

Summary of the policy options		
Option	Details	Description for consultation
O1: Baseline (no changes to EU OSH legislation)	<p>No changes to EU OSH legislation but exposure may change due to a) other legislation (e.g. REACH, national legislation) and b) market developments.</p> <p>Additional guidance, including OSH 'BREFs'</p>	<p>No change to EU OSH legislation (CAD and CMD)</p> <p>Provision of guidance on best available techniques and interpretation of the CMD/CAD</p>
O2: R 1A/1B in CMD (no derogations)	<p>Inclusion of R1A and 1B chemicals into the scope of the CMD with full application of the requirements in the CMD, including:</p> <ul style="list-style-type: none"> - <u>Substitution</u>: stricter requirement than in the CAD: <ul style="list-style-type: none"> o mandatory whenever workers 'are or are likely to be exposed' o 'risk > slight risk' not a prerequisite - <u>Closed system</u>: second RMM in the hierarchy under the CMD vs. no explicit reference to closed systems in the CAD (except for intermediates); - <u>Reduction of exposure to as low as technically feasible</u>: the CMD assumes that any exposure=risk, therefore threshold substances would be treated as having a risk even at levels below the threshold; - <u>IOELVs for R1A/1B substances would become BOELVs</u>: it is assumed that IOELVs under the CAD for R1A/1B substances would become BOELVs under the CMD; and - <u>Record keeping</u>: Record keeping for at least 40 years would be required for R 1A/1B substances. 	<p>Inclusion of R1A and 1B chemicals into the scope of CMD with full application of the requirements in the CMD</p>
O3: R 1A/1B in CMD but with derogations	<p>Inclusion of R 1A/1B into the scope of the CMD but with derogations from the substitution, closed systems, minimisation and record keeping requirements, unless an EU scientific committee confirms that the substance in question has no threshold for reprotoxic effects.</p>	<p>Inclusion of reprotoxic 1A and 1B chemicals in the scope of the CMD but with derogations from the substitution, closed systems, minimisation and record keeping requirements, unless an EU scientific committee confirms that a substance has no threshold.</p>
O4: Merge CAD & CMD into a single directive but no modernisation	<p>Merging the CMD and CAD into a single directive, applying CMD-equivalent requirements to R1A/1B substances but no further changes:</p> <ul style="list-style-type: none"> - This would effectively be CAD and CMD in parallel but in one document; - Old terminology: Language would not be updated or modernised; 	<p>Merging the CMD and CAD into a single directive, applying CMD-equivalent requirements to R 1A/1B substances</p>

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	<ul style="list-style-type: none"> - CMD-equivalent requirements would apply to CMR 1A/1B substances and CAD requirements would apply to all other substances with a hazard classification. 	
O5: Merge CAD & CMD and modernise	<p>Merging the CMD and CAD into a single directive, applying CMD-equivalent requirements to R1A/1B substances and updating/modernising OSH-related terminology and requirements:</p> <ul style="list-style-type: none"> - CMD-equivalent requirements would apply to CMR 1A/1B substances and CAD-equivalent requirements would apply to other types of hazardous substances; - Skin and respiratory sensitisers would also be subject to CMD-equivalent requirements; - Common terminology for substances subject to CMD-equivalent and CAD-equivalent requirements; - Terminology to be brought into line with REACH; and - Use of BLVs as part of health surveillance would not be mandatory. 	<p>Merging the CMD and CAD into a single directive, applying CMD-equivalent requirements to R 1A/1B substances and updating/modernising OSH-related terminology</p>