

EPOH contribution to the consultation regarding the 4th revision of the Carcinogens and Mutagens Directive, CMD (Directive 2004/37/EC)

The European Platform for Occupational Hygiene (EPOH) welcomes the Commission's proposal for a revision of the Carcinogens and Mutagens Directive (CMD) and would like to express its support to the further setting of European occupational exposure limit values (OELVs) for chemical agents of concern at the workplace.

Our comments will not cover the process of OELV setting currently applied in the EU but will focus on implementation of the CMD and the use of OELVs in Occupational Hygiene risk assessments at the workplace.

EPOH Comments

EPOH welcomes the Commission's proposal of establishing binding OELVs for three new substances under the CMD directive. In general, EPOH welcomes the EU Commission's timely and continuing review of high risk substances at the workplace while wishing that continuing transparency in process for OELV setting be ensured. EPOH supports the EU Commission focus on OELV setting and the principle of review and hopes it will continue. EPOH also encourages the EU to continue the waves more regular and to consider more substances.

However, EPOH would like to draw the attention on the fact that transitional periods should be as short as possible. Of course occupational hygienists will take their ethical rules into account and advice their clients for an immediate implementation of the new limit values.

Information from professionals dealing with chemical risk and exposure assessment in workplaces can be crucial in identifying the priority chemical agents. EPOH supports as well the continuous prioritization of substances including for example Metal Working Fluids, which is a significant health hazard highlighted for review by IARC and should be examined as a priority by the EU Commission. In general, EPOH would like to see a prioritization process that takes the recommendations expressed by ACSH and national expert groups into account. Above all, EPOH recommends to consider a risk-based concept of OELV setting. Following this concept, already implemented in several EU member states, for carcinogens without a threshold limit value, a target level and a minimum requirement level concentration should be defined. The target level should be set by means of a concentration that pose an acceptable health risk. For the minimum requirement level socio-economic aspects can be taken into account.

Moreover, EPOH is favorable on the possible inclusion of reproductive toxicants in the Directive, considering a consistent risk assessment approach depending on the availability of OELVs, reliable and adequate measurement methods, thresholds for effect and so on. As more specific chemical agents, such as endocrine disruptors, are also a high risk for workers, another approach can be taken, considering broadening the Chemical Agents Directive (CAD) as starting point. This could lead to a more pragmatic approach with the CAD providing the general requirements for all chemical agents and annexes describe the more specific requirements for groups of chemicals with specific toxicological properties, endpoints and exposure pathways. This approach would also need less resources and put the focus more on the establishment of specific OELVs to help reducing exposure to workers.

EPOH would also like to underline the importance of skin absorption of chemicals, which can be significant. However, the approach of risk management of dermal exposure still presents some lacks: specifically, there are no European occupational limit values available. For these reasons, it is crucial to introduce the current knowledge in the existing directives in order to improve the protection of workers' health.

Conclusions

The European Platform for Occupational Hygiene (EPOH) welcomes the Commission's proposal of establishing binding OELVs for three new substances under the CMD directive.

EPOH welcomes the EU Commission's timely and continuing review of Carcinogens and Mutagens and recommends that transparency in the process of OELVs setting will continuously be assured.

EPOH supports the prioritization of substances, as for example Metal Working Fluids, and would like to see a prioritization process that takes the recommendations expressed by ACSH and national expert groups into account. For carcinogens without a threshold for effect, EPOH recommends to consider a risk-based approach, with a target level and a minimum requirement level concentration, which should take into account an acceptable health risk and socio-economic aspects.

EPOH recommends the inclusion of reproductive toxicants in the Directive, considering a consistent risk assessment approach. EPOH also proposes a possible alternative approach by broadening the CAD for all chemical agents and have annexes to the CAD with specific requirements for groups of chemicals with specific toxicological properties (e.g. carcinogens, mutagens, reprotoxic, endocrine disruptors, etc.). EPOH is also favorable to give more importance to skin absorption of chemicals, working for filling still existing gaps in current approach, for example the lack of European standards.

EPOH believes that the contribution of worldwide researchers and scientific bodies can continue adding value to the standard setting process in Europe.

In conclusion, the EPOH supports the implementation of the proposed CMD including the revised OELVs.

About EPOH

The European platform for Professionals in Occupational Hygiene (EPOH) was set up in 2016. Currently there are eight professional organizations who have representatives in the platform. AEHI – Spain, AIDII - Italy, BOHS - United Kingdom, BSOH – Belgium, DGAH – Germany, NVvA - The Netherlands, SOFHYT - France and SSHT – Switzerland.

The objectives of the EPOH platform are focused on promoting the harmonization of occupational hygiene (OH)-related methods, standards and guidelines and serving as a contact point and discussion partner for European Union (EU) staff/institutions. We also aim to contribute to schemes of training, qualification or certification in OH in the context of a common EU regulation and exchanging OH knowledge and practical field experiences. We also want to strengthen the communication and collaboration between the different European associations and creating more visibility of OH as a profession at European level.