



30 March 2026

To: EP EMPL Committee members

Dear Member of the European Parliament's Employment and Social Affairs Committee,

We are writing to express our deep concerns regarding the European Parliament's approach to impose an unfeasible occupational exposure limit value (OEL) for cobalt and its inorganic compounds under the **sixth revision of the Carcinogens, Mutagens and Reprotoxic substances directive (CMRD6)**.

In an already strained global supply environment for critical raw materials, further impacted by ongoing geopolitical tensions, introducing a disproportionately low OEL risks pushing the cobalt industry out of Europe to our main global competitors. Crucially, such a restrictive limit value would create a profound regulatory incoherence, effectively undermining the strategic objectives of both the Industrial Accelerator Act and the Critical Raw Materials Act and thereby reducing Europe's potential avenues to deliver on its ambitious targets for a more circular economy and a defence-ready continent. This would be to the detriment of Europe as a whole as it will not only lead to significant job losses across various sectors in the EU and social dumping to countries with lower protection standards for workers but also exposes the European economy to become overly dependent on China and the USA for its production of cobalt-based goods.

- **We therefore urgently call on the European Parliament not to lower the proposed occupational limit value of 20 µg Co/m³ for the inhalable fraction and 4.2 µg Co/m³ for the respirable fraction for cobalt and its inorganic compounds to 10 µg Co/m³ after the transition period of six years.**

Warning signals from industry clearly indicate that many actors across the value chain will be unable to comply with the limit value of 10 µg/m³ (inhalable fraction) after the transition period of six years or even in the long term. These feasibility issues were only very partially identified during the socio-economic study that preceded the adoption of the opinion by the Advisory Committee on Safety and Health at Work (ACSH). Similarly, the Commission's impact assessment does not sufficiently take into account the technical and economic feasibility of the 10 µg/m³ value. Lastly, the RESourceEU Action Plan clearly underlines that the specific operational realities of the extractive, recycling and processing sectors should be fully considered in the current implementation and possible future revisions of the CMRD.

With the **deadline for amendments** in the EP Employment and Social Affairs Committee scheduled for **14 April**, this is the time for MEPs to support a more proportionate revision of this directive that takes into consideration the EU's commitments set out in the White paper for European defence, the Critical Raw Materials Act, the RESourceEU Action Plan, the Industrial Accelerator Act and the upcoming Circular Economy Act.



Against this background, we draw your attention to [BusinessEurope's position paper on CMRD6](#), and strongly encourage you to take these messages into consideration going forward in the process.

In this respect, BusinessEurope and its member federations are fully committed to ensuring a high level of occupational safety and health standards for all workers and stand ready to collaborate constructively with the European Parliament to ensure that the protection of workers to harmful substances in the workplace on the one hand and support for European companies to maintain their strategic autonomy on the other hand do not become mutually exclusive but can reinforce one another.

Yours sincerely,

Maxime Cerutti
Director Social Affairs
BusinessEurope