



EUROPEAN COMMISSION
DIRECTORATE-GENERAL HEALTH AND CONSUMER PROTECTION
Directorate C - Scientific Opinions
Unit C2 – Management of Scientific Committees; scientific co-operation and networks
Scientific Committee on Toxicity, Ecotoxicity and the Environment

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**SCIENTIFIC COMMITTEE ON TOXICITY, ECOTOXICITY AND
THE ENVIRONMENT (CSTEE)**

Opinion on the

“Revision of the 1996 Technical Guidance Document (TGD) in support of Commission Directive 93/67/EEC on risk assessment for new notified substances and Commission Regulation (EC) 1488/94 on risk assessment for existing substances [also being extended to provide guidance on risk assessment for biocides under 98/8/EC (excluding human exposure evaluation)]”

submitted for CSTEE opinion on 23 August 2001

Draft revision version on

WORKPLACE EXPOSURE ASSESSMENT

CSTEE opinion expressed by written procedure on 25 January 2002

General comments

This chapter describes, after a general introduction, the methods used to assess the occupational exposure. It is a good description of the use of measured data and/or model estimates, but there is no mention of the importance of comparisons and prioritising between these two categories. This experience is essential for the improvement of both measurement strategies and the models.

Table 1 (page 29) is a very useful summary for the risk characterisation stage, and here the tiered approach is mentioned for the first time in the document. It could have been useful to bring that up also in other sections of the text.

Much of the information now included in annexes could have been included in the main text to improve the readability of the document. As it is now it is often difficult to find the references as these sometimes direct to the main text, in other cases to an annex.

Specific comments

The exposure routes described in section 2.2.2 do not include eye contact. Especially for substances which may have effects on the eyes - this has to be taken into account. The hand-to-mouth and hand-to-eye transfer of the chemical could also be mentioned, even if it is very difficult to estimate this exposure route.

Dermal exposure (page 3) is not only described by the amount per surface area, but also the contact time. Other compounds present, such as water, may also influence the exposure and penetration.

The information needed for the assessment of occupational exposure (page 5) should also include the used volumes, even if such information is not used in the models.

The approach to handle “no detects” from measurements (page 8) can be improved by the use of zero and detection limit. This will give a range, which can be used for the risk characterisation, where the upper limit will give a more conservative result.

In the section on Biological monitoring (pages 23-24) the use of metabolites is not mentioned. If metabolites are measured, the link to the mother substance has to be described as well as formation and degradation rates. The possibility of other precursors also has to be investigated.