COMPILED COMMENTS ON OEL CONSULTATION

Comments provided during consultation are made available in the table below as submitted through the web form. Please note that the comments displayed below may have been accompanied by attachments which are listed in this table and included in a zip file if non-confidential. Journal articles are not confidential; however they are not published on the website due to Intellectual Property Rights.

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Last data extracted on 13.12.2021

Substance name: Isoprene EC number: 201-143-3 CAS number: 78-79-5

GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
13.12.2021	Germany	Division 4 - Hazardous Substances and Biological Agents of the Federal Institute of Occupational Safety and Health	National Authority	1

Comment received

Division 4 - Hazardous Substances and Biological Agents of the Federal Institute of Occupational Safety and Health submits the following comments on the draft scientific report of ECHA for evaluation of limit values for isoprene at the workplace.

Chapter 5.3 Occupational exposure, p. 11

The described workplace situation seems to be plausible, although the urgency of deriving a BOELV when reading it is not very obvious:

"... lead to some levels of worker exposure" (p. 11) does not really sound like high exposures. There is no measurement data described in the report for the EU, only US data was referred and ECETOC TRA calculations are listed. Both show no significant exceedances of the proposed OEL (if you take the 90th percentile for the measured values, there is no exceedance for the US data).

Chapter 9.2 Derived Occupational Exposure Limit (OEL) Values, p. 27 ff
The value derived by the ECHA Secretariat corresponds to the German OEL and the MAK value, whereby in Germany a short-term value was derived, which ECHA does not do.

Chapter 9.2 Derived Occupational Exposure Limit (OEL) Values, 9.2.1.1 DFG and AGS, p. 27

Editorial remark: in chapter 9.2.1.1, first sentence, reference is made to the documentation of the MAK-Commission (DFG (2005)). However, it must be DFG (2009).

Date	Country	Organisation	Type of Organisation	Comment
				number

03.12.2021	Belgium	Lower Olefins and Aromatics (LOA)	Company Manufacturer	2
		REACH Consortium		
		VZW		

Comment received

- 1. Agreement with the proposed OEL value.
- 2. Comment concerned with the last paragraph of section 9.2.1.1 page 27.
- 3. Editorial comment on section 7.7.1 page 22.

ECHA note – An attachment was submitted with the comment above. Refer to public attachment LOA Isoprene OEL WG FINAL reply to ECHA RAC 25Nov21.pdf

Date	Country	Organisation	Type of Organisation	Comment number
03.12.2021	Sweden	Nordic Expert Group for Criteria Documentation of Health Risks from Chemicals (NEG)	International NGO	3

Comment received

See attachment

ECHA note – An attachment was submitted with the comment above. Refer to public attachment NEG comments on ECHA Isoprene December 2021.pdf

PUBLIC ATTACHMENTS

- 1. LOA Isoprene OEL WG FINAL reply to ECHA RAC 25Nov21.pdf [Please refer to comment No. 2]
- 2. NEG comments on ECHA Isoprene December 2021.pdf [Please refer to comment No. 3]