

**WORKING GROUP ON ACTION TO CONTROL CHEMICALS**

WATCH/MIN/2009/2

**Meeting date:** 12<sup>th</sup> June 2009**Open Gov. Status:** Fully open**Type of paper:** Final**Paper File ref:****Exemptions:****WORKING GROUP ON ACTION TO CONTROL CHEMICALS**Minutes of the 16th meeting of the Working Group on Action to Control Chemicals held on 12<sup>th</sup> June 2009, Town Hall, Bootle**Members Present**

Steve Fairhurst (Chair)  
 Steve Bailey  
 Robin Chapman  
 Rosemarie Hutchinson  
 Len Levy  
 Steve Binks  
 Ching Aw  
 Alastair Hay  
 Len Levy  
 Steve Williams  
 Julian Peto (ad hoc member)  
 Robin Howie (ad hoc member)

**Apologies**

Tony Fletcher  
 David Farrar  
 Martie van Tongeren

**HSE Officials Present**

Nicola Gregg (Secretariat)  
 Anna Rowbotham (Secretariat)  
 Hayley Keating (Secretariat)  
 Rob Turner  
 Garry Burdett  
 Barry Tylee  
 John Cocker  
 John McAlinden  
 Dil Sen  
 Sarah Mallagh

<b>1</b>	<b>Introductions and apologies</b>
1.1	The Chairman welcomed everybody to the meeting. Apologies were received from Tony Fletcher, David Farrar and Martie van Tongeren.
<b>2</b>	<b>Administrative issues</b>
2.1	The Chairman asked for any declarations of interest related to the items on the agenda. Robin Chapman declared an interest in the item on the misuse of some chemicals as drugs; in relation to the same item Steve Bailey expressed an interest in 1,4-butanediol. Steve Williams expressed an interest in the Environment Agency report on setting environmental assessment levels (EALs) and in naphthalene. All these points related to agenda item 6.
2.2	WATCH secretary Nicola Gregg reminded WATCH members to send in their expenses claim forms in time for the end of the financial year 09/10.
2.3	<b>Dates for next meeting</b> The secretary asked members to indicate which dates were appropriate for the 17 <sup>th</sup> WATCH meeting to be held in the Autumn. Members indicated that the 10 <sup>th</sup> , 11 <sup>th</sup> and 12 <sup>th</sup> of November were the most suitable dates for the next meeting. The Secretariat agreed to check the availability of the preferred venue in Birmingham for these dates and advise members of the date of the next meeting

	<p>accordingly. The Chairman indicated that at present there was sufficient business for a one-day meeting but not for the customary two-day residential of previous years.</p>
2.4	<p><b>Adoption of agenda</b></p> <p>WATCH members agreed to adopt the proposed agenda (WATCH/Agenda/2009/2).</p>
<b>3</b>	<p><b>Minutes of 15<sup>th</sup> meeting</b></p>
3.1	<p>Members had been invited to comment by correspondence on the draft minutes of the 15<sup>th</sup> meeting. No comments were received. Members agreed the minutes of the 15<sup>th</sup> meeting (WATCH/Min/2009/1) as being finalised.</p>
3.2	<p><b>Matters arising/Secretary's report</b></p> <p>The Secretary informed members that in relation to minute reference 7.2 of the Secretary's Report, WATCH's opinion on the degree of the evidence for a link between welding and chronic obstructive pulmonary disease (COPD) had been delivered to the ACTS secretariat in April 2009.</p>
<b>4</b>	<p><b>Further update on activities relating to past WATCH papers: Azo dye penetrants</b></p>
4.1	<p>The Chairman opened the item by referring members to the minuted action arising during the 15<sup>th</sup> WATCH meeting, 24<sup>th</sup> February 2009, under reference 5.10 of the Secretary's Report. HSE had been given an action to check whether or not CI Solvent Red 164 has been pre-registered under REACH. The Chairman confirmed that CI Solvent Red 164 has been pre-registered under REACH by two different companies, in the lowest tonnage band (1-100 tonnes per annum).</p>
4.2	<p>The Chairman reminded WATCH that at the February 2008 meeting the committee had considered the potential cancer hazard and risk posed by the use of azo dye penetrants such as CI Solvent Red 164, a penetrant dye used in the detection of cracks in metal components (WATCH/2008/1). Since then, WATCH had been updated on activities and developments at the February 2009 meeting. He invited John McAlinden (HSE, Chemicals Risk Management Unit) to give the committee a brief update on further developments</p>
4.3	<p><b>Use of CI Solvent Red 164 – Brief update</b></p> <p>John McAlinden updated members on further developments (he also tabled a brief written report to members).</p> <p><b><i>Hazard and exposure data</i></b></p> <p>He informed members that all the four formulators that had worked with HSE on establishing the extent of worker exposures to CI Solvent Red 164 had confirmed that their substance and supply was covered by a REACH pre-registration, made either directly by them (as the importer) or by their supplier. Visits to user sites began during February 2009 but progress has been slow. To date, HSE has visited two foundries and has the agreement of twelve workers who use the dye penetrant that they will submit urine samples for biological monitoring purposes. As some of the workers are not regular users of the dye, it is anticipated that collection of appropriately-timed urine samples for all 12 workers will take up to 6 months. HSE is currently awaiting the results of the analysis of urine samples already submitted by five workers. A further foundry has submitted urine samples for analysis to a different laboratory but has agreed to share the results with HSE and WATCH. At one foundry visited by HSE hand-</p>

	<p>pumped bottles were being used and no visible aerosol was detected; the process was being carried out in an open bay.</p> <p>Further visits will be made over the summer and autumn to a range of sites where non-destructive testing (NDT) using azo dye-containing liquid penetrants is carried out. Industries to be visited comprise, but are not limited to :</p> <ul style="list-style-type: none"> <li>(i) one more foundry and a forging shop; and,</li> <li>(ii) sites undertaking welding and subsequent in-service inspection of fabrications and structures such as pressure vessels, pipelines, ships and fairground rides.</li> </ul> <p>Although a partnership has been established with the British Institute of Non-Destructive Testing (BINDT) whereby up to 50 independent consultant examiners who regularly use liquid penetrants containing CI Solvent Red 164 will participate in an exposure monitoring programme with HSE, the process of contacting each individual and seeking their participation in this study was proving to be a slow process.</p> <p><b>Potential substitutes</b></p> <p>John McAlinden informed WATCH that one formulator site is actively pursuing a substitute dye. The formulator reported to HSE :</p> <p><i>‘Repeated testing using Nerosol Red B works in all ways but is too high in sulphur content. A high sulphur content can cause cracking if left with stainless steel and we are trying to find cracks, not cause them. We have now exhausted the possible red alternatives. Others are too weak or high in sulphurs and/or chlorine and we are now looking at purples. In the meantime we are encouraging NDT examiners to use fluorescent dyes wherever they can.’</i></p> <p>He informed members that Nerosol Red B comprises a glycol ester carrier of a non-azo dye. European Standard EN ISO 3452-2-2006 specifies a maximum sulphur content of 200 ppm for penetrant dyes.</p> <p>HSE is preparing a proposal for a project focussing on substituting the use of CI Solvent Red 164 in foundries; the proposal which will be put forward for next year’s HSE science (research) plan.</p>
4.4	<p>The Chairman thanked John McAlinden and opened the item for general discussion.</p> <p>A WATCH member asked how urine samples from workers at the foundries involved in the biomonitoring programme were processed. John McAlinden replied that shortly after each sample is taken, it is dispatched to the Health and Safety Laboratory for analysis and analysed immediately on receipt. The WATCH member asked how long azo dye penetrants have been used for NDT purposes and whether there have yet been any reports claiming an association between a case or cases of bladder cancer and this use? John McAlinden replied that the azo dyes have been used for a long time. Dil Sen added that there have been some case reports of bladder cancer that have claimed a link with this exposure situation.</p>
4.5	<p>The Chairman thanked members for their comments and brought discussion on this item to a close. WATCH will be updated as significant further progress is made.</p>

5	<b>Asbestos : Progress towards developing a control banding approach to the control of asbestos exposure situations</b>
5.1	<p>The Chairman opened this item by reminding members that at the last WATCH meeting in February 2009, the committee had discussed how a control banding approach for asbestos might be developed, following on from the WATCH position on asbestos-induced cancer risk estimation arrived at in October 2008. Members had expressed the importance of anchoring risk management in a control banding approach to a defined target level (or levels) of risk. The determination of an “acceptable” target level of risk involves policy and socioeconomic considerations as well as scientific aspects and is therefore not wholly within the remit of WATCH. However, in the interests of trying to move this aspect further forward, a WATCH member had kindly agreed at the February meeting to draft a preliminary paper exploring the issue of “acceptable” risk levels and associated asbestos exposure conditions. The Chairman thanked the WATCH member for preparing this paper (Annex 1: <i>A basis for setting Control Banding band limits for exposure to asbestos - WATCH/2009/3</i>) and explained that he would be looking to WATCH to debate how the paper facilitates further development of the control banding concept.</p> <p>To complement discussion of the paper, the Chairman invited Garry Burdett (HSL, Fibres Unit) to give a short presentation reflecting how the HSE’s thinking on control/risk banding concepts for the control of asbestos exposure situations had developed since discussion on this topic at the last WATCH meeting. The Chairman said that in his view different ways of thinking about a control banding approach had emerged. He asked members to recall the discussions at the October 2008 WATCH meeting, when the idea of a control banding approach had emerged, and asked each member to try to recall what he or she had in mind when advocating “control banding”? Clearly it would be important to seek a consensus view on the best way forward.</p> <p>The Chairman welcomed Barry Tylee (HSL, Fibres Unit) and Sarah Mallagh (HSE, asbestos policy responsibility) and handed over to Garry Burdett.</p>
5.2	<p><b>Presentation and demonstration of computer-based model</b></p> <p>Garry Burdett gave WATCH a short presentation, updating members on work carried by himself and Andy Darnton (HSE, Statistics Branch) on the development of a computer-based control banding model for asbestos.</p> <p><b><i>Recap of the emergence of the control banding concept</i></b></p> <p>Recalling discussions on the issue at previous WATCH meetings, Garry reflected that in previous discussions WATCH had addressed what could be said about the level of risk of cancer for different asbestos-exposure situations. In doing so it was envisaged that WATCH would use the available dose-response data derived from occupational studies and would then have to address extrapolation downwards to lower dose levels. The Hodgson and Darnton (2000) model [H&amp;D] was central to this debate. Members had expressed concern about the absolute numerical precision of risk estimates derived from the H&amp;D model, particularly in extrapolating below the range of exposures covered by the available historical data on occupationally-exposed cohorts of workers. WATCH had proposed developing a control banding approach for establishing and communicating the scale of the risk believed to be associated with different extents of exposure to asbestos and linking the different degrees of risk with appropriate control advice. Given the uncertainties associated with the H&amp;D risk estimates, he saw a key advantage of using a</p>

control banding approach being that assessments of positions and recommendations for appropriate action could be offered that would be reasonably robust, but would not give a false impression of excessive numerical precision. He considered that if “bands” were based on ranges of exposure or risk spanning an order of magnitude, then the assessments of situations made would not be expected to be wrong by more than one band.

He pointed out that the lower end of the exposure spectrum covered by the available occupational epidemiological studies was 10 f.yr/ml as an expression of cumulative exposure.

***Adapting a “classical” control banding approach to the control of exposure to asbestos***

In a standard control banding approach, as can be applied to the risk management of other hazardous substances, for example, new substances with limited data, little may be known about exposure or risk. Typically for these substances, there may be some (albeit limited) hazard data. Using this a starting point, a hazard band (reflecting a perceived view of the toxicity potential being high, medium or low), and a band reflecting the perceived magnitude of potential exposure (high, medium or low) would be assigned to the substance and use situation, and such a matrix would be used to determine the most appropriate control band (and therefore control strategy) for that substance and use.

The situation for asbestos is somewhat different, in that the associated hazard has been well characterised and there is a body of knowledge relating to exposure in different situations. It is the risk posed by different exposures to different types of asbestos fibre that is the parameter of interest in determining the control strategy. Hence, in a control banding approach applicable to asbestos, the ‘hazard’ aspect of the classical control banding approach could be replaced with a ‘risk’ aspect in order to generate a control-band appropriate to a given exposure situation. Garry Burdett also considered that it is important to note also that the options available for controlling exposures to asbestos are largely prescribed (e.g. asbestos licensing regulations, Duty to Manage Asbestos), thus constraining the options that could be offered as control advice.

HSE has attempted to assign ‘orders of magnitude’ risk bands to different asbestos exposure situations and considered what control measures might be appropriate for each band/situation. These concepts have been incorporated into a computer- based model.

Garry showed a slide of the risk bands fitted to different exposure situations expressed as a lifetime risk per million. He emphasised that the model was still under development. There are still problems to address. One is that although it would be ideal to always set control bands and hence risk management advice based on *cumulative* exposure, there are other drivers. Current airborne exposure control limits for asbestos of 0.1 f/ml or 0.6 f/ml relate to any instance of short-term exposure (e.g. 4 hours and 10 minutes respectively) rather than cumulative exposure. Because of the need to match legal requirements, the control banding approach must accommodate and be compatible with existing statutory control measures defined by law (e.g. Control of Asbestos Regulations 2006). For any tasks carried out continuously for 4 hours in air concentrations of asbestos greater than 0.1 f/ml or for 10 minutes at concentrations greater than 0.6 f/ml, licensing controls should automatically become applicable. At the lower end of the exposure spectrum, ‘Asbestos Essentials’ and ‘Duty to Manage’ regulations should come into play. All these stipulated control requirements must be accommodated within the model and emerge appropriately as outputs from the model when used. Overall, he emphasised that the development of a

	<p>control banding model for asbestos along the lines he indicated is complicated and requires further work.</p> <p><b>Demonstration of RiskCalc computer-based tool</b></p> <p>Garry Burdett gave WATCH a demonstration of the RiskCalc computer-based tool. Inputs to the tool are: asbestos fibre type (e.g. amosite, chrysotile and crocidolite), exposure concentration, exposure duration (years, weeks, days or hours) and age at stage of exposure. Rather than assume long-term exposure at a particular concentration, the tool incorporates realistic assessments of typical task durations. Although the intention is for the model to provide a risk band as the main output, the predicted lifetime risk is also provided for information. Further development of the tool will entail providing the associated control approach in the column adjacent to the risk band output.</p> <p>By way of demonstration, if a user entered the following inputs : fibre type = crocidolite; air concentration = 0.1 f/ml and exposure duration = 4 hours, the model predicts the lifetime risk to be 6/100,000 and a risk band = 1 (the lowest risk range in the current version of model) . If the exposure duration is increased substantially (e.g. to two weeks), the risk band becomes = 4, a substantially higher level, indicating that a higher level of control is now required. If the user changes the fibre type to chrysotile instead of crocidolite, risk band = 2 emerges from the model.</p>
5.3	<p><b>General discussion on the computer-based tool, RiskCalc</b></p> <p>The Chairman thanked Garry Burdett. He asked for clarification on how the RiskCalc tool should be used and interpreted. Is the intention that user would initially enter an exposure concentration that would arise in a working situation if no controls were applied, to ascertain the level of risk that would arise and hence determine what control strategy is needed? Garry Burdett replied that the purpose of the tool is to inform users on what regulatory limits and control measures (some of which will be stipulated in existing asbestos-related law) are appropriate for different asbestos exposure situations. The Chairman asked whether the outcome of adherence to such control measures would be that the risk associated with any given situation would be reduced to a specified level or range? Garry Burdett replied that the users must implement control measures mandated by legislation in order to drive exposure, and therefore risk down. The Chairman asked whether the purpose of the RiskCalc tool was to assist workers and employers in meeting the requirements set out by legislation? Gary affirmed that this was the thinking: the tool provides a link to legally required control measures. He reiterated that applying a control banding approach to the control of exposures to asbestos was not straightforward: there is a hierarchy of control measures mandated by legislation that must be observed by law and further thought may be needed as to what additional measures can be stipulated beyond this.</p>
5.4	<p>The Chairman invited WATCH members to express their views, and in doing so asked that they give equal consideration to the paper presented in Annex 1.</p>
5.5	<p>A WATCH member asked to what extent does reliable exposure concentration information relevant to different exposure situations exist, that could be put into the RiskCalc tool? Garry Burdett replied that information on typical exposure concentrations created by different operations can be obtained from available databases, although one could always argue for more measurements to be made to improve judgements about the exposure concentrations potentially created in various tasks. The WATCH member asked what degree of confidence could be placed in the concentrations suggested by such</p>

	databases? Was there a case for further measurement data being obtained to validate estimates and judgements about exposure concentrations? Garry Burdett wondered if it would be helpful to include in RiskCalc suggested exposure concentrations for different situations, as set out in previous HSE guidance, rather than leaving it entirely to the user to establish the appropriate exposure concentration to input.
5.6	A WATCH member suggested that an additional control band could be included in the model corresponding to a lifetime risk of 1 in a million. Although a risk of a single figure in 100 000 is deemed to be an "acceptable" level of risk in some circumstances, users of RiskCalc could misinterpret risk Band 1 (see final paragraph of 5.2 above) as the level of risk for which no action is required. To clarify this, an additional band corresponding to the level deemed "acceptable", to the extent that no action is required, should be included in the model. Garry Burdett agreed, suggesting that a Band 0, corresponding to such a low level of risk and requiring no action could be included in the model.
5.7	A WATCH member asked whether the tool could be used by a worker who understood his or her historical exposure profile, to input a number of different exposure situations in order to determine the total risk applying to a career history. Garry Burdett replied that the tool could be used in such a manner.
5.8	A WATCH member questioned the logic for assigning the numbers to different types of asbestos fibre in the order of 3 for crocidolite, 2 for amosite and 1 for chrysotile. He considered that it would be better that the numbering reflected an order of hazard, with the top figure of 1 for crocidolite (ie reverse the numbering). Garry Burdett agreed.
5.9	A WATCH member asked how the computer-based RiskCalc tool would be used, in practical terms. If HSE intended this model to be available to those at a worksite, to use in a form installed on a laptop, the member suggested that the model would need to include considerably more information about different potential exposure situations. Garry Burdett replied that one idea was to make the tool available as a web-based application via the HSE website. Workers planning to undertake licensed work involving asbestos are currently required to complete an online assessment of different situations and scenarios (e.g. the AB5 assessment form) in order to obtain a licence. Experience from this online assessment indicates that workers do carry out some degree of measurement to underpin estimates of exposure concentrations, to show that the way they are working is sufficiently controlled. Another WATCH member asked whether the online process for licencing asbestos work was in fact a form of control banding approach? Garry Burdett confirmed that, to some extent, this was true.
5.10	A WATCH member asked how useful a computer-based or web-based tool would be to, for example, carpenters or maintenance workers who tend to do multiple small tasks for which exposure information may be lacking. Rob Turner (HSE, Corporate Specialist Division) agreed that some sort of tool would potentially be of more use to these groups of workers (e.g. plumbers, electricians, carpenters etc), who may not have the knowledge and experience that is expected for licensed operators of the potential threat posed by asbestos in their work. The former type of worker has also been the focus of HSE's recent awareness-raising campaign on asbestos. He suggested that a tool should be targetted at groups of workers for which potential asbestos exposures in the tasks being undertaken fall below those covered by existing licensing regimes for asbestos. Garry Burdett concurred with the idea of targetting the model at maintenance workers. He informed the committee that the issue of environmental exposure was an also an important issue to take account of and

	<p>there was mounting pressure on regulatory authorities to explore this further. A lot of exposure information in respect of some of the relevant low-level exposure scenarios had been already gathered and could potentially be incorporated into the model. For example, a USA survey of 3000 school buildings suggested that typical airborne fibre concentrations may be around 0.00008 f/ml. The RiskCalc tool could be readily adapted to take account of exposure situations encountered by those such as maintenance workers, as well as environmental exposures.</p>
5.11	<p>A WATCH member raised two questions. Firstly, would the model predict the same risk band for a scenario involving exposures to 1 f/ml for 30 years as for a scenario involving exposures to 30 f/ml for 1 year? Garry Burdett replied that in applying the H&amp;D algorithm, the tool would give a similar, but not necessarily identical outcome; the risk bands emerging would be either the same or possibly adjacent bands. Secondly, could the model address the issue of mixed exposures involving different types of asbestos fibre? Garry replied that this was a difficult issue to address since in many situations it would not be clear what would be the distribution of various types of asbestos fibre. For the purpose of applying the model, it may be necessary for assumptions to be made regarding the most predominant form of fibre associated with a given exposure; and to derive a risk band and control advice on this basis.</p>
5.12	<p>A WATCH member asked what is known about where different types of asbestos fibres have been used historically in buildings. For example, would a maintenance worker going into a domestic dwelling know the likely type(s) of asbestos incorporated in its structure? Garry Burdett replied that advice in respect of types of asbestos fibre typically found in premises is provided in MGHS100. Although the default assumption is to assume the worst case, ie exposure to crocidolite, in reality the chances of workers encountering crocidolite in buildings is low. Most asbestos cements contain chrysotile. Amosite is currently the most common form of asbestos associated with premises, present in insulation boarding.</p>
5.13	<p><b>Discussion on the target level of risk to which control strategies should be linked</b></p> <p>Another WATCH member agreed that the committee should give primary consideration to exploring the control of exposures to asbestos that fall below the scope of currently regulatory schemes (e.g. those situations encountered by maintenance workers). He considered that the starting point for a computer-based tool should be a description of the exposure situation, rather than an airborne fibre concentration. The situation description could either be chosen from a range of options offered to the user within the application itself, or could be left to the judgement of the user. The member also considered that it was necessary to say something about level of risks deemed to be socially acceptable. If some guidance in respect of the acceptability of risk is not incorporated into the tool, it will be left to the user to draw inferences on the basis of the output given; such inferences might be unwarranted. For example if, through the application of controls, the initial risk band associated with an uncontrolled environment is reduced to a lower band, it would be inferred that the level of risk reflected in this lower band is “acceptable”. Would this be the case? There was a crucial question: at which risk band should exposure control be deemed sufficient and no further measures considered? The WATCH member considered that some judgements in respect of the acceptability of the risk outcomes generated by such a tool were needed to better inform the user, whether these judgements can be made by WATCH or in another forum. In this context, where there might be variability in exposure pattern and duration, a</p>

	<p>conservative approach could entail assigning the risk band arising from the worst-case exposure situation for any particular operation. Although this is a conservative approach, it would cover all workers involved in a particular type of task, including those experiencing frequently repeated exposures. Another way of looking at this might be to consider that, when dealing with asbestos, exposure duration may often be difficult to assess; hence (as with “classical” control banding approaches), airborne concentration could be used instead as the measure of exposure.</p>
5.14	<p>The Chairman reflected back some thoughts on the term “acceptability” of risk. The concept of the acceptability of risk could be approached in two different ways. One way would be to define a numerical risk level regarded as acceptable. Risk management measures can then be applied to any circumstance, these being aimed at achieving the control of risk to this pre-defined “acceptable” level. A second way of looking at this is to consider that in many other situations, occupational hygienists and inspectors who visit workplaces, and regulatory authorities that adopt positions and consider appropriate stances to take, make judgements about levels of risk management that are deemed to be create “acceptable” conditions (eg ideas of “good practice” and “best practice”). In this case, although there may not be a quantitative measure of the level of associated risk deemed to be socially acceptable, in the achievement of these conditions is there not a strong element of acceptance of appropriateness or “acceptability”?</p>
5.15	<p>The Chairman elaborated his point with an example. There are workplace processes associated with occupational exposures to hexavalent chromium (e.g. chrome plating), for which control measures have been put in place; and for which there are concepts of good/best practice. He argued that it could be inferred that the conditions involved under such exemplary circumstances have been deemed “acceptable”, without the risk being quantified. There are many other examples where society accepts exposure circumstances (eg benzene at petrol stations) for which the associated risks have not been reliably quantified.</p>
5.16	<p>A WATCH member pointed out that worker exposure at a given exposure standard or control limit should not be regarded in terms of “acceptability”, as employers have a duty to reduce exposures to all hazards to as low as is reasonably practicable. This is important in legal cases, where defendants must demonstrate this - HSE is not required to prove that risks are unacceptable. ‘Technically feasible’ is another term used in legal cases to judge the extent to which exposures (and hence risks) have been controlled. He added that asbestos is also covered by the EU Carcinogens Directive and hence exposures must be reduced to ‘as low as reasonably practicable’ (ALARP).</p>
5.17	<p>A WATCH member expressed concern about how relevant, in terms of total lifetime risk, might be transient, unconscious exposures to concentrations of asbestos higher than might have been assumed. For example, those drilling into walls not knowing about the presence of asbestos; or someone taking off personal protective equipment after a piece of work, without following the correct procedure. He considered that these situations might give rise to exposures contributing significantly to total risk, but there is limited data in this respect.</p>
5.18	<p>A WATCH member expressed being uncomfortable with the idea that for asbestos, a low level of risk might be identified for a particular scenario that would translate into no exposure control measures being applied. He expressed that view that although the anticipated exposures associated with some tasks might be low, some level of active exposure control should always be applied.</p>
5.19	<p>A WATCH member stressed that in all walks of life decisions about risks and</p>

	<p>their acceptability are made on a daily basis, in the absence of there being precise data or accurate numerical risk estimates to inform or underpin such decisions. Workplace decisions are usually made taking into account what generally constitutes good practice in terms of exposure reduction and control. Further levels of exposure control can always be applied to any situation, but one needs to know when the appropriate measures have been implemented. However, in order to define good practice, some idea is needed of the level of risk associated with such conditions. In “Asbestos Essentials” it is acknowledged that there are various scenarios in which exposures can occur that are below the legally defined limits but might still be considered to be of significance. In these cases, it is important to determine the maximum stringency of exposure control that is deemed to be reasonably practicable.</p>
5.20	<p><b>Further development of the concept of a computer-based tool for advising on the control of potential exposures to asbestos</b></p> <p>The Chairman noted that members had reacted favourable to the idea of the computer-based tool RiskCalc being further developed and then used to advise on appropriate control for different asbestos exposure situations. In order for HSE and WATCH working in conjunction to progress this concept further, he wanted to ascertain the degree of agreement on the current status of the tool and the needs and directions for its further development. Recapping on the discussion so far, he noted that :</p> <ul style="list-style-type: none"> <li>(i) Members had generally regarded favourably the concept of the tool.</li> <li>(ii) Some, but not all members had considered dispensing with the high risk bands 5 and 6 in the tool, on the basis that these circumstances are covered by existing detailed provisions within asbestos regulations. Some members had also raised the idea of the tool having an additional lower risk band (0) corresponding to the 1-in-a-million level of risk.</li> <li>(iii) Several members had agreed with the idea that it was necessary to define a level of ‘acceptable risk’, derived in a manner such as that pursued in the discussion paper, Annex 1. However, other members had suggested that the control of exposures to asbestos should be driven by concepts of best practice, rather than by attempts to derive and present quantified risk estimates.</li> <li>(iv) Several comments had been made about the intended target users of the tool and related ‘user-friendly’ aspects. Members identified the need for users to insert or select descriptors relating to tasks or operations (with which they are familiar), rather than expecting them to derive (less familiar) exposure estimates.</li> </ul> <p>The Chairman asked WATCH members to re-address these points, with the aim of arriving at a consensus view on the further progression of the tool.</p>
5.21	<p>A WATCH member pointed out that, in the context of applying such a tool to control asbestos exposures, the characterisation of some scenarios involving exposures to asbestos was not straightforward. For example, the risks posed to female office workers by exposure to asbestos in buildings are largely unknown. Whilst this might be regarded as an environmental exposure scenario rather than a (direct) occupational one, it presents a much different scenario to one where a worker is setting out to do a specific task involving potential exposure to asbestos and is proactively considering the exposure control options. Female office workers do not have the option to control their exposures if they are not aware of their exposure situation. Another WATCH member agreed that the further characterisation of exposure scenarios in the tool was important and</p>

	suggested that the tool should be further developed to portray a range of relevant scenarios.
5.22	A WATCH member expressed some concern that, at present, the RiskCalc tool might put office workers in a risk band as high as 3; the same approach might put carpenters in a very high risk band. Another WATCH member expected the risk for this group to emerge in the top risk band (band 6) whilst risks for electricians might be in band 5. He expressed his view that the risks posed by exposures to asbestos in office workers were not negligible. The UK has higher environmental exposures than many other countries; unacceptable environmental exposures are known to have occurred in the 1960s and 1970s due to the widespread use of asbestos-containing materials.
5.23	Garry Burdett replied that for workers carrying out minor jobs involving potential exposures to asbestos at 0.01 f/ml.year, the tool would currently assign risk band 3, triggering concern and the need for action to control exposure.
5.24	A member commented that judgements about the 'user-friendliness' of the tool depend on how the tool is intended to be used. In his mind it was essential to decide if the tool, in its final form, is intended to be used by workers in general, or by those with asbestos control expertise. Another member added that two versions could be produced, one for each user group.
5.25	Rob Turner highlighted that there are many examples of reasonable control measures that workers could be asked to apply in order to reduce their potential exposures to asbestos. For example, it was not unreasonable to expect workers who drill holes, where there is any possibility that asbestos might be present or uncertainty about the situation, to wear a face-mask. These kinds of judgements could be incorporated into the tool.
5.26	A WATCH member asked what is known about asbestos exposures in general construction workers and whether or not there are concerns about potential cumulative exposure during a working career in this industry? Garry Burdett informed the committee that in a study of the construction sector, workers had been given passive sampling devices to wear on their clothing and had been asked to fill in a questionnaire to identify tasks involving asbestos. In the study, workers tended not to fully identify the range of tasks they carried out where exposures to asbestos could occur. However, analysis of their personal sampling devices indicated that substantial exposures to asbestos occurred rarely. He also commented that events involving short-term exposure to asbestos frequently give rise to concern across various sections of the population, but people rarely ask questions about the risks posed by long-term exposures.
5.27	A WATCH member pointed out that around 100,000 fibres of asbestos could be released into the air from drilling a hole into an asbestos insulation board in a domestic building. As well as posing a risk to the health of the workers engaged in the drilling, this action could also contaminate the building and pose a health risk to its occupants. In addition to protecting the health of workers through the use of appropriate control measures, consideration must also be given to what is reasonably practicable in terms of protecting the health of other people who may be indirectly exposed to asbestos as a result of work activities.
5.28	The Chairman returned to his points at 5.20 and asked WATCH if it was in agreement with the approach being taken to generate a computer-based tool to advise on controlling exposures to asbestos and if it supported the idea of its further development along the lines discussed. <b>WATCH members affirmed with the Chairman that this was the case.</b> The Chairman then asked

	members to give consideration to the intended target user(s) and exact intended purpose of the tool. One possibility was to keep open options until further progress has been made on the tool (for example, the incorporation of exposure scenarios).
5.29	A WATCH member wanted to ensure that attention was paid to an important point, that being the composition of materials containing asbestos. For example, although amosite is the most commonly encountered form of asbestos in buildings today, the risks of mesothelioma associated with exposures to materials containing amosite mixed with as little as 1% crocidolite are significantly higher than the risk associated with exposures to amosite alone.
5.30	A WATCH member pointed out that workers who strip asbestos from buildings experience higher risks than other groups. Since there are a large number of workers in this sector, he asked whether this warranted a specific model to be developed for these workers. Rob Turner questioned whether a separate model was needed for strippers, given that this group of workers are already covered by the asbestos regulations. The WATCH member did not consider that the requirements of existing regulations on asbestos were sufficiently protective towards this group of workers. Another WATCH member suggested that the issue of what is relevant in terms of exposure control for strippers could be further explored in consultation with experts during the further development of the tool.
5.31	The Chairman noted members' comments regarding the development of expert- or worker-targeted forms of the tool, but pointed out that the issue of the intended user(s) could be kept open, pending further development of the tool. He asked WATCH to what extent members wanted to engage with the further development of the tool between meetings?
5.32	A WATCH member commented that since a working group had not been convened to progress this issue, he advocated that Garry Burdett and Andy Darnton continue to develop the model, with HSE keeping WATCH informed of progress and with the option for committee members to input on an on-going basis.
5.33	A WATCH member commented that input from the committee would largely depend on the intended purpose/end-user of the developing tool. He suggested that other interested parties/stakeholders could also be approached for advice on the further progression of the tool. Other WATCH members agreed with the idea of approaching other organisations or securing wider involvement in this initiative. For example, given that IOSH is such a large organisation, would it be feasible to suggest that IOSH could offer somebody to help further develop the tool.
5.34	The Chairman asked Garry Burdett whether he expected there to be sufficient advancement in the development of the model to warrant another discussion at the Autumn WATCH meeting or whether more time would be needed? Garry Burdett replied that he did not envisage there to be a huge amount of work that would be needed before being ready for further discussion at the next WATCH meeting. He also anticipated being able to produce a progress report mid-way between this June meeting and the Autumn one. The Chairman asked what should be done to engage in wider consultation on the generation of a conceptual tool for controlling exposures to asbestos? Garry Burdett replied that there would be various organisations that could be approached; Defra has an interest in environmental exposures to asbestos and should therefore be consulted.

5.35	A WATCH member returned to the theme that relatively high potential occupational exposures to asbestos are addressed by licensing, whilst potential at the low end of the exposure range could be regarded as having an “environmental” source. He considered that the primary focus for the RiskCalc tool should therefore be in the middle of this exposure spectrum, being concerned with occupations associated with potential intermediate exposures (e.g. plumbers, electricians, carpenters). Guidance or an ‘Approved Code of Practice’ highlighting best practice in terms of exposure reduction and control for such occupations was needed. He suggested that the committee should avoid complicating the issue by attempting to address too broad a range of situations of scenarios and should instead, focus on the areas where the most effective change in awareness and risk management practice might be made.
5.36	<p>The Chairman thanked members for their comments and brought discussion on the item to a close. He again thanked the member for producing Annex 1. <b>He confirmed with WATCH its agreement to the further development, in a control banding manner, of a computer-based tool to provide advice on controlling exposures to asbestos’</b></p> <p><b>WATCH advocated that further consideration should be given to :</b></p> <ul style="list-style-type: none"> <li><b>(i) clarifying the thinking regarding the intended target users and associated ‘user-friendly’ considerations.</b></li> <li><b>(ii) the ability to enter into the tool a description of the working situation or potential exposure scenario, rather than the necessity to estimate an exposure level</b></li> <li><b>(iii) a re-appraisal of the risk bands to be covered (the possibility of adding lower risk bands and removing the current highest risk band or bands)</b></li> </ul> <p><b>Based on the discussion and this position:</b></p> <ul style="list-style-type: none"> <li><b>• time would be allocated on the Autumn 2009 WATCH meeting agenda for further progression of this issue.</b></li> <li><b>• an update on progress would be issued to members before then.</b></li> <li><b>• in the meantime, he invited members wishing to track more closely and/or input to the further development of the tool to contact Garry Burdett directly.</b></li> </ul>
6	<b>The potential for WATCH contribution to consultation processes launched by others – examples to consider</b>
6.1	<p>The Chairman reminded WATCH that at the last meeting in February, the question had been posed by a WATCH member whether or not the committee should participate in consultation processes that are launched by others on issues relevant to the work of WATCH, or comment on the work of other organisations that is relevant to WATCH’s Terms of Reference. Members had been supportive of the principle of WATCH responding to consultations and expressed a willingness to trial the envisaged process over a period of 6 months.</p> <p>The Chairman brought the committee’s attention to a number of examples assembled by the Secretariat, of documents offering opportunities for WATCH to express a view during consultation exercises, or in one case what would have been an opportunity for a representative of WATCH to participate in a meeting.</p> <ul style="list-style-type: none"> <li><b>(i) <i>Descriptive versus Quantitative Risk Assessment of Genotoxic Carcinogens: Workshop Report.</i> 2<sup>nd</sup> April 2009, London, The</b></li> </ul>

	<p>(ii) Interdepartmental Group on the Health Risks from Chemicals <b>Framework for risk assessment of combined exposures to multiple chemicals.</b> World Health Organisation/International Programme on Chemical Safety</p> <p>(iii) Recommendations from the Scientific Committee on Occupational Exposure Limits for <b>aniline (SCOEL/SUM/153)</b> and for <b>naphthalene (SCOEL/SUM/90)</b></p> <p>(iv) <b>Proposals for updating H1 Environmental Assessment Levels for air to protect human health: Stakeholder Discussion Document.</b> Environment Agency, April 2008.</p> <p>The Chairman pointed out that for each of the above the intention was to explore further the concept of WATCH's involvement in formal representation at an event or giving a formal response to consultation exercises.</p> <p>A further example, which was a specific case on which he wanted a view, was the potential for WATCH to contribute to an ongoing consultation processes - <b>Advisory Council on the Misuse of Drugs(ACMD): A consultation on Gamma Butyrolactone (GBL)</b></p> <p>The Chairman explained that he wanted to begin with a consideration of this document and the background to it. More generally, he asked members to consider whether the committee should respond to these kinds of opportunities and if so, how (e.g. send in written views; or, where appropriate, by sending a representative to an event; and how to address whether or not any views expressed should be, and be taken as, the personal views of an individual or the collective views of the committee). Given that the timings and advance notice of such opportunities were unlikely to coincide with the committee's meeting schedule, he also asked members to consider how timing issues should be overcome.</p>
6.2	<p><b>Potential for WATCH contribution to consultation processes: Gamma Butyrolactone (GBL)</b></p> <p>The Chairman invited a WATCH member to provide some background to the ACMD's consultation initiative on GBL and the proposal developed by the Home Office to address this issue. The member informed the committee that on the 26<sup>th</sup> April 2009, a 21 year old girl had died at a party after taking GBL as a recreational drug. GBL is currently used as an industrial chemical and can be obtained easily from the internet. Once ingested, GBL is rapidly metabolised in the body to gamma hydroxybutyric acid (GHB), also known as the "date-rape" drug. As a result of the fatality involving GBL, the ACMD initiated a consultation to address how GBL and the related substance 1,4-butanediol (1,4-BD) could be controlled in order to prevent misuse. As part of this initiative, the Home Office identified 3 options aimed at restricting the availability of GBL and 1,4-BD to legitimate uses only and the discussed the implications of taking each of these options forward.</p>
6.3	<p>The Chairman thanked the WATCH member for introducing the GBL item and opened the item for general discussion. A WATCH member agreed that the issue of controlling GBL (or other chemicals) in order to prevent misuse was an important one, but did not consider this an issue falling within WATCH's remit. The Chairman pointed out that since GBL was an industrial chemical, knowledge within WATCH of its availability and use within industry might usually inform this topic. The member responded that, in his view, given that the Home Office had reached a decision to take action to control this substance in order to</p>

	prevent its misuse, he did not see that there was a requirement for further scientific assessment and advice on this issue, as could be provided by WATCH.
6.4	The Chairman emphasised that, alongside the specific recent history surrounding GBL, the issue of the control of GBL had also been provided as an example of a consultation exercise, to which WATCH could consider the appropriateness of making a response.
6.5	A WATCH member commented that other industrial chemicals (eg amyl nitrate) have been misused as 'recreational drugs' and considered this an issue that the committee might discuss. Another WATCH member disagreed. He emphasised that the role of WATCH is to advise the HSE and not formulate independent views on specific issues. It should also not duplicate the work of other groups within whose remit specific issues lie. Several members agreed with the view that it was not appropriate for WATCH to respond to the ACMD consultation on the control of GBL. A member added that since the ACMD, also a government advisory council were addressing this issue, unless the HSE is approached directly in the context of this consultation, he did not consider there to a need for the committee's involvement.
6.6	<p><b>Discussion on the Environment Agency's consultation on a proposal for updating H1 environmental assessment levels.</b></p> <p>A WATCH member stated that the committee should focus primarily on issues related to occupational health risks posed by chemicals. This end, the committee could explore consultation initiatives in which relevant health and safety issues emerge for example, the Environment Agency's (EA) proposals for updating H1 Environmental Assessment Levels for air to protect human health. The member considered that the issues raised in the stakeholder discussion document to be of more direct relevance to HSE, rather than WATCH, as he felt that there is a discrepancy between EA and HSE views on UK workplace exposure limits (WELs).</p>
6.7	Another member expressed surprise that HSE had not already been involved in discussions with EA on this issue. The Chairman replied that he was not aware that anyone outside of EA had been involved in the preparation of this document; he believed that EA had prepared the discussion document in order to initiate a dialogue with key stakeholders. Adding further clarification, a WATCH member informed the committee that he had encountered the document when the EA had invited the Chemical Industries Association to comment on the proposal as a key stakeholder group. He had expressed some concern over aspects of the proposal and had directed the WATCH Secretariat to it.
6.8	Several members expressed the view that it was more appropriate for HSE to respond to this initiative. The Chairman asked members whether, in addition to a response by HSE, WATCH should also take a position on this issue and make a contribution to the consultation? A member considered that since WELs have a legal standing defined by HSE, then HSE should respond. This given, another member asked whether this inferred that such issues should not be raised at WATCH at all. The WATCH member expressed the view that the committee's role in such a consultation should be limited to highlighting relevant issues and passing them on to HSE to progress further.
6.9	A WATCH member gave the committee further insights into the IGHRC consultation on risk assessment of genotoxic carcinogens. He reminded the committee that the IGHRC comprises representatives of UK government

	<p>departments, including HSE, research councils and agencies, and aims to stimulate the development of new improved approaches to the assessment of risks to human health from chemicals. IGHRC therefore provides a forum in which the discipline of human health risk assessment can be discussed in a broad sense, covering methodological aspects, research and best practice. As an expert committee of HSE, the IGHRC invites WATCH to comment directly on all the documents it prepares. The Steering Committee to the IGHRC considered it timely to review the risk assessment approaches for genotoxic carcinogens. A workshop was convened in April 2009 attended by members of the Committee on Carcinogenicity, IGHRC and invited delegates from UK government departments, including HSE.</p>
6.10	<p>In respect of the scope for WATCH to comment on recommendations from SCOEL on occupational exposure limits, a WATCH member pointed out that these documents were already sent out for broad consultation as part of the preparation process. In his view, HSE should decide whether or not to invite input from WATCH on such issues. He did not consider it appropriate for the committee to make any independent suggestions. Other members agreed with this suggestion but confessed to some uncertainty about the role the committee should have in consultations.</p>
6.11	<p>A WATCH member commented that the committee had, in the past, carried out 'horizon scanning' activities in order to identify priority topics that could be explored further in discussions at WATCH meetings. At the last meeting he had put forward the idea of WATCH becoming involved in consultation processes because he considered it to be appropriate for the committee to engage in such initiatives in order to be more proactively involved in pertinent contemporary issues. He suggested that the committee could approach consultation opportunities in a number of different ways that did not necessarily require a detailed discussion at a committee meeting. Members could nominate consultations for consideration by the committee and responses or views could be canvases by telephone. The committee could approach each consultation opportunity on a case-by-case basis and retain a degree of flexibility in how these should be dealt with, rather than rule out the idea of being involved in this type of work completely.</p>
6.12	<p>The Chairman noted that, across the range of examples provided, members seemed to consider it not to be appropriate that the committee should actively participate in the consultation - expressing instead, a consensus view that the HSE should take the lead in such matters. In his opinion this was a reasonable stance to take, although it represented a change in position from that expressed at the last committee meeting. A WATCH member commented that the examples of consultations provided for the committee's consideration in this respect may not have been the best ones.</p>
6.13	<p><b>The Chairman thanked members for their comments and brought discussion on the item to a close. He affirmed with WATCH that the committee agreed to approach consultation opportunities on an informal basis, in-which there was a process of two-way exchange between the committee and the HSE:</b></p> <ul style="list-style-type: none"> <li>➤ <b>Where consultation opportunities have been identified by HSE and HSE requires an input from WATCH, the committee will be informed via the WATCH Secretariat, taking any relevant deadlines into account.</b></li> <li>➤ <b>Where opportunities are identified by WATCH members, they will inform the Secretariat accordingly who will, in turn liaise with the</b></li> </ul>

	<b>relevant people in HSE to establish whether a response from WATCH is needed.</b>
<b>7</b>	<b>Any other business – SCOEL</b>
7.1	The Chairman informed members that there were two items for discussion under ‘any other business’ (AOB): (1) the operational process of SCOEL and (2) the future work-plan of ACTS. The Chairman invited those WATCH members, who are also members of SCOEL and/or ACTS, to introduce these topics.
7.2	<p><b>(1) Operational process of SCOEL</b></p> <p>A WATCH member who is also a member of SCOEL reminded the committee that at the last WATCH meeting in February he had informed members that SCOEL was reviewing the process by which criteria documents and recommendations on occupational exposure limits were formulated. SCOEL currently relies heavily on individual members to produce the summary criteria documents and an associated recommendation for an exposure limit, based on publicly available literature and other expert review documents. This involves a considerable amount of work to be undertaken by individual members. Some members did not have time to undertake these activities and the committee had little in the way of administrative support - only one official from DG Employment is assigned to the committee, on a part-time basis. SCOEL is therefore looking to change the process. In the past, criteria documents were available to the UK members of SCOEL as those prepared by HSE’s experts within national or EU regulatory programmes.</p> <p>On behalf of the committee, the SCOEL Chairman set out the need for an improved, better supported operational process in a letter drafted to the head of the appropriate section in DG Employment, providing examples of how similar work has been carried out by other organisations (e.g. the German MAK Commission; and the Dutch Expert Committee DECOS). The letter also made reference to REACH reflecting the view of SCOEL that for data-rich substances with a significant likelihood of exposure, it may be more appropriate for SCOEL, rather than industry, to establish the associated Derived-No-Effect-Levels (DNELs). Although the letter was dispatched several months ago, no formal reply has yet been received from DG Employment. SCOEL has, however, been informed that a response will be made at some point in the future. In light of this, SCOEL members consider that their concerns are being dismissed and overlooked by the administrators of the committee who do not recognise the need for change. SCOEL members now intend to apply more pressure to drive this matter forward. The HSE board has been approached regarding this issue in the past and advice was given to raise the matter with EC commissioners. Some members of SCOEL have suggested that the Joint Research Council (JRC), which holds a budget and provides support to other EU technical committees, could be approached. Some tentative discussions have been had with the JRC regarding how this could be practically implemented; JRC staff could draft the technical content of criteria documents, whilst members of the SCOEL committee could continue to formulate the recommendations on specific occupational exposure limits; and administrative support staff could compile and distribute documents for consultation.</p> <p>In summary, the WATCH member emphasised that the process of bringing operational changes to SCOEL was progressing slowly and unproductively.</p> <p>Another WATCH member, also a member of SCOEL emphasised that for some</p>

	time the committee has been expected to deliver a heavy workload with little resource and support. In reality, much of the work is being delivered by SCOEL members from Germany, who have access to additional resources and knowledge via the MAK Commission. Other SCOEL members, including those from the UK, often struggle to deliver the expected workload.
7.3	The Chairman thanked the WATCH member for this perspective. He asked if there were any further comments. A WATCH member expressed the view that the work of SCOEL was important in terms of establishing EU occupational exposure limits and should be carried out in such a way that does not compromise its quality.
7.4	Another WATCH member asked whether WATCH had a role in offering comment on the operational processes adopted by SCOEL? The Chairman replied that, in his view, this was a matter for ACTS, as it was more an issue of the UK policy towards SCOEL and EU OEL-setting. Given that ACTS was to be discussed as the next AOB item, he moved onto this topic.
7.5	<p><b>The work-plan of ACTS</b></p> <p>A WATCH member, also a member of ACTS, reminded the committee that the HSE Board had asked ACTS to propose its work-plan. As a result, several advisory committee sub-groups worked independently to devise components of a programme of work before meeting with Les Philpot (HSE, ACTS Chairman) to combine these into a 2-page work-plan document which was presented to the HSE Board. In response to this document, the HSE Board commented as follows (extract from the board meeting minutes):</p> <p><i>12.1 Giles Denham presented the paper that sought the Board's view on draft workplans from the advisory committees covering agriculture, construction and toxic substances. The paper was the start of a process that would enable more informed Board discussions and feedback on the work of advisory committees and other committees to be considered at future meetings.</i></p> <p><i>12.2 The Board thanked Giles for the paper and those involved in producing the draft workplans and made the following points :</i></p> <ul style="list-style-type: none"> <li><i>a. the paper provided a model process that could be gradually rolled out to other committees that should be made aware of the impending exercise</i></li> <li><i>b. further work is required on the work-plan processes and this would take place after the strategy launch and would reflect the Board's views</i></li> <li><i>c. the CONEAC construction and AIC agricultural work-plans were good initial responses to the draft strategy and the board were content for the sector advisory committees to be reconstituted in their current forms</i></li> <li><i>d. the Board would be exploring the work and content of ACTS in consultation with its members and in relation to work of other similar bodies</i></li> <li><i>e. the Board now had a gate-keeping role for the work of advisory committees which included ensuring novel work followed appropriate processes and was aligned to the strategy.</i></li> </ul> <p>Members of ACTS had not been requested to attend the Board meeting, although they had offered to attend to address any questions. In presenting its workplan to the HSE Board, ACTS had intended to clearly convey how its work aligned with the HSE strategy and establish a clearer working relationship between ACTS and WATCH. ACTS had conveyed to the HSE Board that its constitution covered a broad base in terms of the range of decisions HSE could</p>

	be required to undertake in relation to toxic substances. However, in reflecting on the views of the Board conveyed in the minutes of the meeting, members of ACTS could not gauge clearly how the board had viewed its workplan as a whole or specific aspects of it. Pending further clarification of this, ACTS members considered the committee was in a 'state of limbo'.
7.6	The Chairman thanked the WATCH/ ACTS member for the introduction and asked other members if they had views on this issue.
7.7	A WATCH member asked whether the request made by the HSE Board to ACTS to produce a workplan was driven by the idea of aligning the work of advisory committees with the HSE strategy. A WATCH member, also a member of ACTS, replied that a view had been held by members of ACTS for some time that the committee was gradually being disenfranchised. In his mind these views have come about because several issues, apparently pertinent to the remit of ACTS, have been progressed without referral to the committee. He informed WATCH that no substance-related issues had been addressed at the last few meetings the committee has had. There was a feeling amongst members that the committee could be perceived as being redundant on the basis that there had been no apparent achievements in the past two years, when in reality, few pertinent issues had been referred from HSE for its consideration. In mapping out its future role, ACTS had given priority to the idea of enhancing its relationship with WATCH, but at the same time, maintaining distinct but complementary roles. This was opposed to one idea that had been suggested elsewhere, that ACTS and WATCH could be merged into one functional group.
7.8	Another WATCH member highlighted the importance of recognising that the issues of health risks posed by chemicals is not one that only affects the chemicals industry. Chemicals are used widely across society and there are many issues the UK government needs to address in respect of protecting people's health. Although, it may be currently be unclear what the views of the HSE board are towards to work of ACTS, there is nevertheless a clear need for the UK government to adopt positions on a broad range of issues and convey these to industry and other stakeholder groups. The UK perspective on chemicals should be formulated by HSE, working in conjunction with its advisory bodies and underpinned by detailed technical work. If the UK government opts to dissociate itself from this role, a void will be created in the techno-regulatory arena for chemical safety in the UK.
7.9	In relation to WATCH (as opposed to ACTS) the Chairman commented that in his view HSE would always have need for an expert scientific advisory committee. However, it was apparent that, at present, there were fewer issues than in previous years emerging from HSE's work that require such expert scientific advice. One reflection of this situation was that the Chairman suggested that the Autumn 2009 WATCH meeting should be a one-day meeting instead of the usual two-day meeting of recent years.
7.10	On the theme of WATCH and its future, a WATCH member requested clarification from HSE as to why increasingly fewer issues were being put forward for WATCH's consideration.
7.11	Another WATCH member asked whether the reasoning behind the shortage of issues being put forward by HSE for WATCH's consideration was on account of a lack of availability of technical resource within the HSE to prepare papers for the committee?
7.12	A WATCH member recalled that it had been suggested at previous meetings

	that WATCH could be called upon to address specific issues arising in connections with the evaluation of chemicals under the recently implemented REACH scheme, although its input would not be expected for at least a couple of years. This being the case, and given the shortage of issues being put forward for WATCH 's consideration from HSE, he asked what work the committee should undertake in the interim
7.13	Another WATCH member informed the committee that bodies affiliated to other government departments, for example Defra's Chemical Stakeholder Forum, had been active in proposing priority substances deserving of attention under REACH. He suggested that HSE could potentially have an important contribution make to such considerations.
7.14	Given the concerns that had been expressed in the discussion, a member asked the WATCH Chairman to write to the HSE Board to request clarification on the future roles and workloads of WATCH and ACTS. Another member suggested that the committee put work on hold until clarification on this issue has been obtained. The Chairman explained that he couldn't operate in respect of ACTS, but he agreed seek clarify from HSE; he would indicate that from WATCH's perspective, unease had been expressed about the role of ACTS arising from the broad review of its workplan and the implications this in turn may have on WATCH's role and work schedule. In so doing, the Chairman would endeavour to achieve a clear position by the next WATCH meeting in the Autumn.
7.15	A WATCH member stated that it terms of a bottom line to this issue, if HSE wanted to maintain advisory groups such as ACTS and WATCH, it must clearly define their role, purpose and activities. He considered it disrespectful in the extreme that members, who devote much time and effort to the work of these committees should be kept in limbo in this respect. Another member pointed out that if other government departments regularly referred matters to its advisory groups focused on chemical safety issues, why did HSE not also have the need to do likewise?
7.16	A member suggested that WATCH should not ignore the opportunities for it to influence its own future; for instance, it could seek to identify ways in which it could operate more effectively. Rob Turner agreed that a two-way process of dialogue should operate between HSE and WATCH in which issues and suggestions were passed back and forth.
7.17	<b>The Chairman thanked members for their comments and brought discussion on the item to a close. He noted that members had expressed concern about the future role of ACTS, arising from the HSE board's review of its workplan, and had concerns about the potential implications this had for the future of WATCH. The Chairman agreed to seek clarify from HSE on these matters and provide members with a clear position at the Autumn 2009 WATCH meeting</b>
7.18	<b>ACTION : The Chairman to seek clarity from HSE on the future role of ACTS and WATCH and provide a clear position on this matter at the Autumn WATCH meeting.</b>
<b>8</b>	<b>Date of next meeting</b>
8.1	The Chairman thanked everybody for their contributions to the meeting. The Secretary reminded members that the dates for the next meeting in the Autumn will be confirmed by correspondence.  The meeting closed at 3.20pm