

Committee for Socio-economic Analysis (SEAC)

**Response to comments on the SEAC draft
opinion
on the Annex XV dossier proposing
restrictions on
Chromium VI in leather articles**

ECHA/SEAC/RES-O-0000002419-71-02/S2

Chromium VI
EC number: Not applicable
CAS number: Not applicable

8 March 2013

Substance: **Chromium VI in leather articles**
CAS number: **Not applicable**
EC number: **Not applicable**

Comments and response to comments on SEAC draft opinion on Annex XV restriction dossier proposing restriction on **Chromium VI in leather articles**
Annex XV report submitted by Denmark 20 January 2012.
Public consultation on SEAC draft opinion started on 7 December 2012.

Ref	Date Country/ Organisation/ MSCA	Comment	Response
84	2013/02/11 12:21 Denmark/ Individual	<p>Thank you for giving me the opportunity to express my opinion on shoe chromate dermatitis. I'm now 67 years old and have all my life been self-employed and have my own business where I frequently spend 12 hours a day where it is needed for me to walk around and take care of guests and my staff. During the last 11 years I have had a severe dermatitis starting on the feet and later spreading to my hands. I have been diagnosed as allergic to chromate. I have had all available treatments including systemic treatment with Prednisolone for long periods and systemic drugs like chemotherapy. Some of it helps but only for shorter periods. Even if I for the last 10 years have had chrome free shoes I still have severe flare of eczema on both feet and hands. If I had not had my own business I would probably have been out of work or have had prolonged periods with sick leave. My guess is that I would have been on sick leave maybe half of the year. My condition is so that I have small fresh blisters on both feet and hands all the time, and often with deep fissures, which is painful when walking, and 3 to 4 times a year I am treated for secondary infections. I now have some time for leisure activities and I have family around the world. It is difficult for me to fully enjoy my private time e.g. when playing golf and similar activities it is difficult for me because for me because of my continuous dermatitis. I have tried to avoid chrome in shoes but have found it extremely difficult. As a sum up I think that my chrome dermatitis from my shoes in a very significant</p>	<p>Thank you for your opinion. We are very sorry that the proposed restriction may come too late for you, because as you said, for the last 10 years you have been wearing chrome free shoes and it has not helped much. However, from your comment we can see that you are glad for other people who will be spared from the suffering you have to endure.</p>

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		way has affected my quality of life during the last 11 years. In my view it is important to have a regulation of chrome in shoes.	
83	2012/12/27 13:26 Belgium/ Individual	Dear Sir/Madam, I've written an article on this very issue which can be seen at http://www.hsimagazine.com/article.php?article_id=54 This is a great initiative and applaud the direction that this paper takes. As a minimum this has to be adopted however personally this should become listed as a substance of very high concern (svhc) within the REACH framework. I've been working in the Personal Protective business for over 17 years now at national, european and global level and have seen the damage chromium vi does to people.	Thank you for your support on the proposed restriction.
82	2012/12/27 11:31 Italy/ Individual	As actor in the PPE (Personal Protective Equipment) market where the use of leather made gloves is still wide and common (30-40% of the gloves used in the industry [metal manufacturing, welding, etc.]& in the building-construction segments) and where the market controls from the relevant authorities are, at least in Italy, totally absent (exceptions are in Germany and for those PPE sold in DIY shops, monitored by RAPEX), I agree that CR-VI in leather articles should be banned. A new leather glove is, often, used every day or every shift. This give an idea about the proglonged contact with the skin. Reason of this are: 1) the contact with oily/greasy parts - where leather offer a better grip vs. other material, due to the absorption of oil/grease that remain in contact with the skin until the glove is replaced; 2) the poor quality of the average leather glove that limits the life of the product;	Thank you for your support on the proposed restriction.

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		<p>3) the better comfort of leather glove (building-construction); 4) the competitive price of leather made PPE gloves Please note as well that most of the time, at least for light duty activities, the alternative to leather made gloves are synthetic-PU coated (polyurethane) gloves that contains DMF (dimethylformamide) as manufacturing residue.</p>	
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