HEALTH AND SAFETY AUTHORITY

2012 Survey of Chemical Usage in Irish Workplaces

Final report

4/30/2013

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Executive summary

This 2012 Survey of Chemical Usage in Irish Workplaces was conducted in follow up to a Chemical Usage Survey carried out in 2007. In 2007 the aim of the survey was to produce a profile of chemical usage in Irish workplaces which could then be used by the Health and Safety Authority to inform and direct the implementation of future chemical safety legislation and policy. It was concluded in that survey that the level of knowledge of the type and quantity of chemicals used in Irish workplaces was generally poor as was the development of appropriate on-site safety management measures. Based on these observations, the aim of the 2012 survey was to examine whether awareness of chemical legislation and management has increased over the past five years and, if so, to assess how this knowledge has improved.

In addition, as awareness and knowledge of the new Classification, Labelling and Packaging (CLP) Regulation was not addressed in the 2007 survey, this survey aims to establish the baseline of awareness of this Regulation amongst Small and Medium Enterprises (SMEs). Also arising from the 2007 survey was the observation that the level of preparedness for implementation of the REACH[1] Regulation was quite poor. As REACH only came into force in 2007, it would be expected that by 2012 the familiarity and understanding of the Regulation should have increased.

This current survey reviewed areas in the 2007 survey where more information was needed and addressed these data gaps through investigation of the current level of awareness of chemicals used in the workplaces, awareness of the actors of their duties and their understanding of the authorisation process under REACH, along with their understanding of the new CLP Regulation and how the knowledge of SME's has increased since 2007.

Those selected to partake in 2012 were chosen in order to investigate if their knowledge on chemicals and on the Regulations had increased since they took part in the 2007 survey. In

[1] Registration, Evaluation, Authorisation and Restriction of Chemicals EC 1907/2006

deciding who to include in the 2012 survey, the initial database was the list of respondents from the previous 2007 survey. The majority (approx. 90%) of respondents in 2007 employed fifty employees or less and therefore were classed as small and medium-sized enterprises and were also considered suitable for the 2012 survey.

Of the 613 companies selected to be surveyed in 2012, a total of 420 businesses were validated for inclusion. 100 survey responses were received, and just over half matched the dataset from 2007, i.e. 55% responding to both the 2007 and 2012 survey. Although 55% of respondents completed both surveys, no direct comparison could be made between the results from both years, because detailed responses from the 2007 survey were not available and survey participation was confidential and anonymous. 12% (12) of respondents in 2012 were additional SMEs identified by the Authority from separate lists of detergents manufacturers and chemical importers. 33% (33) were unidentified respondents, who possibly answered the survey on the Authority's website following its promotion in the relevant sector newsletters, including the Authority's newsletters and those from stakeholders' representative networks.

In 2007, 52% of respondents indicated that they did not use any chemicals in their workplace; 44% did not consider that they had a role in the chemical supply chain and 41% did not maintain any chemical records. On completion of the 2012 survey, 20% of respondents indicated that they did not use chemicals, and 22% of respondents indicated that they did not know what their role in the chemical supply chain was, indicating that a small number of SMEs continue to have a limited understanding of their supply chain role. 26% of participants indicated that they did not record any details of chemicals on site.

The 2012 survey also tried to determine where chemicals were sourced. The majority of SMEs (77%) sourced their chemicals from an Irish supplier and 51% of SME respondents also sourced chemicals from an EU supplier.

Only 39% of those surveyed in 2007 were aware of the REACH Regulation while 66% were aware of the REACH Regulation in 2012, an improvement of awareness since the first

survey. The survey also established that 66% of SME were downstream users and 17% were distributors.

When asked about the type of records they maintained, the majority of respondents indicated that they use Safety Data Sheets (SDSs), with 59% maintaining a chemical inventory and 43% completing risk assessments. 26% did not maintain any details of chemicals in their workplace, which may have significant consequences for appropriate chemical safety management.

The findings of the 2012 survey suggest that while chemical awareness and awareness of the REACH Regulation would appear to be higher than when the first survey was conducted in 2007, there are still a number of issues which need to be addressed, such as increasing awareness of the CLP Regulation and the safe management and storage of chemicals.

On examination of the data obtained, it was revealed that skin sensitisers (H317/R43), at 47%, were the most commonly used high-risk chemicals, followed by respiratory sensitisers (H334/R42) at 28%. Of the responses received, 11% of respondents indicated that they use chemicals classified as carcinogens: 3% use those classified as mutagens and 8% use those classified as reproductive toxins (collectively described as CMRs), indicating that the majority of Irish workplaces do not use CMR chemicals.

When surveyed on how businesses sourced their knowledge on REACH and other chemical legislation, the top response was the Authority's website at 65% together along with various other sources of knowledge from the Authority, such as inspectors and the Chemicals Helpdesk. These results indicate that the Authority has been a significant provider of information through a combination of communication methods.

Survey results on the CLP Regulation revealed that 68% of respondents were aware of the Regulation, the hazard pictograms and labelling statements that it introduces on labels. The remaining 32% were unaware of the CLP Regulation. When surveyed on the meaning and understanding of selected pictograms, an average of 78% showed recognition and understanding. Despite the high percentage of respondents being aware of the CLP

Regulation, it was observed that only 33% of businesses had carried out training with employees.

The findings of the survey suggest that the Authority should continue to promote safe chemical management through publication of free fact sheets on subjects where understanding appears to be lacking, for example, new CLP pictograms or the importance of chemical risk assessment. The relevant webpages on the Authority's website should be a priority source of information for stakeholders, as the results show it to be a widely used source of information on chemical legislation for Irish companies. Continuation of targeted inspection campaigns and participation in EU-wide coordinated projects is recommended to increase awareness of the obligations under the REACH and CLP Regulations. It is also suggested that the Authority should complete a cohort study of workers and consumers in order to establish the basic level of knowledge of hazard labelling and perception of the associated risks.

Finally, a chemical safety awareness campaign could be beneficial if targeted at specific sectors, such as those who do not consider themselves chemical users, to ensure that they are not downstream users of everyday chemicals such as detergents.

1.0 Introduction

The Health and Safety Authority commissioned this follow-up survey to the 2007 Chemicals Usage Survey to assist in the implementation of the Authority's strategy of ensuring the safe and sustainable use of chemicals.

Assessing the data collected from this survey on the level of awareness of chemical usage in the workplace and knowledge of the relevant chemical legislation, namely REACH and CLP, allows the Authority to focus on areas where awareness needs to be heightened. The findings from the 2012 survey will also assist the Authority in fulfilling Goal 5 of the 2013–2015 Strategy, which provides for promoting the safe and sustainable management of chemicals, and Goal 1: To enable employers, employees and other duty-holders to reduce risks to safety, health and welfare.

The purpose of the survey is to assess:

- The awareness levels of chemicals used in the workplace within small and medium-sized enterprises (SMEs)
- The types of chemicals used in SMEs
- The current understanding within SMEs of their duties under the REACH Regulation
- The understanding within SME's of the new Regulation (EC) No. 1272/2008 on the Classification, Labelling and Packaging of substances and mixtures (CLP).

1.1 Literature review

To gain a full understanding of the issues to be addressed, a review of the results of the previous Health and Safety Authority Survey of Chemical Usage in Irish Workplaces (2007) was completed. This review also was beneficial in identifying the data gaps from the 2007 findings.

A Eurobarometer report (Special Eurobarometer 360 Consumer understanding of labels and the safe use of chemicals report, EU Commission, 2011), a consumer survey on the understanding of labels and safe use of chemicals was also reviewed, as well as a study on

communication about the safe use of chemicals (European Chemicals Agency [ECHA], January 2012). The ECHA study examined the communication of information to the general public on the safe use of substances and mixtures and the potential need for additional information on labels.

In addition, information on the various processes under the REACH Regulation, such as authorisation and restriction, were researched, mainly through the guidance documents available on the ECHA website.

The review of the initial 2007 survey helped to identify where further survey elaboration was required and the key aspects on which to focus. The findings established that there was limited data available on the type and number of chemicals used, their quantities and intrinsic hazards and chemical management procedures, and that the level of understanding of chemical usage was lowest in smaller businesses. It was evident that larger companies had a better understanding of health and safety issues, as they tended to have the ability to devote sufficient resources to chemical management, e.g. appointing a health and safety manager.

In the 2007 survey, respondents' awareness of the chemical supply chain and their position within it was generally poor: 44% of survey respondents indicated that they had no role in the chemical supply chain, which showed a possible lack of awareness and understanding, given that 48% of respondents confirmed that they used chemicals in the workplace. It was found that the most prevalent chemicals were those classified as harmful and irritant. Most respondents claimed not to use carcinogens, mutagens, or reproductive toxins (CMRs) and the majority who did handled less than ten individual chemicals classified as CMRs per year. In 2007, 61% of respondents surveyed were unaware of the REACH Regulation; this lack of awareness was greatest in smaller companies.

Based on the findings of the 2007 survey, it was decided to focus again on companies' understanding of the REACH Regulation, their level of knowledge of their role in the chemical supply chain and where they source information regarding REACH and chemical Regulations.

In reviewing the 2007 survey, it was noted that there were a number of areas where the questions needed to be reconsidered to obtain a greater understanding of chemical usage within relevant sectors.

In 2007, respondents were asked to estimate the annual tonnage of substances used which were classified as an environmental hazard, including whether the substances were persistent, bioaccumulative and toxic for the environment (PBTs) or very persistent and very bioaccumulative for the environment (vPvBs). However, unlike carcinogens, mutagens or reprotoxins, neither the label nor Safety Data Sheet for such chemicals will explicitly state that it is a PBT/vPvB, making it difficult for companies to establish whether they use them. Therefore, in the 2012 survey respondents were asked if they used chemicals/mixtures labelled with the wording "very toxic to aquatic organisms and may cause long term adverse effects in the aquatic environment" and if they used any of the substances formally listed on the candidate list as identified PBT/vPvBs, thereby allowing for the gathering of information on substances of environmental concern.

Only 33% of respondents answered questions concerning CMR use in 2007. The responses received supported the assumption that the majority of Irish workplaces do not use CMRs. The survey findings may indicate a lack of awareness of CMR use in smaller companies, but this could not be confirmed from the data collected. Taking this point into consideration, participants in 2012 were again questioned regarding their use of CMRs as well as respiratory and skin sensitisers in order to gain an insight into the prevalence of high risk chemicals in the Irish workplace.

The information gathered on awareness of REACH in 2007 was also limited as it was a relatively new Regulation which had just come into force in June 2007. At the time, substances of very high concern (SVHCs) had not yet been identified, therefore the Candidate List and Annex XIV, identifying substances subject to authorisation, had not been drafted. Consequently, no information could be gathered on this process under REACH.

Additionally, there was no information gathered on the new CLP Regulation in 2007 as this Regulation had not yet come into force.

In the 2012 survey, questions were included on knowledge of the company's role under REACH and knowledge of the Candidate List and use of substances on Annex XIV. Survey participants were also asked to provide information on their level of awareness of the new Classification, Labelling and Packaging (CLP) Regulation e.g. preparation of labels, provision of training.

Both the Eurobarometer and ECHA studies provided useful information on the understanding of individual CLP pictograms. The findings show that among the general public some hazard pictograms are hardly known and that there is generally little understanding of the safety measures that need to be taken when using chemical products. With the introduction of the new rules under the CLP Regulation, employers and employees will need to understand the new safety labels on chemicals which they purchase, use and/or are required to prepare. Therefore, participants of this survey were asked to identify some of the new pictograms introduced by the CLP Regulation and state their understanding of what they mean.

1.2 Background

Since 2006, at a European level, there has been a major overhaul in the chemical Regulation of industrial chemicals. The REACH Regulation (EC) No. 1907/2006, which came into force on 1st June 2007, is one of the most significant regulatory measures governing the use of chemicals. REACH provides a duty to communicate information in the supply chain, including to the general public, on hazards and risks associated with substances on their own, in mixtures and in articles.

In 2007 it was assumed that most Irish workplaces used chemicals to some extent, but limited data was available. Therefore, the Authority commissioned a consultant to conduct a survey of the nature and extent of chemical usage in Irish workplaces to generate data, which would assist the Authority in informing and directing the implementation of future chemical safety legislation and policy in Ireland. It was the first survey of its kind in Ireland and represented one element of the REACH implementation strategy which was managed

by the Authority in its role as the lead Competent Authority for the administration and enforcement of the REACH Regulation in Ireland.

Regulation (EC) No. 1272/2008 is a new EU Regulation on the Classification, Labelling and Packaging (CLP) of chemical substances and mixtures. It came into force on 20th January 2009. It introduces a new system for the classification and labelling of chemicals based on the Globally Harmonised System of Classification and Labelling of Chemicals (GHS), which endeavours to provide an international system to standardise label elements and Safety Data Sheets. It establishes new hazard communication elements for substances and mixtures which are somewhat different to those previously used in Europe. As a result, each chemical substance/mixture placed on the EU market will need to be reclassified and relabelled by specific deadlines as laid out in the legislation. Both of these Regulations are applicable to chemicals used in the workplace.

This report looks at the current awareness levels of chemicals used in the workplace, the duties of REACH and the understanding of the new CLP Regulation, and whether this awareness is greater than it was in 2007. Assessing the level of awareness of chemical usage and legislation in the workplace will allow the Authority to focus on the areas that currently have the greatest risk and lack of understanding or knowledge in order to help heighten awareness.

With the introduction of the new rules under the Globally Harmonised System (GHS) of Classification and Labelling of Chemicals, consumers will also need to understand the new safety labels on chemicals and chemical household products that they purchase. However, due to time constraints, a survey was not completed on consumer awareness. It is recommended that it should be considered in the future to gather a baseline of information on the level of consumer knowledge of the new label information and pictograms.

2.0 Objectives and scope of report

In 2012, the Authority decided to undertake a follow-up survey to investigate whether the initial findings of the 2007 survey were still relevant. Since the initial survey was carried out, employers and employees have had five years to increase their knowledge about the chemicals they use and their duties under the REACH Regulation. The process of authorisation of substances of very high concern was established since the last survey and substances have been added regularly to Annex XIV of REACH, necessitating a greater awareness by employers of their duties and the impact on their business. Additionally, a basic awareness amongst SMEs of the new CLP hazard communication requirements needed to be established through the survey. Since 2007, the Authority has undertaken a number of initiatives to help companies heighten their awareness, including the preparation of a number of specific pieces of guidance, factsheets and toolkits on chemicals; publication of a chemical e-bulletin and newsletter; improvement of the chemical pages on the Authority's website and holding seminars and webinars on REACH and CLP. It is hoped that these efforts will have increased and improved knowledge amongst the workforce. To this end, in 2012 an intern was engaged within the Authority to undertake a follow-up survey.

The survey was conducted as an examination of information on the current level of chemical awareness in order to enable the Authority to inform and direct the implementation of future chemical safety legislation and policy. The survey was designed with the following objectives:

- Establish the extent and understanding of chemical usage amongst participants in Small to Medium Enterprises (SMEs) and identify gaps in knowledge
- Identify the extent to which information on chemical usage in Ireland is monitored and recorded within companies
- Establish the level of knowledge in Irish workplaces of roles in the chemical supply chain
- Gauge the knowledge of the REACH Regulation in 2012
- Establish a baseline of knowledge of the new CLP Regulation in 2012

- Identify the level of knowledge on chemical management
- Identify where companies source their knowledge
- Establish if they are aware of the Candidate List or SVHCs (Substances of Very High Concern), whether their company uses substances on that list and whether they are using chemicals from the authorisation list – Annex XIV of REACH (list of substances subject to authorisation by the European Chemicals Agency [ECHA])

3.0 Survey method

3.1 Survey ethics

Strict professional standards, ethics, confidentiality and the researcher's duty of care were upheld throughout the survey, in particular and in relation to:

- Protection of the identities and interests of those participating in the survey
- Guaranteeing confidentiality of information supplied throughout the survey
- Protection of data obtained during the course of this survey

3.2 Targeting of survey participants

2007 survey review

The 2007 survey revealed that there was a direct correlation between company size and their understanding and management of chemical usage: larger companies tended to have a better understanding of health and safety management issues affecting their employees, including chemical risks. It was decided, therefore, to target Irish small and medium-sized enterprises (SMEs) in the 2012 survey.

In 2007 the Authority provided a database of 36,801 businesses to the commissioned consultants for use in the survey. Businesses in the database were assigned NACE[2] sector codes by the database vendor and from this list the Authority selected twelve sectors containing 11,121 businesses for inclusion in the survey on the basis that they would be likely to contain chemical users. However, on completion of the 2007 survey it was noted that a significant percentage of respondents did not operate in the twelve sectors specified by the database. These twelve sectors were subsequently recoded to the most appropriate NACE sectors, thereby resulting in an expansion of the final database of the 2007 survey to sixteen NACE Sectors.

[2] Nomenclature Generale des Activites Economiques dans l`Union Europeenne" (General Name for Economic Activities in the European Union)

On review of the 11,121 companies selected from the 2007 business database, it was noted that 242 were duplicate contacts, 272 were incorrect contacts and one business had ceased trading. This left 10,606 businesses available for inclusion in the 2007 survey. While attempts were made to contact all 10,606 of these businesses during part A of the survey (structured telephone interviews), only 3,590 businesses agreed to participate. Of these, 1,690 agreed to participate in part B of the survey (online/postal survey), with a total of 613 survey responses in part B received, representing a 36% response rate.

2012 Survey

The list of 613 respondents from the 2007 survey database was initially screened to determine suitability for use in the 2012 survey. The majority (approx. 90%) of those 613 respondents employed fifty employees or less and therefore were classed in the SME category and were considered a suitable target group for the 2012 survey.

It was felt that it was important to select those respondents to the 2007 survey in order to investigate whether their knowledge on chemicals and chemical Regulation had increased since they took part in 2007. Of the 613 companies 192 were discounted: 79 had ceased trading since 2007 and the remainder were either duplicate contacts (company names which had been entered twice) or had no contact number details. This final screening resulted in a total of 342 businesses from the 2007 study being validated for inclusion in the 2012 survey. An additional list of 58 detergent manufacturing companies and 20 chemical importers compiled by the Authority was also added to the contacts database. These three lists together totalled 420 businesses to be contacted for the 2012 survey.

Initially, an attempt was made to contact all 420 businesses by phone. However, a number of respondents requested to be contacted at a later time. Despite numerous attempts to make follow-up contact, a total of 70 businesses could not be contacted: 62 due to the unavailability of appropriate contacts and a further 8 businesses indicated that they did not wish to participate in the survey. This decreased the total number of companies to be surveyed in 2012 to 350. Of these, a total of 100 companies responded, representing a 29% response rate.

Of the 100 survey responses received in 2012, just over half matched the dataset from 2007 with 55% (55) responding to both the 2007 and 2012 survey. 12% (12) responded from the detergents manufacturing/chemical importers contact lists, and 33% (33) were unknown respondents, perhaps voluntarily participating through the Authority's website link or newsletter.

In summary, in 2007 contact was made with 1,690 businesses; 613 companies responded, giving a response rate of 36%. In 2012, of the 350 businesses contacted, 100 responded, giving a response rate of 29%.

3.3 Survey methodology

Various methods for information-gathering were considered, with the main options being telephone survey, postal survey and online survey.

It was decided that all methods could be utilised. A phone survey coupled with a follow-up email containing a web link to an online survey questionnaire was agreed as the simplest and most effective method to collect the required information from respondents within the timeframe allocated.

An online software tool[3] provided the capability to generate a questionnaire on the web, thus allowing respondents to submit their responses via the internet in a confidential and anonymous manner.

There are various benefits to using an online survey tool:

- The questionnaires can be embedded into electronic material and can be sent out via email, e-bulletins or incorporated into webpages.
- It is a low-cost tool which permits a quick data capture turnaround where, unlike phone or postal surveys, 10,000 people can be surveyed as easily as 10 people.

[3] Survey Monkey®

- Responses can be captured electronically and directly loaded into a database where results can be easily analysed e.g. number of responses, number of skipped questions, percentages of questions answered etc.

This data collection function is by far the most important benefit of online survey tools.

Using the online tool, a simple, focused and user-friendly survey questionnaire was prepared containing twenty questions (see Annex 1) to help collect the information required by the Authority from respondents. The survey included detailed questions about awareness of CLP and the REACH Regulations, the Candidate List, substances subject to authorisation, environmental and human health hazards and the sourcing of information regarding chemical Regulations.

The phone survey of the 350 companies selected commenced at the beginning of July 2012. An attempt was made to call every number on the list and the survey objectives were explained to respondents in the hope that they would participate. The telephone survey was directed towards those in positions of responsibility such as safety, environmental and general managers, to ensure that participants could provide informed responses. During the telephone conversations a structured body of text was used: each conversation commenced with the same formalities, introductions and explanations of the purpose of the survey and confirmation of strict assurances of confidentiality. The telephone proforma information is provided in Annex 2.

Following agreement from the participants by phone, the survey link was then emailed for completion. The option of receiving the questionnaire by post was offered; however, only one company required it by post. The email sent out to participants (see Annex 3) providing the link to the online survey questionnaire was accompanied by an explanation of the purpose of the survey and the fact that it would be viewed in strict confidence. Participants were also reminded that any information provided would not be used for enforcement purposes.

3.4 Awareness-raising of the survey

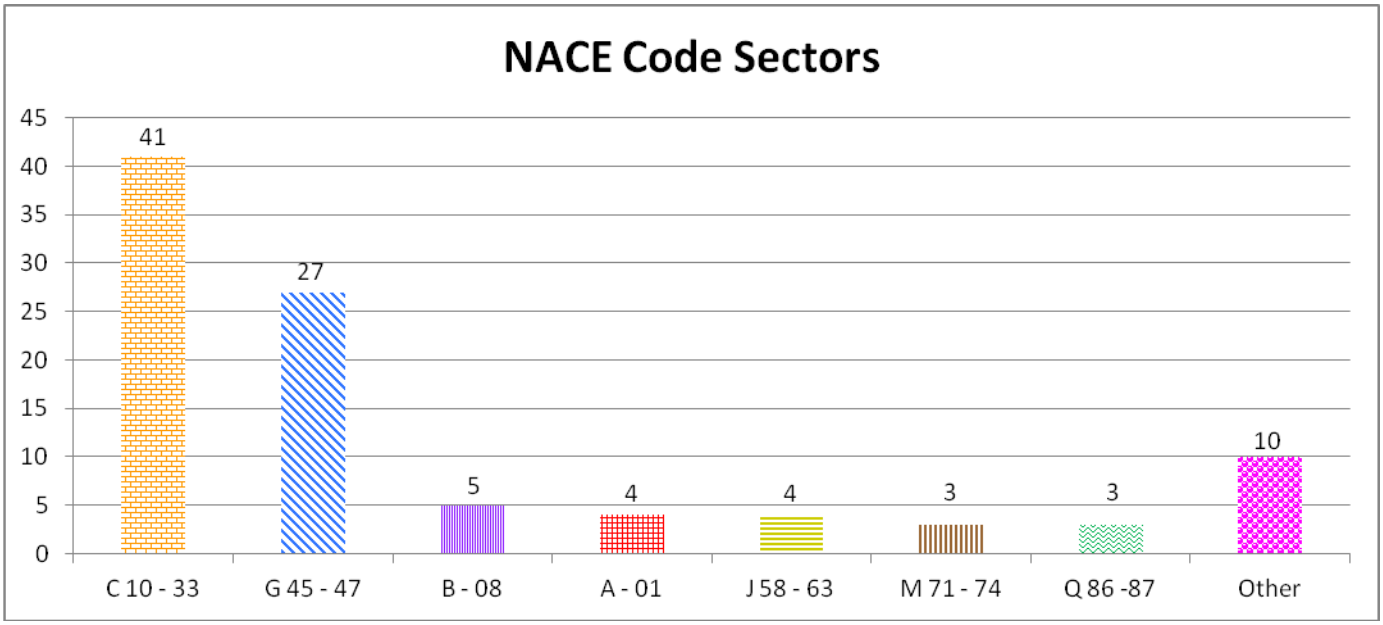
Prior to commencement of the survey, awareness was raised by advertising on the Authority newsletter, chemicals e-bulletin, Health and Safety Authority Twitter account, the *Health and Safety Review* publication (July 2012), the Authority's website and the Department of Jobs, Enterprise and Innovation webpage.

4.0 Analysis of Results

The results can be summarised as follows:

Of the 350 companies contacted, 100 replied, giving a response rate of 29%. The main participants were involved in manufacturing of chemicals, pharmaceuticals and medical devices, distribution and wholesale of chemicals, printing, quarrying and detergent manufacturing and distribution.

Figure 4.1 NACE code sectors

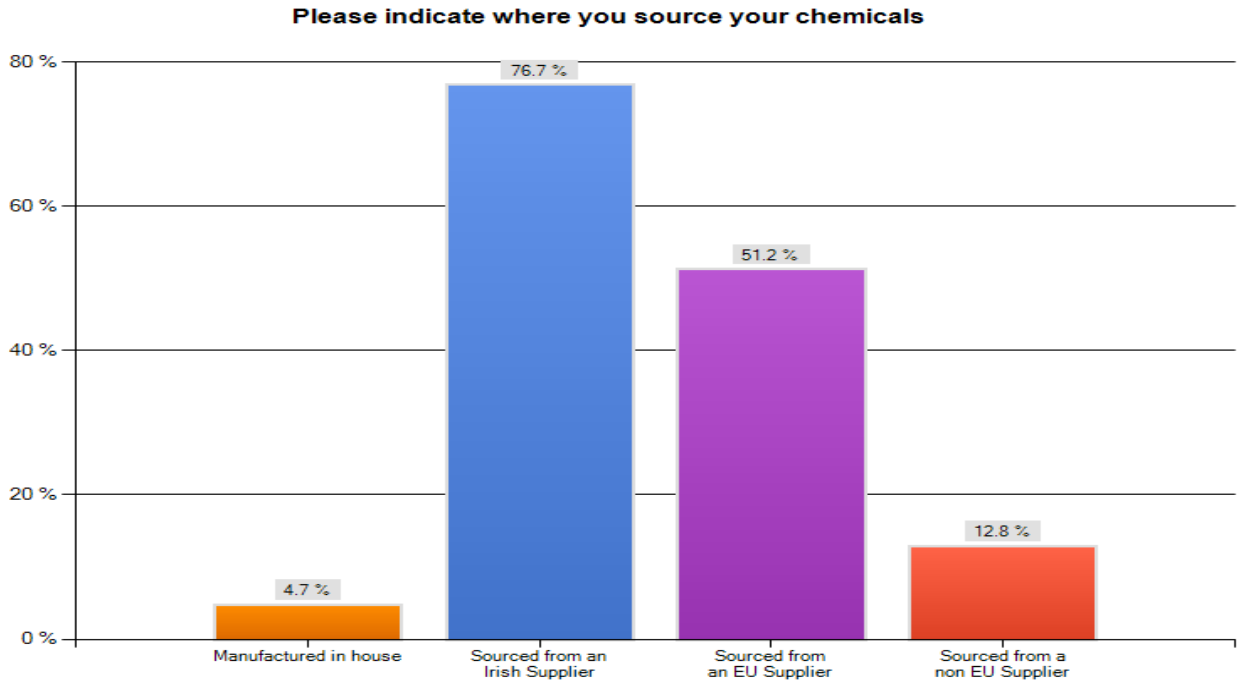


*List of NACE business sectors are included in Annex 4

Source of chemicals

Survey responses indicated that 80% of participants use chemicals in the workplace, while 20% declared that they did not use any chemicals.

Figure 4.2 Indication of where chemicals are sourced



Of those using chemicals, 5% of respondents indicated that they manufactured chemicals in-house, 77% indicated that they sourced from an Irish supplier, 51% of participants from an EU supplier and 13% from a non-EU supplier.

REACH awareness

Survey responses indicate that 66% of respondents understand their role in the REACH Regulation. 13% do not understand their role and 21% stated that they are not aware of the REACH Regulation.

Figure 4.3 Understanding of company's role in the REACH Regulation

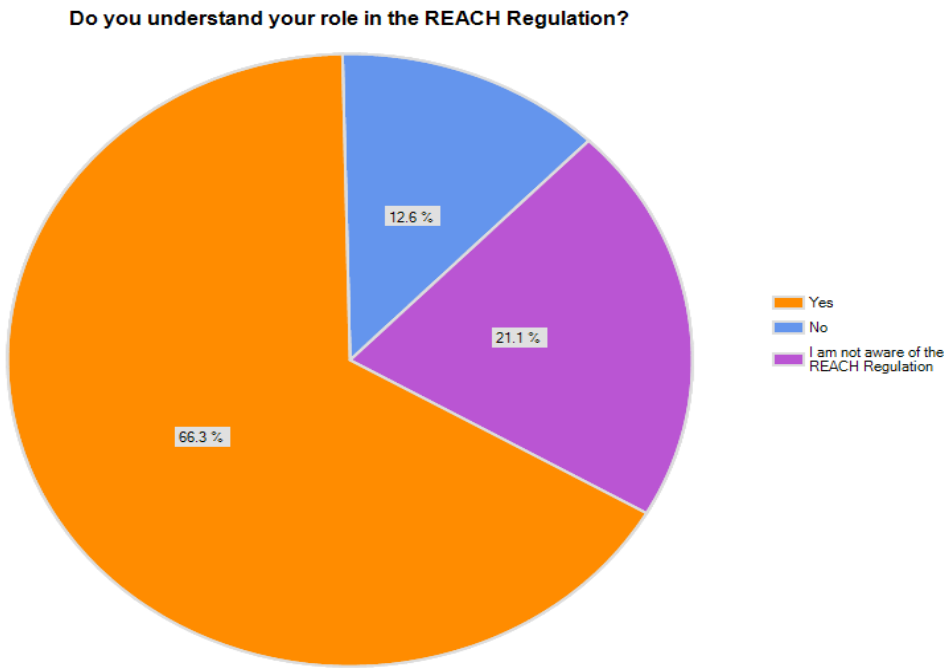
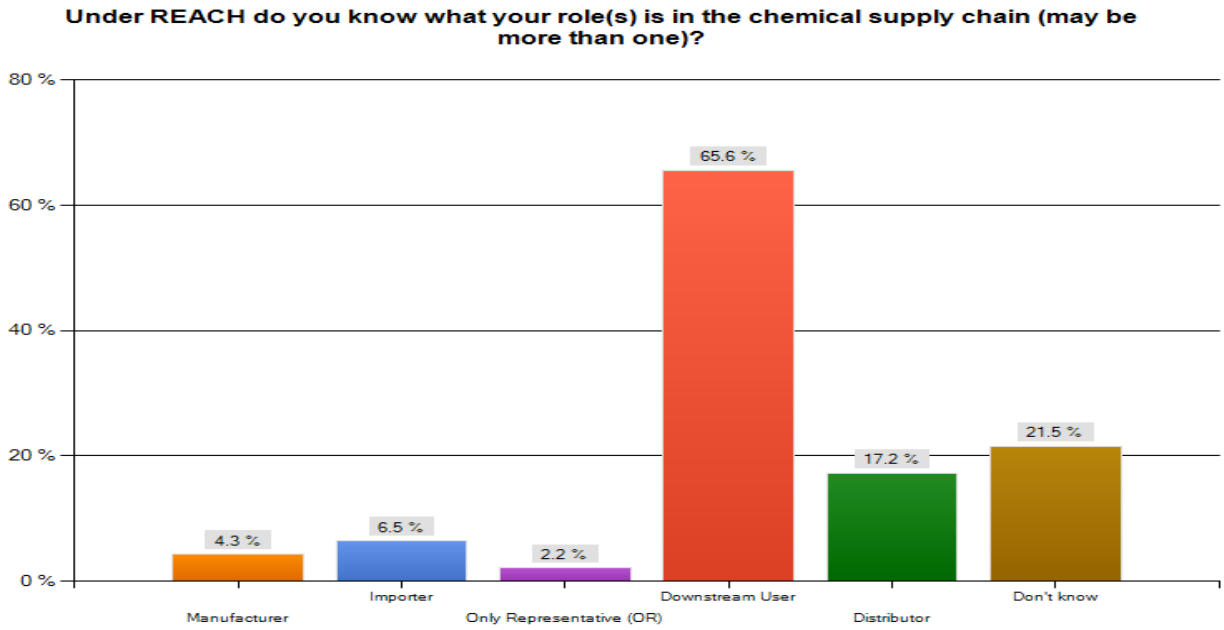


Figure 4.4 Identification of company's role in the supply chain



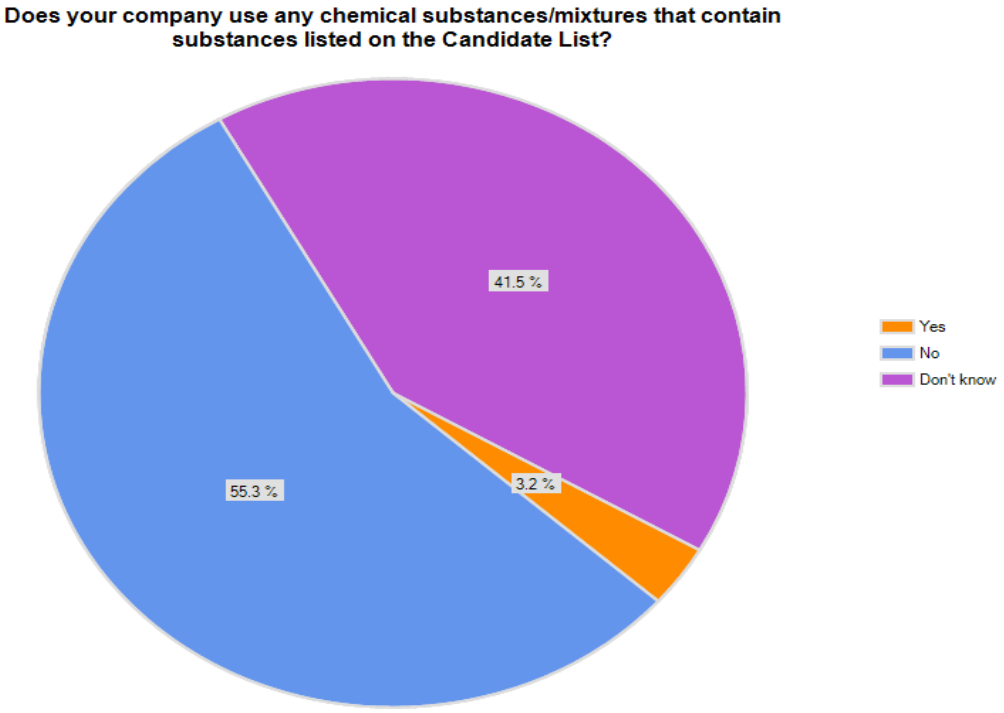
The majority of respondents, 66%, indicated that they are downstream users in the chemical supply chain, followed by distributors at 17%, importers at 7%, manufacturers at 4% and only representatives (OR) at 2%. 22% of participants did not know what role they undertook in the chemical supply chain.

When asked what aspect of REACH was not understood, a high number – 91 participants – did not give feedback, while a minority of 9 responded that they were not sure of their full responsibilities and they could not find clear responses to their questions. One respondent requested “clear no jargon information” as opposed to heavy legislative text.

Knowledge of the Candidate List

54% of respondents knew what the Candidate List is. 46% were not aware of the Candidate List nor of what it represents.

Figure 4.5 Use of chemicals that contain substances listed on the Candidate List

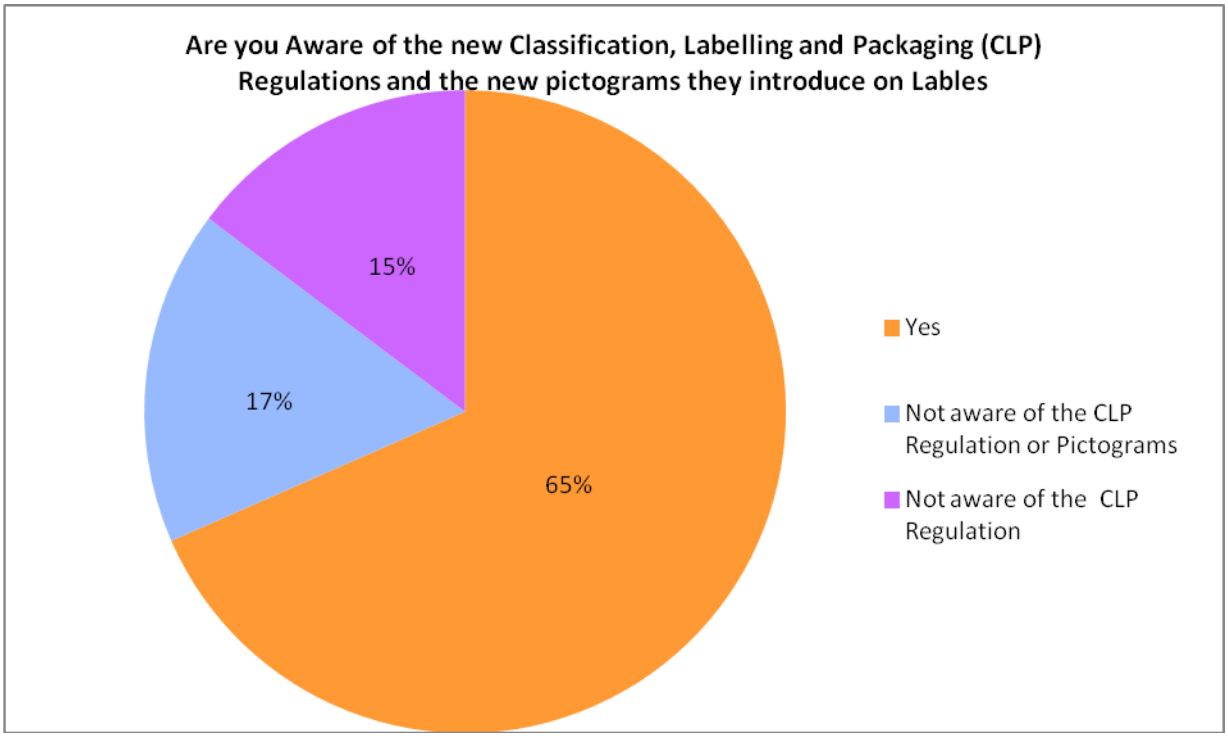


3% of respondents indicated that they used substances of very high concern (SVHCs) listed on the Candidate List. 55% indicated that they did not use any substances on the list, while 42% did not know whether they were using these substances or not.

CLP (Classification, Labelling and Packaging Regulations) awareness

68% of respondents are aware of the new CLP Regulation and the new pictograms and hazard statements they introduce on labels. Of those who admitted not being aware of the Regulation (32%), 17% responded that they were not aware of the CLP Regulations or the pictograms and 15% claimed no awareness of the CLP Regulation only.

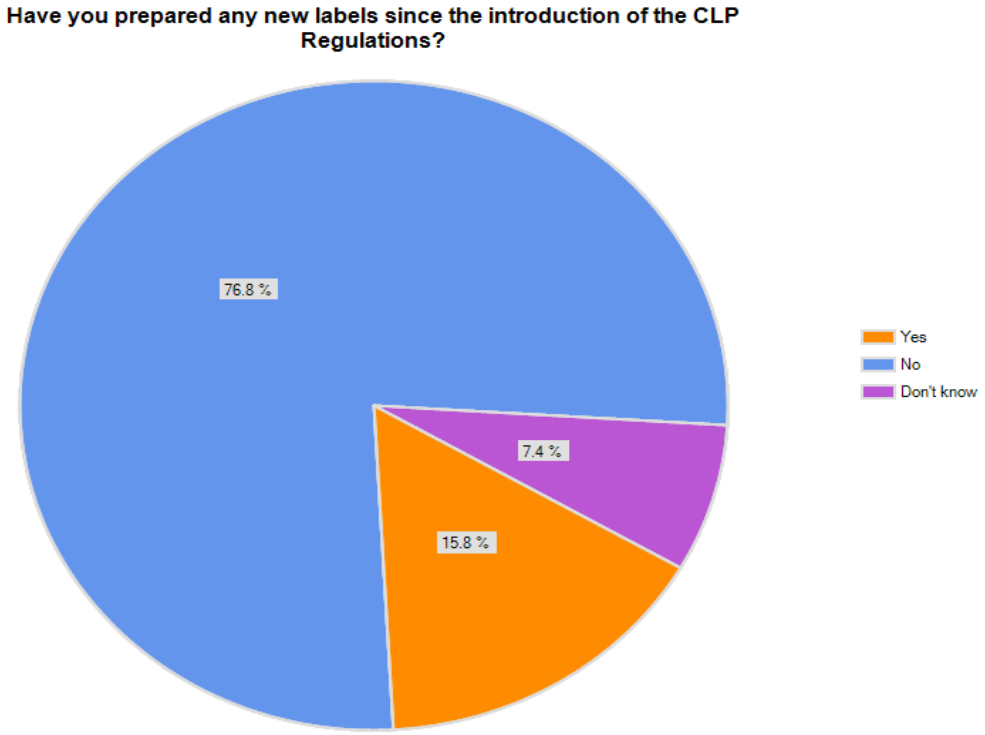
Figure 4.6 Awareness of CLP Regulations and the new pictograms on labels



Of those surveyed who are aware of the Regulation, 33% have carried out training with employees on the new labels; the remainder of respondents had not carried out any training.

16% of respondents indicated that they had prepared new labels since the introduction of the CLP Regulation while the majority, 84%, indicated that they had not prepared labels since its introduction. However, this may indicate that they do not yet have a duty to prepare labels under CLP because they deal with mixtures only which do not require labelling under the CLP Regulation until June 2015.

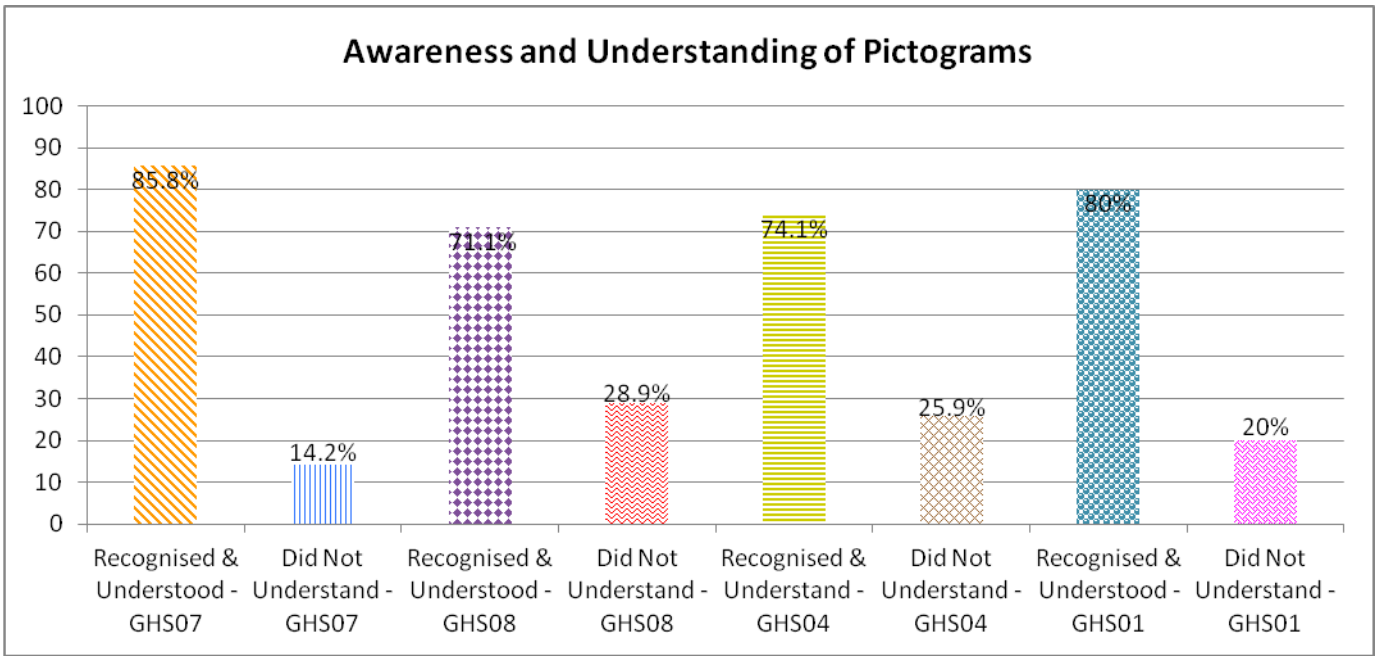
Figure 4.7 Preparation of new labels since the introduction of the CLP Regulations



Awareness and understanding of pictograms

When questioned on the pictograms introduced in the CLP Regulation, 86% understood the meaning of the GHS07 pictogram (Exclamation Mark); 14% had no understanding. 71% recognised and understood the GHS08 (Exploding Man) pictogram, while 29% were unaware of it and what it meant. 74% were aware of what the GHS04 (Gases Under Pressure) pictogram stood for, while 26% had no understanding. 80% of respondents understood GHS01 (Explosive) pictogram; 20% of respondents had no awareness of this pictogram or its meaning.

Figure 4.8 Awareness and understanding of pictograms

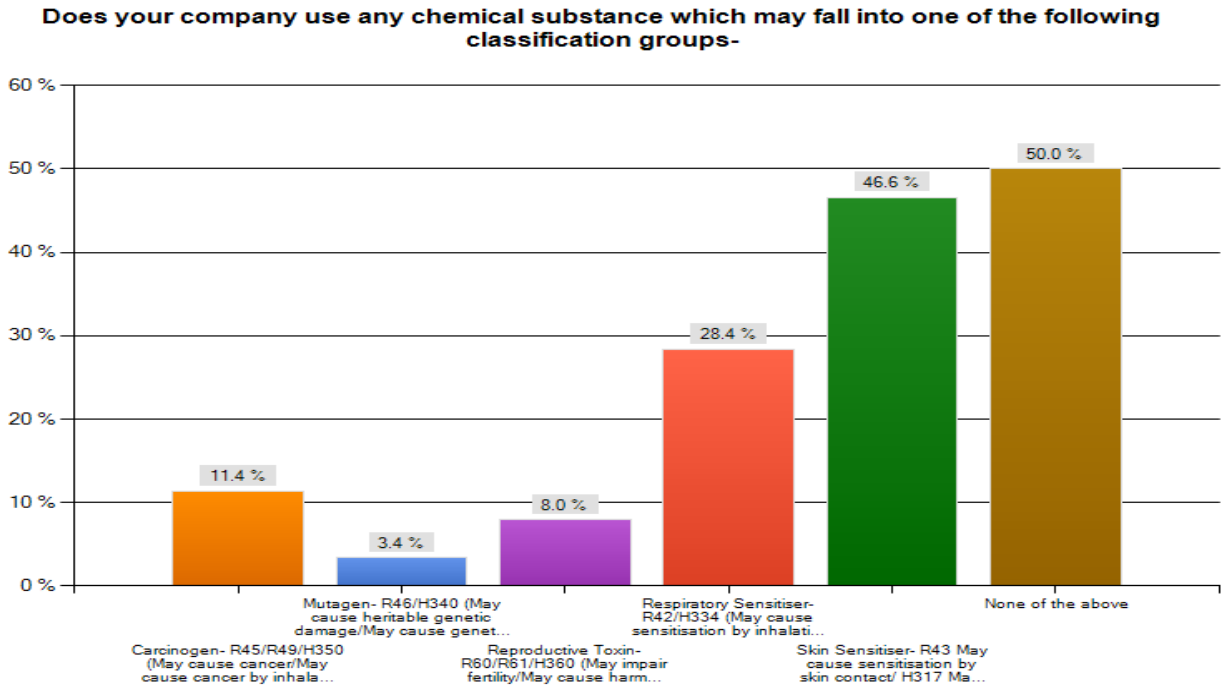


Use of chemicals classified for human health hazards

An analysis of the data obtained reveals that the most prevalent human health classification assigned to chemicals used was skin sensitisation (H317/R43), with 47% of respondents using chemicals classified as such, followed by those classified as respiratory sensitisers

(H334/R42) at 28%. Also reported was the use of carcinogens (H350/R45/R49) at 11%, reproductive toxins (H360/R60/R61) at 8% and mutagens (H340/R46) at 3%.

Figure 4.9 Use of chemical substances classified for human health hazards



Use of substances classified for the environment

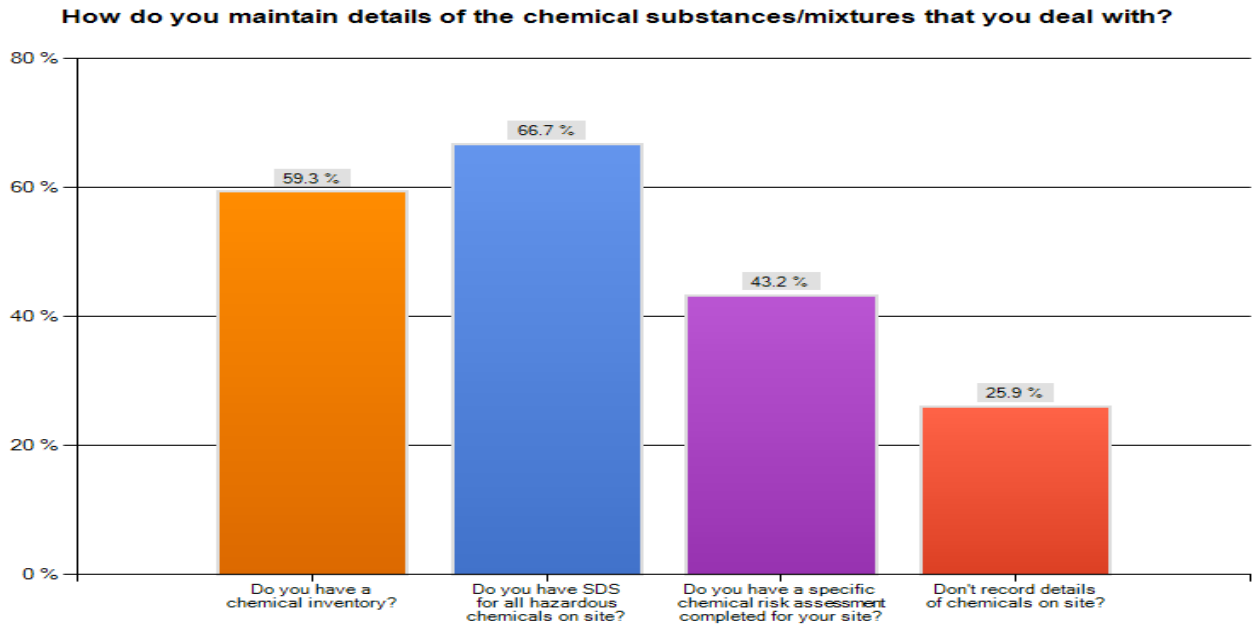
Survey responses indicate that 31% of respondents use chemicals that are toxic to the environment (H400, H410 or R50/53) while 69% indicate that they do not use such chemicals.

When surveyed on the use of specific chemicals identified on Annex XIV as persistent, bioaccumulative, toxic for the environment (PBTs) or very persistent and very bioaccumulative for the environment (vPvBs), just one respondent indicated that they used Musk xylene (used as a fragrance and fragrance enhancer in detergents) while 99% of respondents claimed not to use any of the particular chemicals listed.

Maintenance of information on chemicals

It was found that 67% of companies have and use SDSs for all hazardous chemicals on-site. 59% keep a chemical inventory, 43% have specific chemical risk assessments and 26% don't record any details of chemicals maintained on site.

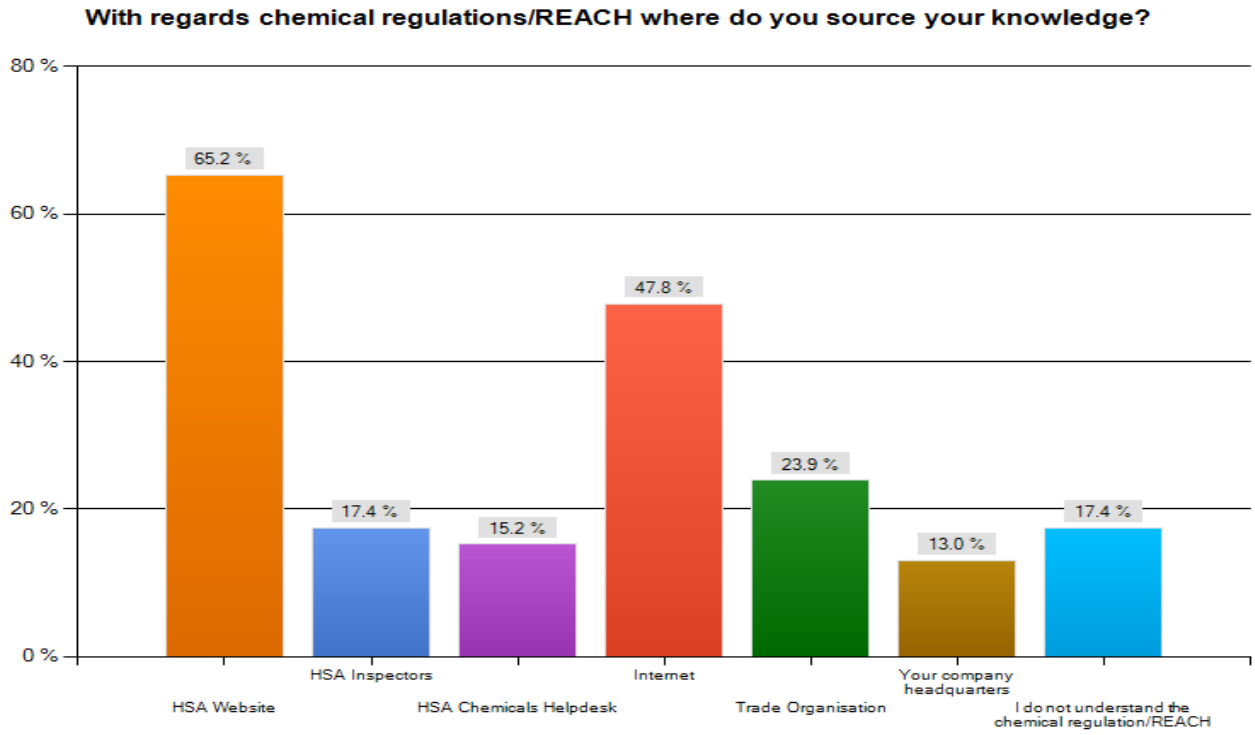
Figure 4.10 Maintenance details of chemicals in the workplace



Sourcing of knowledge regarding chemical regulations/REACH

Survey responses indicate that the majority of respondents, 65%, use the Authority's website to source information on Regulations. 48% use other internet sites, 24% use a trade organisation, 17% gather knowledge from Health and Safety Authority Inspectors, 15% use the Authority's Chemical Helpdesk, 13% use their company headquarters and 17% claim not to understand chemical Regulations/REACH.

Figure 4.11 Sourcing of knowledge regarding chemical regulations/REACH



Summary of results

The following table summarises results received in both the 2007 and 2012 chemical surveys. Although 55% of respondents completed both surveys, it was not possible to undertake a direct comparison between the two, as detailed responses from 2007 were not available due to confidentiality and anonymity of information.

Table 4.1 - Summary of 2007 and 2012 survey results

Chemical Survey	**2007**	**2012**
Number of survey respondents	613	100[4]
Number contacted	1,690	350
Response rate	36%	29%
Repeat respondents (2007 and 2012 survey)		55%
Awareness of chemical usage: Respondents using chemicals	27%	80% (80)
Awareness of the REACH regulation	39%	66% (63)
Where respondents source chemicals:		
-Irish suppliers	80.5%	77% (66)
-Non-EU suppliers	11.2%	13% (11)
-Manufactured in-house	2%	5% (4)
Knowledge of respondent's role in REACH supply chain:		
Not aware of role	44%	22% (20)
Maintenance of chemical details		
-No data recorded	40.8%	26% (21)
-Keep chemical inventory	40.5%	59% (48)
CMR usage		
-Use of carcinogens	5.1% (29)	11.4% (10)
-Use of mutagens	3.1% (13)	3.4% (3)
-Use of reproductive toxins	5% (21)	8% (7)

[4] 80 of the 100 responses received in 2012 were identified as chemical users, with the remaining 20 claiming not to use chemicals in their workplace

5.0 Conclusions

Establish the extent and understanding of chemical usage amongst participants

One of the aims of the survey was to establish the extent and understanding of chemical usage amongst participants. A fundamental assumption of the survey was that all businesses targeted used chemicals to some extent in their workplace. Based on the data obtained, it was established that 80% of respondents did use chemicals on-site, whilst 20% of survey participants claimed not to use chemicals. So it can be concluded that in 2012 the majority of SMEs in the sample did use some form of chemicals in their workplace.

On review of the 20% of respondents who claimed that they did not use any chemicals, 10% stated that they were not using chemicals in the workplace and therefore have no need for knowledge on REACH, CLP or the Candidate List. 6% claimed not to use any chemicals and failed to complete the full survey, while also indicating that they have no need for knowledge on chemical Regulations. 4% stated that they did not use any chemicals in their workplaces. However, it was established that those 4% of respondents were distributors of chemicals and therefore were indeed users of chemicals; they all responded that they did have a high knowledge of chemical legislation. We can conclude that there is a lack of knowledge regarding what is defined as a chemical in the SME sector, especially when other responses are taken into account – 22% did not know their role in the chemical supply chain and 21% were not aware of the REACH Regulation.

Identify the extent to which information on chemical usage in Ireland is monitored and recorded within companies

Participants were asked how they maintained details of the chemicals they deal with. The majority of respondents, 67%, use Safety Data Sheets (SDSs) for all hazardous chemicals on site; 59% maintain a chemical inventory and 43% complete a risk assessment on specific chemicals used in the workplace. So while 67% have SDSs, indicating that they use

chemicals, only 43% complete chemical risk assessments. Therefore, 24% of chemical users do not have any form of chemical risk assessments for chemicals used in the workplace.

Some respondents indicated other forms of recording details such as invoicing and stock control, while 26% did not maintain any details of chemicals on-site. The lack of chemical records/inventory in these businesses may have significant consequences for appropriate chemical safety management. One respondent's comment that their company "only use domestic chemicals – these are suitable for the general public to use" again highlights that there may be a lack of understanding of chemical risk assessment in the workplace for general use chemicals.

Establish the level of knowledge in Irish workplaces of roles in the chemical supply chain

An ability to identify their role in the chemical supply chain is an indicator of the level of chemical safety awareness among participating businesses. 20% of respondents stated that their businesses did not use chemicals, indicating that these businesses do not consider themselves to have any role in the chemical supply chain. It may also indicate, however, that a relatively small percentage of participating SMEs have a low level of understanding of the supply chain role, therefore efforts to raise awareness of positions in the supply chain should be directed towards smaller companies.

66% of respondents considered themselves to be downstream users within the chemical supply chain. 17% of respondents claimed to be distributors. Importers, manufacturers and only representatives (OR) received low responses at 7%, 4% and 2% respectively. 22% of participants admitted to not knowing what role they played in the chemical supply chain. 21% of respondents were not aware of REACH.

When asked where they source their chemicals, 13% of companies stated that they sourced from a non-EU supplier, indicating that they import chemicals. However, looking at the responses provided on role in the supply chain, only 7% of respondents stated that they were importers, with an additional 2% acting as only representatives. Therefore, there may

be a number of companies importing chemicals who are unaware of either their role in the supply chain or their obligations under the legislation.

Gauge the knowledge of REACH in 2012

Since the previous survey in 2007 there has been a five-year gap for companies to increase their knowledge and awareness of the REACH Regulation. When questioned, 66% of respondents indicated that they understood their role under REACH. This figure is very positive and shows an increase compared to figures from the previous survey, which showed that only 39% of respondents were aware of REACH in 2007.

21% indicated that they were not aware of the REACH Regulation in 2012, and another 13% did not understand their role under the Regulation. In conclusion, a total of 34% of respondents have no understanding of REACH or its implication on their business. From the data obtained, it is clear that the Authority should continue to raise awareness of REACH, targeting smaller businesses and, as requested by participants, providing information in simpler terms.

When surveyed on how participants source their knowledge on REACH and other chemical legislation, the majority of respondents indicated that they had obtained their knowledge from Authority sources: 65% used the Authority's website, 17% relied on interaction with the Authority inspectors and 15% used the Authority's Chemicals Helpdesk. Other sources of information were the internet (48%), trade organisations (24%) and company headquarters (13%). 17% of respondents indicated that they did not understand chemical or REACH legislation.

These results indicate that without the Authority's efforts, knowledge of chemical legislation would have been much lower. The Authority has been the most significant provider of information through a combination of communication methods.

Gauge the knowledge of Classification, Labelling and Packaging (CLP) in 2012

The CLP Regulation on the Classification, Labelling and Packaging of substances and mixtures is a relatively new Regulation which aims to protect workers, consumers and the environment by means of labelling which warns of the possible hazardous effects of a particular chemical. It incorporates the GHS classification criteria and labelling rules agreed at UN level and introduces new classification criteria, hazard pictograms and hazard and precautionary statements while taking account of elements which are part of the current EU legislation. It complements the REACH Regulation and will replace the existing system contained in the Dangerous Substances Directive and the Dangerous Preparations Directive by 1st June 2015. It also includes provisions regarding the notification of classifications and labelling elements to establish a classification and labelling inventory.

When surveyed on the new CLP Regulation, 68% of respondents indicated that they were aware of the Regulation and of the new hazard pictograms and labelling statements that it introduces. 32% were not aware of this Regulation. Of those who were aware, 33% had carried out training with employees on the new label format; 67% indicated that they had not provided any form of training. 16% of respondents claimed to have prepared new labels since the introduction of the CLP regulation, while the majority, 84%, had not prepared any. It should be borne in mind that downstream users (66% of respondents) and distributors (17% of respondents) may not yet be required to prepare labels at all. For example, if they are end users, formulators or importers of mixtures, they would not yet be required to prepare new mixture labels according to CLP until June 2015. Additionally, 2% of respondents claim to be only representatives and, as such, are not provided for under the CLP regulation, and therefore have no labelling obligations.

When surveyed on the meaning of certain pictograms which are now present on labels, a high percentage of respondents showed awareness and understanding (70-80%). However, the fact that respondents were in positions of responsibility – managers, health and safety officers etc. – and are likely to be knowledgeable about chemicals as part of their role they may not provide us with an accurate picture of how well informed the employees, i.e. those using and exposed to the chemicals, are. Despite a higher percentage of companies being

aware of the CLP regulation, only a minimal amount of training has been provided, therefore efforts to raise awareness should be targeted at all businesses to encourage training and promote understanding of the pictograms and statements as well as duties under the legislation for employers and employees who use chemicals in the workplace.

Establish the knowledge/awareness of chemicals used in the workplace

Participants were asked to complete questions on the type of chemicals they used, focusing on those chemicals that are considered high risk.

Participants were asked to state whether they used any of a number of chemicals currently on the Authorisation and Candidate Lists. The substances listed in the survey were chosen because they are identified as Substances of Very High Concern (SVHCs) meeting the criteria of persistent, bioaccumulative and toxic (PBT) and/or very persistent, very bioaccumulative (vPvB) for the environment and have therefore been included in the Candidate List for authorisation. As the CLP Regulation does not provided for the formal classification and labelling of substances as PBTs or vPvBs, it is difficult to establish how widely used they are. An analysis of data from the survey relating to use of those specific substances shows a low response rate, with only one respondent claiming to use a substance on the list (Musk xylene, which is used as a fragrance and fragrance enhancer in detergents).

Data relating to the use of substances/mixtures with associated environmental hazard endpoints (H400, H410/R50-53), indicated that the majority of respondents (69%) do not use such chemicals, while almost one-third (31%) claimed to use chemicals classified as dangerous for the environment.

Although it has been established that practically all workplaces in the sample use chemicals to some extent, it is also reasonable to assume that almost all workplaces use some chemicals with associated human health hazards. Consequently, participants were asked whether they used chemicals classified as carcinogens, mutagens, reproductive toxins

(CMRs) and skin and respiratory sensitisers so that the Authority could gauge the prevalence of such high risk chemicals in Irish workplaces.

An analysis of the data reveals that the most commonly encountered high risk chemicals were skin sensitisers (H317/R43), with 47% of respondents claiming to use them, followed by respiratory sensitisers (H334/R42) at 28%. Also reported was the use of Category 1A or 1B (under CLP) Category 1 or 2 CMRs, with use of carcinogens (H350/R45/R49) at 11%, reproductive toxins (H360/R60-R61) at 8% and mutagens (H340/R46) at 3%. This response rate indicates that the majority of Irish SMEs do not use CMR chemicals. However, 50% of respondents claim not to use chemicals under any of these classification groups – this claim could indicate a lack of awareness of human health hazards in smaller workplaces.

Identify the level of knowledge on chemical management

It can be seen from the results of the survey that chemical management in SMEs may still be poor. 26% of participants do not maintain any detailed records of chemicals, and a total of 34% do not understand their role under REACH or are unaware of the Regulation, suggesting that they are not aware of the implications of using chemicals under such Regulations. It can be estimated from the results that approximately 24% of chemical users do not complete any form of chemical risk assessment.

Of those who responded, 32% had no awareness of the CLP regulation and therefore have not completed training with employees on the new pictograms on labels. Of those who were knowledgeable about the Regulation, a high percentage (67%) had not completed training. While the understanding of the meaning of the pictograms was encouraging, whether this represents the true extent of understanding amongst workers remains to be established.

In relation to chemicals classified as higher risk health hazards, 47% of respondents use skin sensitisers and just over a quarter of participants use respiratory sensitisers, both of which are considered a priority health focus within the Authority.

It is usually acknowledged that SMEs in particular have difficulty managing their chemical risks. This may be due to several factors, such as the number of Regulations small companies have to follow or a lack of specialist knowledge concerning health and safety within the company. Such issues surrounding chemical management may have significant consequences in workplaces, as there may be poor safety management measures in place. This is a concern, especially taking into consideration the numbers claiming to use sensitisers and CMRs.

The results of the survey in 2012 indicate a higher level of knowledge of REACH and its obligations than in the 2007 survey. Based on the results, it is clear that the Authority is a valuable source of information for Irish workplaces. It is important that the Authority should continue its work to improve understanding in those areas where knowledge appears to be most lacking so that all companies are aware of their many duties under chemical legislation.

6.0 Recommendations

The conclusions in Section 6 reveal that knowledge and understanding is still deficient in the way chemicals are managed in some Irish workplaces. The following recommendations should be taken into consideration in order to address these issues.

It is recommended that the Authority undertake a chemical safety initiative similar to the BeSMART tool to help change perception and heighten awareness of chemical usage. BeSMART was launched by the Authority as part of the Taking Care of Business initiative for small business. It is a free, easy to use, online tool which can assist small business owners/managers in generating their own risk assessments and safety statement in consultation with their employees, as required under health and safety law.

The general awareness and definition of what a chemical is seems to be unclear in some cases. Therefore, highlighting that even simple cleaning products are classified as chemicals may engage employers and employees to be vigilant about the use of such chemicals. It is imperative that all businesses recognise that chemicals, including basic products such as cleaning agents, require good chemical management.

Within such a campaign consideration should be given to creation of guidance on the completion of a chemical inventory and risk assessment, and the importance of such documents should be emphasised. With the knowledge that a substantial number of survey respondents use chemicals classified as high risk i.e. sensitisers or CMRs, and that 23.5% of those who indicated they used chemicals do not complete a risk assessment, it is vital to stress the importance of risk assessment.

The Authority should consider focusing its awareness-raising campaign on and offering guidance to Irish distributors and retailers, as the majority of respondents are downstream users who source their chemicals from these Irish suppliers (almost 77% of respondents). If distributors and retailers are not well informed on chemical legislation, the vital process of passing information up and down through the supply chain, which is imperative for ensuring the correct risk management measures are implemented, will not take place.

A number of respondents use chemicals classified as carcinogens, mutagens and reproductive toxins (CMRs) – 11% claimed to use carcinogens, 3% mutagenic substances and 8% reproductive toxins. A further 28% use respiratory sensitisers, while the majority of respondents, 47%, use skin sensitisers. These figures are worrying when it can be seen that approximately 23% do not carry out chemical risk assessments and 46% are not aware of the Candidate List. These issues could be an area in which the Authority could develop awareness and guidance to help ensure that Irish workplaces manage and handle chemicals safely .

It is recommended that the Authority consider producing specific simple guidance on the hazards and meanings of the new pictograms for CLP. Continuation of targeted inspection campaigns is also recommended, e.g. targeting companies which use specific substances on the Authorisation List through organised inspections with prepared questionnaires and information for both the inspectors and the companies. In this way inspectors can advise on the issues regarding the authorisation process and, in turn, the knowledge gained by inspectors through participating in such campaigns can be spread to all companies visited.

Continued participation in projects coordinated by ECHA's Forum for the Exchange of Information on Inspection is recommended, as these have the dual benefit of training inspectors in specific areas of REACH and CLP Regulations as well as raising awareness of duties under the legislation in the companies visited. Inspectors are a valuable resource in providing direct advice and information to SMEs, with almost 18% of respondents relying on Health and Safety Authority inspector interaction to source information on chemical legislation; therefore, the more knowledgeable the inspectors are, the more awareness and understanding they can pass on to companies.

Over 65% of participants use the Authority's website to obtain information on chemicals, so the website should be kept user-friendly and informative. Comments received indicated that some companies did not find it easy to obtain clear, simple information. Respondents felt that the legislative language used was too complex or technical to be understood. Continuation of simplified, informative guidance is recommended.

This study gathered information from people who were likely to be knowledgeable about chemicals, such as managers, health and safety officers and environmental officers. It is recommended that a survey on employees and consumers be conducted in order to gather information on their knowledge of chemicals and to establish what training and information has been passed on in workplaces. Such a survey could provide a picture of the true extent of knowledge among those who use and are exposed to chemicals directly. The results of the 2012 survey showed that a significant number of respondents were still unaware of the CLP regulation (almost 32%) and that many of those respondents who were aware had not trained staff regarding the new pictograms and statements. Currently, substances are labelled according to CLP; by mid-2015 all mixtures will also be labelled in accordance with CLP. When surveyed on understanding of CLP pictograms on hazard labels, 78% of respondents understood and were aware of these pictograms and their hazards. However, as stated above, the respondents were likely to be knowledgeable given their position in the company, so these responses may not be a true reflection of the level of understanding among employees. Lack of awareness and training is a serious concern, as many workers may not be informed of the hazards of the chemicals they are working with. Thus, a follow-up survey on the level of comprehension of hazard pictograms would certainly be beneficial. As household cleaning chemicals are so widely used in both workplaces and in the home, a project examining the types and contents of household cleaners available in the Irish marketplace would be useful in determining which cleaning products pose the greatest risk to Irish workers and consumers.

Overall, while the data collected through this survey is helpful, informative and beneficial to the Authority in focusing on the priority policy measures required, one recommendation for future surveys would be to provide an incentive for companies to participate, e.g., by offering free entry to a win a prize upon completion of the survey. It may also be more beneficial to have inspectors gather the required information directly from companies, as the level of co-operation may be greater on a face-to-face basis.

Annex 1 – Survey Questionnaire

Chemical awareness

Thank you for taking the time to complete this survey for the Health and Safety Authority. Your feedback is important to us and will help to us to improve our services. This survey should only take about five minutes of your time. Your individual answers will be completely anonymous and strictly confidential.

1. Company name:

2. What is your main business?

3. Do you use any chemicals on your site?
    - Yes
    - No
    - Don't know

4. Please indicate where you source your chemicals:
    - Manufactured in-house
    - Sourced from an Irish supplier
    - Sourced from an EU supplier
    - Sourced from a non-EU supplier

5. Are you aware of the new Classification, Labelling and Packaging (CLP) Regulations and the new pictogram they introduce on labels?
    - Yes
    - No

- Am not aware of the new CLP Regulations

6. Do you put your own label on chemicals?

   - Yes
   - No

7. Have you prepared any new labels since the introduction of the CLP Regulations?

   - Yes
   - No

8. These are some of the new symbols introduced in the new CLP Regulation, what is your understanding of what the following symbols mean?

_____

_____

_____

9. Under REACH do you know what your role(s) is in the chemical supply chain (it may be more than one)?
    - Manufacturer
    - Importer
    - Only representative (OR)
    - Downstream user
    - Distributor
    - Don't know

10. Do you understand your role in the REACH Regulation?
    - Yes
    - No
    - I am not aware of the REACH Regulation

If No, what aspects do you not understand?

11. Do you know what the Candidate List is?
    - Yes
    - No

12. Does your company use any chemical substance/mixtures that contain substances listed on the Candidate List?
    - Yes
    - No
    - Don't know
    - If yes, please list how many:

13. Does your company use chemical substance/mixtures that contain any of the following substances?
    - Musk xylene (used as a fragrance and fragrance enhancer in detergents)
    - Hexabromocyclododecane (HBCCD) (used as a flame retardant in polystyrene, plastics)
    - Short-Chain Chlorinated Paraffins (SCCPs) (used as a flame retardant in rubber/sealants/textiles and as a plasticiser in paints)
    - Anthracene or coal tar substances (used as a laboratory chemical, the production of pharmaceuticals and for pyrotechnics)
    - 4-tert-Octylphenol (used to make polymers)
    - None of the above

14. Does your company use chemical substances or mixtures that are labelled with the following hazard statements: "Very toxic to aquatic organisms" or "May cause long-term adverse effects in the aquatic environment" (**H400, H410 or R50/53)?**
    - Yes
    - No

    If yes, how many?

15. Does your company use any chemical substance or mixture that are which may fall into one of the following classification groups?
    - Carcinogen – R45/R49/H350 (may cause cancer/may cause cancer by inhalation)
    - Mutagen – R46/H340 (may cause heritable genetic damage/may cause genetic defects)
    - Reproductive Toxin – R60/R61/H360 (may impair fertility/may cause harm to the unborn child/may damage fertility or the unborn child)
    - Respiratory Sensitizer – R42/H334 (may cause sensitisation by inhalation/may cause allergy or asthma symptoms or breathing difficulties if inhaled)

- Skin Sensitizer – R43/H317 (may cause sensitisation by skin contact/may cause an allergic skin reaction)

16. How do you maintain details of the chemicals/ mixtures that you deal with?
    - Do you have a chemical inventory?
    - Do you have SDS for all hazardous chemicals on site?
    - Do you have a specific chemical risk assessment completed for your site?
    - Don't record details of chemicals on site
    - Other – please specify

17. With regard to chemical Regulations/REACH, where do you source your knowledge?
    - HSA Website
    - HSA Inspectors
    - HSA Chemicals Helpdesk
    - Internet
    - Trade organisation
    - Your company headquarters
    - I do not understand chemical Regulations/REACH
    - Other – please specify

Annex 2 – Chemical Survey Telephone Speech

Hello, may I speak with [NAMED CONTACT] please?

If [NAMED CONTACT] is available, confirm that this person is responsible for Health and Safety or Environmental Management and is able to answer some questions on the topic.

If it is not the relevant person, ask:

Can you please tell me who in your company is the most appropriate person to address questions concerning health and safety or chemical management?

My name is Lorna Rabbitte and I'm calling on behalf of the Health and Safety Authority. I work with the Chemical Business Services division in the Authority. I'm currently completing an internship with them, and I am undertaking a review of chemical usage in the workplace. This is a follow-up to the Chemical Usage Survey that the Authority carried out in 2007.

This survey asks questions about the chemicals used in the workplace. It also tries to establish what awareness there is of chemical legislation and what your understanding is of the new labelling and packaging Regulations, CLP.

It's hoped that the results will help the Authority to understand where business employers and employees need assistance in managing their chemicals safely so that we can develop useful supports. The survey or any of its contents will be strictly confidential and will not be used for enforcement.

Would you mind answering a short questionnaire on this topic?

The survey should not take longer than ten minutes of your time. All responses will be completely anonymous and strictly confidential.

The questions are straightforward. I'll just quickly run through them.

Q1–4 are just general questions, such as 'What is your main business?', 'Do you use chemicals?'

Q5–6 are on the REACH Regulation and your understanding of it.

Q7–9 are on the CLP Regulations and new pictograms.

Q10–12 are on the Candidate List and your understanding of it.

Q13–14 are about CMRs and whether you deal with these substances.

Q15–16 look at how you maintain details of your chemicals and where you source your knowledge on chemicals.

It's important to answer honestly. You may not understand some of the questions asked or images presented but we do need your honest answers in order to gain valid results.

You will receive an email in the next few days with instructions of how to complete the questionnaire. Can you please confirm your email address so that we can forward you the link to the online questionnaire? (If you have no email address that is not a problem; we can print you a copy and forward it on in the post. Could you please confirm your postal address?)

On behalf of the Authority I would like to thank you for your time and co-operation. Completing this survey will assist the Authority in putting in place measures to ensure that the safety and health of people is ensured at the highest level possible. If you have any further queries on chemicals/chemical Regulations, please contact the Chemicals Helpdesk by phone on 1890 289 389 or email chemicals@hsa.ie.

Short Explanations:

CLP Regulations:

Classification, labelling and packaging of substances and mixtures; aims to protect workers, consumers and the environment with labelling which reflects possible hazardous effects of a particular chemical. It's a step towards having harmonised classification and labelling worldwide so that everyone will understand the hazards of a chemical.

REACH:

Registration, Evaluation, Authorisation and Restriction of Chemicals; a Regulation designed to manage and control the potential hazards and risks to human health and the environment from the manufacture, import and use of chemicals within the EU.

Candidate List:

A list of substances which present an unacceptable hazard to human health or the environment (substances of very high concern – e.g. cancer-causing chemicals or chemicals that are damaging to the environment). The ultimate aim is to phase out or replace these substances with safer alternatives through the authorisation process.

Annex 3 – Email Invitation

Dear Sir/Madam,

Following on from our conversation, please follow the link below to complete the survey.

It is hoped that the results of this survey will help the Authority to understand where business employers and employees need assistance in managing their chemicals safely so that we can develop useful supports. The survey or any of its contents will be strictly confidential and will not be used for enforcement.

On behalf of the Authority I would like to thank you for your time and co-operation. If you have any further queries on chemicals/chemical Regulations please contact the Chemicals Helpdesk by phone on 1890 289 389 or email chemicals@hsa.ie

Link to Survey: https://www.research.net/s/KCVD5V8

Kind regards

Lorna Rabbitte

Annex 4 – NACE Sectors

Table 1.0 – List of NACE business sectors included in the 2012 survey

Sector Code	Sector Name - Description	No. of Respondents
I 55 - 56	Accommodation and Food Service Activities	
N - 80	Administration and Support Service Activities	
A - 01	Agriculture, Forestry and Fishing	
F - 43	Construction	
P - 85	Education	
K - 66	Financial and Insurance Activities	
Q 86 -87	Human Health and Social Work Activities	
J 58 - 63	Information and Communication	
C 10 - 33	Manufacturing	4
B - 08	Mining and Quarrying	
S - 95	Other Service Activities	
M 71 - 74	Professional, Scientific and Technical Activities	
O - 84	Public Administration and Defence, Compulsory Social Security	
E - 36	Water Supply, Sewerage, Waste Management and Remediation Activities	
G 45 - 47	Wholesale and Retail Trade, Repair of Motor Vehicles and Motorcycles	2