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CONSULTATION DOCUMENT

**Second phase consultation of Social Partners under Article 154 TFEU
on revisions of Directive 2004/37/EC to include binding occupational exposure limit
values for additional carcinogens and mutagens**

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1. INTRODUCTION

The purpose of this document is to consult the social partners at EU level, in accordance with Article 154(3) of the Treaty on the Functioning of the European Union (TFEU), on the content of the envisaged Commission proposal concerning revisions of Directive 2004/37/EC of the European Parliament and of the Council on the protection of workers from the risks related to exposure to carcinogens or mutagens at work ('Carcinogens and Mutagens Directive'), and to ask whether they wish to enter into negotiations as provided for by Article 154(4) TFEU.

Occupational cancer is the first cause of work-related deaths in the EU and remains a major concern for all stakeholders. This has also been recognised in the EU Strategic Framework on Health and Safety at Work 2014-2020 (COM(2014) 332 final)¹, which identified a better prevention of work-related diseases, including cancer, as one of the three key challenges in this area. Consequently, the Social Partners and Member States have called for a better protection of workers by establishing additional binding occupational exposure limit values (OELs) in Annex III to the Carcinogens and Mutagens Directive, also in the light of relevant developments such as the list of priority carcinogens established by the European Trade Union Confederation (ETUC)².

The European Parliament³ and the Council⁴ in their feedback on the EU Strategic Framework on Health and Safety at Work also stressed the urgent need to better protect workers against carcinogens or mutagens at the workplace and invited the Commission to consider improvements to the legislation, by reviewing the existing binding occupational limit values and adding new ones.

The Commission further reinforced its commitment to improve workers protection against the exposure to carcinogens or mutagens in its recent Communication "Safer and Healthier Work for All – Modernisation of the EU Occupational Safety and Health Legislation and Policy" (COM(2017) 12 final)⁵. The Commission identified the need to step up the fight against occupational cancer through legislative proposals accompanied by increased guidance and awareness-raising among the top three priorities for action in the area of occupational safety and health.

In this context, this initiative aims to enhance the relevance and the effectiveness of the Carcinogens and Mutagens Directive by establishing binding OELs for certain additional carcinogens, in addition to the previous two proposals that the Commission adopted on 13 May 2016⁶ and 10 January 2017⁷, in view of amending the Carcinogens and Mutagens Directive addressing together 20 substances and mixtures. On 11 July 2017, an agreement has been reached by the representatives of the European Parliament and the Council on the first proposal, which, following confirmation by the European

¹<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014DC0332>

²https://www.etuc.org/sites/www.etuc.org/files/other/files/suggested_50_boel_candidates_-_april_2015.pdf

³Resolution of the European Parliament of 25 November 2015 on the EU Strategic Framework on Health and Safety at Work 2014-2020

⁴ Council conclusions of 5 October 2015 on a new agenda on health and safety at work to foster better working conditions

⁵<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2017:12:FIN>

⁶<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1506506836261&uri=CELEX:52016PC0248>

⁷<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1506506836261&uri=CELEX:52017PC0011>

Parliament and the Council in accordance with Article 294, paragraphs 3 and 4, of the TFEU, will lead to the adoption by the co-legislator of the amendments to the Directive.

On 26 July 2017, the European Social Partners were invited to give their views on the possible direction of EU action in a first phase consultation as provided for under Article 154 TFEU.

Following the responses received, the Commission is now launching a second phase consultation of the Social Partners on the content of a possible proposal, as required under the Treaty.

This document brings together the main results of the first phase consultation and it sets out potential avenues for EU-level action. It is accompanied by an analytical document giving further background information and analysis, on the problem that the Commission aims to address and the objectives of the initiative, a summary of the results of the first phase consultation, a description of the regulatory framework at EU level and the situation in the Member States, the legal basis for EU action, the added value of EU action and the measures that could be considered as possibilities for EU action.

2. FIRST PHASE SOCIAL PARTNER CONSULTATION

In the first phase of the Social Partner Consultation, the Commission has consulted the Social Partners on the approach regarding the third and fourth amendments for the establishment and/or revision of binding occupational limit values in Annex III to the Carcinogens and Mutagens Directive. Social Partners were also consulted on possible other substances/mixtures or processes and/or process-generated substances for inclusion in the next amendments of Annexes I and III to the Carcinogens and Mutagens Directive.

The first phase of social partner consultation closed on 30 September 2017.

2.1 Workers' organisations

Three trade unions replied to the first phase consultation: the European Trade Union Confederation (ETUC), the European Confederation of Independent Trade Unions (CESI), and the European Federation of Building and Woodworkers (EFBWW).

They all acknowledged the importance of the existing legislation; however, their views sometimes differ as to which strategy should be used and which factors should be taken into consideration.

Possible improvements to the EU legal framework

The workers' organisations agreed, broadly, with the issues described in the consultation document and confirmed the importance they attach to protecting workers from the health risks associated with exposure to carcinogens and mutagens. However, ETUC and EFBWW consider it necessary to extend the scope of the Carcinogens and Mutagens Directive to include reprotoxic substances, and to ensure consistency with other policy areas such as public health and environment.

Concerning the approach regarding the third and fourth amendments, for the establishment and/or revision of binding occupational limit values in Annex III to the Carcinogens and Mutagens Directive, ETUC and EFBWW agree with the list of 8 priority substances identified by the Commission. However, both organisations consider that the fourth amendment should be expanded in order to reach the target of 50 binding OELs in 2020. ETUC has proposed a priority list of such substances (see annex 1 of this document). CESI considers that the latest available data need to be used when revising the Carcinogens and Mutagens Directive.

As regards the other substances to be added to Annex III, while CESI suggests that they should be identified on the basis of sound and independent scientific research, ETUC and EFBWW insist, as mentioned above, that 50 substances in Annex III have to be addressed by 2020. After 2020, the process of setting OELs should continue regularly in order to include most of the substances at the workplace. ETUC considers that publishing a multi-annual plan containing the complete list of

substances to be addressed and the deadlines by which OELs are to be defined would greatly increase the predictability of future legislative developments.

With regard to processes and/or process-generated substances set out in Annex I to the Carcinogens and Mutagens Directive, ETUC considers it important to include all process generated substances for which monographs from the International Agency for Research on Cancer (IARC) are available. In this context, ETUC considers that, for example, diesel engine exhaust emissions should also be addressed as soon as possible, while not delaying the Commission's adoption of the third and fourth batches of proposals for revising the Carcinogens and Mutagens Directive. In the ETUC list this substance is indicated as a candidate for the fourth amendment. ETUC also requests a quick review of the OEL for crystalline silica aiming at a new value of 50 µg/m³. EFBWW expressed similar views concerning diesel engine exhaust emissions and crystalline silica. CESI suggested carrying out an in-depth study to identify other process generated substances for inclusion in Annex I of the Carcinogens and Mutagens Directive.

Among other issues, ETUC and EFBWW stressed the need for more consistent and transparent criteria for setting OELs and for better cooperation between the expert groups working on OELs at the EU level as well as in Member States, and that purely health-based OELs should prevail whenever possible. They also proposed that the Senior Labour Inspectors Committee should support the implementation of the Carcinogens and Mutagens Directive, and that European research and development programmes should support research on possible substitution of carcinogens and mutagens. Further, ETUC suggested to take into account multiple exposures and improve the quality of data. In this regard, they consider that the development of databases, involving all Member States, and the improvement and transparency of information sources would facilitate the identification of occupations and activities with higher risk of cancer. CESI and EFBWW considered that legal initiatives should be complemented by other measures, for example, fostering preventative health-oriented behaviour and information on best available technology.

Apart from the revision of the Carcinogens and Mutagens Directive, ETUC and EFBWW suggested to adapt other EU legislation to establish a coherent strategy for fighting occupational cancers, e.g., concerning asbestos, solar radiation, occupational exposure to nanomaterials, occupational exposure to endocrine disruptors and occupational exposure to pesticides. ETUC further mentioned biological agents, electromagnetic fields, ionizing radiation, radon and radon progeny, night work and posted work as well as environmental tobacco smoke.

Willingness to enter into negotiations

The workers' organisations do not want to launch a negotiation procedure pursuant Article 155 TFEU concerning the third and fourth amendment of the Carcinogens and Mutagens Directive and urge the Commission to progress with the revisions.

ETUC indicates, however, that it might wish to discuss complementary issues with employers and seek convergent positions on certain questions.

2.2. Employers' organisations

Four employers' organisations replied to the first phase consultation: BusinessEurope, the European Association of Craft Small and Medium-sized Enterprises (UEAPME), the European Chemical Employers Group (ECEG) and the Council of European Employers of the Metal, Engineering and Technology-based industries (CEEMET).

The employers' organisations supported the objective to effectively protect workers from occupational cancer, including by setting binding OELs at EU level. They consider this is in the interest of workers and businesses and contributes to a level playing field. However, they also raised some concerns about the approach taken when setting such values.

Possible improvements to the EU legal framework

Concerning the issues identified in the consultation paper, the employers' organisations supported the general direction of the Commission to pursue revisions and update of Annexes I and III of the Carcinogens and Mutagens Directive, subject to certain conditions. In their opinion, binding OELs should be set for priority substances only. The process of limit values setting should be based on sound scientific evidence, technical and economic feasibility, socio-economic impact assessment and opinion of the tripartite Advisory Committee on Safety and Health at Work (ACSH), as it is done currently by the Commission. While the employers' organisations considered that the Commission's criteria for prioritising substances are relevant, they suggested that the criteria of technical and economic feasibility should also be included. Such a comprehensive framework would allow identifying and prioritising substances to be addressed in a short- and long-term perspective. BusinessEurope and CEEMET further emphasized that proposing a series of substances on the basis of unofficial lists should be avoided, as should be the setting of arbitrary numerical target of additional binding OELs without clear criteria for prioritisation. In addition, CEEMET expressed the need for EU validated protocols for measuring exposure to hazardous substances in order to ensure better consistency. UEAPME and CEEMET further stressed the need to assess impact on SMEs, in particular on micro-enterprises, in terms of proportionality and feasibility of action, as well as to take account of sectoral differences. The employers' organisations also suggested that consideration should be given expedite the process for setting binding OELs at EU and make it more efficient. There is also a need to ensure coherence with other EU chemicals legislation. They further considered that guides, examples of good practice and other tools can assist in implementing this Directive.

Concerning the third amendment, BusinessEurope overall supported the Commission's approach. Regarding the fourth and subsequent amendments, they stressed that inclusion of specific substances should depend on whether they meet the conditions / criteria mentioned above and whether the preparatory work has been completed. Further they stressed the benefit of recommending Biological Limit Values, where scientifically justified and relevant. ECEG and CEEMET supported the overall process for developing and adopting binding OELs as long as the above criteria and processes are correctly applied. UEAPME, on the other hand, considered that without having seen concrete proposals for limit values it is not possible to take a complete position with regard to this question. They further suggested that the latest available data need to be used when revising the Carcinogens and Mutagens Directive (supported by CEEMET) and that too restrictive limit values could be very burdensome for employers leading to a risk of non-compliance. For example, beryllium, cadmium and formaldehyde play important role in recycling and too low limit values would have negative impact on this sector.

The employers' organisations agreed with the Commission's current approach for periodic revision of Annex III of the Carcinogens and Mutagens Directive, with BusinessEurope and ECEG further reiterating that binding OELs should be established only for those substances which meet the above conditions and which have gone through the necessary preparatory procedures.

UEAPME agreed with the Commission's current approach for periodic revision of Annex I. On the other hand, BusinessEurope considered that further extending Annex I would provide only limited benefit as it is often not clear to which specific substance exposure should be reduced or avoided and to which extent/level. In this respect, BusinessEurope suggested to consider the possibility to move substances already included in Annex I, where relevant, to Annex III, if the chemicals which are responsible for the hazard have been identified. ECEG also was not convinced about the benefit of extending Annex I.

Willingness to enter into negotiations

The employers' organisations consider that the existing preparatory procedures already involve social partners, including in the ACSH consultations. Therefore, they do not want to launch a negotiation procedure pursuant Article 155 TFEU.

That being said, BusinessEurope would welcome discussing in an informal way with the trade unions how the existing preparatory procedures could be made more efficient and smoother. ECEG similarly would welcome such discussions. CEEMET would welcome a further role for sectoral Social Partners in the setting of binding OELs at EU level.

3. PROBLEMS RELATED TO WORKERS PROTECTION FROM THE EXPOSURE TO CARCINOGENS OR MUTAGENS

The key issue that this initiative aims to address is to improve workers protection from the risks related to exposure to carcinogens or mutagens. The recent estimates show that cancer is the biggest killer in the occupational strand with 106 307 fatal cases per year in EU28, followed by circulatory illnesses with 49 462 cases.⁸ Different forms of cancer may be initiated or worsened by the exposure to carcinogenic and/or mutagenic chemical agents at work. Another study⁹ estimates that between 91 500 and 150 500 people were newly diagnosed with cancer in 2012, caused by past exposure to carcinogenic substances at work. 57 700 – 106 500 people died in 2012 as a result of a work-related cancer.

Apart from the significant social and financial burden to those affected by the disease including their families, cancer is also associated with significant costs to society from dealing with cancer (e.g. loss of productivity, cost for social security systems). Recent estimations indicate that the cost of work-related cancers alone amounts to EUR 119.5 billion.⁶

Exposure of workers to carcinogens is significant. For example, concerning substances listed in section 5 of this document - which could be dealt with under a forthcoming third amendment of the Carcinogens and Mutagens Directive - the estimated number of exposed workers reaches 971 000 for formaldehyde, 207 350 for cadmium and its inorganic compounds, 65 000 for beryllium and its inorganic compounds. More information on occupational exposure and adverse health effects for these substances is available in the accompanying analytical document.

Although modern production technologies allowing lower exposures are available, they are not fully used. Wide application of such technologies would allow further reducing occupational exposure to carcinogens or mutagens. For example, exposure to cadmium could be further reduced in plating and coating processes by a higher degree of automation supporting feasibility of the implementation of OELs.

A constant development in scientific and technical evidence in this area requires continued adaptation of the existing legislative framework to further improve workers protection and to ensure level playing field.

4. THE NEED FOR EU ACTION

There is already an EU legislative framework in place in relation to workers protection against carcinogens and mutagens. The Framework Directive (89/391/EEC) lays down general principles for

⁸ EU-OSHA, The economics of OSH, 2017, <https://visualisation.osha.europa.eu/osh-costs#!/>

⁹ The Netherlands National Institute for Public Health and the Environment (RIVM). Work-related cancer in the European Union: Size, impact and options for further prevention, available at: http://rivm.nl/en/Documents_and_publications/Scientific/Reports/2016/mei/Work_related_cancer_in_the_European_Union_Size_impact_and_options_for_further_prevention, p. 11

improving health and safety of workers and is complemented by individual Directives, introducing inter alia provisions related to exposure to dangerous chemicals.

The Carcinogens and Mutagens Directive (2004/37/EC), the Chemical Agents Directive (98/24/EC), the Asbestos Directive (2009/148/EC) and Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals ('REACH') are the main pieces of legislation for the protection of workers from exposure to carcinogens and mutagens substances and/or any hazardous chemicals. The Carcinogens and Mutagens Directive lays down particular minimum requirements in the area of protection of workers from exposure to carcinogens and mutagens at work including limit values. It also indicates that the setting of OELs for particular carcinogens and mutagens is an integral part of the mechanism for protecting workers.

When proposing OELs or definitions of process-generated substances, the Commission draws on various sources of scientific advice. This advice serves as the basis for preparing Commission proposals in consultation with Social Partners and the tripartite Advisory Committee on Safety and Health at Work, and taking into account an analysis of social, economic and environmental impacts.

OELs for specific chemical agents are set in Annex III to the Carcinogens and Mutagens Directive, which currently has limit values for three chemicals.¹⁰ As mentioned above, the Commission adopted two proposals addressing further 20 substances and mixtures, the first of which, addressing 13 substances, is about to be adopted by the European Parliament and the Council.

Rapid scientific developments and technological change play a crucial role in a better understanding of occupational hazards and exposures, and allowing potentially for better prevention and protection. Therefore, there is a need to regularly update the Carcinogens and Mutagens Directive with new or revised OELs.

A number of Member States have established national limit values for specific carcinogenic and mutagenic substances and mixtures. However, the values often differ by orders of magnitude leading not only to unequal workers protection, but also to complex considerations for companies operating across the EU. For example, for 4,4'-Methylene-bis(2-chloroaniline) (MOCA) the values differ by a factor of more than 40 in those Member States which have introduced an OEL. The analytical document provides more details regarding the situation in Member States.

The setting of EU-wide OELs reflecting the latest available scientific evidence is an effective way to ensure the same minimum level of workers protection in all Member States and would contribute to level playing field. Establishing new limit values would provide a common reference point for employers, workers and enforcers. They can also be useful as regards the inclusion of health and safety considerations during the design phase of plants, machineries and processes.

No considerable change in the situation can be expected to occur if the issue is dealt with at Member State level only. Lack of EU action would most likely mean that there will remain Member States where no limit values exist for certain carcinogens or where those values do not ensure adequate workers protection.

5. POSSIBLE AVENUES FOR EU ACTION

In light of the need to constantly improve workers' protection against carcinogens or mutagens and to avoid the harmful consequences of avoidable occupational cancer, after assessing the social partners' replies, the Commission considers that there is a need for further action at EU level.

Legislative action appears an effective policy avenue for achieving binding OELs across the European Union and improving workers protection against carcinogens or mutagens. Binding OELs could be set at a level to decrease the occupational cancer burden, and improve productivity, the internal market

¹⁰<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1506506354537&uri=CELEX:32004L0037>

and competitiveness. The legal requirement of businesses across the European Union to follow these OELs could guarantee the effectiveness of the EU action. On the other hand, businesses would face increasing costs to comply with the OELs, including likely expenses for ventilation systems and personal protective equipment. The magnitude of the costs and benefits of possible OELs would depend on the specific limit values which are proposed taking into account scientific advice, opinion of the tripartite Advisory Committee on Safety and Health at Work and related assessments.

Taking into consideration the above, an appropriate action seems to be a revision of the current EU legislative framework on carcinogens and mutagens by adding new binding occupational limit values for the following chemicals (as already specified in the first phase consultation) in a forthcoming third amendment of the Carcinogens and Mutagens Directive:

- Cadmium and its inorganic compounds that are carcinogens as defined in the Directive
- Beryllium and its inorganic compounds that are carcinogens as defined in the Directive
- Arsenic acid and its salts that are carcinogens as defined in the Directive
- Formaldehyde [CAS No 50-00-0]
- 4,4'-Methylene-bis(2-chloroaniline) (MOCA) [CAS No 101-14-4]

Concerning the above mentioned substances for the third amendment, the Commission would take into account the values / range of values endorsed by the tripartite Advisory Committee on Safety and Health at Work.

For subsequent amendments of the Carcinogens and Mutagens Directive, a first candidate list of the following substances is given consideration:

- Nickel compounds that are carcinogens as defined in the Directive
- Acrylonitrile [CAS No 107-13-1]
- Benzene [CAS No 71-43-2]
- Diesel engine exhaust emissions

As regards diesel engine exhaust emission, which is a complex issue for example in terms of defining exposure and identifying adequate measurement methods, the Commission is continuing its efforts to find the most appropriate action. In this respect, at least two approaches are being explored – to address this mixture as a process generated substance or to take a component-specific approach.

Furthermore, the Commission will give due consideration to further suggestions received during the consultation process:

- Regarding further action on crystalline silica, as suggested by the workers' organisations, for which a compromise was reached between the European Parliament and the Council during the negotiations on the first amendment on the Carcinogens and Mutagens Directive, the Commission will assess the situation as soon as new evidence becomes available.
- As regards addressing reprotoxic substances, suggested by the workers' organisations, during the negotiations between the co-legislators on the first amendment to the Carcinogens and Mutagens Directive it was agreed that the Commission will assess by the first quarter of 2019 the option of amending the scope of this Directive to include reprotoxic substances. In addition, on-going work on the best way to tackle endocrine disrupters is being carried out by the Commission services. This current discussion also includes reflexion on possible options to address reprotoxic substances. Therefore, this issue is not further considered in this consultation paper.

It is to be noted that some of the agents and processes suggested by the workers' organisations fall outside of the scope of the Carcinogens and Mutagens Directive and thus are not considered in this consultation paper.

Further elaboration on the legal, social and economic background of the various possible avenues for EU action is indicated in the analytical document as well as explanations on the different chemicals and selection criteria for prioritisation. In the case that the Commission decides to put forward a legislative proposal, the costs and benefits of the proposed measures will be further assessed. In order to feed the development of the next stage of its work, the Commission would welcome the social partners' views on the potential impact of the measures identified above.

6. NEXT STEPS

The Commission will take into account the results of this consultation in its further work to develop its proposals to improve workers protection against the exposure to carcinogens or mutagens. It will suspend such work if the social partners decide to negotiate between themselves and communicate a decision to do so **within six weeks** of the launch of the second phase consultation. In the event that the social partners do not decide to start negotiations, the Commission will consider bringing forward proposals to modify and / or complement the existing legislation.

7. QUESTIONS TO THE SOCIAL PARTNERS

The Commission therefore seeks the views of the social partners on the following questions:

- What are your views on the possible avenues for EU action, and the elements set out in section 5 of this document?
- Are the social partners willing to enter into negotiations with a view to concluding an agreement with regard to any of the elements set out in section 5 of this document under Article 155 TFEU?

Annex 1: ETUC's list of carcinogens proposed for the fourth amendment (supported by EFBWW)

No.	Substance/group of substances	CAS No.
Candidates for batch 4		
Process generated and legacy substances		
9	Benzo(a)pyrene (Benzo(def)chrysene)	50-32-8
31	Diesel engine exhaust emissions	
42	Leather dust	
46	N-Nitroso diethanolamine (2,2'-(Nitrosoimino)bisethanol)	1116-54-7
47	N-Nitroso diethylamine (Diethylnitrosoamine)	55-18-5
48	N-Nitroso dimethylamine	62-75-9
49	N-Nitroso di-n-propylamine (Nitrosodipropylamine)	621-64-7
51	2,3,4,7,8-Pentachlorodibenzofuran	57117-31-4
53	Polychlorinated biphenyls (PCB)	1336-36-3
61	2,3,7,8-Tetrachlorodibenzopara- dioxin	1746-01-6
new 4/17	Welding fumes	
Substances classified as C1A/1B (or due to be classified)		
1	Acetaldehyde (ethanal)	75-07-0
5	Anthraquinone	84-65-1
12	4,4'-Bis(dimethylamino)-4''- (methylamino)trityl alcohol	561-41-1
17	2-Chloro-1,3-butadiene (Chloroprene)	126-99-8
19	α -Chlorotoluene	100-44-7
21	C.I. Basic Violet 3	548-62-9
22	C.I. Solvent Blue 4	6786-83-0
23	Cobalt compounds classified as C1B	7646-79-9 10124-43-3 ...

25	Poly[(aminophenyl)methyl]- aniline (technical MDA)	25214-70-4
30	1,2-Dichloropropane	78-87-5
new 9/16	1,2-Dihydroxybenzene (pyrocatechol)	120-80-9
32	N,N-Dimethylhydrazine	57-14-7
34	2,3-Epoxypropyl methacrylate (glycidyl methacrylate)	106-91-2
	Ethylene imine	151-56-4
37	Gallium arsenide	1303-00-0
40	Isoprene (2-Methyl-1,3-butadiene)	78-79-5
43	Methylhydrazine	60-34-4
50	2-Nitrotoluene	88-72-2
	4,4-Oxydianiline and its salts	101-80-4
52	Phenolphthalein	77-09-8
54	Potassium bromate	7758-01-2
55	1,3-Propanesultone	1120-71-4
	1,3-Propiolactone (3-propanolide)	57-57-8
58	Quinoline	91-22-5
60	Styrene oxide (Epoxyethyl)benzene)	96-09-3
68	1,2,3-Trichloropropane	96-18-4
CLH process currently under way		
new 2/16	2,2-Bis(bromomethyl)propane-1,3-diol	3296-90-0
14	Butanone oxime	96-29-7
new 6/16	Cobalt metal	7440-48-4
33	1,4-Dioxane	123-91-1
new 4/16	N-(Hydroxymethyl)acrylamide (NMA)	924-42-5
59	Silicone carbide fibres	409-21-2

Numbering of substances:

The numbering of substances in the above tables corresponds to the following publication:
<https://www.etui.org/Publications2/Reports/Carcinogens-that-should-be-subject-to-binding-limits-on-workers-exposure>