

**Protecting workers while preserving Europe's Industrial Backbone:  
Industries' Recommendations regarding benzo[a]pyrene in the 6th revision of the CMR Directive**

Joint Industry Statement

Brussels, 12 February 2026

The European aluminium, steel, coal chemical, ferroalloys and silicon, carbon and graphite industries have come together to raise serious concern about the **newly proposed Occupational Exposure Limit Value for benzo[a]pyrene**, as polycyclic aromatic hydrocarbon mixture (PAHs) representative, in the framework of the **Proposal for a Directive of the European Parliament and of the Council amending Directive 2004/37/EC<sup>1</sup> regard to the addition of substances and setting limit values in its Annexes I, III and IIIa<sup>2</sup>**. In its current formulation, the proposed occupational exposure limit value (OELV) for benzo[a]pyrene would **pose a significant risk to the production of several key materials and endanger subsequent supply chains**. If adopted as it stands, **this would increase Europe's reliance on imports of these materials** or even value-added products. Rather than reducing risks, this approach would merely displace them, **shifting the burden to workers and the environment outside the EU** and beyond EU regulatory control.

Due to the nature of the raw materials required for our respective European industrial processes, undesirable and non-intentional exposure to PAHs occurs. Because there are no existing substitutes to raw materials containing PAHs, we are **fully committed to ensuring the protection of our workers and consistently invest in occupational health and safety**. However, in its current form, the proposal does not provide a sufficiently balanced and workable framework for effective implementation by our industries.

To ensure an effective workers' protection while safeguarding European production of strategic and critical raw materials, we urge:

- **Harmonising the rules by ensuring the recognition, in all Member States, of the protective factors attributed to Personal Protective Equipment (PPE) which must be worn by workers when residual exposure occurs.** At present, the recognition of PPEs and their assigned protection factors is explicitly provided for in the legislation of some Member States, while it is absent or inconsistently applied in others. A harmonised EU approach would ensure legal clarity, equal worker protection, and consistent implementation across the Single Market.
- **Extending the transition period from six to ten years to allow industry sufficient time to develop, test, finance, and implement new techniques and technologies.** The extended timeframe would enable technically feasible site improvements, necessary upgrades to Personal Protective Equipment, and appropriate worker training where technological solutions are not possible. Given that the required investments are expected to reach several million euros per site<sup>3</sup>, a longer transition period is essential to spread costs over time and minimise

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<sup>1</sup> Directive 2004/37/EC on carcinogens, mutagens and reprotoxic substances at work

<sup>2</sup> (COM (2025)0418 – C10-0180/2025 – 2025/0232(COD)).

<sup>3</sup> *According to the European Commission's impact assessment for PAH (RPA Final Report V3, 2024), compliance with the proposed OEL of 70 ng/m<sup>3</sup> requires major site-level upgrades (e.g. containment systems, ventilation and process enclosures), reflected in €220 million in first-year adjustment costs and €200 million in recurrent annual costs for companies. Sector analyses show compliance burdens of up to*

impacts on production and operational continuity. In addition, the transition period should encompass all carbon and graphite manufacturers, not just electrode producers, as the entire sector shares the same manufacturing process and supports critical industries such as batteries for EVs and energy storage, components for renewable energy systems, electronics, and defence.

We are operating in a time of heightened geopolitical fragmentation, marked by intensified competition among nations to secure critical resources. Our sectors constitute a core pillar of Europe's industrial base, providing raw materials to Europe's resilience, competitiveness, and security. At a time when the European Union's role and integrity are challenged across the international stage, it is imperative that key industries like ours are not further weakened.



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