

POLICY STATEMENT

The CII welcomes the Council Conclusions of 10 December 2019 calling for a clarification of the REACH-OSH Interface

December 2019

The Cross-Industry Initiative for better regulation in chemicals management (CII) welcomes the Council's Conclusions "*A New EU Strategic Framework on Health and Safety at Work: Improving the implementation of Occupational Safety and Health in the EU*" which emphasize the importance of the regulatory framework of Occupational Safety and Health (OSH) and the need to further clarify the interface between OSH and REACH.

The CII particularly supports the Council's recognition of the OSH framework, "as a cornerstone of workers' wellbeing and protection" which contributes essentially to the "economic growth and the competitiveness of the Union". The Council explicitly highlights the role of OSH directives in managing chemical risk in the workplace and advises that the setting of binding OELVs is essential to reducing the risk among millions of workers of developing occupationally related cancers. Like the CII, the Council identifies areas where the application of OSH should be improved, stating that "the EU's OSH and chemical legislation sometimes generate overlaps or even contradictory requirements, which risk causing confusion, administrative burden and legal uncertainty" and further suggesting that the Commission should "CLARIFY the interface between the OSH, REACH and CLP legislations and improve coordination by developing transparent procedures and criteria to be used when selecting the most appropriate substance specific regulatory options."

The CII considers the clarification of the REACH-OSH interface essential to the goal of protecting workers while maintaining the competitiveness of the EU's industries. The CII, therefore, supports the Council's conclusions and recommends the following:

- developing Guidance on Risk Management Option Analyses (RMOAs) that would provide criteria for selecting the most appropriate risk management option and that would, in particular, clarify in which cases OELs are preferred to other risk management options.
- developing the long-planned Common Understanding Paper on REACH and OSH. This paper should be developed under the responsibility not only of DG Environment and DG Growth (for REACH) but also of DG Employment (for OSH). It should take into account input from Member States and stakeholders.

The Cross-Industry Initiative (CII) is a coalition aimed at streamlining chemicals management. It currently comprises over 60 organisations: sectoral associations at the EU and national level, as well as companies. To know more about our position and our proposals, please consult our website www.cii-reach-osh.eu or contact us at info@cii-reach-osh.eu.