

## **EWA Statement for ECHA on the call for comments and evidence on Occupational exposure limits of welding fumes**

### 1- EWA ( European welding association) Relevance of association

EWA represents the European manufacturers of Welding Equipment, Welding consumables and Health and Safety equipment. EWA members are national welding associations of Germany, Italy and France and also main European producers (including UK and Turkey ). EWA is an association, which represent around 80% of the European production of welding equipment and welding consumables in Europe/ EWA are considered by the European commission as representative of our industry and are regularly consulted for the elaboration of European directives when our industry is involved

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EWA informs regularly the users of welding technology on the risks linked with the welding processes and the adapted protection to be used ( WES : Welding exposure scenario) / last update was done in 2021 June – and can be viewed on the EWA website in 21 European language : <https://european-welding.org/health-safety/>

In the EWA Exposure Scenario, we did add the Use Descriptor System, developed by ECHA, to facilitate the chemical risk assessment and supply chain communication.

EWA exchanges regularly with the IIW (International institute of welding) especially with IIW commission VIII & ( health , safety , environment)

### 2- Welding OSH practice “as is”

The welding industry respects since ever the adaptation of occupational exposure limits (OEL), based on updated medical findings ( or scientific literature regarding health studies on the effects associated with welding and its allied processes). Welding Technology providers are very concerned by the safety of welders , and the exposure of employees to welding fumes has to be reduced continuously. EWA is always recommending that the best protection equipment is strictly used to avoid the risks (individual or collective) .

In Europe we have different dust or welding fume limits among the different member states.

In some countries selective material specific elements in the welding fume are considered and controlled according to their carcinogenic health effect, e.g. Cr VI compounds, oxides from Ni, Cd, Be.

### 3- Potential new OEL for “welding fumes+” under CMD

We have not yet been informed by any European or local authority why the “welding fumes +” (which are welding fumes and fumes from other processes such as plasma cutting and air carbon arc gouging that generates fume in a way that is similar to welding) as process-generated substance of mixed and varying composition shall be ruled under the CMD in the future. We would appreciate receiving this information, to inform accordingly also our members.

As stated above, if medical scientific findings justify such a change in regulation, we expect the welding industry to work toward an efficient implementation in the best interest of its users. To ensure practically the occupational safety of welders, as well as the preservation of workplaces,

value generated and competitive know-how in EU, we recommend consideration of following critical success factors (CSFs);

- a. **Harmonization across EU:** many of our members operate across national borders and should not use different measures for different employees in different EU countries.
- b. **Simplification:** e.g. clear, understandable, measurable and communicable OEL values for the most hazardous substance, less singular elements to be controlled, subsuming of OELs where possible.
- c. **International adequacy:** if new EU OELs would undermatch substantially OELs announced in other globally competitive regions, neither employees nor employers will benefit; exporting workplaces with the hazard and the value generated outside EU is not an option.
- d. **Improve information all over Europe :** of welders and their employers on the risks and ways of protection. To increase the level of training of welders , welding technicians and engineers during their formation period with a regular update/ To have a strict application of the use of protective equipment and fume treatment systems.

**We offer the compelling experience of our members as consultative contribution for the upcoming ECHA processes addressing “welding fume +” related themes.**

#### 4- Industry initiative to reduce welding fume exposures started

EWA is supporting In Germany

- the DVS (German Welding Association) which started 2020 the “REarc welding” initiative, to substantially Reduce Exposures in arc welding. This was industry triggered, intrinsically motivated by responsible care for employees, and before current regulatory changes were announced.
- In a collaborative consortium with welding technology providers and users, with national OSH authorities and institutions, with research and educational centres, unions and trade associations, DVS aims to develop and implement new prevention measures which can reduce hazardous welding emissions already at their source, and as such, are more effective than current practice. The initiative comprises two workstreams, one on “Innovation” and one on “Information”.

EWA will support with interest any other initiative that could be taken by other European institutes in order to improve the protection and safety of welders

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