



# Nederlandse Arbeidsinspectie in Europees speelveld



Nederlandse Arbeidsinspectie  
*Ministerie van Sociale Zaken en  
Werkgelegenheid*



Monique Waegemaekers, specialist Arbeidshygiëne bij  
Inspectiebreed kenniscentrum van NLA



## Wereldtoneel:

Sinds 1919, nu 187 landen lid,  
Tripartite organisatie:

- Werkgevers
- Werknemers
- Overheden



International  
Labour  
Organization

Het basisidee: er kan geen duurzame vrede kan zijn zonder  
sociale rechtvaardigheid



Afspraken ('conventies') over arbeid, o.a.:

[Convention C187 - Promotional Framework for Occupational Safety and Health Convention, 2006 \(No. 187\) \(ilo.org\)](#)



# Europa

27 Member States (MS)

- Europese commissie
- Europees parlement
- Council (representatives van MS)



Europese richtlijnen (directives) [Europese richtlijnen inzake veiligheid en gezondheid op het werk | Safety and health at work EU-OSHA \(europa.eu\)](#)

Gebaseerd op ILO conventions



## Nederland

EU-Richtlijnen omzetten in nationale wetgeving

Door: Ministerie SZW

Voorafgegaan door openbare (internet)consultatie

Recent:

Wijziging in Carcinogenen and Mutagen Directive:

Uitgebreid met Reprotoxisch -> april 2024 in Ndl

Voorlichting door SZW [Home | Arboportaal](#)

Informatie van NLA: [Home | Nederlandse Arbeidsinspectie \(nlarbeidsinspectie.nl\)](#)





# Handhaving in Europa

Nog geen gelijk speelveld .....

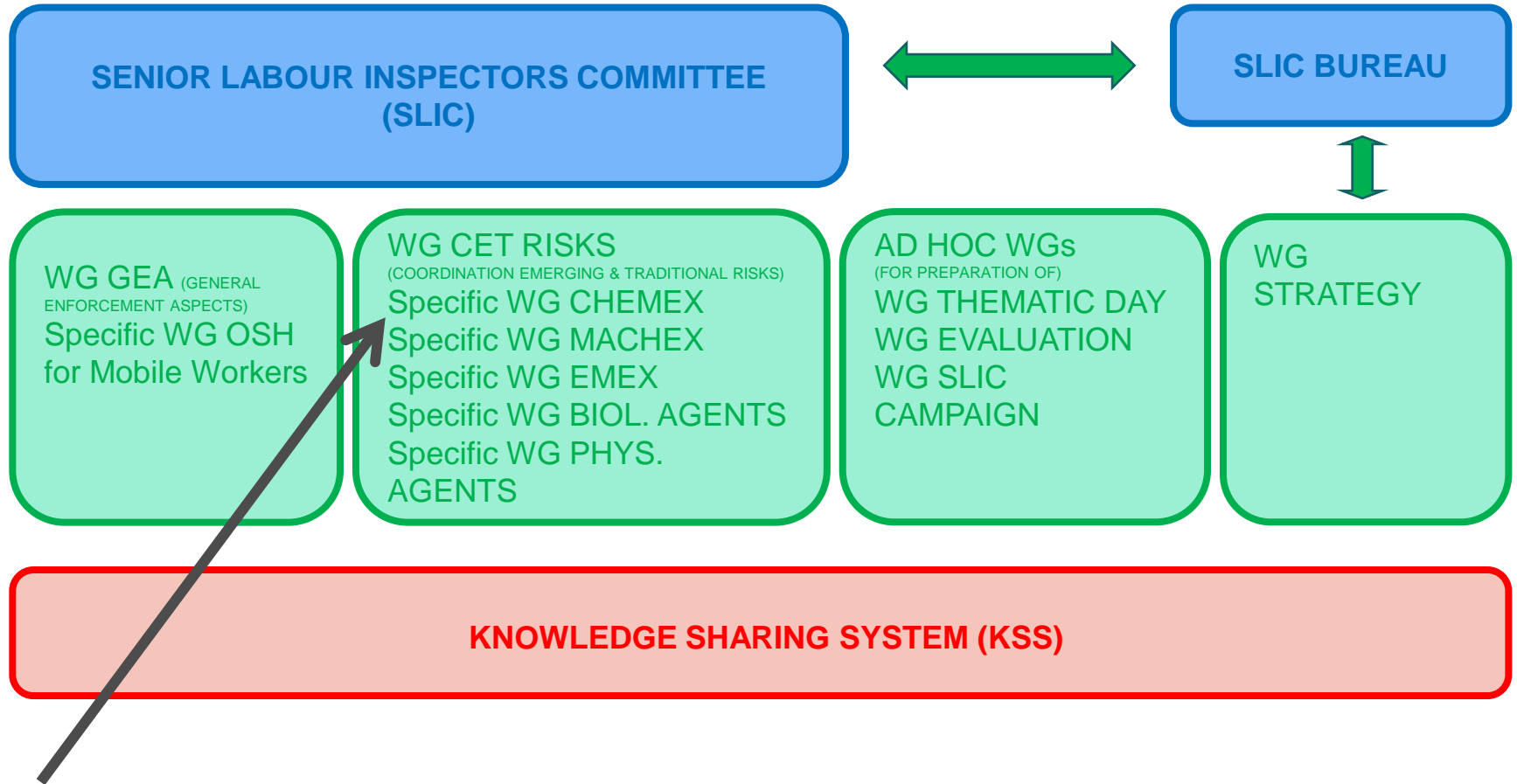
- Nationale 'vertaling' verschilt
- Grenswaarden niet overal gelijk
- Aanpak van inspecties verschilt

Verbetering door instellen van

SLIC: **S**enior **L**abour **I**nspectors **C**ommittee





Sinds 1995

# SLIC STRUCTURE



# Guidances: SLIC (public access) — Bibliotheek (europa.eu)

Pagina 1 /3

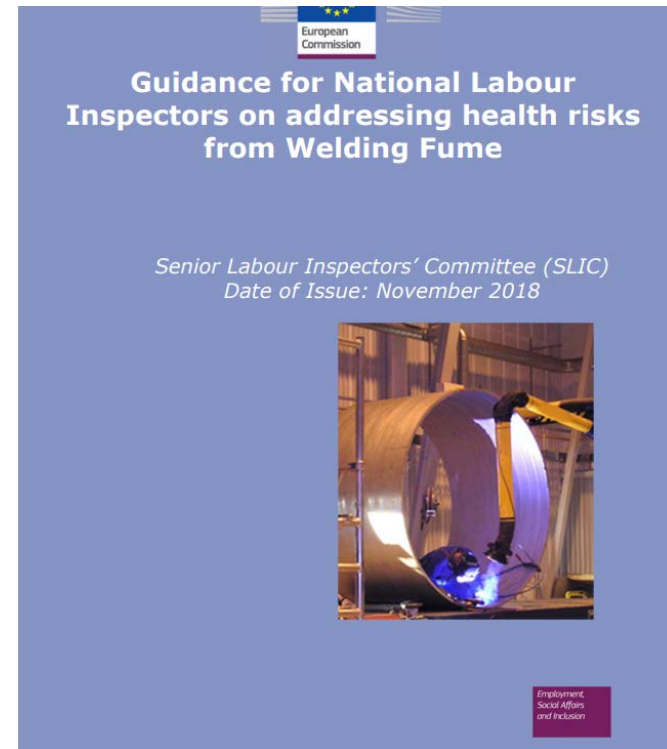
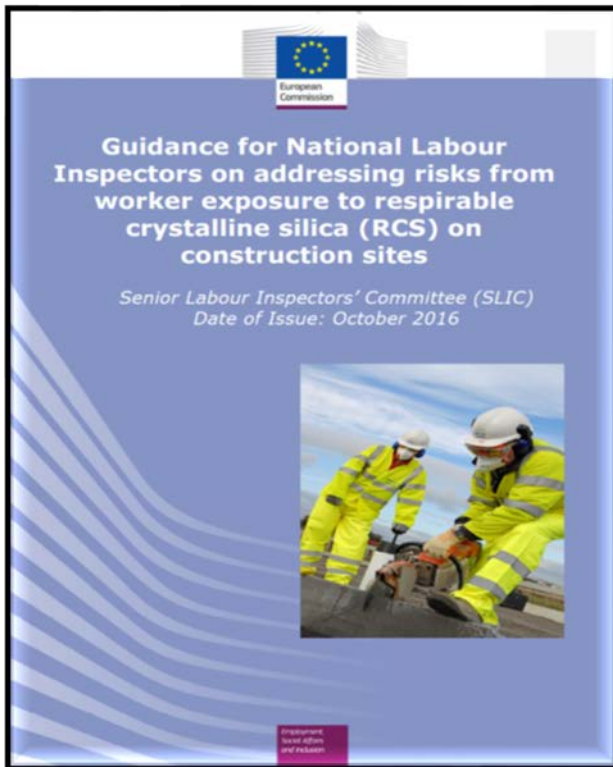
<input type="checkbox"/>	Naam	Titel
<input type="checkbox"/>	 <b>Guide EMEX - Psychosocial Risks</b> Kopiëren Details	Guide EMEX - Psychosocial Risks
<input type="checkbox"/>	 <b>Guide BIOLEX - Non-Binding Guidance on Biological Agents</b> Guide BIOLEX - Non-Binding Guidance on Biological...	Guide BIOLEX - Non-Binding Guidance on Biological Agents
<input type="checkbox"/>	 <b>Guide CHEMEX - Chemical Hazards at the Workplace</b> Guide CHEMEX - Chemical Hazards at the Workplace	Guide CHEMEX - Chemical Hazards at the Workplace
<input type="checkbox"/>	 <b>Guide MACHEX - Training of Inspectors on work equipment safety inspections</b> Guide MACHEX - Training of Inspectors on work eq...	Guide MACHEX - Training of Inspectors on work equipment safety inspections
<input type="checkbox"/>	 <b>Guide MACHEX - Load lifting equipment</b> Guide MACHEX - Load lifting equipment	Guide MACHEX - Load lifting equipment
<input type="checkbox"/>	 <b>Guide MACHEX - Use of Portable ladders</b> Guide MACHEX - Use of Portable ladders	Guide MACHEX - Use of Portable ladders
<input type="checkbox"/>	 <b>Guide - Common Principles for Labour Inspection</b> Guide - Common Principles for Labour Inspection	Guide - Common Principles for Labour Inspection
<input type="checkbox"/>	 <b>Cross-border - eHandbook</b> Cross-border - eHandbook	Cross-border - eHandbook



# Richtlijnen SLIC Chemex, o.a.

kwarts

lasrook

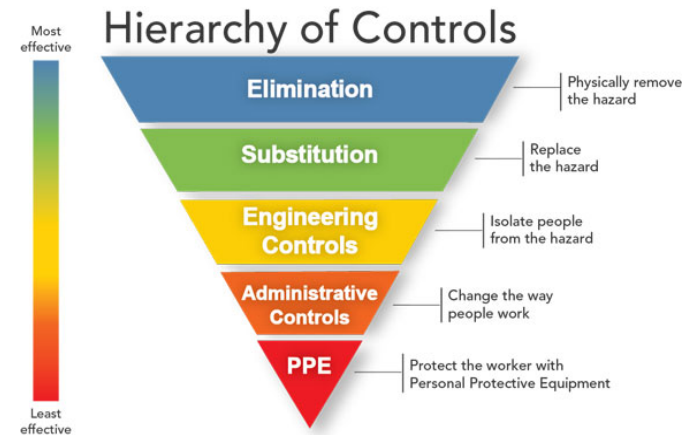






# Opbouw richtlijnen

- Gezondheidseffecten en impact
- Factoren die blootstelling bepalen
- Verschillende lasprocessen
- Wetgeving
- Inschatten blootstelling
- Gezondheidsbewaking
- Voorbeelden van maatregelen per lasproces

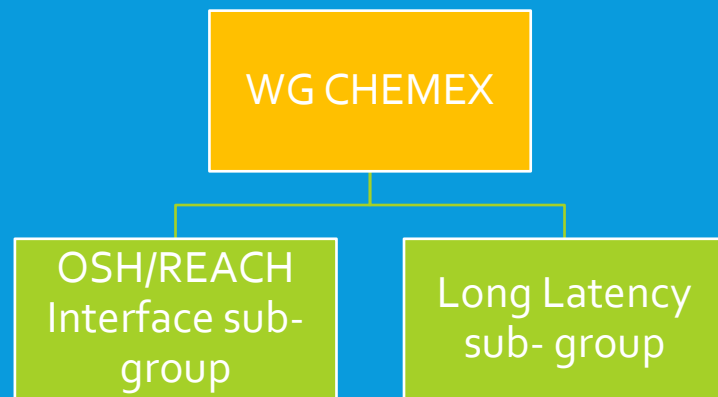


**TS 2 Gas metal arc welding (GMAW) – also known as Metal Inert Gas (MIG) & Metal Active Gas (MAG) welding – stainless steel & other chromium & nickel containing alloy Page 1 of 2**

General comment	GMAW/MAG/MIG generates varying amounts of fume, depending on a number of factors such as current, metal type, surface coating or contamination, operator practices. The fume composition is directly related to the consumable (wire) and any surface material. With metals containing chromium & nickel, the health hazard is greater due to asthma- and cancer-causing components of the particulate fume.
Recommended controls for welding fume	<p>Ensure clean, uncoated metal</p> <p>Local exhaust ventilation, appropriate to task &amp; workpiece, will be required:</p> <ul style="list-style-type: none"> <li>▪ Extracted bench</li> <li>▪ On-gun</li> <li>▪ Fixed or mobile hood</li> </ul> <p>RPE is also required</p> <ul style="list-style-type: none"> <li>▪ APF of at least 20</li> <li>▪ Power-assisted or air-fed RPE</li> <li>▪ Additional filtration will be required if coating/surface contamination present when filtered devices are selected</li> </ul> <p>*For short-term tasks, type P3 high-efficiency disposable RPE is acceptable. *Not applicable when welding Cd or Beryllium based alloys<sup>10,11</sup></p> <p>In oxygen deficient areas, e.g. enclosed spaces, RPE should be air-fed.</p>
Possible Actions by National Labour Inspector	<p><b>High Health Risk</b> - Consider <b>immediate action</b> when all controls missing/ineffective (e.g. stop work, use of Notices, use of administrative fines etc.)</p> <p><b>Medium Health Risk</b> - Consider <b>action</b> in situations where one control is missing/ ineffective (e.g. use of Notices requiring action) or the <b>Hierarchy of control</b> has not been followed, i.e. RPE without consideration of LEV</p> <p><b>Low Health Risk</b> - No action required where all controls are present and effective</p>
Design Out Risks	<ul style="list-style-type: none"> <li>▪ Replace with TIG/GTAW – if possible</li> <li>▪ Minimise the amount of welding</li> <li>▪ Automation of repetitive welding tasks (robotic welding)</li> <li>▪ Use of the correct set-up &amp; operating parameters of welding equipment can also minimise fume production.</li> <li>▪ Ensure metal components are free from surface coatings or contamination (Thermal degradation of surface coatings &amp; debris will generate other hazardous substances.)</li> <li>▪ If de-greasing agents are used then use alternatives to chlorinated degreasing solvents, which can react to produce phosgene gas</li> <li>▪ Provide training of operators on control measures to ensure they</li> </ul>

# SLIC CHEMEX WORKING GROUP

- **Structure:** Chair (NL), Co-chair (IE) + 5 members; 2 sub-groups + invited expert
- **Mandate:**
  - Promoting enforcement by sharing of good practices, guidelines etc
  - Develop knowledge and promote exchange
  - Cooperate with the other risk-related groups
  - Ensure Coordination and cooperation with other relevant enforcement bodies & agencies





# KSS Questionnaire

## EN689 - Workplace chemical risk assessment

Is the EN689 standard mentioned in the national legislation as a standard for checking compliance with OEL's?

Yes	No	Other
5	10	6
23.8%	47.6%	28.6%



## KSS Questionnaire

### EN689 - Workplace chemical risk assessment

**Which minimal requirements do you expect to see in a Chemical workplace risk assessment for inhalational exposure? (more answers possible)**

	Yes	No	Other
• We ask for involvement of an occupational hygienist	8	9	4
• We always require measurements	2	16	3
• We accept exposure models e.g. ECETOC TRA, Stoffenmanager	12	2	7
• We accept a 'basic characterization' / qualitative risk assessment (estimation of exposure by professional judgement, earlier measurements, exposure data in database, .....)	18	1	2
• We always accept the exposure scenario under REACH	4	13	4
• We only accept the exposure scenario under REACH if the circumstances are equal in the workplace as in the described exposure scenario	8	6	7
• Other	7		



## Work in progress ....

**Guidances** in ontwikkeling:

- 'how to assess a chemical workplace riskassessment'
- 'sensitizers', inclusief di-isocyanaten

**Pilot Inspectieproject** di-isocyanaat restrictie, start najaar 2023 (ism ECHA)

**Roadmap on carcinogens:** delen van inspectieresultaten

**EU-OSHA:** Discussie over belang en wijze van toezicht:  
[EU labour inspectors are key to making occupational safety and health a reality | Safety and health at work EU-OSHA \(europa.eu\)](#)



# Persoonlijke ervaringen

- 'Out of my comfortzone'
- Toch leuk!
- Veel brengen, minder halen
- Complex
- Belang REACH-OSH interactie
- Kwestie van geduld....

## Wat betekent dit voor jullie?

- Nuttige informatie?
- Waar kun je invloed uit oefenen?
- .....