

POSITION STATEMENT
Review of the Binding EU Occupational Exposure Limits for Lead
must be a Priority for DG Employment

EUROBAT and the International Lead Association call upon DG Employment to:

- **request that the Scientific Committee on Occupational Exposure Limits (SCOEL) make a health-based occupational exposure limits review a priority as a first step in reducing the existing EU binding limit values for lead**
- **support any Commission proposal to exempt the industrial use of lead and compounds from REACH authorisation by reference to Article 58(2), considering that long standing Occupational Safety & Health (OSH) legislation already exists to ensure the proper control of any workplace risk related to lead exposure**

Lead has long been recognised as hazardous to the health of workers and well established EU and national OSH legislation already exists to protect workers from the health effects of lead exposure.

Currently lead and inorganic lead compounds are the only substances in the Chemical Agents Directive (98/24/EC) to have an EU binding occupational and biological exposure limit value, supplemented by a mandatory requirement for employers to undertake health surveillance. Member States are required to establish a corresponding national binding biological limit values based on, but not exceeding, that established at EU level. In addition, the Pregnant Workers Directive (92/85 /EEC) protects the health and safety of women in the workplace when pregnant, or after they have recently given birth, and women who are breastfeeding. The Directive also includes specific provisions that are designed to ensure that expectant mothers and those breastfeeding are not exposed to lead.

In 2013, the Advisory Committee on Health & Safety at Work indicated that the current EU binding Occupational and Biological Limit values for lead are now not reflective of the current scientific evidence for health effects in the workplace and that these limits should be reviewed and amended as soon as possible. SCOEL was requested to add lead to its workplan, but given its current workload little progress has been made.

As a result of inactivity in reviewing EU binding limit values for lead, Member States have recently proposed that authorisation of the use of lead compounds under the EU REACH Regulation is required as the OSH legislation no longer affords adequate protection to workers.

However, the EU battery manufacturing and lead producing industry already have well established voluntary lead exposure management programmes that encourage companies to continuously reduce employee occupational lead exposure to levels below that required by regulation and this has resulted in performance that now far exceeds the current EU binding limit value established for lead and inorganic lead compounds.

EUROBAT and ILA therefore believe that it is not proportionate to use REACH authorisation to rectify issues of implementation of EU occupational, health and safety legislation and that, in the case of lead and inorganic lead compounds, the most appropriate course of action is an urgent review of the available science by SCOEL followed by establishment of revised EU wide binding limit values.

For more information please contact:

Bob Tolliday, ILA Communications Manager, tolliday@ila-lead.org tel: +44 (0) 20 7833 8090

Rene Schroeder, EU Affairs Manager, rschroeder@eurobat.org, tel: +32 2 761 1653

About ILA and EUROBAT



ILA is the trusted and authoritative global trade association for the lead industry. Its member companies are at the forefront of lead mining, smelting and recycling and through ILA are working towards a vision of a sustainable global lead industry that is recognised for the positive contribution it makes to society. ILA acts as the secretariat for the Lead REACH Consortium that was established in 2008 to help companies meet their REACH obligations for lead metal, lead chloride, and ten lead compounds covered by the Voluntary Risk Assessment for Lead (VRAL). www.ila-lead.org



EUROBAT is the association for the European manufacturers of automotive, industrial and energy storage batteries. EUROBAT has 52 members from across the continent comprising more than 90% of the automotive and industrial battery industry in Europe. The members and staff work with all stakeholders, such as battery users, governmental organisations and media, to develop new battery solutions in areas of hybrid and electro-mobility as well as grid flexibility and renewable energy storage. www.eurobat.org