

## STATEMENT

# CII contribution to the Commission public consultation on the EU Strategic Framework on Health and Safety at Work (2021-2027)

*The Cross-Industry Initiative for better regulation in chemicals management (CII) fully supports a strong EU framework for Occupational Health and Safety (OSH) that strives for a consistent improvement of the health and safety of workers across Europe.*

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To ensure an ever-stronger OSH framework and its implementation in the EU, the CII recommends that the following issues are considered by the Commission in the development of the EU Strategic Framework on Health and Safety at Work (2021-2027):

- The need to **clarify the interface between REACH and OSH legislations** by proposing a set of actions to solve this issue, in line with the 2nd REACH review and the Council Conclusions of December 2019.
  - We welcome DGs ENV-GROW's thought-starter to promote a **decision tree that would clarify the interface and optimise worker protection**, as presented in the recent paper on REACH Restriction and OSH Occupational Exposure Limit Values (OELVs). However, we are concerned by the proposal to set restrictions that would cover the same scope as an OELV.
  - The **OSH legislation is essential to protecting workers** while at the same time maintaining the competitiveness of EU's industries. We believe that REACH Restrictions and Authorisations should not be considered as the preferred option when potential risks from a substance have found to be limited to the workplace and can be more effectively addressed by workplace-specific legislation.
- The need to **highlight the role of OSH in preventing work-related cancers and to set OELVs** when they have been identified as the best risk management options to tackle concerns at the workplace.
- The need to **stress the key role of Risk Management Option Analyses (RMOAs) in identifying the most optimal risk management option**.
  - To improve their predictability and consistency, we call on developing **clear criteria on RMOAs** that would allow selecting the most appropriate risk management option and would clarify in which cases OELVs are preferred to regulatory risk management under REACH.
  - We recommend that these criteria are developed in the framework of a specific **REACH-OSH multi-stakeholder forum** (including REACH and OSH experts, DG EMPL, DG ENV, DG GROW, ACSH, MSCAs and stakeholders).

*The CII was set up in 2015 as a cross-industry European platform aimed at streamlining chemicals management. It is currently comprised of over 60 organisations, associations, manufacturers, as well as downstream users of chemicals, large companies and SMEs who stand for using the most effective tool to manage risks caused by chemicals. The CII activities particularly focus on exposure to chemicals in the workplace and the interface between the EU legislation on Occupational Health and Safety (OSH) and the general regulatory framework for Chemicals (REACH).*

To know more about our position and our proposals, please consult our website [www.cii-reach-osh.eu](http://www.cii-reach-osh.eu) or contact us at [info@cii-reach-osh.eu](mailto:info@cii-reach-osh.eu)