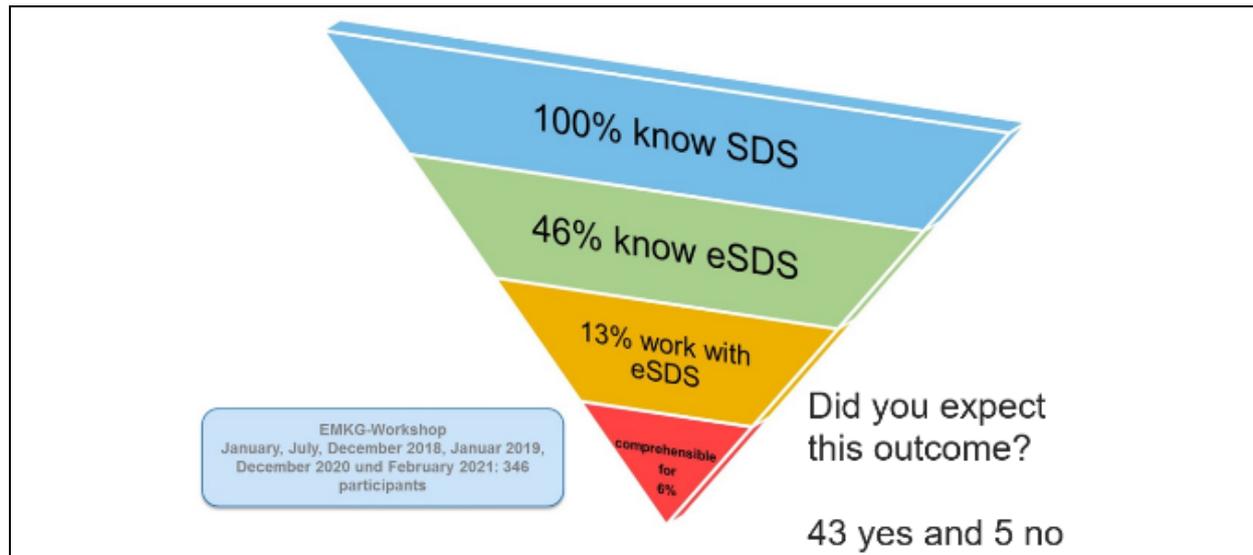


Fig. 3.7: (e)SDS perception of EMKG-Workshop-participants (2018 – 2021; $n = 346$).

Ms Godas and Ms Hammerschmidt asked the participants for their opinion on the major difficulties with (e)SDSs in the supply chain. The discussion showed that eSDSs are too long and complex, not user-targeted and difficult to compare with the businesses' own risk assessment. Additional difficulties in this sector may arise from the potential lack of knowledge on duties among stakeholders along the supply chain, as well as the fact that use descriptors and the meaning of PROCs are not always clear.

The discussion in each session led to the common understanding, that an improvement for the (e)SDS is needed, e. g.

- A harmonized, structured format,
- Binding minimum requirements
- An electronic exchange format,
- Easy handling of data
- A reliable data basis
- Reduction of redundant information between the main body of the eSDS and ES
- Standardized phrases that are easy to understand
- User targeted (clarity of user's need)
- The provisioning of more guidance documents and best practice examples.

Over all sessions, workshop participants agreed mostly with the enabling of simplified, user targeted information and digital communication and information processing. A slightly smaller amount, but still the majority of participants, agreed to set legally binding minimum requirements for the ES and a legally binding format for communication.

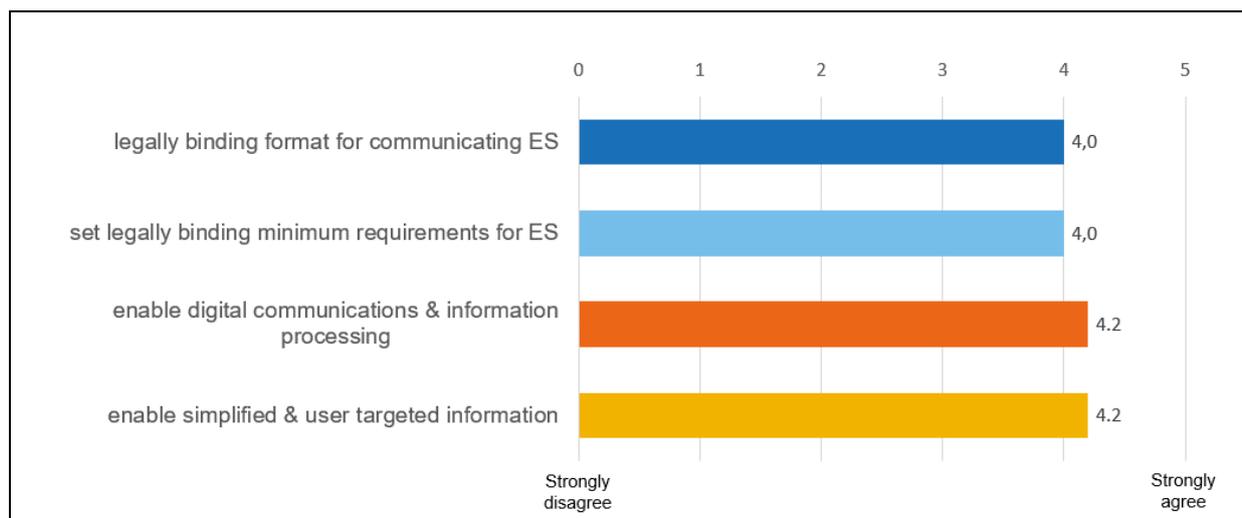


Fig. 3.8: Survey: Level of Agreement regarding possible changes ($n = 53$).

To reach this goal, input from the whole supply chain on the specific needs is necessary as well as developing a common understanding between REACH and occupational safety and health (OSH). Unfortunately, there are still problems with communicating safe use information in the supply chain and structured information for mixtures is still needed. The difficulty here poses as having no adequate methodology to integrate the information about the substance as such into the mixture SDS. Accordingly, only one third of the participants ($n=53$) said that exposure scenarios for mixtures would be helpful.

Looking into the future, there is a lot of room for improvement along the supply chain communication, as authorities cannot always address all needs and more input of specific demands along the chain is necessary. The main goal will still be the establishment of a basic understanding between REACH and OSH.

3.3 Workplace Risk Assessment

Melanie Berghaus, Katrin Braesch

In these sessions, Ms Berghaus and Ms Braesch from BAuA gave an overview of the EMKG Workplace & Chemicals (formerly known as the Easy-to-use Workplace Control Scheme for Hazardous Substances). The focus was on applying the EMKG with the participants in an action-oriented way via case studies and discussing the challenges of a workplace risk assessment in parallel.

The EMKG Workplace & Chemicals comprises the hazards caused by inhalation, skin contact as well as fire and explosion. It supports step-by-step the risk assessment of activities with hazardous substances to derive appropriate protective measures (Control Strategy Level 1 to 3 or “expert advice”). Control Guidance Sheets (CGS) concretize the measure level. They form a modular system of measures that are build upon each other. This system considers the graduated concept of risk control

measures of the Hazardous Substances Ordinance (see Figure 3.9). The Minimum Standards (Control Strategy 1) always have to be implemented and can usually be applied to the entire working area.

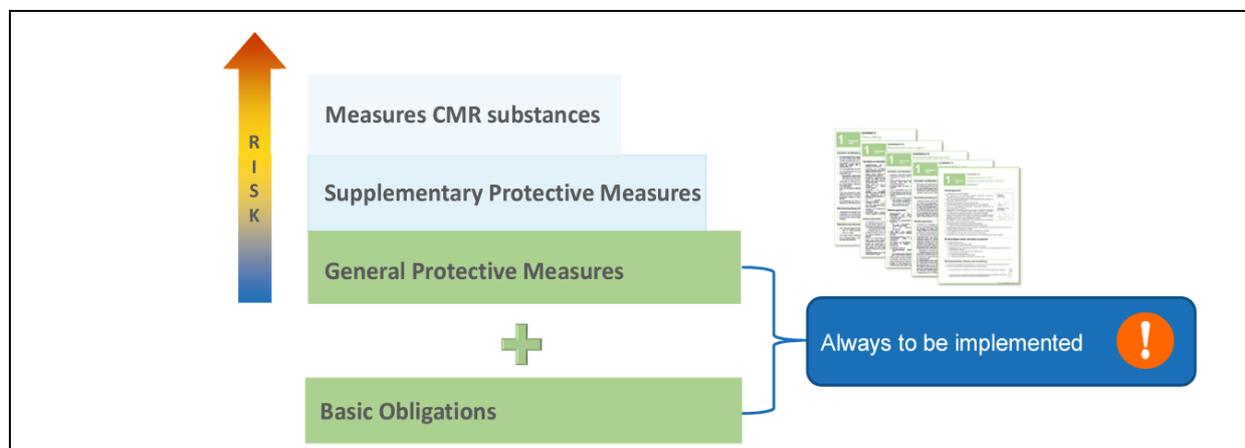


Fig. 3.9: Determination of Protective Measures – graduated concept.

At this point the participants started to work on the case study “wood workshop” and followed the first 4 steps:

- Step 1: Divide into working areas
- Step 2: Implement the Minimum Standards
- Step 3: Define the Activities
- Step 4: Identify the Risks

In summary, it was stated, that Minimum Standards are basic organisational and hygiene requirements. They always have to be implemented and are not repeated in ESs. The big advantage is that they are already sufficient in many cases.

As the discussion results indicate more information by downstream users would be very useful for registrants who write exposure scenarios to enable them to integrate practical information, because otherwise eSDSs are only based on theoretical models. The next steps were carried out using the activity “cleaning a workpiece with isopropanol and a cloth” as an example for the risk assessment with the EMKG Workplace & Chemicals. Next to workplace-based parameters (e. g. quantity, effective area, duration of skin contact), the SDS is the most important source for substance-related parameters like H-phrases, OEL, boiling point (see Figure 3.10).

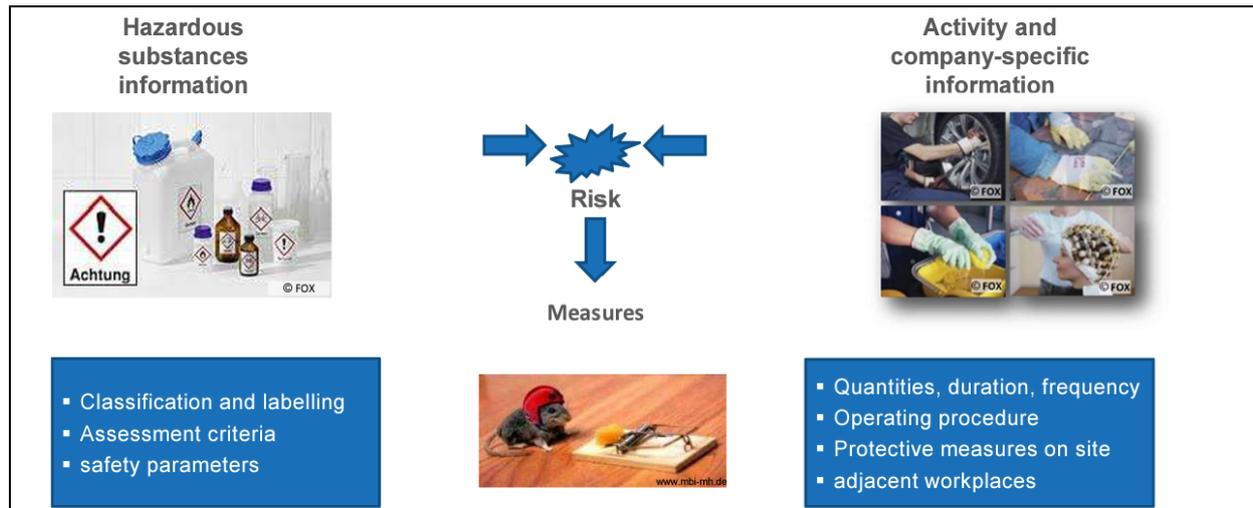


Fig. 3.10: Procedure – reliable information needed.

The risk assessment is only as valid and reliable as the information it is based on. In particular, SDS Section 2 and 8 (H-phrases and OEL) and SDS Section 9 (boiling point or vapour pressure) are key parameters to determine the EMKG Workplace & Chemicals hazard group and release group. This is exactly where the discussion with the participants picked up, because especially when dealing with mixtures, boiling point or vapour pressure are often missing or the OEL often is not available or up to date. Therefore, a plausibility check of the SDS and, in case of missing information, communication with the supplier or manufacturer is an important factor. To complete the risk assessment process, the selection of suitable additional measures to supplement the minimum standards was addressed, as well as the effectiveness check and documentation of the selected measures. Finally, it was emphasised that sufficient time for the implementation of protective measures is another crucial point.

In further discussions, it was pointed that risk assessment is already complicated and time-consuming in itself. This is another reason why companies rely on accurate communication along the supply chain. At the end of the sessions, the participants learned about complementary products of the EMKG Workplace & Chemicals in order to be able to continue working with them.

4 Summary and conclusions

The starting point of the workshop was an introduction and overview on the REACH2SDS project. From registration dossier to safety data sheet to workplace risk assessment is the approach on which the project was built. Following the project overview, a placement of REACH2SDS in the larger framework of European chemicals policy was given. It became clear that the Commission has ambitious goals for the review of regulations, including REACH, taking into account the issue of simplifying communication in supply chains. Data availability is the very core of communication along the supply chain. Therefore, information from the REACH registration, especially the chemical safety report (CSR) structure is an important pre-requisite in order to generate meaningful exposure scenarios or safe use advice. This basis provides relevant information for safety data sheets that in general is helpful to implement and ensure occupational safety and health. That is why ECHA started to evaluate the completeness of CSRs manually in addition to an automatic check, ensuring that the available data is quality-checked. The SDS is 'the vehicle' to communicate information regarding the safe use to the user of a substance, either on its own or in a mixture in industrial or professional activities. It draws the connection between chemical safety and occupational safety and health. However, it is advisable to check the SDS for their quality and plausibility before proceeding with workplace risk assessment, because the risk assessment is only as good and reliable as the information on which it is based. Furthermore, it must be considered that a one-to-one transfer of ES to workplaces is usually not possible and that an adaptation of RMM to the individual workplace is almost always necessary.

Despite all efforts so far, the communication through the supply chain is not properly working as intended. This is also mirrored by the experiences from enforcement authorities who face similar challenges than the companies, only from a different perspective.

During the breakout sessions it became clear that complex supply chains, a too broad and too unspecific description leads to confusing and not sufficiently targeted information and consequently results in an unclear value of ES information. In general, the information is too lengthy and not practical.

Key elements regarding a simplified communication in the supply chain are a language easy to understand, minimum standards for the exposure scenarios for communication, and harmonising the electronic formats. Considering the needs of formulators who have to merge and evaluate the single substance information for a mixture SDS would also be of great benefit. Major improvements in the ES could be: avoid duplication and contradictions between the main body of the eSDS and ES.

In conclusion, improvements in the eSDS are helpful and desired as well as the mutual recognition of ES and OSH risk assessments. In particular, the hierarchy of measures should already be taken into account in the registration dossier in order to better align ES and OSH risk assessment. Required expertise and instruments can complement each other. This could improve efficiency and boost the acceptance of ES in practice. A common understanding between REACH and occupational safety and health (OSH)

will also support the communication in the supply chain and consequently lead to better health and safety at the workplace.

Outlook

The workshop ended with a statement and outlook by the hosts Ms Godas and Mr Pipke, both from BAuA. Both emphasised that communication in the supply chain is crucial for the safe handling of chemicals.

Those responsible for chemical safety and occupational health in supply chains and in regulatory bodies are called upon to further improve risk management communication and thus make an essential contribution to the safe and sustainable use of chemicals. At the same time, processes have already been initiated to improve the interplay between REACH and OSH and to achieve more synergies.

The final report of the REACH2SDS project will take up the discussions and findings of the workshop and derive further need for action and possibilities for action.

In order to be pro-active, the participants were given valuable “take home messages” by Ms. Godas:

- Establish in-house networks with colleagues who deal with REACH & OSH
- Take a critical and honest look at your work and ask for feedback
 - Could I use this information to create a safe working environment in which my employees will not get ill?
 - Could I decide on the basis of this information whether regulatory action is required?
- Get involved in professional networks
- Change what does not work in small steps and do not set up a workaround

***“Good and reliable
information is essential
for chemicals legislation
and safety at work!”***

References

BAuA	<p>REACH2SDS Project</p> <p>From registration dossier via safety data sheet to workplace risk assessment – data availability and quality between REACH and occupational safety (REACH2SDS) – project page www.baua.de/EN/Tasks/Research/Research-projects/f2415.html</p> <p>Vom Registrierungs-dossier über das Sicherheitsdatenblatt zur Gefährdungsbeurteilung – Datenverfügbarkeit und -qualität zwischen REACH und Arbeitsschutz (REACH2SDS) – Projektseite www.baua.de/DE/Aufgaben/Forschung/Forschungsprojekte/f2415.html</p>	EN DE
BAuA	<p>REACH2SDS Workshop</p> <p>REACH2SDS Workshop “Vom Registrierungs-dossier über das Sicherheitsdatenblatt zur Gefährdungsbeurteilung” am 27./28.09.2021 – Workshop Documentation www.baua.de/DE/Angebote/Veranstaltungen/Dokumentationen/Gefahrstoffe/REACH2SDS-Workshop-2021.html</p>	DE EN
BAuA	<p>Helpdesk:</p> <p>Information on safety data sheets for the German market – www.reach-clp-biozid-helpdesk.de/DE/REACH/Sicherheitsdatenblatt/Sicherheitsdatenblatt-EN/Emergency-Telephone-number.html</p> <p>Sicherheitsdatenblatt – www.reach-clp-biozid-helpdesk.de/DE/REACH/Sicherheitsdatenblatt/Sicherheitsdatenblatt_node.html</p>	EN DE
BAuA	<p>Vergleich Gefährdungsbeurteilung im Arbeitsschutz und Expositionsszenarium nach REACH (BAuA-Stellungnahme) – www.baua.de/DE/Themen/Arbeitsgestaltung-im-Betrieb/Gefahrstoffe/REACH-Bewertungsstelle-Arbeitsschutz/pdf/Gefaehrdungsbeurteilung-Expositionsszenarium.pdf?__blob=publicationFile&v=5</p>	DE
BDI	<p>Electronical SDS transfer: www.esdscom.eu</p>	EN
CEFIC/ VCI	<p>REACH Practical Guide on Safe Use Information for Mixtures under REACH – The Lead Component Identification (LCID) Methodology – cefic.org/app/uploads/2016/03/Practical-Guide-Safe-Use-Information-for-Mixtures-under-REACH_v6-1-1.pdf</p>	
ECHA	<p>Communication in the supply chain – echa.europa.eu/communication-in-the-supply-chain</p> <p>Kommunikation in der Lieferkette – echa.europa.eu/de/communication-in-the-supply-chain</p>	EN DE

ECHA	Communication in the supply chain: Infographic – echa.europa.eu/de/communication-in-the-supply-chain-infographic	EN
ECHA	Forum enforcement projects – echa.europa.eu/de/about-us/who-we-are/enforcement-forum/forum-enforcement-projects	EN
ECHA	REF-5 Project Report “Extended safety data sheets”, exposure scenarios, risk management measures an operational conditions (adopted on 23.11.2018) – echa.europa.eu/documents/10162/17088/ref-5_report_en.pdf/1bee1c5c-2ed6-da94-91e4-ee3ce1ac37?t=1544698766502	EN
ECHA	REF-11 Project press statement – echa.europa.eu/de/-/highlights-from-enforcement-forum-38-meeting	
ECHA	RRA 3 – REACH Review Action 3 – echa.europa.eu/de/reach-review-action-3	EN
ECHA	Use maps – echa.europa.eu/csr-es-roadmap/use-maps/concept Verwendungskarten – echa.europa.eu/de/csr-es-roadmap/use-maps/concept	EN DE
ENES	Exchange Network on Exposure Scenarios (ENES) – echa.europa.eu/about-us/exchange-network-on-exposure-scenarios Netzwerk für den Austausch von Expositionsszenarien – echa.europa.eu/de/about-us/exchange-network-on-exposure-scenarios	EN DE
EUR-Lex	COUNCIL DIRECTIVE on the introduction of measures to encourage improvements in the safety and health of workers at work/Arbeitsschutz-Rahmenrichtlinie (89/391/EEC) data.europa.eu/eli/dir/1989/391/oj	EN/ DE
EUR-Lex	CLP-Regulation/CLP-Verordnung data.europa.eu/eli/reg/2008/1272/oj	EN/ DE
EUR-Lex	REACH-Regulation/REACH-Verordnung data.europa.eu/eli/reg/2006/1907/2014-04-10	EN/ DE

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Workshop agenda

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Agenda REACh2SDS Online-Workshop*

Day 1: 27.09.2021

9:00 - 10:00 Entering the Digital World

10:00 - 10:20 Welcome and procedure Clarissa Eickholt & Christian Schumacher, Systemkonzept

10:20 - 10:30 Setting the scene Rüdiger Pipke, BAuA FB4

10:30 - 11:15 The REACh2SDS project Nicoletta Godas, BAuA FB4



11:15 – 11:30 Break



11:30 - 1:00 pm

Key note speeches:

Data availability, communication & workplace risk assessment/management

Importance of supply chain communication

Veronika Jezso, EU Commission, DG for Internal Market, Industry, Entrepreneurship and SMEs
Unit GROW F1 (REACH)

Data availability of use and exposure information

Annika Mälkiä, ECHA Unit Data Availability

Chemical Safety Assessment and Safe Use in the Supply Chain

Kevin Pollard, ECHA Unit Exposure and Supply Chain

Workplace risk assessment

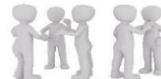
Melanie Berghaus, BAuA FB4

1:00 pm - 2:00 pm Lunch Break

&



1:30 - 2:00 Networking option



2:00 pm - 4:00 pm Workshop-session I



Data basis: the registration dossier ® Communication via eSDS ® Workplace Risk Assessment/Management

4:15 pm End day 1

4:15 pm - 4:45 pm Networking option



* Subject to changes

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Day 2: 28.09.2021

9:00 - 9:30 *Entering the Digital World*

9:30 - 9:45 **Setting the scene & summary day 1** Rüdiger Pipke, BAuA FB4

9:45 - 11:15 **Key note speeches: interplay reach & OSH**

Interplay REACH & OSH for users of chemicals

Alick Morris, EU Commission, DG Employment, Social Affairs and Inclusion
Health and Safety at Work Unit

Enforcement perspective on supply chain communication

Abdulqadir Suleiman, The Norwegian Labour Inspection Authority

Industrial end users of chemicals: how to deal with REACH & workplace risk assessment

Evelyn Tjoe Nij, Dow Benelux

The Challenge: How to choose and communicate RMM

Marco Borgmann, Follmann Chemie GmbH



11:15 – 11:30 Break



11:30 - 12:30 **Workshop-session II**



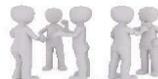
Data basis: the registration dossier → Communication via eSDS → Workplace Risk Assessment/Management

12:30 pm - 1:30 pm **Lunch Break**

&



1:00 pm - 1:30 pm **Networking option**



1:30 pm - 2:15 pm **Afternoon Session**

How long does it take to translate changes into legislation or guidance

Lilia Medvedev, BAuA Federal Office for Chemicals (BfC)

eSDS and OSH Risk Assessment: Experiences from a VCI Expert Workshop

Stefan Engel, VCI

2:15 pm - 3:00 pm **Workshop Session Summary & Discussion**

3:00 pm - 3:15 pm **Outlook** Rüdiger Pipke & Nicoletta Godas, BAuA FB4

3:15 **End day 2**

3:15 pm - 4:00 pm **Networking option**

