

Minority position di-isocyanates

While I fully support that there is an unacceptable risk to human health arising from the use of the substance(s) which needs to be addressed across the EU, unfortunately I am not convinced that the proposed conditions as presented will be effective in preventing such exposures.

The premise of the restriction proposal is not to “ban” products containing these substances but to put in place handling measures to prevent or minimise exposure through training and instruction. The obligation to provide training and instruction is a measure that is already provided for in EU legislation under Directive 98/24/EC. I support that the training content outlined in this proposal should be addressed by those using the substances as part of this existing obligation and those placing these products on the market should ensure that sufficient information on the safe handling and use is provided to users. However, the proposed conditions presented in the opinion will be difficult to implement as they are not prescriptive enough in terms of what constitutes harmonised certification of the training across Member States such as for example a requirement for certification as part of an international proficiency training course (like those developed under the International Occupational Hygiene Association) which would be responsible for certifying what constitutes “adequate training”, “training material”, “training providers” or “a recognised dermal assessment tool”.

In addition, even though a threshold for the sensitising effect is not known there is still a need to consider providing an exposure limit with an emphasis on preventing short term exposures in order to reduce occupation exposure to a level that prevents at least symptomatic effects. This is a measure that should be included especially considering there is currently no EU harmonised exposure value and national OELs currently vary between Member States.

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