

**Submissions from the Public Consultation on  
a draft 2018 Code of Practice for the Safety, Health and Welfare (Chemical Agents) Regulations  
2001  
22<sup>nd</sup> March to 20<sup>th</sup> April 2018  
(4 submissions received)**

<b>Submission 1</b>	
Document Submitted by	Miriam Mcauliffe
Organisation	SKBT
Submission Date	27 April 2018
Document reviewed by Darren Arkins	
<p><b>Subject:</b> OELV for Methylene Chloride</p> <p>Hello</p> <p>I was hoping to seek confirmation on the new proposed OELV for Methylene Chloride (cas # 75-09-2). The draft CoP indicates a reduction in the existing OELV along with including STEL &amp; SK notation , however it appears to be changed from an 8hr OELV of 50ppm to a proposed changed of 100ppm which is an increase ?</p>	
<p><b>Response</b></p> <p>Hi Miriam,</p> <p>Thanks for your comment on the draft Code of Practice re: Methylene Chloride.</p> <p>Yes, you are correct, it is an increase from 50ppm to 100ppm to bring into line with the EU 4th Indicative list Directive 2017/164/EU so we have better harmonisation with other member states. We had indicated the increase in the accompanying Explanatory Note and Analysis documents with the draft CoP.</p> <p>We have had no comments to maintain the 50ppm so it is likely we will adopt the new 100ppm limit value.</p> <p>I hope this answers your query.</p> <p>Regards,</p> <p>Darren</p> <p>Darren Arkins</p> <p>Senior Inspector, Chemicals and Prevention Division</p>	

<b>Submission 2</b>	
Document Submitted by	Susana Planas MunGavin
Organisation	ChemADVISOR
Submission Date	27 Mar 2018
Document reviewed by Darren Arkins	
<p><b>Submission</b></p> <p><b>From:</b> Susana Planas  <b>Sent:</b> 27 March 2018 15:51  <b>To:</b> consultation  <b>Subject:</b> Draft CoP 2018</p> <p>Hello,</p>	

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Could you please indicate whether the OELVs with regards to Cadmium and Cadmium compounds are correctly listed in the in the Draft CoP 2018?

Please see image below with values provided in the Draft Code under Public consultation. As the values in bold represent the new or proposed changed values according to Schedule 2 of the CoP 2016, would the TWA value 0.025 mg/m<sup>3</sup> be withdrawn? The current CoP applies this OELV for Cadmium oxide fume CAS No. 1306-19-0.

Cadmium	231-152-8	<b>7440-43-9</b>	-	0.025
<b>Cadmium and compounds, as Cd.</b>	-	<b>7440-43-9</b>	-	<b>0.01</b> <b>0.002 (R)</b>

Thank you for your kind attention.  
Susana Planas MunGavin  
European EHS Specialist  
ChemADVISOR, a UL Company  
Supply Chain and Sustainability

**Response**

Cadmium entry deleted from draft COP as this was an error.

**Submission 3**

Document Submitted by	Loretta Mathews
Organisation	Janssen Pharmaceutical Sciences UC
Submission Date	18 <sup>th</sup> April 2018
Document reviewed by Darren Arkins	

**Submission**

From: Mathews, Loretta  
Sent: 18 April 2018 11:47  
To: consultation  
Subject: Public Consultation on Code of Practice for the Chemical Agent Regulations

Hi  
Reviewed Draft Code of Practice 2018. Don't mind losing Schedule 3 provided the CAS number remains in Schedule 1, which looks like it is the case.

Regards,  
Loretta

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Loretta Mathews  
Industrial Hygienist  
Janssen Pharmaceutical Sciences UC

**Response**

Agreed that Schedule 3 will be retained in the updated 2018 Code of Practice for reasons outlined in submission 4.

**Submission 4**

Document Submitted by	Imelda Kiely
Organisation	Pfizer Ireland Pharmaceuticals
Submission Date	23 March 2018

**Submission**

From: Kiely, Imelda  
Sent: 23 March 2018 10:39  
To: consultation  
Cc: Walsh, Mary O.  
Subject: Public Consultation on Code of Practice for the Chemical Agent Regulations

Thanks for requesting feedback on the Draft Code of Practice for the Chemical Agent Regulations. I have reviewed the document and have one comment only:

- Re the Proposal to remove Schedule 3 from the document I believe that this will have a negative impact on end users of the document and would request that Schedule 3 should be left in place as an index. This is the first place I and my colleagues go when looking up chemicals as the nomenclature within the Code of Practice can vary from material to material. Having the CAS number available makes it possible to have a quick reference to check is the material in the Code of Practice or not and it saves us a lot of time and is very valuable to us.

Kind regards,

Imelda Kiely  
Occupational Hygiene Team Lead  
EHS Dept  
Pfizer Ireland Pharmaceuticals,

**Response**

Agreed that Schedule 3 will be retained in the updated 2018 Code of Practice for reasons outlined in submission 4.