

BOHS Comments on the REACH and COSHH Interface

The British Occupational Hygiene Society (BOHS) is a learned and professional society with the objects of improving scientific knowledge and practice in the prevention of ill health from occupational and environmental hazards, with members drawn from a wide range of multidisciplinary specialities and including leading academics and practitioners in the field. The organisation includes the Faculty of Occupational Hygiene, which provides examinations and qualifications in occupational hygiene. Our publication, the Annals of Occupational Hygiene is acknowledged as one of the leading global scientific journals in the field.

REACH and COSHH Interface

The Regulations for COSHH and REACH both impose responsibilities for risk assessment of chemical substances to identify appropriate risk management measures to adequately control exposures. However, the basis of the Risk Assessment for these Regulations differs as follows:

- For COSHH, the risk assessment is the responsibility of the employer. It requires exposure assessment in the actual workplace and takes into account the specific workplace conditions such as layout, airflow, operating procedures and working practices.
- For REACH, the risk assessment is the responsibility of the Manufacturer or Importer of the substance. It is based on a hypothetical Exposure Scenario with potentially limited input from users to define typical operating conditions and risk management measures. It is performed remotely from the workplace often using theoretical exposure models.

A practical implication for the REACH assessments is the need to generalise the use conditions for each Exposure Scenario to be representative of all potential workplaces. As a consequence the assessments under REACH may not be precisely matched to all conditions of use which can only be determined by an employer's risk assessment under COSHH. This has significant implications for workplace health and safety. For example, if a REACH assessment is over-precautionary to ensure that the upper bounds of the Exposure Scenario are adequately covered, the additional controls can introduce new risks to the health, safety or well-being of workers, (for example by creating an ergonomic issue or by forcing workers to wear respirators or gloves that are unnecessary). On other occasions REACH assessments may under-protect workers because they overlook elements of the local situation or because basic good practices have not been included. In either case, REACH assessments are likely to result in sub-optimal level of control.

This has an important impact on the interface between the risk assessments carried out for REACH and COSHH. The information advised in an Exposure Scenario under REACH can only practically be used to inform the COSHH assessment which should either be confirmed or adjusted to take account of local workplace conditions.

If the local COSHH assessment results in recommendations that are markedly different from those of the REACH Exposure Scenario and local control can be clearly demonstrated, this points to a need to adjust the Manufacturer's REACH

Exposure Scenario and potentially the supporting REACH Chemical Safety Assessment rather than the local COSHH assessment.

In conclusion, it is the BOHS view that a site-specific COSHH assessment, properly informed by the hazard information in the REACH assessment, will take specific workplace conditions into account and should provide the most appropriate recommendations for achieving adequate control of exposure.

Disclaimer

The views in the document provide a considered opinion of the issues as they relate to the objects of the Society to improve scientific knowledge and practice in the prevention of ill health from occupational and environmental hazards. They may not necessarily coincide with the views of individual members or their employing organisations. The document is not intended to convey any legal interpretation.

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