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POSITION

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CETS, the European Committee for Surface Treatment, is an international federation of national associations engaged in the supply of technology, chemicals, and paint products to the surface treatment industry. Its purpose is to provide a scientific and engineering voice at the European Union on proposals for environmental, health and safety legislation.

Non-governmental environmental organisations: experts or populists?

In the field of chemical regulations, documents whose scientific soundness does not stand up to simple plausibility tests are repeatedly being circulated. Some of these require a more rigorous inspection to assess their resilience. However, several authors make no secret of their partiality. Self-proclaimed experts make demands and assertions which, if weighed up carefully, lack any attempt at objectivity or scientific validity. Below are some comments by Malte-Matthias Zimmer, Head of the Department for Environmental and Chemical Policy at the Central Association for Surface Technology (ZVO Germany) on a current example.

Recently an open letter from the European Environmental Bureau (EEB)¹ and other NGOs² appeared, addressed to the REACH Committee. It contained various demands for the further processing of the applications for authorisation currently being discussed. The arguments that it presents are worth looking at more closely. First of all, it should be pointed out that the author of the letter is a chemist (according to internet research³). In it she asserts that 85 percent of cancer cases occurring at the workplace are caused by exposure to ten chemicals, including chromium. To ascribe a carcinogenic effect to chromium is at the very least a grossly negligent falsehood. Metallic chromium is harmless to health. What the author means is presumably chromium (VI). But this distinction is not made, since anybody can understand 'chromium', but probably not 'chromium (VI)'. Correspondingly, the intended effect on the undiscerning reader is considerably higher but misleading.

For its figures, the letter refers to a study by the European Trade Union Institute (ETUI)⁴, dating from Oct 2015. This includes a list of the chemicals most frequently causing cancer at the workplace (page 12). Here chromium is indeed listed as the sixteenth of the most significant determining factors (though again, this mainly means chromium (VI)). However, what the EEB letter fails to mention is that this sixteenth place does not account for any significant share of the 85 per cent: the proportion is smaller than 1 percent. According to the study, the vast majority of cancer illnesses are caused by: asbestos, shift work, mineral oils and UV radiation. The tenth place is occupied by tobacco smoke in the air. The two latter causes leave the reader somewhat baffled. UV radiation is actually a general risk in life, and tobacco smoke at the workplace ought to be a thing of the past. The diesel exhausts in sixth place are certainly also difficult to isolate from the omnipresent effects of civilisation. The same is true for mineral oils.

¹ <https://eeb.org/publications/31/chemicals/95247/ngo-letter-reach-committee-on-carcinogenic-chromate-substances.pdf>

² ClientEarth, HEAL, ecologistas en accion, Sepansos, Danish ecological council, Global 2000

³ <https://www.linkedin.com/in/tatiana-santos-853b8212/?originalSubdomain=be>

⁴ <https://www.etui.org/Publications2/Working-Papers/Eliminating-occupational-cancer-in-Europe-and-globally>

As a whole, the study needs to be questioned. It states that industrial jobs have a considerable impact on the incidence of cancer. On page 10 however the fact is overlooked that the proportion of work-related cancer cases amongst the total number of fatal cases in EU countries has remained constant at around 2 percent. A simple internet search⁵ would have revealed this aspect. The fact that the estimated proportion in Ireland seemed to be higher than in Italy should raise doubts in this context.

The ETUI study deserves further criticism: for example, the reference to an outdated paper on cancer-related fatalities dating from 1981 (page 6), which merely contains estimated values. This questionable study, however, was apparently consulted as a reference for the pronouncements of the EEB without being checked.

The author even goes beyond the statements in the study, asserting that 'with more than 100,000 deaths per year, occupational cancers are the leading cause of death in the EU'. This is plainly ridiculous. Of the 5.26 million fatal cases in the EU⁶ in 2017, the proportion was 2 percent, which is hardly the predominant cause of death asserted here. In fact, cardio-vascular disorders continue to occupy first place – by a wide margin.⁷ In Germany they accounted for 39% of all causes of death in 2015, in contrast to 25% for cancer. The total number of cancer-related fatalities in 2017 thus amounted to around 1.3 million. Even the questionably high estimate of 0.1 million work-related cases is no 'leading cause of death' where cancer is concerned. In the EEB's open letter, pure populism is obviously at work. The author also states that providers of alternative technologies have clearly stated that alternatives are available on the market. This is no wonder: these providers could hardly have found a better advertising platform. However, they have never had to deliver any actual proof along the lines of an application for authorisation. The lack of market penetration after many decades of market presence, however, does not indicate any technological breakthrough. This can be recognised even with rudimentary experience of the market and technological implementation.

As a written document to prove the capabilities of alternative technologies, the author refers to an open letter to the Commission from the FIPRA (Alliance of PVD Providers).⁸ This makes comparisons with the environmental scandals revealed in the US in the 1990s. These scandals, however, do not have the least thing in common with the responsible handling of chromium trioxide in the surfacing industry, which has been regulated for years. The reference is out of place, populist and misleading. The EEB's appeal to the REACH Committee is based on these threadbare statements, including some by competing sectors, and comes to the conclusion that: 'The applications for authorisation (AfA) submitted by the applicants do not demonstrate that alternatives are unavailable.' This obviously arbitrary statement has an almost dogmatic air.

It is puzzling that the author has not noticed the lack of fundamental information. And it leads to the question of whether she is aware of the consequences of her demands. Realistic insights can only be gained through practical experience with customers, the market, and complex technical interrelationships. This experience is obviously lacking in the present case. With its demands, the EEB consciously puts at risk the survival of companies in which committed people work and place long-term confidence in the technologies they employ and the products manufactured by them. The employees and their families rely on them. Together with the entrepreneurs, works councils and managers ensure continuity and safety.

The recklessness with which the fate of many people is being influenced here, on the basis of what is not even half-truths, can only be described as irresponsible.

⁵ <https://de.statista.com/statistik/daten/studie/162187/umfrage/sterbefaelle-in-den-eu-laendern/>

⁶ <https://de.statista.com/statistik/daten/studie/354261/umfrage/sterbefaelle-in-eu-und-euro-zone/>

⁷ <https://www.aerzteblatt.de/nachrichten/72563/Herz-Kreislauf-Erkrankungen-und-Krebs-haeufigste-Todesursachen>

⁸ <https://fipra.com/wp-content/uploads/2018/10/A-sustainable-alternative-to-CrVI-Letter-from-the-Alliance-of-PVD-Providers-APP10.pdf>