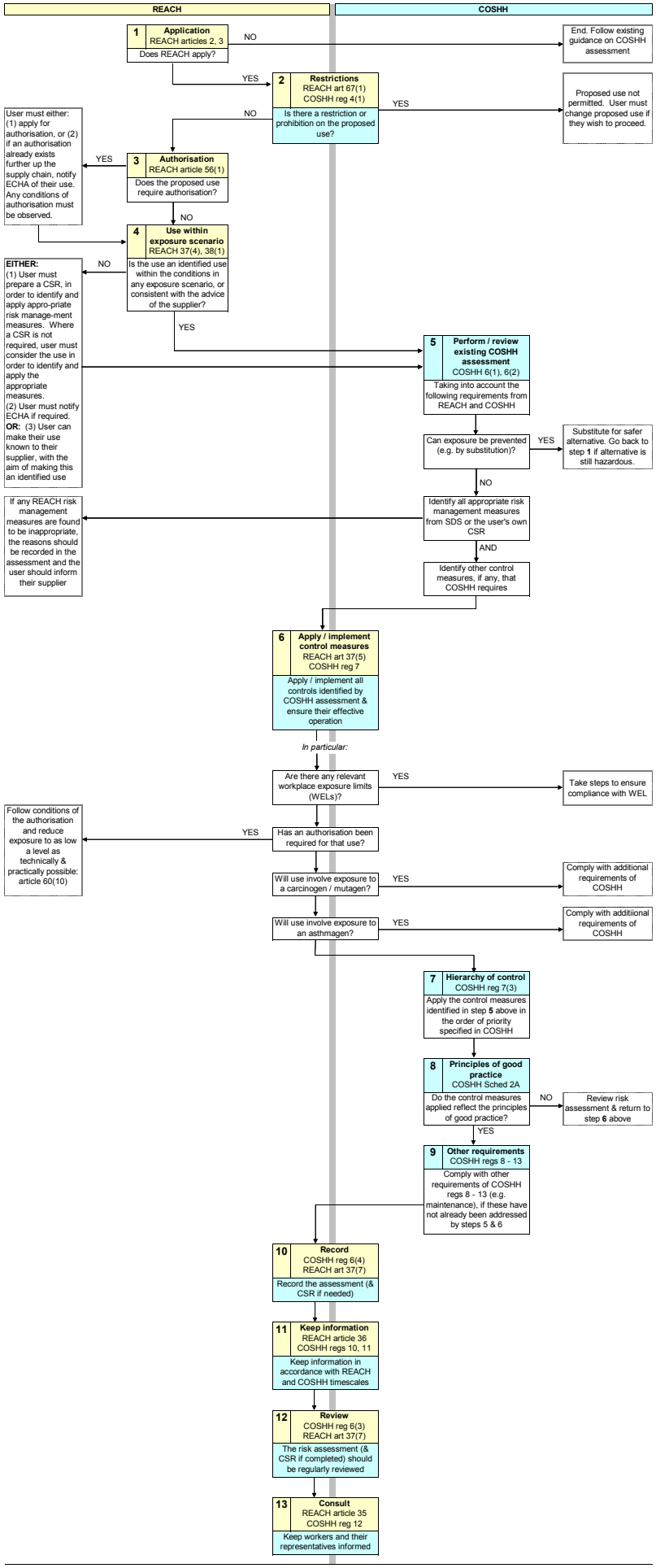
REACH
COSHH
1 Application
REACH articles 2, 3
Does REACH apply?
NO
End. Follow existing guidance on COSHH assessment
YES
2 Restrictions
REACH art 67(1)
COSHH reg 4(1)
Is there a restriction or prohibition on the proposed use?
YES
Proposed use not permitted. User must change proposed use if they wish to proceed.
NO
3 Authorisation
REACH article 56(1)
Does the proposed use require authorisation?
YES
User must either: (1) apply for authorisation, or (2) if an authorisation already exists further up the supply chain, notify ECHA of their use. Any conditions of authorisation must be observed.
NO
4 Use within exposure scenario
REACH 37(4), 38(1)
Is the use an identified use within the conditions in any exposure scenario, or consistent with the advice of the supplier?
NO
EITHER: (1) User must prepare a CSR, in order to identify and apply appro-priate risk manage-ment measures. Where a CSR is not required, user must consider the use in order to identify and apply the appropriate measures. (2) User must notify ECHA if required. OR: (3) User can make their use known to their supplier, with the aim of making this an identified use
YES
5 Perform / review existing COSHH assessment
COSHH 6(1), 6(2)
Taking into account the following requirements from REACH and COSHH
Can exposure be prevented (e.g. by substitution)?
YES
Substitute for safer alternative. Go back to step 1 if alternative is still hazardous.
NO
Identify all appropriate risk management measures from SDS or the user's own CSR
If any REACH risk management measures are found to be inappropriate, the reasons should be recorded in the assessment and the user should inform their supplier
AND
Identify other control measures, if any, that COSHH requires
6 Apply / implement control measures
REACH art 37(5)
COSHH reg 7
Apply / implement all controls identified by COSHH assessment & ensure their effective operation
In particular:
Are there any relevant workplace exposure limits (WELs)?
YES
Take steps to ensure compliance with WEL
Has an authorisation been required for that use?
YES
Follow conditions of the authorisation and reduce exposure to as low a level as technically & practically possible: article 60(10)
Will use involve exposure to a carcinogen / mutagen?
YES
Comply with additional requirements of COSHH
Will use involve exposure to an asthmagen?
YES
Comply with additional requirements of COSHH
7 Hierarchy of control
COSHH reg 7(3)
Apply the control measures identified in step 5 above in the order of priority specified in COSHH
8 Principles of good practice
COSHH Sched 2A
Do the control measures applied reflect the principles of good practice?
NO
Review risk assessment & return to step 6 above
YES
9 Other requirements
COSHH regs 8 - 13
Comply with other requirements of COSHH regs 8 - 13 (e.g. maintenance), if these have not already been addressed by steps 5 & 6
10 Record
COSHH reg 6(4)
REACH art 37(7)
Record the assessment (& CSR if needed)
11 Keep information
REACH article 36
COSHH regs 10, 11
Keep information in accordance with REACH and COSHH timescales
12 Review
COSHH reg 6(3)
REACH art 37(7)
The risk assessment (& CSR if completed) should be regularly reviewed
13 Consult
REACH article 35
COSHH reg 12
Keep workers and their representatives informed