

**COMMENT ON****Call for evidence on scientific assessment of occupational exposure limits (OELs) of Lead and its compounds**

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WVMetalle would like to comment on the call launched by ECHA to support the development of a scientific report on health-based exposure limits at the workplace for Lead and its compounds.

WVMetalle especially raises aspects from German point of view, i.e. the recent national evaluation of the Lead blood limit value, the way to implement this limit value via a Technical Rule and the quite decent database on blood lead levels within workers exposed to lead and its compounds within German Non-Ferrous Metals industry.

Wirtschaftsvereinigung Metalle (WVMetalle), the German Non-Ferrous Metals Association, represents the German Non-Ferrous (NF) metals industry towards politics and economy in order to maintain and establish measures at a very high level. Today, WVMetalle has about 670 member companies, including producers and processors of most base and special metals and compounds including lead metal and lead compounds. WVMetalle is member of the German Industry Association (BDI) and of the European Non-Ferrous Metals Association (Eurometaux).

WVMetalle welcomes the activity to develop proposals for revised EU health-based exposure limits for lead and its compounds. As a member of the DG Employment Working Party Chemicals who will advise the tripartite Advisory Committee on Health & Safety at Work (ACSH) the signee of this comment has actively contributed to the prioritization of the re-evaluation of the existing EU OELs under the Chemicals Agents Directive (CAD).

- The International Lead Association (ILA) and Pb REACH Consortium will provide detailed commentary on health effects, toxicology, epidemiology and modes of action based upon information already contained in the REACH Registration dossiers or the Voluntary Risk Assessment for Lead and Lead Compounds. We therefore abstain from re-submitting this information but would like to express our full support to this information.
- We would like to emphasize that under the umbrella of the German Committee on Hazardous Substances (AGS), a Tripartite Committee advising the Federal Ministry of Labour and Social Affairs (BMAS), a long debate on an update of the national OELs for Lead and its compounds took place recently. Two issues had been assessed. First, the introduction of a limit value on air lead

concentrations and, second, the revision of the current biological limit value. As a result, the Subcommittee III on Hazard Risk Assessment developed a scientific opinion for a health based Biological Limit Value (BGW) which was concluded on at AGS level in Mai 2017. With respect to a limit value for air lead concentrations, the UA III considered the uncertainties in the correlation of blood lead values and an air lead concentrations as so relevant that a scientifically sufficient quality of a corresponding air concentration (AGW) can't be guaranteed. That means that only biomonitoring is considered as scientifically adequate in the case of lead and no air limit value is established. The resulting Biological Limit Value was fixed at 150 µg Pb/l blood. The complete documentation is available (in German language) at the homepage of German competent authority BAuA: <https://www.baua.de/DE/Angebote/Rechtstexte-und-Technische-Regeln/Regelwerk/TRGS/pdf/903/903-blei.pdf?blob=publicationFile&v=3>.

- Germany also recognizes that the envisaged reduction of the blood lead level at workplaces is extremely difficult and needs a thorough analysis of the situation in all affected areas as well as a description of dedicated and state of the art protective measures for relevant uses of Lead and its compounds. Therefore, the recent conclusion on the new Biological Limit Value in Germany for lead in blood to 150 µg/l is not yet legally implemented. The actual biological binding limit values are fixed within the Technical Rule 903 (<https://www.baua.de/DE/Angebote/Rechtstexte-und-Technische-Regeln/Regelwerk/TRGS/pdf/TRGS-903.pdf?blob=publicationFile&v=11>). For Lead a value of 400 µg/l resp. 300 µg/l for women < 45 years is in place and will only be replaced by the reduced value once the revised Technical Rule on Hazardous Substances (TRGS) 505 "Lead" is updated correspondingly. The TRGS 505 is directed to employers and contains special protective measures for uses involving Lead and inorganic Lead compounds as well as mixtures containing Lead. The process to reevaluate the TRGS 505 on Lead started in 2017 and is envisaged to be finalized beginning of next year. WVMetalle emphasizes on this activity as ECHA explicitly requested information on uses and experiences within the call for evidence for the Lead OELs.
- German AGS decided to postpone the reduction of the BGW based on elaborated information from industry and science showing how many efforts are already undertaken at plant level and how long it takes to lower blood lead levels at workplaces. One main German lead producer company presented their case at AGS level followed by a site visit at their primary plant. In addition, WVMetalle presented an overview of the blood lead statistics which is undertaken since many years within German affected Non-ferrous metals industry covering lead primary and secondary producers, battery production, lead sheet and special leaded products producers as well as leaded alloys producer. A summary of the very recent results from that WVMetalle database is compiled in annex 1 of this comment. More detailed graphs are part of the confidential attachments uploaded via the ECHA call of evidence page. Of course, WVMetalle is willing to share further information on that database upon request.

**Berlin, 21<sup>st</sup> June 2019**

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## ANNEX 1

of the WVMetalle comment on the Call for evidence on scientific assessment of occupational exposure limits (OELs) of Lead and its compounds

### Recent results from WVMetalle Blood Lead Evaluation Statistics

#### Blutbleistatistik WVM/GDMB

##### Wesentliche Aspekte des gemeinsamen Abfragebogens:

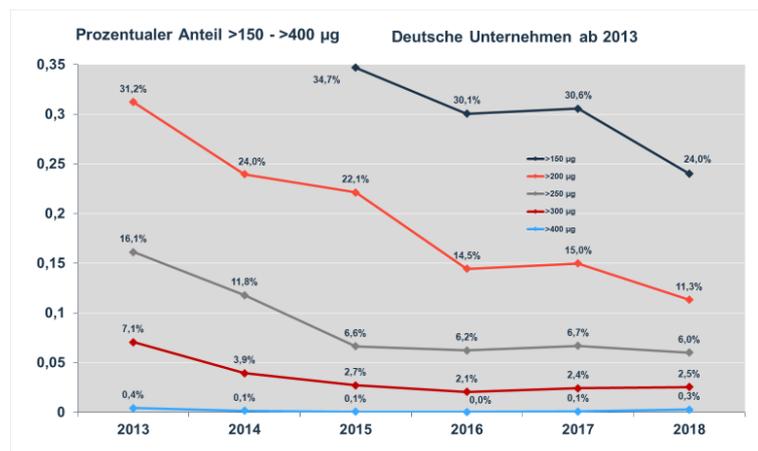
- Abfrage einmal jährlich über WVMetalle oder GDMB
- Detaillierte Erfassung in 50er Schritten
- Keine weitere Unterteilung bei Werten über 500 µg Pb/l Blut
- Erfassung der absoluten Werte und prozentualen Anteile
- Erfassung der Mittleren Blutbleiwerte
- Informationen zu den Mitarbeitern und zu den getroffenen Sicherheits- und Schutzmaßnahmen
- Neu: Auswertung in Perzentilen!

Blutbleistatistik 2018

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