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| <b>Advisory Committee on Toxic Substances Paper</b> |                  | <b>ACTS/23/2006</b>       |            |
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| <b>Exemptions:</b>                                  |                  |                           |            |

## **ADVISORY COMMITTEE ON TOXIC SUBSTANCES**

### **The Future of CHANs**

**A paper by Gary Dougherty**

**Cleared by Steve Coldrick**

#### **Issue**

1. CHANs have outlived their purpose and there are good reasons for suspending them.

#### **Timing**

2. Routine.

#### **Recommendation**

3. That ACTS agree that CHANs are suspended.

#### **Background**

4. CHAN is the acronym for a Chemical Hazard Alert Notice. The first CHANs were published in 1997. The original purpose of CHANs was to alert chemical users of when an OES had been withdrawn and a MEL was being considered. CHANs would contain a summary of the hazards and brief guidance on control measures. CHANs were initially paper documents that were distributed according to a mailing list. More recently, they have become web only documents. To date, 36 CHANs have been issued, of which 13 have been withdrawn following the introduction of a MEL. No new CHANs have been issued since 2003.

#### **Argument**

5. Maintaining the status quo on CHANs is not an option for several reasons:
  - since the OES/MEL system has been replaced by WELs, the original purpose of CHANs is no longer applicable;
  - the style of CHANs (high reading age, poor layout and lack of specificity) is inappropriate for the original target audience of SMEs;
  - the remaining 23 CHANs need extensive re-drafting to update both the content and style;
  - for some of the substances, the classification and labelling has been revised such that they now fall under the Carcinogens ACoP. For the other substances, current labelling indicates the need for strict exposure control, and/or classification under COSHH

Essentials recommends specialist advice. In many cases, there is now other guidance available;

- anecdotal evidence suggests that numerical limits in CHANs tend to be treated as *de facto* exposure limits. This is not in line with the principles of good practice under COSHH.

### **Link to HSC Strategy**

6. This would contribute to the commitment made in the HSC/E simplification plan to rationalise COSHH guidance to make it more accessible and focus on key 'how to' information for employers.

### **Communication Plan**

7. Technical solutions are available to redirect anybody trying to access CHANs to a page explaining that they have been suspended. This page could contain substance-specific information or could simply refer users to COSHH Essentials where appropriate.

### **Evaluation Plan**

8. Policy and technical colleagues will monitor any subsequent feedback or complaints received either directly or through Infoline, and report any significant issues to ACTS.

### **Consultation**

9. Within HSE, the International Chemicals policy group, the Occupational Hygiene Unit, the Industrial Chemicals Unit and the COSHH communications group have all been consulted and agree that CHANs should be suspended.

### **Costs and Benefits**

10. No significant costs are foreseen. Benefits are that out-of-date and potentially misleading CHANs will no longer be available, and HSE will be seen to be taking positive action to rationalise and simplify its guidance.

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

11. The costs of suspending CHANs are minimal. They would involve setting up a web redirect and making slight changes to any future editions of EH40. Also, suspending CHANs would mean that they do not need to be updated, which can be viewed as a cost saving.

### **Environmental, European and other implications**

12. None

### **Action**

13. ACTS is invited to agree HSE's recommendation to suspend CHANs.

### **Contacts**

Gary Dougherty  
0151 951 4572  
gary.dougherty@hse.gsi.gov.uk