



Brussels, 2<sup>nd</sup> July 2008  
WC/TM/bg

**Re: Dichloromethane (DCM) in paint strippers and Directive 76/769/EEC**

Dear Member of the Environment Committee,

With a view to the upcoming ENVI vote on amending Council Directive 76/769/EEC as regards restrictions on the marketing and use of certain dangerous substances and preparations, the European Trade Union Confederation (ETUC) would like to share its thoughts on the use of Dichloromethane (DCM) in paint strippers.

As you may know, exposure to DCM released from paint strippers is of concern for human health. According to the Commission, between 1989 and 2007, 18 fatalities and 56 non-fatal injuries have been registered in the EU. Among the 18 fatalities, 9 were for industrial use, 8 for professional use and 1 for consumer use.

In February 2008, the Commission proposed the EU Parliament and the Council to amend Directive 76/769/EEC in order to limit the risks from DCM (COM (2008)0080). For industrial uses, it is proposed to allow DCM-based paint strippers activities under strict conditions only. For professional uses, it is proposed to ban the use of DCM-paint strippers in non-professional setting unless Member States have licensed professionals for those activities. Finally, for consumer uses, a total ban of placing on the market DCM-based paint strippers is proposed.

While ETUC supports the Commission proposals for industrial and consumer uses, we believe that the proposed measures to eliminate the risks to professionals are insufficient. **ETUC believes there should be a complete ban also for professional uses without any possibility for Member States to allow further use by specifically licensed professionals.** The reasons are as follows:

- Professional users of DCM-paint strippers are mainly self-employed workers (painters & decorators) and it would be difficult for Member States to prevent non-licensed professionals from using DCM-based paint strippers;
- Half of the registered deaths linked to the use of DCM-paint strippers are among professional users;
- Various safer alternatives to DCM-based paint strippers are already available on the market ;
- Replacement of DCM-paint strippers by available safer alternatives would be in total coherency with the hierarchy of risk reduction measures laid down in Directive 98/24/EC on the protection of the

- health and safety of workers exposed to chemical agents;
- The complete ban also for professional use would be in line with the impact assessment commissioned by the Commission;
  - A number of European Countries have already put in place national measures to ban or substitute DCM (Austria, Denmark, Sweden)

ETUC therefore asks you to support the amendments tabled on this issue by Mr Carl Schlyter in his draft report dated 16 June 2008.

Thank you in advance for giving your close consideration to this letter.

Yours faithfully,



Walter Cerfeda  
Confederal Secretary