



Council of the
European Union

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NOTE

From:	General Secretariat of the Council
On:	31 May 2023
To:	Delegations
Subject:	Proposal for a Directive of the European Parliament and of the Council amending Council Directive 981241EC and Directive 20041371EC of the European Parliament and of the Council as regards the limit values for lead and its inorganic compounds and diisocyanates - Renunciation letter from the Committee of Regions (CoR)

Delegations will find attached a renunciation letter from the Committee of Regions on the above proposal.



**European Committee
of the Regions**

The Secretary-General

Brussels, date of official registration
SGCab/GP/dp – D/889 (2023)

Thérèse Blanchet
Secretary-General
Council of the European Union
Rue de la Loi / Wetstraat 175
1049 Bruxelles / Brussel

Dear Secretary-General,

On behalf of the President of the European Committee of the Regions (CoR), Vasco Alves Cordeiro, I would like to thank you for your referral request to the CoR, dated 8 March 2023, regarding the following dossier:

Proposal for a Directive of the European Parliament and of the amending Council Directive 98/24/EC and Directive 2004/37/EC of the European Parliament and of the Council as regards the limit values for lead and its inorganic compounds and diisocyanates – [COM(2023) 71 final].

The CoR's Commission for Social Policy, Education, Employment, Research and Culture (SEDEC) decided at its meeting on 20 April 2023 not to issue an opinion on this proposal and not to include the dossier into the ongoing work of the CoR.

While welcoming the European Commission's proposal for a Directive, the CoR would like to draw the European Commission's attention to the views expressed by the CoR in its *Opinion on [EU Strategic Framework on Health and Safety at Work 2021-2027](#)*, adopted on 26 January 2022. The CoR suggested including substances toxic to reproduction to the list of priority carcinogens. Indeed, given that the proposal for a Directive acknowledges that "lead and its inorganic compounds are key occupational reprotoxicants that can affect both fertility and the development of the fetus and meet the criteria for classification as toxic for reproduction (category 1A)", the CoR believes that reprotoxic substances that meet the EU criteria for classification as category 1A/1B should be placed under the scope of the Carcinogens and Mutagens Directive (CMD), which applies much stricter criteria and binding limit values.

Should you require any further information, please do not hesitate to contact the SEDEC secretariat (sedec@cor.europa.eu).

Yours sincerely,

Petr Blížkovský

Cc : Vasco Alves Cordeiro, President of the European Committee of the Regions
Didier Seeuws, Director-General, GIP – General and Institutional Policy, General Secretariat of the Council of the European Union

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Electronically signed by BLIZKOVSKY Petr on 31/05/2023 08:42