



From:

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CMD iii Feedback Consultation: Formaldehyde value chain alliance supports COM proposal

Formacare, the Cefic sector group for Formaldehyde, the social partners of the chemical industry, the European Trade Union Confederation as well as formaldehyde users along the value chain strongly support the Commission proposal for the third amendment of the Carcinogens and Mutagens Directive in which Formaldehyde is included. Echoing the joint letter that was signed in 2016 in support of the CMD Revision, the formaldehyde value chain once again strives to build a consensus.

The proposal **harmonizes binding minimum requirements that protects European workers and enables industry to strive in Europe at the same time**. The signatories of this letter are convinced that the recommendations of the Scientific Committee for Occupational Exposure Limits (SCOEL) on which the Commission's proposal is built is the best way to safeguard/ensure worker's safety. Therefore, as listed in the annex of the Commission's proposal, a binding occupational exposure limit of 0,3ppm for a 8-hours time weighted average is in our opinion, the most efficient choice. (0,6ppm for a 15 minutes Short Term Exposure Limit).

As a matter of fact, many of the EU Member States have already implemented a BOEL setting maximum exposure to formaldehyde at 0,3ppm or lower¹. The revision of the European Directive on Carcinogens and Mutagens at work would provide a level-playing field, accelerating the entry into force of what is widely recognized as a safe threshold for workers.

Sincerely,

Sylvain Lefebvre

Esther Lynch

Emma Argutyán-Kahlmeyer

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¹ 14 EU member states currently have BOELs above 0.3 ppm, 10 have BOELs of 0,3 ppm already and 2 have BOELs lower than 0.3 ppm.