



Subject: Social partners' reflection on interplay between REACH and OSH

On September 7th, 2017 the Expert Group Meeting on Health and Safety of the European Sector Social Dialogue Committee Chemical Industry in Brussels discussed the interface between the REACH chemical legislation and the European Occupational Safety and Health (OSH) regulations. In recent discussions on EU level it has been proposed to merge the SCOEL process, setting European-wide occupational exposure limits, with the work of the RAC, the risk assessment committee of the European Chemicals Agency (ECHA), managing the REACH process.

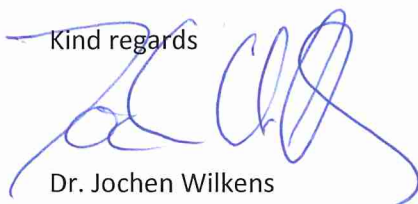
While representatives from both workers and employers supported the idea to streamline processes, speed up procedures on EU level and avoid duplicate work, they were also very sceptical about a merger of the SCOEL and the RAC. The composition of both groups and the procedure by which the expert members for these groups are chosen today are very different. The roles played by government representatives, scientific experts and social partners are totally different in both groups, reflecting the different tasks and purposes. In the view of the social partners there are good reasons for those differences to be maintained.

While a better cooperation between both groups is welcomed by employers and workers and a work of both committees under a single roof (e.g. of ECHA) seems to be worth to be explored further, a full scale merger would mean the current focus, especially the one on health and safety at the workplace of the SCOEL, could not be maintained in the same way.


The European Sector Social Dialogue Committee in the chemical industry calls on all parties involved in the current discussion to take note of these considerations. The social partners of the sector, the European Chemical Employers Group (ECEG) and the IndustriAll European trade union, today are in favour of keeping both the SCOEL and the RAC with their current tasks and compositions. As any further discussion – and even more any decision - on this issue will potentially have a major impact on how health and safety is organized in the sector in Europe, the social partners and the SSDC expect to be involved and consulted in any further discussions and decisions in this area.

Thank you for your consideration.

Kind regards



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