

Dr. Tim Bowmer  
Chairman of the Risk Assessment Committee

ECHA  
Annankatu 18  
PO Box 400,  
FI-00121, Helsinki, Finland

7 November, 2017

Subject: Public consultation on OEL for benzene

Dear Dr. Bowmer,

With this letter Concaawe, the scientific division of the European Petroleum Refiners Association, would like to express its concerns on the ECHA/RAC proposal to lower the occupational exposure limit (OEL) for Benzene by 10-fold, to 0.1 ppm.

The current OEL value in Europe of 1 ppm was adopted by Concaawe in 2010 as the Derived Minimal Effect Level (DMEL) to develop the REACH chemical safety assessments for the low-boiling point naphtha's (which covers gasoline and its blending streams) and thereby describing and implementing the operational conditions and risk management measures necessary for safe use by Concaawe member company in their refineries, depots, retail stations.

Concaawe acknowledges that the current EU OEL needs to be updated. However, new scientific evidence, shared with RAC OEL working group, does not support the value proposed by RAC which we consider to be overly conservative and scientifically unjustified.


Whilst we have not directly provided comments on the report via the public consultation process, Concaawe's industrial hygiene and toxicology experts have been actively involved in the development and submission of scientific feedback provided by the Lower Olefins and Aromatics (LOA) consortium. Concaawe endorses the value proposed by LOA (0.4-0.7 ppm) as a scientifically sound alternative OEL, which based on the most current scientific evidence, will protect worker safety.

Concaawe would like to stress that the new RAC proposal will have a major impact to the refining industry and society, which contradicts the conclusion made by RAC in the Benzene OEL report.

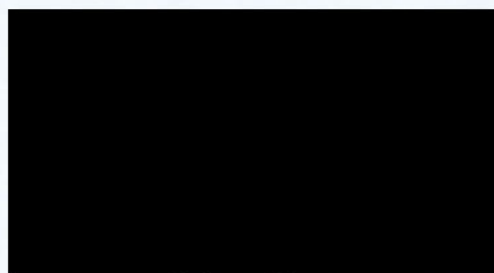
Lastly, we trust that the wealth of relevant information and data generated by Concaawe's scientists, who are considered to be global experts on this topic, will be taken into consideration. This information has been shared with the RAC OEL working group at various occasions.

We remain available for any further clarifying discussion.

Yours sincerely,



PhD, ERT  
Science Executive, Health



Science Director