

## Respirable Crystalline Silica Towards an Appropriate Regulatory Solution

### KEY MESSAGES:

- ▶ UEPG, the European Aggregates Association, supports the Position<sup>1</sup> adopted by 19 European organisations<sup>2</sup> in recognition that Respirable Crystalline Silica (RCS) comprises a complex dossier deserving of thorough assessment and a proper regulatory decision. This position focuses on the following points:
- ▶ The best regulatory solution for RCS handling and use at the workplace would be to include a **Binding European OEL of 0.1 mg/m<sup>3</sup> in the Chemical Agents Directive**, taking into account that:
  - The main health risk due to RCS exposure is silicosis and that this should be the primary focus of prevention (ref: SCOEL, 2002); the RCS hazard is expressed through a secondary mechanism
  - Setting a limit value for RCS in the Chemical Agents Directive would be appropriate for such a common exposure at work and in the environment because it would recognise the secondary mechanism and the need to address silicosis, while implementing a standard threshold level (OEL) protecting workers from silicosis throughout Europe
  - The RCS cancer hazard varies widely and is not observed in all industrial sectors. Regulating RCS in the EU Carcinogens at Work Directive would severely & unfairly impact sectors where the hazard does not exist (e.g. coal mines and coal fired plants); has not been observed (e.g. farming, beach life-guarding, etc.); or not observed in absence of silicosis (e.g. quarries, ceramics, etc.)
  - Some of the requirements of the Carcinogens Directive (e.g. substitution) are irrelevant for RCS, therefore the Carcinogens Directive is **not** the suitable regulatory solution for RCS handling and use at the workplace
  - Only certain types of dry processes handling RCS should be regulated at EU level
  - The OEL value must be proportionate to the occupational health risk and be measurable with statistical validity, in order to be implemented effectively.
- ▶ UEPG believes that **prevention is crucial**. This is the focus of the NePSi EU Social Dialogue Agreement on Crystalline Silica Good Handling and Use which, it is widely agreed, provides adequate control measures and workers protection. In reality, the biennial NePSi Reporting provides **unique incentives** to companies to improve continuously the protection of workers.
- ▶ UEPG supports, strongly, the call of the 19 organisations listed below to request that the European Commission and its Committees reconsider the possibility of including the OEL for RCS in the Chemical Agents Directive.

<sup>1</sup> Position Paper online at <http://www.safequarry.com/HotTopic.aspx> Type "Chemical Agents" in Keyword box, then 'Search All'.

<sup>2</sup> BIBM; Cembureau; CEPE; Cerame-Unie; ECI; EFFCM; EMO; ESGA; Eurima; Euroalliages; Eurogypsum; Euromines; Euroroc; Exca; Feve; GlassFibreEurope; Glass for Europe; IMA-Europe; and UEPG.