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Health and Safety Support Unit

26th September, 2008

Richard Pedersen
International Chemicals Unit
Health and Safety Executive
Rose Court
2 Southwark Bridge
London SE1 9HS

Dear Mr Pederson

European Commission proposal on dichloromethane based paint strippers

This response is submitted by Unite the union. Unite is the UK's largest trade union with 2 million members across the private and public sectors. The union's members work in a range of industries including manufacturing, financial services, print, media, construction, transport and local government, education, health and not for profit sectors.

Unite is in support of the EU proposal and would urge the HSE to agree to it on behalf of the UK. It should be noted that as well as using paint strippers containing Dichloromethane, our members use similar products, called ink strippers, in the printing industry, which contain Dichloromethane, often in conjunction with other solvents.

Unite is concerned about the effects of exposure to these materials and would stress that this includes both fatal and non-fatal effects. The emphasis on the relatively few fatal effects being put forward by HSE hides the extensive and potentially damaging non-fatal effects experienced by many users.

Unite is willing to support the use of DCM-based paint strippers and ink strippers in industrial installations provided that certain safety conditions were met (e.g. effective exhaust ventilation or respiratory protective equipment, enclosed strip tanks and appropriate gloves). If these conditions cannot be met, the use of such products must not be permitted. Unite also expects to see such provisions fully enforced in the UK.

Yours sincerely,

A handwritten signature in black ink that reads "Bud Hudspith".

Bud Hudspith
Unite H&S Advisor