

Implementing European regulatory
requirements on hazardous substances in
Italy: the experience of the Chemical Agents
Directive

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What this presentation is about

- Exposure to hazardous substances at work still a significant problem
- European study on effective regulatory strategies to improve risk management
- Evidence of what works
- Problem of smaller firms
- Gaps between regulation and reality?

The regulatory philosophy

- National measures implementing Framework Directive 89/391 and Chemical Agents Directive
- Risk management
- Preventive principles

Evidence of success?

- Generally raised awareness concerning hazardous substances
- Significant provision of information, training, specialist services, support tools etc
- Some evidence of occurrence of risk management according to Framework Directive/CAD principles – in large firms and those in which hazardous subs are central to business purpose
- Continued emphasis on PPE
- Weaknesses in risk assessment
- Limited worker involvement
- Limited evidence of effective enforcement/inspection

The problem of small firms

- Failure to reach small firms etc
- Limited evidence of nature of the problem or solutions. Usually understood in terms of:
 - Regulatory reach
 - Awareness/understanding/capacity/will
 - Suppliers' Information
 - Arrangements for managing OHS
 - Access to services
- Solution: 'Make it simple'..... 'provide support'

Current developments to support small firms

- Easy-to-use guidance and tools
 - COSHH Essentials , Stoffenmanager, BASIS, Kemie Guiden, Easy to Use Workplace Control Scheme, PIMEX, Column Model, PragMaGuS, Gefahrstoffe im Griff/Handwerk, GISBAU/WINGIS
- Regulatory inspection emphasis on guidance and advice

But what works?

- Tools work where they are applied with support
- Little robust evidence of transferability or sustainability
- Limited study of socio-economic contexts of their application
- Such evidence as there is points to:
 - Concerns about complexity
 - Issues of access
 - Sustainability?
 - Supports for OHS management in small firms work for chemicals too
- Best form of support –face to face contact
- Infrastructural processes key determinant of successful use

What helps?

- Regulatory inspection
- Supply chain support:
 - Responsible care, product stewardship,
 - Motor industry dealerships repairers
- National strategies – eg Netherlands VASt Programme, attempts to connect these elements

Will REACH help?

- Better risk communication in supply chains
 - More information?
 - Two-way communication?
- But increasing the effectiveness of infrastructural support?
- Role of regulatory inspection in supply relationships?
- Integration of REACH with workplace regulation under the Chemical Agents Directive?