

Communication on safe use in REACH can be improved



CEFIC Long-range Research Initiative
Request for Proposals (RfP)

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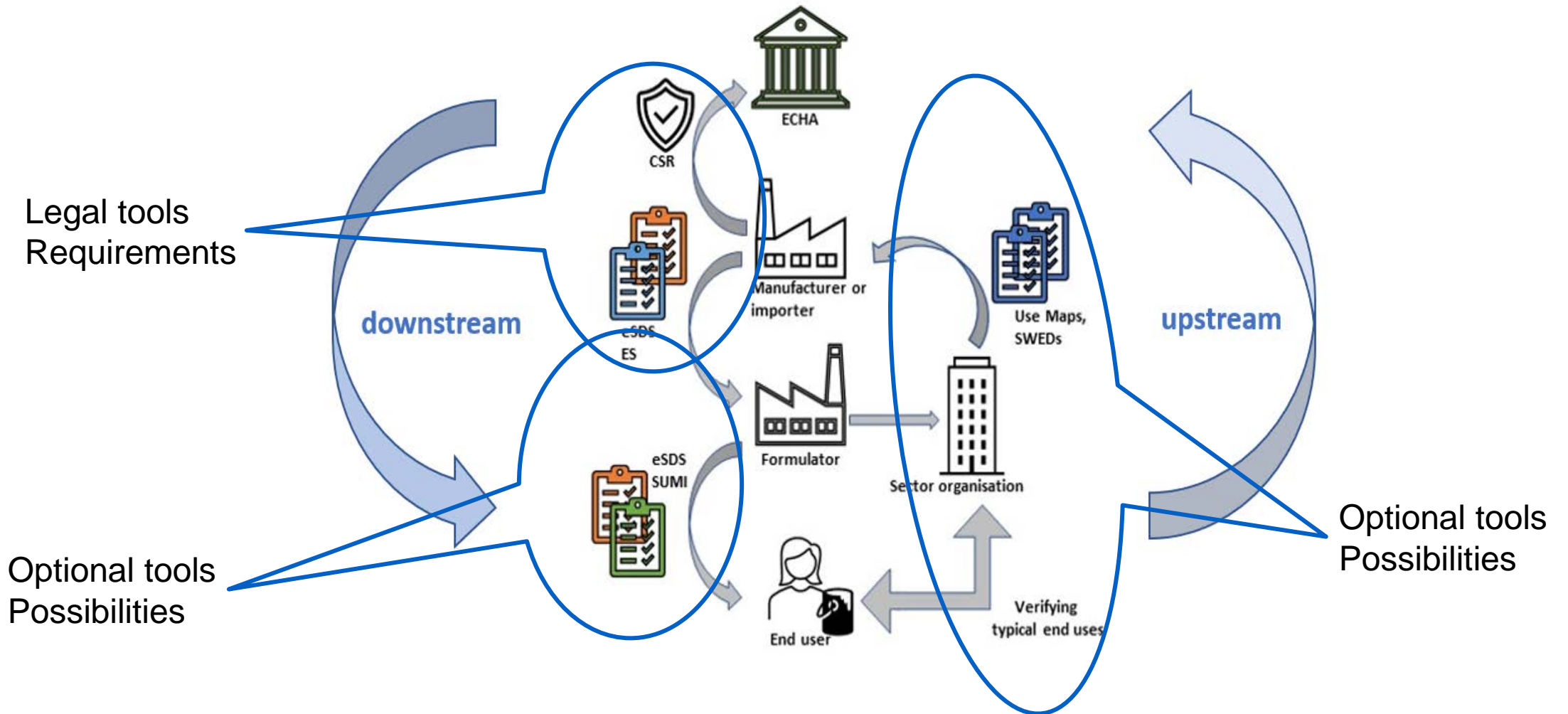
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Content

- Background
- Study design
- Results
- Conclusions and Recommendations



Information flows up- and downstream



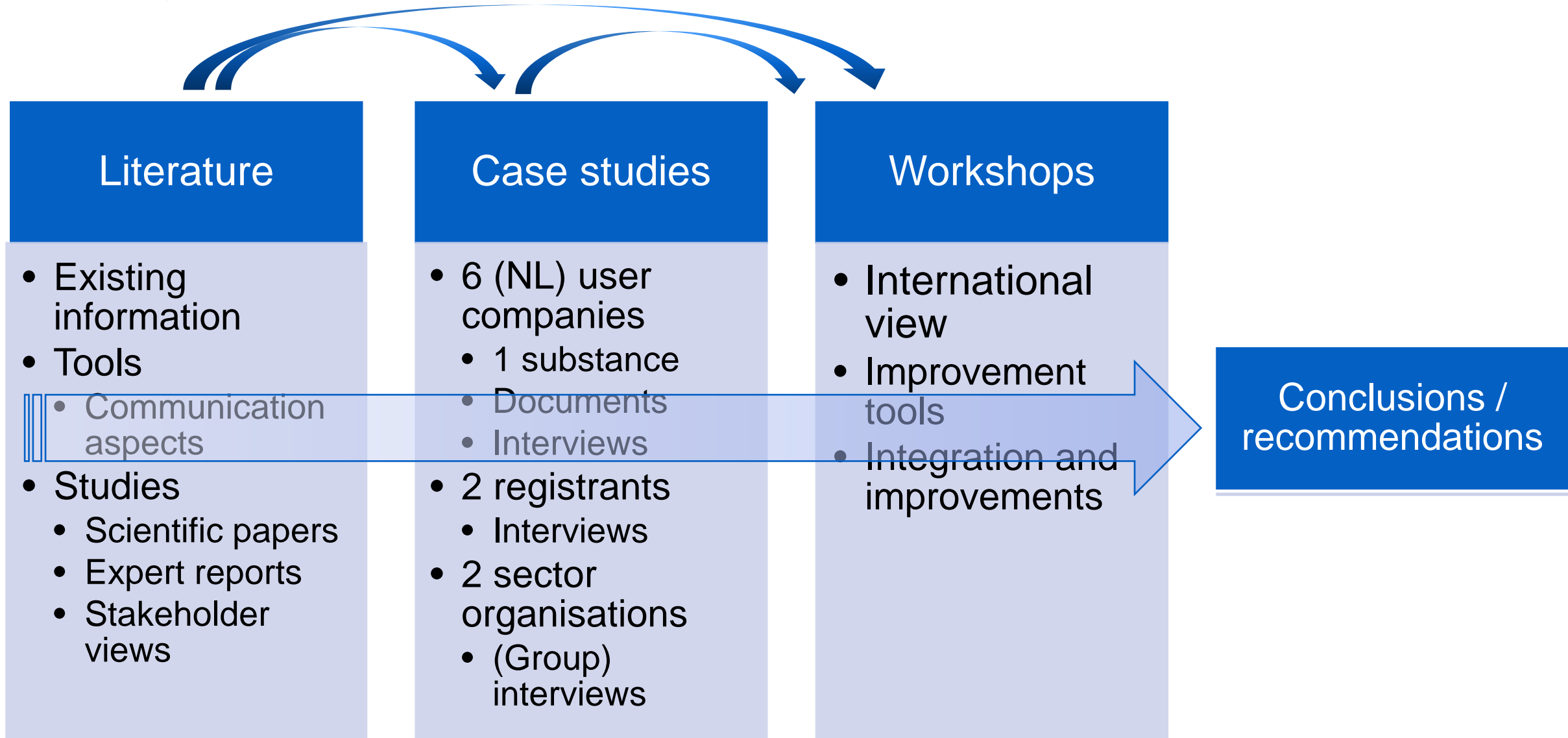
Background project

- REACH aims at ‘high level of protection’
- Dossiers, SDS, Exposure Scenarios are tools
- Up + down stream communication (safe) use conditions vital
- Real improvements are the goal
- Cefic Long-range Research Initiative (LRI) project
 - *“Optimizing the benefit of REACH worker exposure assessments: ensuring meaningful health risk communication”* – LRI-B23
- Objective: substantial contribution optimization communication safe use information



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Project set-up



Analysis of existing information (literature) - tools

- ‘Tools’ = any instrument with aspects communication safe use
 - Legal tools – (Chemical Safety Report), SDS, Exposure Scenarios ↓
 - Guidances – from ECHA, authorities, sector groups, etc.
 - Standard phrases catalogue ↓ ↑
 - Generic Exposure Scenarios, Use Maps, Specific Worker Exposure Descriptions (SWEDs) ↑
 - Safe Use of Mixtures Information (SUMI) ↓ ★
 - Workplace Instruction Cards (WICs) ↓ ★
- Limited visible contribution of real end-users in developments (except WICs)



↓ Mainly on downstream communication

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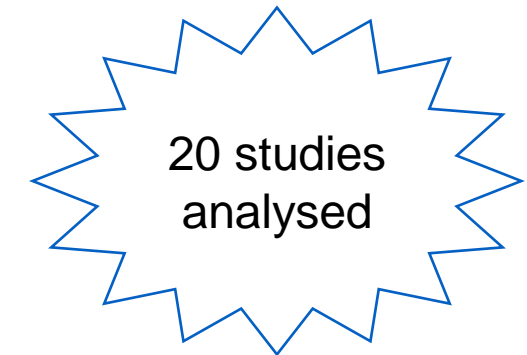
★ On mixtures / products

By sector groups, mainly formulators

By sector groups or companies

Analysis of existing information (literature) - studies

- Studies = scientific publications, workshop presentations, stakeholder documents, etc.
- Results
 - Studies mainly from begin years of REACH
 - Implementation REACH = work in progress
 - REACH has potential to improve safe use
 - Usability (e)SDS often questionable
 - Terminology is an issue
 - Knowledge and understanding less at SMEs
 - No study on effect of newer tools (e.g. SUMI) or end-user tools (Workplace Instruction Cards)
 - Tendency to harmonisation – not everyone sees only advantages



In-depth survey – Case studies

- Variability in cases – companies (and sector)
 - downstream communication
 - # workers
 - technical sophistication
 - Sector
 - Organisation level of sector
 - Knowledge hazardous substances
 - Types of chemicals
- Study documents (on one substance)
- Interviews
 - Various persons, if possible
- McGuire’s Persuasion-Communication Matrix

| | Message Source | Message Design | Delivery Channel | Receiver | Context |
|----------------------------|----------------|----------------|------------------|----------|---------|
| Orientation to the message | | | | | |
| Exposure | | | | | |
| Attention | | | | | |
| Interest/Liking | | | | | |
| Comprehension | | | | | |
| Acceptance and Use | | | | | |
| Acquisition | | | | | |
| Agreeing | | | | | |
| Memorising | | | | | |
| Retrieving | | | | | |
| Deciding | | | | | |
| Acting | | | | | |
| Sustained use | | | | | |
| Reinforcement | | | | | |
| Consolidation | | | | | |

In-depth survey – Case studies - messages

- Qualitative results – no statistics
- Many interviewees do not distinguish between REACH, CLP, OSH (**context**)
 - One stream of safety information
- Message design important topic of discussion (**design**)
 - Lengthy, complex, not everything useful; may hinder safe working (confusion)
- Updates not always occur; feedback seldom (**delivery channel**)
- Size (of companies) matters (**receiver**)
 - Large companies have or hire expertise; smaller do not
- Well-organised sectors provide support (**receiver**)
- Responsibility appears to be diffused between various stakeholders (**source, receiver**)
- Digital preferred, but who tests for validity and usability"? (**delivery channel**)
- Attitude also important: hearing ≠ knowing ≠ integrating ≠ acting (**receiver**)
 - Social norms important

Workshops – set-up

- Workshop 1: International view results (NL) case studies
 - 17 participants from 7 countries / international organisations
- Workshop 2: Improvement ‘exposure tools’
 - 16 participants – authorities, consultants, industry
 - ‘exposure tools’ = tools that (also) communicate exposure/safe use conditions
- Workshop 3: Integration of results, recommendations for future improvements
 - 24 participants – partially the same as for Workshops 1 and 2

Plenary session
Mentimeter® questions
Based on Work Packages 1 and 2

Breakout rooms
Couple of specific discussion points
Variation in background participants

Plenary feedback from breakouts
Discussions, conclusions,
recommendations

Workshops – concerns and improvements

**Insufficient
feedback**

- Provide support
- Focus, harmonise, digitise

**SDS and ES too
complex**

- Simplify
- Improve knowledge/expertise

**Results exposure
tools not useful**

- Clarify and specify
- Bring in OSH-expertise

**REACH – OSH
not connected**

- Involve more sector-experts
- Stimulate use external experts

**SMEs lack
expertise**

- Increase internal expertise (training, etc.)
- Obtain external expertise

Conclusions

- Awareness / understanding of REACH decreases down supply chain / large to small / technologically advanced to less advanced
- End users see various Regulations all as ‘chemicals legislation’
 - Improvements should account for this
- REACH is EU-wide, surrounding legal, organisational and cultural area is more national
 - This influences perception and parts of implementation (e.g. enforcement, support)
- Exposure scenarios rather unknown to end users; partly because most use mixtures
- Exposure scenarios considered too long and too complex
 - One document for many users; experts, large companies, SMEs, etc.
 - Same substance, different supplier → different exposure scenarios
- Updated SDS not consistently forwarded down supply chain / in companies
- No regular structured feedback on safe use information upstream



Conclusions 2

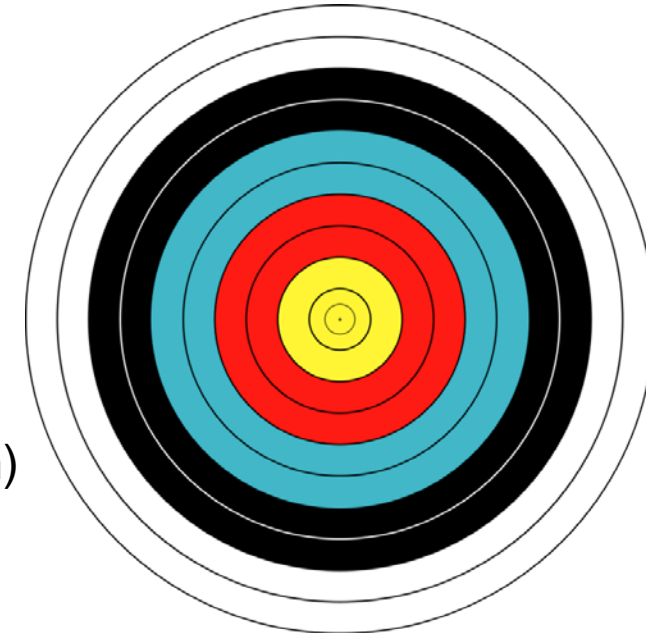
- Several improvement activities ongoing – tools created to assist communication
 - Not (all) well implemented
- Actual end users not extensively represented in activities for improvement
- Various sector organisations not very involved
 - Others are very active
- Actors blame each other
 - Upstream registrant: “Downstream should be better trained”
 - Downstream user: “Registrants should produce understandable documents”
 - Industry: “Authorities created complex (unnecessary) legislation”
 - Authority: “Industry should communicate better”



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Recommendations

- Clarify intended target group for exposure scenarios
 - And ensure understandable information tailored to target group
 - Obligation is on companies
 - Guidance should stress need for sufficient expertise (also downstream)
- Limit length and complexity of exposure scenarios
 - Tailor to receiver and provide practically useful information
 - Educate responsible persons on interpretation of the information
- Digital documentation transfer (e.g. via xml-files) can facilitate tailoring and easy updating
 - Actors in supply chains should cooperate in development
- Better implement existing (additional) tools, such as GES, SUMI
 - Downstream user of chemicals coordination group (DUCC) could take the lead



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Recommendations 2

- Arrange for more (structured) feedback
 - Make relevance feedback more clear and stimulate and facilitate (e.g. digital tools)
- Involve end-user representatives actively
 - Ensure their participation in relevant meetings and developments
- Not very active sector organisations should take a larger role
 - Legal role for sector organisations?
 - Financial support (subsidies, tax-cuts)
- Improved harmonisation REACH and OSH
 - All levels: authorities, experts in companies; legal aspects (e.g. STOP), developments
- Use insight from social sciences to improve communication and implementation of safe use
 - Knowledge on promoters of behavioural change, nudging techniques, etc.



Summarising



Communication on safe use far from perfect



It's them, not us!

(Potentially) useful tools not well implemented



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Education, Participation & Cooperation needed



Better cooperation needed

