August 16th, 2017
Memo 1 on the EU OEL for cadmium: We must prepare for the Commission Impact Assessment

International Cadmium Association

Dear all,

We informed you earlier about the recent initiative from the EU Commission to set an Occupational Exposure Limit (OEL) for cadmium in the workplace air. The SCOEL was asked for an opinion which was discussed in the WPC (Working Party on Chemicals). Proposals now go as low as 1µg Cd/m³ (inhalable) which is far lower than the DNEL of 4µg/m³ (respirable) which was set in the REACH registration file (based on the SCOEL recommendation of 2010).

DG Employment has now asked a consultant (RPA) to make a Socio-Economic Impact Assessment (SEA) to calculate societal and industry cost and benefits associated with different possible OEL levels.

RPA has started working and we are meeting with the project manager this coming Friday.

We want to make you aware that this SEA is the last efficient tool we have as an industry to make a convincing case against an unnecessary low value of the OEL. If we don't act now and deliver the appropriate information, the EU will very likely approve an OEL of 1µg Cd/m³ inhalable, which will become mandatory in all EU member states (EU members can set a lower OEL than the one set at EU level, but not a higher limit value).

What ICdA needs from you is the following information.

Early reporting of OCdBIO and OCdAIR (revised templates will be circulated to you next week):

We need to provide to the consultant as thorough a picture as possible of what the current state of our industry is. Special effort is kindly requested from all of you to participate to OCdAIR-5 as participation for OCdAIR-4 was weak relative to OCdBIO-9. If you need support for either OCdBIO or OCdAIR, please revert to Mik Gilles and we will organize additional on-line training).

1. Measure and report to ICdA, by October 8th, **biomonitoring data using OCdBIO-10 template**,
2. Measure and report to ICdA, by October 8th, **workplace air quality using the OCdAIR-5 template**. You will see a few new things in this template:
    - Create a SEG for the maintenance team (required in REACH)
    - Create a SEG for a group of blue collar workers not exposed to Cd, the purpose is to demonstrate "non-exposed really means non-exposed"
    - For each SEG, report the typical number of hours in the working year that workers of this SEG are exposed to Cd. Often teams rotate to other jobs where their exposure to Cd is zero (indicate a % of 1600 hrs rounded to the nearest multiple of 10: 100%, 90%, 60%...)
    - Report the total number of employees located at the facility (from broom sweeper to CEO)

Air quality improvement costs estimates (deadline and format will be supplied to you later this month):

3. Estimate the required investment (CAPEX) and additional operational cost (OPEX) to achieve a certain air quality:
    - CAPEX are new investments including all related studies,
    - OPEX will include electricity, filters, additional air testing, maintenance …
4. The following target air levels are put forward: (note: the limit values below are to be considered as to be met by the 90th percentile of the exposed workers):
    - The REACH dossier DNEL: **4.0 µg Cd/m³ respirable fraction** (= fraction that reaches the lungs)
    - A value which, per some agencies, brings the cancer risk at 4/1000: **1.6 µg Cd/m³ respirable fraction**
    - The value from the 2017 SCOEL opinion: **1.0 µg Cd/m³ inhalable fraction**

From previous impact assessments executed by this consultant, it appears that in absence of industry data, the cost impact to industry tends to be severely underestimated which makes a low OEL easier to settle for.

We urge all of you to take this very seriously and invest in this exercise. A little time and money invested today can be a huge saving tomorrow…

Ideally, each plant should submit information. At the last ICdA Board of Directors meeting, it was suggested that each Cd industry segment should organize itself to have at least an indication of cost per segment. The following segments are suggested:

Segment 1: zinc smelters and cadmium refiners: 11 plants

- Boliden – Kokkola and Odda
- Nyrstar – Auby, Balen, Budel and Overpelt
- Glencore - San Juan DN, Nordenham and Portovesme
- KCM - Plovdiv
- HCM - Miasteczko Slaskie

Segment 2: specialty chemical compound manufacturers: 4 plants

- Flaurea Chemie - Ath
- Bochemie - Bohumin
- 5N+ - Eisenhuttenstadt
- PPM Recyclex - Langelsheim

Segment 3: industrial battery manufacturers: 7 plants

- Saft – Oskarsham, Bordeaux, Ferak, Nersac
- Hoppecke - Brilon
- Enersys/Gaz - Zwickau
- ARTS Energy - Nersac

Segment 4: pigment manufacturers: 2 plants

- JamesMBrown - Fenton
- Huntsman - Kidsgrove

Segment 5: specialty aerospace connectors and fasteners: 7 plants

- Souriau
- Amphenol
- Radiall
- TE/Deutsch
- LISI
- Alcoa
- Aurcad

Segment 6: surface treatment contractors for aerospace & military applications:

- Will be dealt with through with the assistance of the surface treatment trade organizations

Segment 7: others: 4 plants (PV, IR, contact materials…)

- Calyxo – Bitterfeld (PV)
- Sofradir – Veurey (IR detectors)
- Umicore Thin Film – Hanau (contact materials)
- Lamifil – Hemiksem (trolley wire)

Segment 8: recyclers of cadmium containing waste: 7 plants

- SNAM - Viviez
- Euro Dieuze Industrie - Dieuze
- Accurec - Mülheim
- ZM Silesia - Katowice
- Nimetal - Lichoceves
- Metallo - Beerse
- Metallo - Berango

RPA will prepare a questionnaire which can guide you through the process of collecting the required data. However, this questionnaire will not be available earlier than second half of August. However, the timing of the consultant contract with the Commission is very tight, therefore, your input on CAPEX/OPEX will be requested by end of October at the latest.

Thank you for your understanding and your support. Please revert if you have questions.

Mik Gilles: General Manager of ICdA
Patrick de Metz: Chairman of the H&S Ctee
Howard Winbow: Chairman of ICdA