



Brussels 31 January 2018

Dear Madam,

Dear Sir,

We would like to draw your attention to the project carried out in the framework of the European Human Biomonitoring for EU (HBM4EU) initiative.

The HBM4EU project, which is a joint 5 years- effort involving 26 countries, the European Environment Agency and the European Commission aims at increasing the availability of human biomonitoring data and at harmonising procedures for the collection and use of such data. More information on HBM4EU can be found here: <https://www.hbm4eu.eu/>. Important to note is that HBM4EU has been prioritising several substances on which to focus on during the project and those include chromium(VI).

As you know, chromium(VI) has been in the regulatory spotlight since hexavalent chromium compounds were authorised under REACH and that Commission has published a proposal to set a binding limit value for hexavalent chromium under EU Directive 2004/37/EC on the protection of workers from the risks related to exposure to carcinogens or mutagens at work (CMD).

Interestingly, in this context, HBM4EU is launching a study that could reconcile the aims of both HBM4EU and the regulatory requirements. The full description of the study is available https://www.hbm4eu.eu/wp-content/uploads/2017/03/HBM4EU_AD8.2_Work_plan_for_chromates_study_v2.0.pdf . Please note that information leaflets in national languages are also available.

As Eurometaux, we see several benefits in the study set up by HBM4EU. The main ones are summarised here below:

- Both the REACH Authorisation regime and the setting of a binding limit value under the CMD require to follow the exposure of workers to hexavalent chromium. This can be done by measuring chromium in the air or in urine. However, while air measurements can report information on the air levels at the workplace, they may not represent the workers real exposure if personal protective equipment is used. On the other hand, traditional biomonitoring methods (urinary chromium) may also overestimate the exposure since it cannot differentiate exposure to hexavalent from the exposure to less hazardous trivalent chromium. The HBM4EU study will explore new biomarkers, which can give a more accurate picture on chromium (VI) exposure.
- All the information created in this study can be used to support exposure assessment e.g. in REACH Authorisation process or under the CMD.
- The study will generate recommendations for the companies for the surveillance of workers and information on the applicability of different monitoring methods in different situations, increasing efficiency and potentially reducing costs.

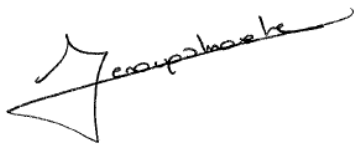


- The study will also cover process-generated fumes like welding fumes, where hexavalent chromium is formed together with less toxic trivalent chromium. The proposed binding limit value in the context of the CMD for welding or plasma-cutting processes or similar work processes that generate fumes is 0.025 mg/m³ until 5 years after the transposition date and after that period the limit will be 0.005 mg/m³. However, some countries also propose biological limit value (BLV) that are quite close to the background of urinary chromium levels in occupationally non-exposed population. Being able to discriminate exposures to both types of chromium may facilitate compliance.

Overall, as Eurometaux, we believe that this study can meet its objective to contribute in building a (better) sound scientific basis for the regulatory EU institutions to set up occupational exposure limits and health based exposure limits. The study will be conducted in following EU countries: UK, Finland, Belgium, Germany, France, Poland, Netherlands, Italy and Portugal and the recruitment of companies is currently on-going. The responsible institutes in each country have a long-standing experience in conducting industrial hygienic and biomonitoring studies at workplaces.

We would therefore strongly encourage you to cooperate with HBM4EU in this study. Please do not hesitate to contact us if you have any further questions.

Kind regards



Violaine Verougstraete