

TRAINING OSH EXPERTS OF THE ROMANIAN COMPETENT AUTHORITIES USING EU LEGISLATION ON CHEMICALS IN PRACTICE

1 General information

Country: Romania.

Available language: Romanian (partly in English).

The **sector covered** in this case study is public administration and defence,

Task covered: not applicable.

Worker groups covered (vulnerable groups): all workers (no specific groups).

The **purpose of this example of good practice** was to provide training on REACH- and CLP-related issues.

The **target group** is safety officers.

2 Initiator/organisations involved

Alexandru Darabont National Research and Development Institute on Occupational Safety (INCDPM), Romania — project coordinator.

University of Oslo, Norway.

Western Norway Research Institute (Vestlandsforskning), Norway.

Norwegian Institute of Public Health, Oslo, Norway.

3 Description of the case

3.1 Introduction/background

Regulations such as REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and CLP (Classification, Labelling and Packaging of substances and mixtures) involve various fields (occupational safety and health (OSH), the environment, public health, consumer protection) and many categories of interested parties while using an abundance of new definitions and scientific terms that may be confusing and impede the overall understanding of the legal texts.

OSH authorities have their own share of duties relating to chemicals legislation. Their staff need to understand — to varying extents, depending on their roles — the scientific aspects behind the legal requirements. This helps them to collaborate with other authorities, understand the basis of the legal developments and risk management measures they are consulted on, and, last but not least, support enterprises in understanding and implementing legal requirements. The role of inspectors at enterprise level is even more important on account of their regular visits within their regions in the territory, an advantage the national REACH and CLP helpdesks do not have since they are not represented at regional level.

The Romanian authorities understood that applying EU regulations on chemicals would require a more complex approach than was common in the past. The CONOSCEDE project was financed by EEA

Grants ⁽¹⁾ (85 %) and Romania (15 %) as part of a programme coordinated by the Ministry of the Environment, which initiated the call for proposals.

3.2 Aims

The CONOSCEDE project aimed to increase the level of knowledge on chemical safety among experts from different authorities working in the fields of OSH, the environment, public health and consumer protection. The partners wanted to develop a common basis for the training with state-of-the-art materials that could be used even after termination of the project. The knowledge and skills improved during the project were meant to help authorities in their work with policy-makers but also in their work with enterprises. Enterprises of all sizes, but especially small and medium-sized enterprises, need support in understanding their duties regarding the REACH and CLP provisions that apply to them. OSH inspectors organise training for enterprises and they are also asked for clarifications during their inspections, for example on the use of derived no-effect levels (DNELs) and occupational exposure limits (OELs) and on the differences between them or on the content of safety data sheets (SDS). Raising awareness among various stakeholders (trade unions, enterprises, non-governmental organisations, and universities that prepare future specialists in chemistry, OSH and toxicology) was also a project goal.

3.3 What was done and how?

Various methods were included, ranging from self-assessment tests, statistics exercises and interpretation of scientific articles to the graduation project. The project included personal mentoring, study visits and meetings with representatives.

3.3.1 Developing training materials

Modern technology was used to improve knowledge and to ease the process of improving understanding of the legislation through training videos, animations, photos and demonstrations.

There was a strong focus on e-learning. E-learning allows the use of video lectures, animations and short films to help participants not only to understand the topics but also to feel more familiar with a subject because they can 'see' what it looks like or how it works. This was particularly important since most of the members of the Romanian authorities have a technical background, while REACH and CLP involve a lot of toxicological information. This type of information was pointed out by participants as difficult to understand, while being impossible to completely avoid. E-learning was also chosen because authorities' members have busy schedules (inspections, visits, travelling, paperwork and meetings), and it allowed them to have a more flexible training schedule. Classroom training was also organised to ensure direct contact between the lecturers and the trainees.

The general approach to the training was agreed in principle by all partners when writing the project proposal. The training materials for the lectures and classes were developed on the basis of the real needs of participants, with special attention to attaining a reasonable balance between theory and practice. The topics were refined according to the participants' needs using questionnaires.

Each partner developed training materials on the areas in which it had the most expertise. The Norwegian Public Health Institute developed the materials on human toxicology and how it is reflected in the indicators used in REACH, CLP and the SDS. The University of Oslo prepared similar materials for ecotoxicology. INCDPM was responsible for the OSH materials, in which a presentation on behalf of the Norwegian OSH Institute (STAMI) was included. Vestlandsforskning developed mainly materials on the life-cycle approach (LCA) mentioned by the chemicals regulations. INCDPM also prepared materials regarding the applicable national legislation, instruments for chemical management, and instruments for multicriteria decisions and statistics (partly subcontracted).

The fact that partners specialising in different fields had to collaborate was a challenge, but this was overcome by their experiences of teaching and of working in multidisciplinary teams.

⁽¹⁾ EEA Grants Romania: <http://www.eeagrants.ro/>

3.3.2 Training sessions

A combination of e-learning, classroom training and study visits — all with their own advantages — was used to train members of the Romanian authorities with duties relating to chemicals. Participants in the training were inspectors from the following three main authorities: the OSH, environment, and public health and consumer protection authorities. The training was organised to allow a mixture of affiliations and backgrounds that would help to encourage collaboration, which was much needed when addressing different problems posed by common legislation. In total, 134 persons were trained, of which 49 were OSH inspectors (the rest belonging to the other previously mentioned authorities). Training needs on two levels — advanced and general — were identified and training sessions were planned accordingly.

3.3.3 Advanced training

Ten of the trainees (of whom three were OSH inspectors) received 6 months of advanced training, 2 weeks of which were spent in Norway. The needs of these trainees were established through a survey; the critical issues the trainees highlighted were toxicology, REACH and CLP implementation and (bio)statistics. The training was intended to improve their ability to participate in the Romanian teams that have to respond to the assignments set by the European Chemicals Agency and other international or national bodies. The training of this group was carried out by high-level Norwegian experts who were partners in the project and who are authors of important studies on chemicals and their management. Practical demonstrations and meetings with representatives of the Norwegian Environmental Agency, STAMI and private enterprises were included in the study visits. OSH-specific aspects, such as derivation of DNELs for workers, workplace exposure scenarios, and the creation and use of chemical safety reports and SDS, were covered in the presentations after more general aspects had been clarified. Analysis of up-to-date scientific articles was used to explain concepts in a given context, develop skills in checking compliance with quality criteria for testing and improve statistical interpretation. In the graduation project that each participant in this group had to deliver before the final examination, the task was to carry out a risk characterisation for certain substances; multidisciplinary project groups were formed to encourage collaboration, while each participant could focus on the most relevant part for her/him (e.g. OSH for OSH inspectors). The Norwegian tutors provided support during the project.

3.3.4 General training

A total of 124 participants (of whom 46 were OSH inspectors) were provided with shorter, more general training (5 days). The course was also a combination of e-learning and classroom teaching. Information on toxicological and other indicators relevant for REACH, CLP and SDS was also presented to this group, but at a more basic level, just to help them understand better their use in the legal texts. One module of this course presented the legislation and had a focus on the REACH, CLP and SDS regulations. Issues that derive from legislation (e.g. from the Candidate List or the Authorisation List) and which should be checked by OSH inspectors when they are visiting enterprises were pointed out. Another module presented tools for chemical management, such as SubsPort (for substitution of chemicals) and Stoffenmanager (for estimating exposures in the workplace).

3.3.5 Awareness raising

Dissemination events, publications and printed materials were developed to raise awareness among interested parties on the importance of better management of chemicals, including of hazardous waste. Conferences, symposiums and workshops were organised, gathering a total of 209 participants. Universities and students were also invited, with the intention of attracting young people to professions related to the management of chemicals.

3.4 What was achieved?

The CONOSCEDE project developed modern training materials focusing on topics of critical interest for the participants in the two types of training (general/advanced). The materials are not available for public

use, but they have already been used by partners for other training programmes and will continue to be used by CONOSCEDE trainees as sources of information to refresh their knowledge.

The project was able to train a substantial number of OSH inspectors specialised in chemistry (almost 10 % of all Romanian OSH inspectors, who have various specialisations, meaning a considerable number of those specialised in chemistry). Some of the participants were trained for the first time on topics such as toxicology, the LCA or statistics during the project. Furthermore, some of the tools presented were not familiar to all the participants (e.g. Stoffenmanager, SubsPort).

One of the participants in the advanced training was promoted from a local OSH substructure to the central body of the labour inspectorate, where he is now in charge of chemicals.

The feedback from the training was very good. The message from one participant was 'I was surprised to see how much I am able to understand now', which shows that, even though it can be difficult to take on so much and such complex information, CONOSCEDE made it a lot easier and more user-friendly.

The impact is hard to estimate at present, but it can be assumed that the project will have the following medium-term results:

- A solid base for further development: participants acquired a solid base on which they can continue to build according to their future needs. CONOSCEDE tried to be realistic as regards the capacity of participants to remember all the details. What was attempted instead was to present participants with a clear structure that could be clearly understood and to which details could be added according to the type and degree of interest of each participant. The CONOSCEDE platform will remain accessible to participants for at least 5 years, which will allow trainees to refresh their knowledge.
- Improved capacity for those trainees who participate in decision-making processes: the training and practical experience improved trainees' capacity to understand data in context and to use them better when consulted. The networking with Norwegian experts will help when asking for a second opinion or support.
- Improved capacity to help enterprises in the implementation of legislation and management tools regarding chemicals: the project not only updated the trainees' OSH-specific information, but also made OSH-related aspects such as toxicology more familiar to them, which improves the ability and confidence of inspectors to discuss legislation like REACH, CLP and SDS with enterprises.
- Consolidated bilateral and national collaboration between different types of authorities based on personal contacts.

3.5 Problems faced

In addition to the challenges that any project has to address in order to achieve useful objectives, there were some problems of an administrative nature.

The most important one was that, although this was not specified in the terms of reference, the participants in the courses were nominated by the authorities, and the resulting group was quite heterogeneous. The project initially proposed its own selection criteria for participants, but plans had to be changed and the training had to address quite a broad variety of participants in terms of interests and levels of knowledge and expertise.

The financial reporting was very detailed. This was a considerable burden, mainly to the Romanian partner (as project leader), but it was felt more keenly by the Norwegian partners, who are used to less bureaucracy.

Organising travel for groups was far more difficult than expected because of the procurement procedure of the project (public selection based on at least three offers) as well as the procedures of travel agencies. Eventually, the procurement procedure of the project had to be changed, because travelling was too important to give up.

3.6 Success factors and challenges

Some of the challenges the project had to face were intrinsic to REACH and CLP and thus expected. REACH and CLP are massive legal texts, and if we consider also the related supporting guidance, they amount to thousands of pages. Unlike other legal texts that refer to a single field (OSH, the environment, consumer protection or public health), REACH and CLP relate to all these fields, which in Romania (and in other countries) are under the jurisdiction of different authorities. Moreover, the regulations require some multidisciplinary ability to understand the scientific and technical elements that are the basis for the rationale behind the legal provisions. This also applies to the newer regulations on biocidal products and SDS. All this can make it hard for the parties involved to find the information they need or be sure of what does not apply in their circumstances. It also raises the issue of collaboration between different authorities and specialists.

Another challenge was the fact that most Romanian OSH inspectors have a technical background. This may be because they have to inspect technical facilities in workplaces. It might also recall the times when engineering measures, most of them 'end-of-pipe solutions', were predominant in OSH.

The availability of the participants for training and travelling was also a challenge and this is one of the reasons why e-learning was chosen.

Finally, the fact that only two of the partners had collaborated before and none of the three Norwegian partners had previously collaborated with the Romanian coordinator was also a challenge, but, after a short period of mutual accommodation, the collaboration worked well, which had a positive influence on the training and tutoring.

Several success factors can be mentioned:

- The project addressed a real problem: central and regional authorities had problems understanding the revised chemical legislation and carrying out their related duties.
- The needs of the participants were assessed at the beginning of the project and were also monitored during the project and taken into account in the training.
- E-learning allowed the use of alternative means of teaching (films, animations), which helped the trainees to understand the issues, become familiar with how things 'look and work', and better remember concepts that are quite complex and were unfamiliar to most of them.
- Self-paced training allowed flexibility (despite some deadlines), which is important for busy working people such as the participants, who have to travel, do paperwork and create reports (
- Training sessions for the short course were organised in each of the eight regions of Romania, limiting the travelling required of participants.
- The number of participants in a group was kept low (generally 10-20) so that more individual attention could be paid to counterbalance the heterogeneity of the participants.
- Participation was free.
- The lecturers were highly experienced experts.
- There was a friendly atmosphere throughout the project (which was even maintained among participants and partners afterwards).
- There was support from the team that coordinated the programme on behalf of the Ministry of Environment, and they were willing to solve problems.

3.7 Transferability

OSH inspectors could use some of the resources and training materials in their own training programmes, as well as in the information campaigns they regularly organise with the participation of enterprises.

The blended approach to the training, which focused on e-learning but also included in-person teaching and tutoring, could be used for other OSH training courses.

The example is easily transferable to any country. The training materials could be translated, although the legal references would need to be amended. Equally important, or even more important, is the way

in which the materials were presented; this approach was the main innovation in such training in Romania and could also be transferred to other countries.

3.8 Costs and/or economic impacts

The overall project costs were approximately EUR 450,000 for a duration of about 15 months (19 May 2015-10 August 2016).

3.9 Evaluation

The case study:

- is transferable to other enterprises/sectors/countries;
- includes all relevant parties, especially those who will be affected by the actions;
- comes from a credible source;
- does not include/contain advertising;
- provides a contact for further information.

3.10 Further information

Contact

Email: laboratorrcb@yahoo.com

About CONOSCEDE: <http://www.conoscede.ro/en>

4 References and resources

BPR — Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products. Available at: <https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr>

CLP — Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures. Available at: <https://echa.europa.eu/regulations/clp/legislation>

REACH — Regulation (EC) No 1907/2006 on Registration, Evaluation, Authorisation and Restriction of Chemicals. Available at: <https://echa.europa.eu/regulations/reach/legislation>

SDS — Commission Regulation (EU) 2015/830 amending Regulation (EC) No 1907/2006. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015R0830>