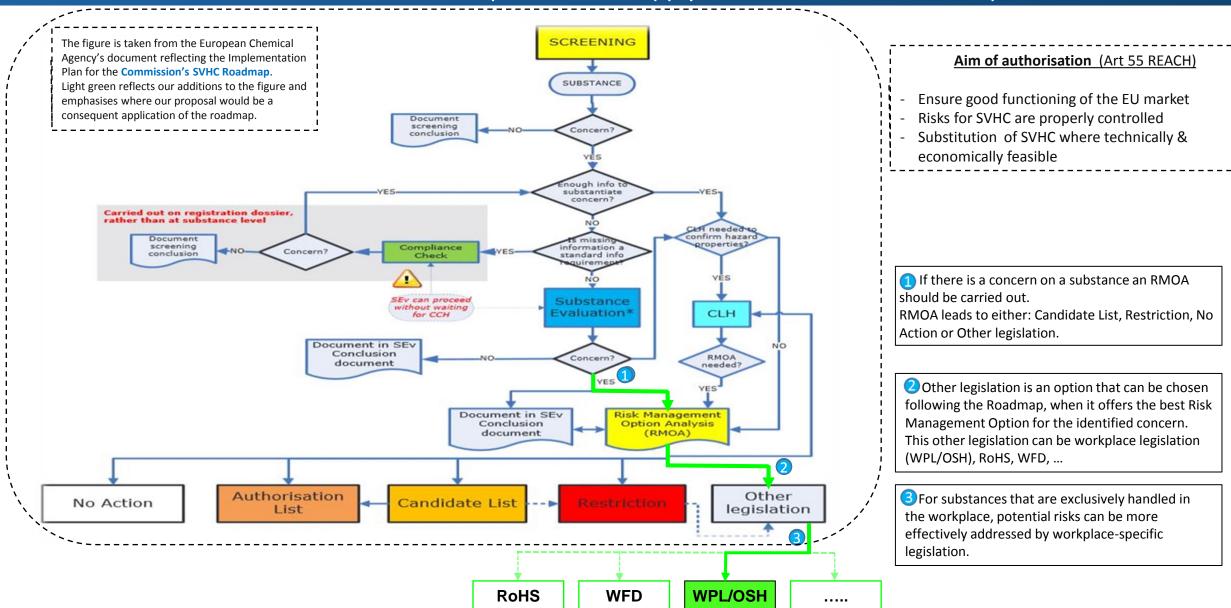
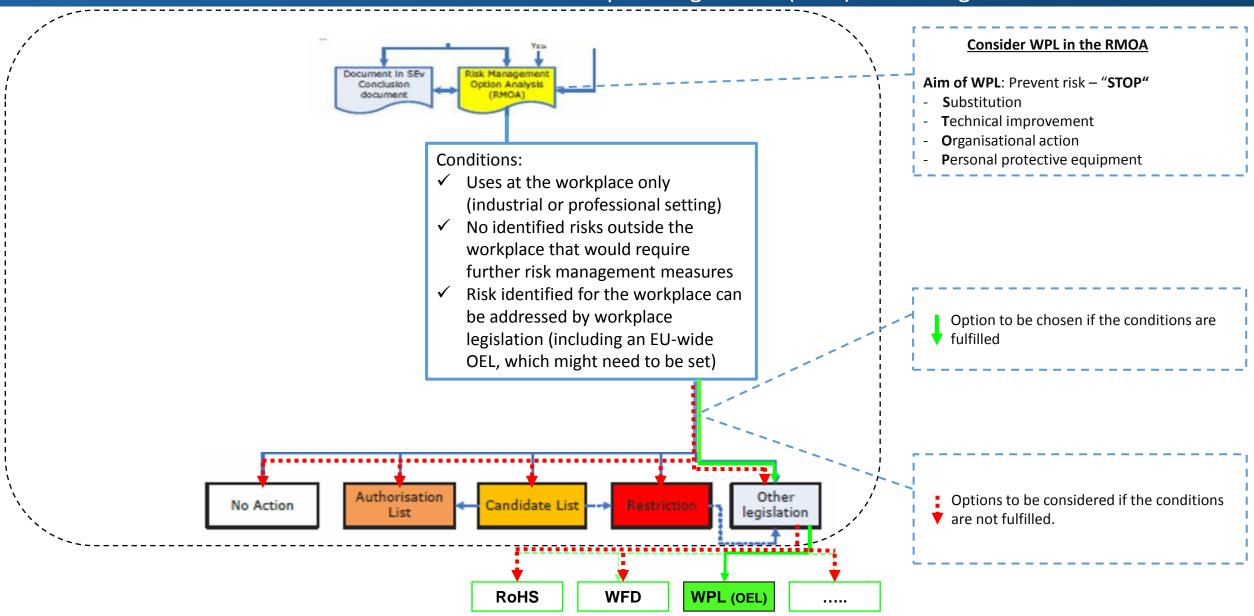
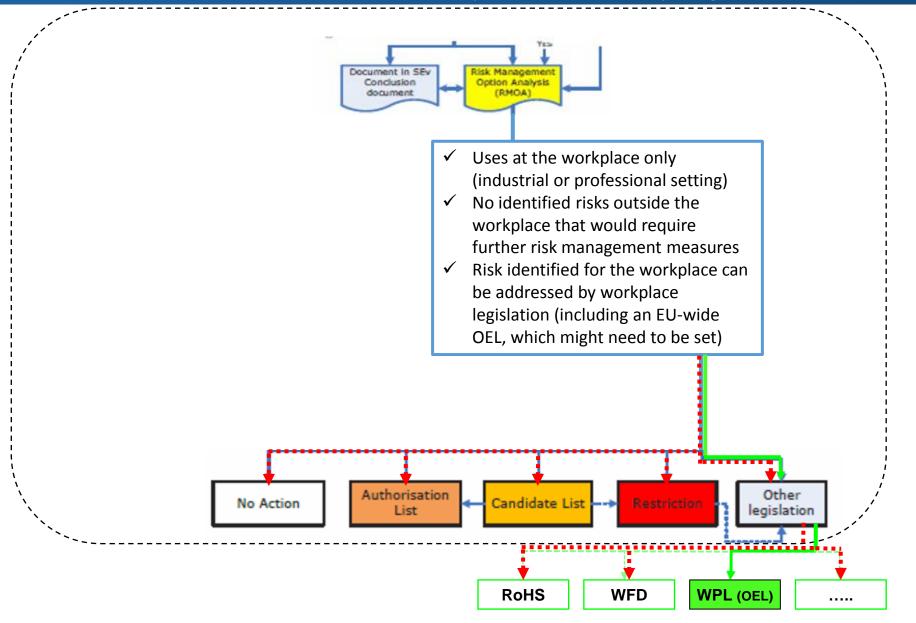
Our initiative: An example of how to apply the Commission's Roadmap



Our initiative: When to choose workplace legislation (WPL) - including OELs



RMOA identifies "workplace concern": Synergies between REACH and WPL

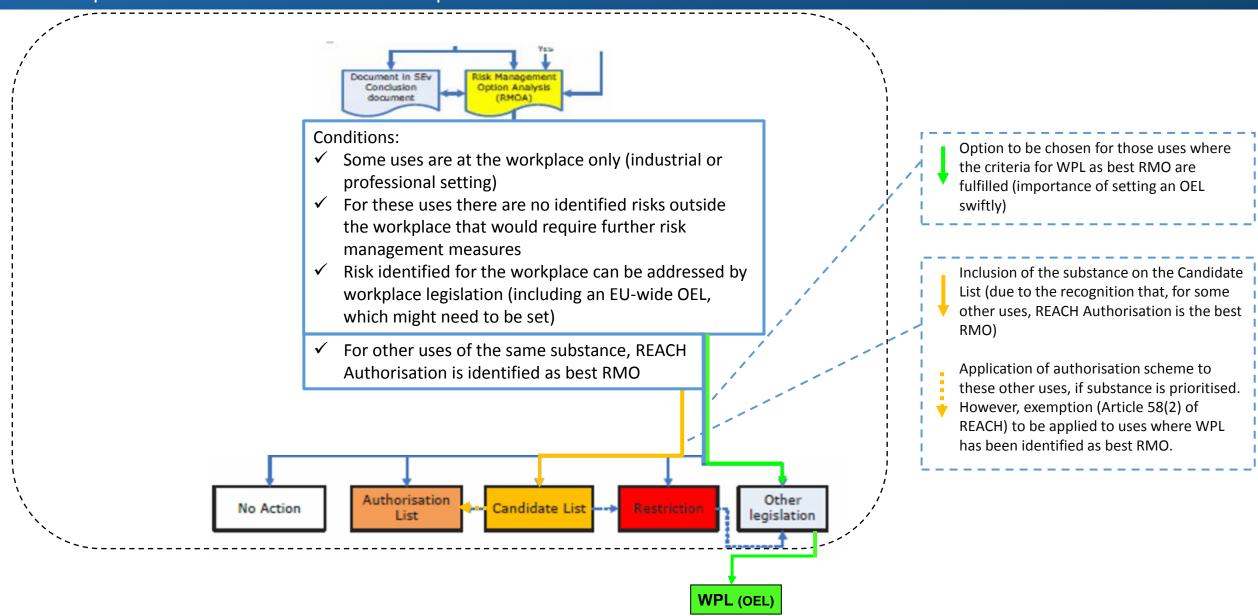


Synergies between REACH and WPL

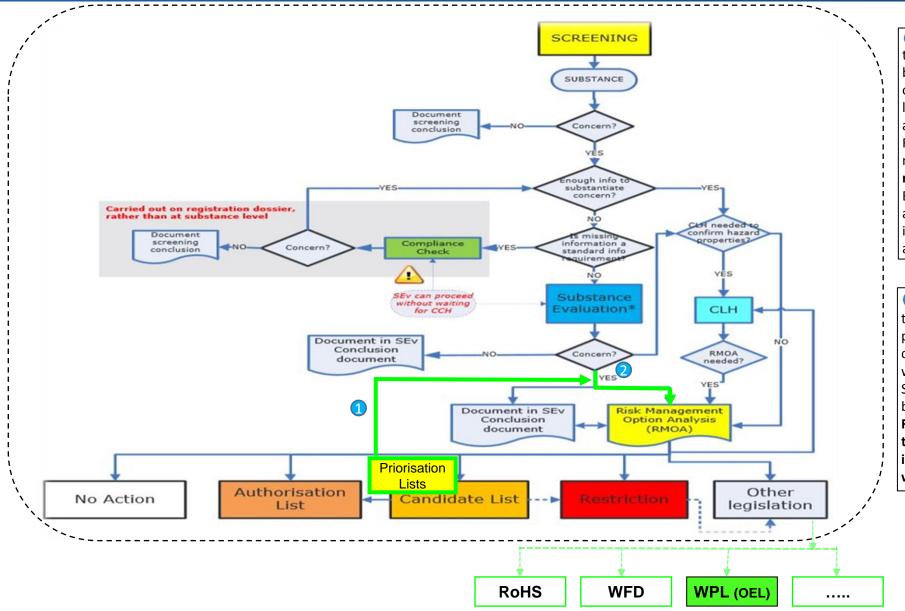
If "workplace concern" is identified

- 1. If a "workplace concern" is identified, DG EMPL should be heard in the course of the RMOA. Where workplace authorities and REACH authorities agree that a risk at the workplace needs to be addressed by means of an OEL, SCOEL's work plan should prioritise that substance with the objective of setting a harmonised OEL as swiftly as possible.
- DG EMPL and SCOEL should be granted easier access to the data in the REACH registration dossier.
- 3. Once SCOEL has recommended a limit value, this could be used as a reference to update the registration dossier. This will contribute to consistent communication in Safety Data Sheets.
- 4. If the implementation of a harmonised OEL requires an impact assessment, DG EMPL should be enabled to use the data included in the REACH registration dossiers. In cases where a public consultation has been conducted under REACH (e.g. in the context of the RMOA), this should also be shared, which would reduce the time needed for the impact assessment.

How to proceed when for some uses WPL qualifies as best RMO and Authorisation is found to be the best RMO for other uses



What to do with substances for which no RMOA was carried out prior to decision to include on Candidate List?



1 Substances addressed early on have not all gone through a proper RMO Assessment as recommended by the SVHC 2020 roadmap. Without weighing other options, they have been included on the candidate list and some of them have been prioritized for authorization.

Reason for this situation: when implementing REACH, not all implications could be foreseen. **The RMOA route is a lesson learnt.**

Besides the risk assessment, an assessment of the available RMOs inside and outside of REACH and an initial assessment of economic impact and lack of alternatives are now included in the procedure.

2 Some substances have already been included on the Candidate List (and have possibly already been prioritized for authorization), but no RMOA was carried out. Where no RMOA was carried out or where it lacked aspects that are now included on the SVHC Roadmap, the assessment should be done before proceeding with authorization.

For fairness and consistency it would be advisable to reconsider the 'automatic routing' that was initially applied to candidate listed substances without the opportunity for an RMOA.