

EWA Statement on occupational exposure limits of welding fumes

2023 January

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.

Welding and brazing are strategic technology used by a lot of industry in Europe:

- Infrastructure, metallic construction
- Transport equipment (Ships, cars, trains, and planes)
- Energy production equipment (all type of power plants, but also windmills)
- Petro chemical equipment (Extraction platform, pipes- line, pipe mills refinery ..)
- Equipment of other industrial sectors (Food industry, Storage, tanks, waste treatment, earthmoving equipment, military equipment, construction of machines ..)
- Maintenance and repair activity
- Other constructions

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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 viewed on the EWA website in 21 European languages : <https://european-welding.org/health-safety/>**

EWA exchange regularly with the IIW (International institute of welding) and commission VIII (health , safety , environment).

2- Welding OSH practice “as is”

The welding industry respects since decades the adaptation of occupational exposure limits (OEL), based on updated medical findings. Welding Technology providers are very concerned by the safety



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of welders, and the exposure of employees to welding fumes have to be continuously reduced. 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 in 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 been informed that a UK based consultancy firm, see also: <https://rpaltd.co.uk/about>, seems conducting a questionnaire, see also: <https://ec.europa.eu/eusurvey/runner/Welding> (deadline to respond March 3rd, 2023) asking stakeholders’ (among of which obviously also industrially based entities) opinions and feedback on the abovementioned issue.

As stated above, based on the updated scientific medical findings and possible change in regulation, the welding industry represented by EWA will continue to work for an efficient implementation, in the interest of its users, closely with the provisions of EU authorities.

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 cannot 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 and the value generated outside EU is not an option.
- d. **Improve information and training 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. The ways to protect welders exist, but a strict application of the use of protection equipment and fume treatment systems has to be applied.**
- e. **For small and medium sized companies: Implementation of financial support** programs for the improvement of personal protective equipment for welders and implementation of fumes extraction and general ventilation systems.

EWA

45, rue Louis Blanc
FR-92038 PARIS LA DEFENSE CEDEX

SIREN : 752 842 047 - NAF : 9412Z - TVA : FR75 752 842 047

www.european-welding.org



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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 aim 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 has created a new group of European companies producing equipment which improve the health and safety of welders – the main European companies developing fumes extraction systems are part of this new group

A new EWA technical committee dedicated to the health and safety of welders have been created in 2021 and will supply more recommendations to welders in the coming months

EWA has taken contact and made recommendations to the European Welding Federation (EWF) and to the International Institute of Welding (IIW) which are in charge to establish the training program of welders , welding technicians and welding engineers – EWA has expressed its wish to see a significant increase in the time devoted to welder safety and the means to improve it.

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.

Prof. Dr. Emil Schubert / EWA President

Guy Missiaen / EWA General Manager

Vincent Man der Mee / Chairman of EWA technical committee

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