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## ADVISORY COMMITTEE ON TOXIC SUBSTANCES

### Chemical Hazard Alert Notices

#### A Paper by Gary Dougherty

##### Issue

1. A revision of Chemical Hazard Alert Notices with a view to improve their effectiveness as a communication tool.

##### Timing

2. Routine.

##### Recommendation

3. ACTS is invited to:
  - i) Comment on the changes to the style, format and name of CHANs and offer any further thoughts that could improve the clarity and impact of the messages contained within CHANs;
  - ii) Offer any further suggestions for means to improve consultation, circulation and penetration of CHANs to the target audience.

##### Background

4. Chemical Hazard Alert Notices (CHANs) are one of the tools HSE uses to communicate hazard information and control advice for specific substances. They are short documents that contain basic hazard and control information. In the past, they have been used as an interim measure for substances for which the existing Occupational Exposure Standard (OES) was being withdrawn because it was deemed 'unsafe'. In this situation, the substance would often go on to have a Maximum Exposure Limit (MEL) set. A CHAN was issued in the interim period, before the establishment of the MEL, to alert suppliers and users to the situation.
5. CHANs have also been used for substances where there is no intention to set an occupational exposure limit, but HSE still wants to alert people to hazardous properties of particular concern (e.g. for the substances: n-propyl bromide, dioxins).

## Argument

6. In our opinion, the impact of CHANs is limited by non-targeted distribution, the complexity of the language used and a lack of useful advice on exposure control. Despite the apparent shortcomings, CHANs clearly have some impact with chemicals users, as witnessed by the enquiries HSE has received about them. Therefore, we think that there is still a valid role for CHANs to play as a communications tool for providing control advice and HSE has been considering possible ways to improve their style and impact.
7. The target audiences for CHANs are chemicals suppliers and the workers and duty holders in the companies that use chemical substances. HSE research has shown that a large proportion of the workers using chemical substances are employed in Small and Medium sized Enterprises (SMEs). It can be assumed that for most SMEs will generally not have ready access to the type of specialist (in-house) occupational hygiene resource needed to interpret complex scientific information. HSE research has also shown that duty holders in SMEs would like clear and simple guidance that gives practical information and advice on both the hazards and exposure control. Whilst larger companies are more likely to have the hygienist resource, they too would appreciate a simpler guide as it saves them time and effort.
8. With this in mind, HSE is trying to improve the style and format of CHANs, by pitching the language at a simpler, less scientific/technical level, by presenting the information in a clear and easily-read format and by offering targeted advice on exposure control. We are also seeking to improve the penetration and circulation of CHANs through better targeting of recipients and improved Internet accessibility.
9. The issues that we have highlighted are detailed below.
  - **Formatting and clarity of message**
    - The health hazard section of the CHANs is too specialised and uses technical jargon. This could lead to poor understanding amongst users.
    - The occupational exposure/control advice has been very general and in some cases places too much emphasis on numerical exposure values as opposed to good practice.
    - The order in which the information is presented could be improved. For example, it is difficult to determine if the document is relevant to you without having first read a good portion of it. HSE research has shown that users want to find out quickly if they need to read an entire document.
    - The reading age of a document is one of the key indicators for 'ease of understanding'. The average reading age of the currently available CHANS is 15.5-16 years. HSE research has shown that for workers in SMEs, overall 64% of people have a reading age of <12.5 years (managers 58%, other employees 74%). Thus, the

language in the current CHANs is too complex for the majority of chemicals users.

- The CHAN format has been inconsistent, with different typefaces, layouts, etc. being used. There is scope for improving this aspect, with the aim of presenting a more consistent and professional image.
- ***Penetration/circulation***
  - When CHANs were first introduced, a list of CHAN recipients was produced and CHANs were routinely sent in paper format to the people on this list. Feedback from these recipients suggests that circulation by this route was poorly targeted and new CHANs for individual substances were going to people who had no history of using that particular chemical. E-mail circulation was not being used. More recently, CHANs have also been published on the HSE website; however, our perception (supported by anecdotal evidence) is that CHANs are difficult to find on the website.

## 10. The proposed changes

- ***Formatting and clarity of message***
  - With a view to reducing the reading age of the document, so that it is closer to that of the target audience, the language used will be made simpler and less scientific/technical, particularly in the health hazard section.
  - Major uses will be listed individually and related targeted control advice, with web links to e-COSHH essentials sheets (where possible) will be given in the 'What should employers do?' section.
  - The order in which the information is presented will be changed to make it more logical and to help users to quickly determine if the document is relevant to them.
  - The function of CHANs has evolved and they no longer simply give out hazard information. To reflect this, 'Hazard' is to be dropped from the title and they are to be re-branded as Chemical Alert Notices. For continuity, we will retain the CHAN acronym; the H coming from CHEMical.
  - Lists of factual data (e.g. information on pre-existing OELs; information on industrial use sectors) will be formatted as bulleted lists for ease of reading.
  - Additional information, e.g. synonyms, CAS number, will be added to the 'What is' section.
- ***Penetration/circulation***
  - Accessibility via the web site will be improved as part of the Chemicals & Substances Portal project.
  - Web versions of the documents will include 'meta data'. Meta data allows web search engines (e.g. Google, Lycos, Ask Jeeves, etc.) to find and categorise web-based documents more easily.

- A contact address, for providing feedback or more information on uses, will be included on each CHAN.
  - When new CHANs are issued, they will be sent directly to specific users (companies/industries) of the substance that have been identified during work on categorising the use profile of the substance.
11. A draft of the revised CHAN for furfuryl alcohol is attached (Annex 1) as an example of the changes in language and formatting. The original CHAN for furfuryl alcohol is included for comparison (Annex 2). With the changes introduced so far, the reading age of the document overall has been reduced from 15.3-15.8 years to 12.9-13.4 years. This is much closer to the reading age of the majority of the target group. The section of the CHAN giving advice to employers uses the most complicated language, if this is excluded from the calculations then the reading age drops to 12.2-12.7. HSE research has shown that for SME the reading age of employers is slightly higher than that of employees. Thus, it is justified to use language that is more complex in this section.

### **Link to HSC Strategy**

12. This work is being carried out as part of the Communication and Education element of the Chemicals Programme (part of the Health & Safety Strategic Hazards programme)

### **Evaluation Plan**

13. For the first few CHANs issued in the revised format, an informal pilot phase will be undertaken in which the views of the people in the industries who use the substance will be sought (workers, safety representatives). The aim is to judge if the changes have been effective in making the document simpler and easier to understand and as a consequence easier to use. Evidence that any required changes in work practices have taken place as a result of advice given in the CHAN will also be sought.

### **Consultation**

14. The reformatting of CHANs is a joint initiative between the Industrial Chemicals Unit and the Occupational Hygiene Unit. Within HSE, the Chemicals Policy Unit and appropriate Manufacturing Sectors in the Inspectorate have been consulted. At an early stage in the development of the revised style, the ACTS Communications sub-group were consulted on the style and formatting. Changes were made because of this consultation. Further consultation with users of the substances for which CHANs are planned is envisioned as part of the evaluation pilot.

### **Costs and Benefits**

15. No formal analysis of the costs and benefits has been done. The new methods for producing involves more work on the occupational hygiene and exposure aspects. Additional work is also required in interpreting the

complex toxicological information and translating this into simple messages. This will increase the cost of producing a CHAN to some degree. However, HSE gains additional knowledge on the use profile of the substances and if the CHANs are better understood this should lead to better protection of workers using the substances in question. It also addresses the stated need of SMEs for advice that is more 'directional' and less 'goal setting'.

### **Financial/Resource Implications for HSE**

16. Small increase in the level of resource required to produce a CHAN.

### **Environmental implications**

17. Not applicable

### **European implications**

18. Not applicable

### **Other implications**

19. None are foreseen at this time.

### **Action**

20. ACTS is invited to:

- i) Comment on the changes to the style, format and name of CHANs and offer any further thoughts that could improve the clarity and impact of the messages contained within CHANs;
- ii) Offer any further suggestions for means to improve consultation, circulation and penetration of CHANs to the target audience.

### **Contact**

**ACTS Secretariat**