

(GROW)

**Subject:** FW: Flash report - Meeting with ZVO 19.5.2014 10.00-11.00

**From:** (GROW)  
**Sent:** Tuesday, May 19, 2015 6:41 PM  
**To:** (GROW); (GROW); (GROW);  
(GROW); (GROW); GROW I1 CHEMICALS REACH  
**Cc:** (GROW)  
**Subject:** Flash report - Meeting with ZVO 19.5.2014 10.00-11.00

Dear all,

and I met the German association for surface treatment (ZVO) that was represented by  
and

ZVO considers that the sector is over-regulated. Companies have to comply with OSH, REACH and national legislation. ZVO considers that OSH is fit for purpose for the following reasons:

1. Companies know how to work with their substances,
2. OSH is more easy to enforce than REACH.
3. OELs cover more risk than REACH (the example of welding was mentioned).

ZVO considers that OSH allows industry to achieve the same goals (and even more) than REACH with much less efforts and costs.

The consultation on authorisation was mentioned and ZVO underlined that since exposure does not necessarily depends on volume, it made no sense to limit the simplified procedure to low volumes.

We underlined that in the absence of binding OELs at EU level, there was a justification for a EU intervention under REACH. ZVO was informed about the Commission efforts to increase consistency between OSH and REACH and in particular the Commission Workshop on "Managing risks related to chemicals: REACH and OSH legislation" that took place on 18 November 2014. The ongoing fitness check of OSH legislation was also mentioned.

At this stage, ZVO is contemplating whether chromates could be further regulated under OSH (with a view to have binding OELs). ZVO will contact EMPL and national authorities to discuss the idea further.



**European Commission**

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