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Initial comments on proposal of European Commission to establish a new exposure limit for diisocyanates

ISOPA/ALIPA welcome the Commission's proposal to establish a harmonized OEL for diisocyanates in the EU. Today, EU Member States have different OEL levels for individual diisocyanates across the Union. We welcome the approach to establish a level playing field in the EU.

We note that the values proposed by the Commission¹ reflect a consensus on an EU OEL for diisocyanates reached within its Advisory Committee on Safety and Health at work (ACSH) by its representatives from Member State governments, workers' and employers' organisations.

These new values will require a very significant investment in the major part of the value chain, as indicated in the Impact Assessment² accompanying the proposal. The Commission's proposal confirms that additional costs of EUR 13.5 billion are required for industry to adopt to the level of 6 µg NCO/m³ TWA.³ ISOPA/ALIPA therefore consider these values to be the lowest workable solution for the polyurethane value chain to strive towards to achieving zero cases of diisocyanates-induced asthma.

The proposed stepwise transition period is also important to allow the development of mitigation measures and to implement best practices by the EU downstream sectors of polyurethane systems and to enable adaptation to the new limit values in EU Member States.

As stated in the ACSH's opinion, these OEL values have been set in complement to a REACH Restriction (Regulation (EU) 2021/979) which sets out mandatory training requirements for workers handling diisocyanates. We strongly support this combined approach in view of the resulting exposure reduction expected from the implementation of mandatory trainings.

In summary, we believe that the proposed OEL values, in combination with the REACH Restriction's mandatory training for workers, will ensure a framework which fully protects workers, and which represents an important step to achieving zero occupational asthma cases, while taking into account socio-economic and feasibility factors.

¹ The Commission proposes an overall occupational exposure limit of 6µg NCO/m³ and a short-term exposure limit of 12µg NCO/m³. A transitional value of 10 µg NCO/m³ with an associated short-term exposure limit equal to 20 µg NCO/m³ should apply until 31 December 2028.

² Impact Assessment accompanying the Proposal, Table 7, pp. 29-30, <https://ec.europa.eu/social/BlobServlet?docId=26642&langId=en>

³ Commission's Proposal, p. 23.