



Managing CMR substances at the workplace



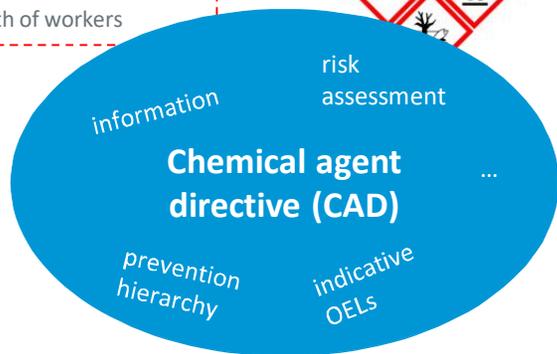
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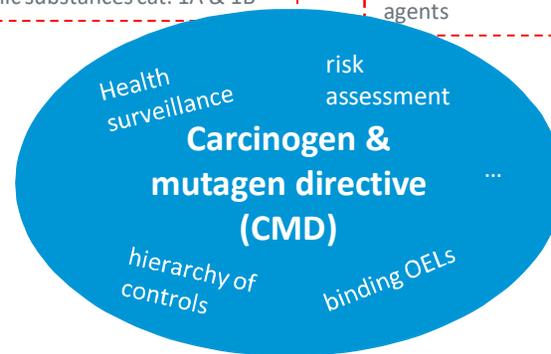
Regulatory framework on chemicals



Any chemical agent because of its physicochemical, chemical or toxicological properties and the way it is used or is present in the workplace, present a risk to the safety and health of workers

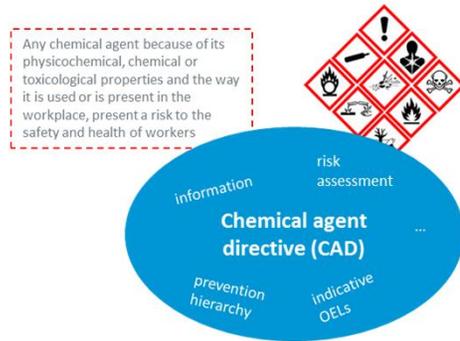


Carcinogenic substances cat. 1A & 1B
Mutagenic substances cat. 1A & 1B
Process generated carcinogenic agents



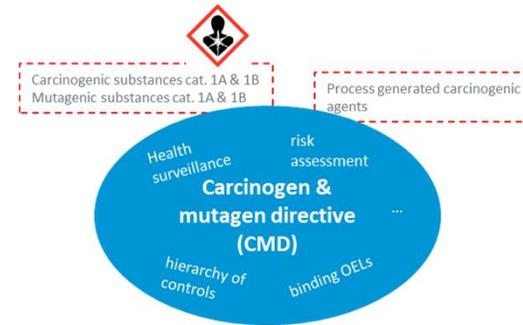
Bulgarian legislation transposing EU legislation

Methods of controlling risks at the workplace



- “ Avoid use of hazardous substances if feasible
- “ Prevent exposure if feasible
- “ Minimise exposure to a level where health risks cease to exist

Occupational exposure limit reflects safe level⁽¹⁾



- “ Substitute CM substances where technical possible
- “ Use CM substances in closed systems where technical possible
- “ Minimise exposure as low as technical achievable

Occupational exposure limit reflects maximum tolerable exposure⁽¹⁾

(1) As a general rule, exemptions are possible

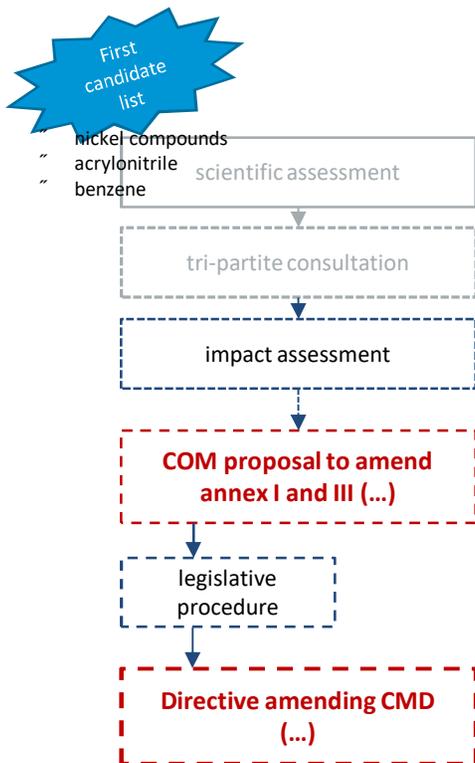
Occupational exposure limits for CM substances



“ Since 2017 24 new OELs have been set

Reference	Number of chemicals covered	Ultimate date for transposition	Legal text
Directive (EU) 2017/2398 (17/12/2017)	13	17/01/2020	 2017_2398
Directive (EU) 2019/130 (16/01/2019)	6	5/02/2021	 2019_130
Directive (EU) 2019/983 (5/06/2019)	5	11/07/2021	 2019_983

Wide exposure limits



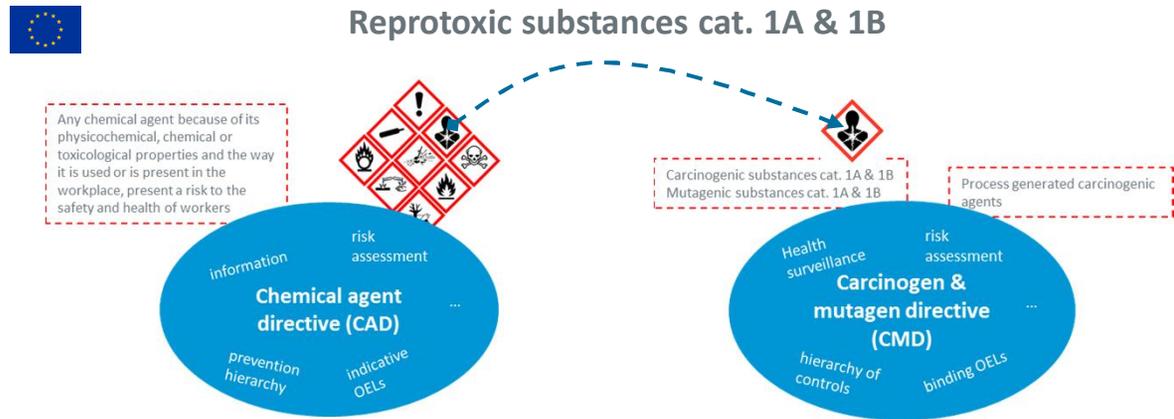
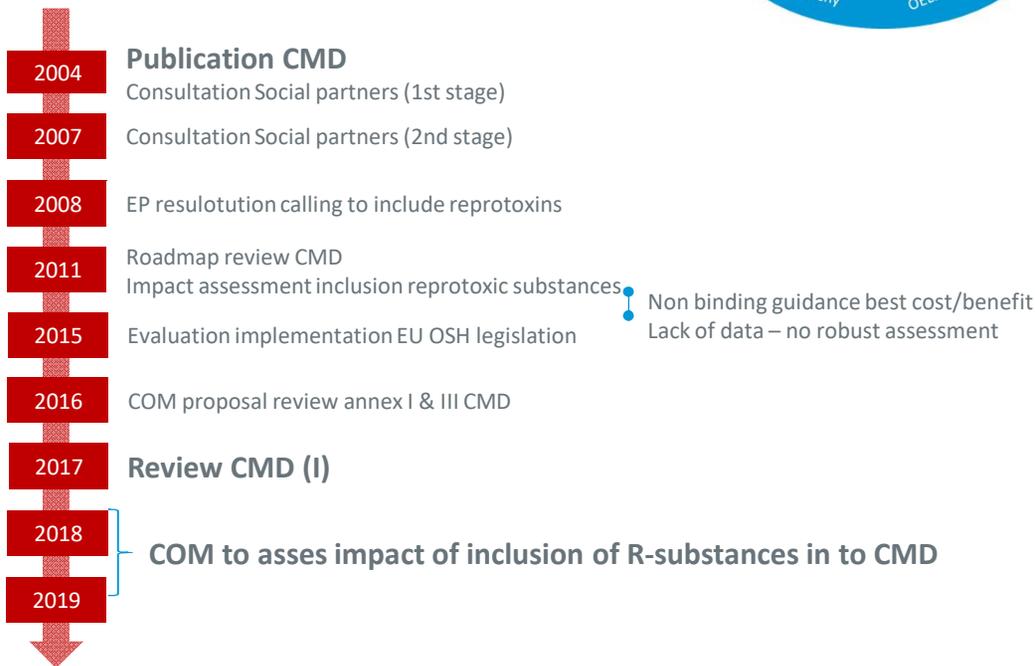
Limits values recommended by the tri-partite advisory body

- “ Benzene
 - 0.5 ppm
 - 0.2 ppm (after 4 years)
 - New review by 2028
- “ Acrylonitrile
 - 0.45 ppm + 1.8 ppm (STEL)
- “ Nickel
 - 0.01 mg/m³ as from 17/1/2025
 - Respirable fraction
 - 0.05 mg/m³ as from 17/1/2025
 - Inhalable fraction
 - Until 17/1/2025 0.1 mg/m³

substances be subject to the same legal obligations?



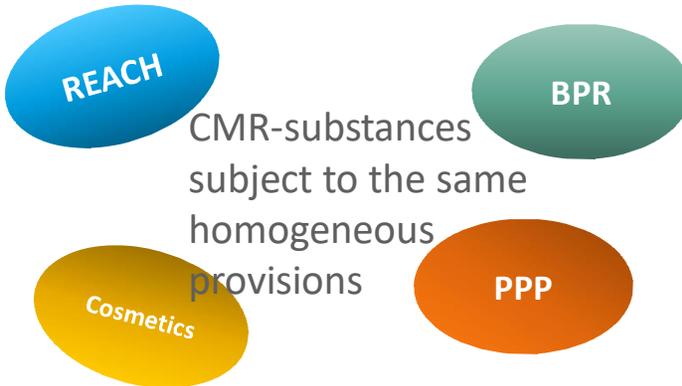
A long standing discussion:



for a harmonised OSH framework?



Legislative coherence at EU level

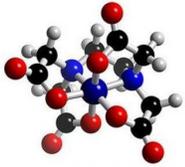


Level playing field across the EU

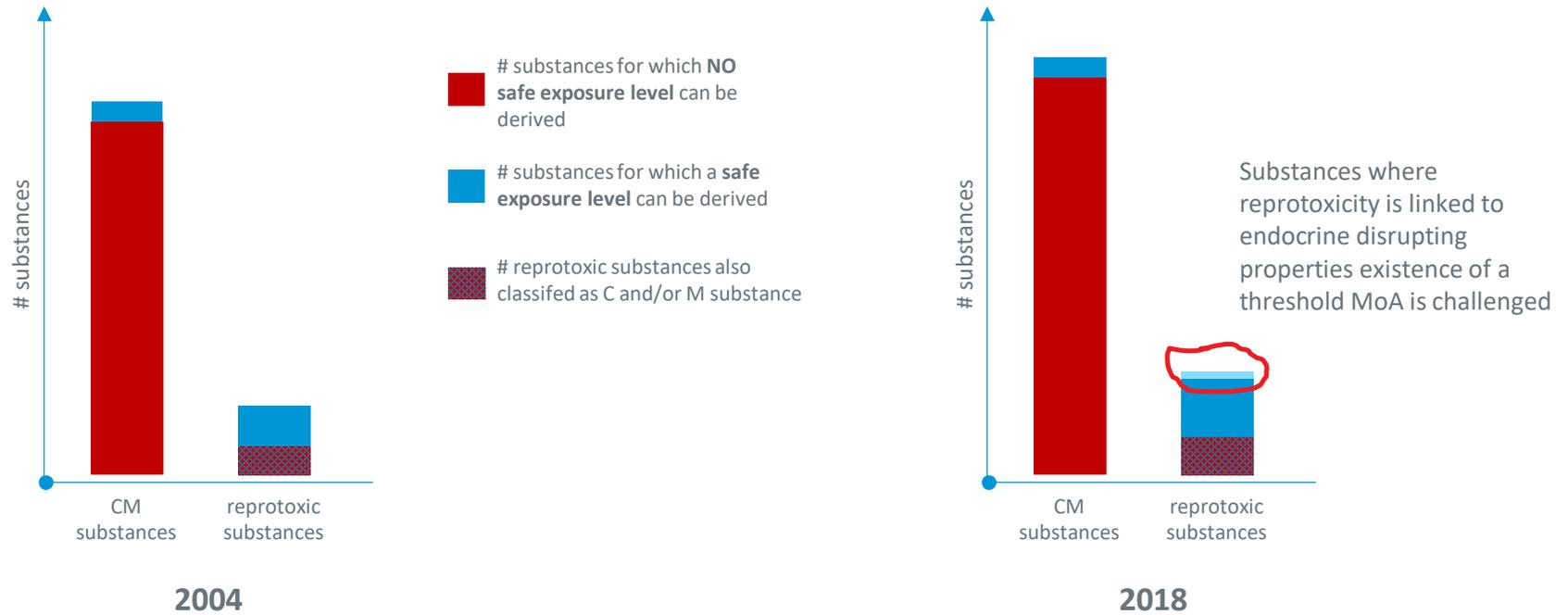


- 1 out of 3 Members States accommodate reprotoxic substances in CM equivalent legislation
- MS having additional requirements for R-substances on top of those imposed by the Chemical Agent Directive.
- Requirements may differ from MS to MS.

for a harmonised OSH framework?



Threshold mode of action reprotoxins is questioned by several stakeholders



n is assessing several options



“ From no change to complete overhaul of current regulatory framework



Overview of the policy options

Option	Extension of CMD to RiA/iB	Merger of CAD & CMD	OSH Guidance	Other changes
O1-: No changes to EU OSH legislation	No	No	No	No
O1: No changes to EU OSH legislation but guidance	No	No	Yes	No
O2: R iA/iB in CMD (no derogations)	Yes: full application	No	Yes	No
O3: R iA/iB in CMD (with derogations)	Yes, but automatically derogated unless/until proven that NT	No	Yes	No
O3+: Cefic/ECEG/ETUC/ IndustriALL declaration	Yes: full application unless/until derogated	No	Yes	OELVs for all RiA/iB T vs NT also for C/M
O4: Merge CAD & CMD	Yes: full application	Yes	Yes	No
O5: Merge CAD & CMD and modernise	Yes: full application	Yes	Yes	Sensitisers Terminology Encourage EU BLVs



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- “ Tri-partite advisory body to advice EU Commission on preferred option
- “ EU Commission to prepare legislative proposal
- “ Timelines are unclear, but change will come