
Mr. Koos RICHELLE
European Commission
Director General
DG Employment, Social Affairs
and Inclusion
B-1049 BRUXELLES

Brussels, 18 April 2011

Dear Mr. Richelle,

We are writing to you in the context of the possible adoption in the near future of the draft proposal for a revised directive on protecting workers' from exposure to electromagnetic fields. This directive, originally adopted in 2004 has been put on hold following the practical difficulties that arose in its application.

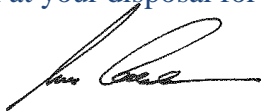
Ceemet and Orgalime have since the start of the revision process collaborated closely with the Commission notably by providing expert input to the Advisory Committee on Safety and Health (ACSH), which will shortly be adopting an opinion on the draft proposal. You will find enclosed the employers' opinion which is to be adopted by the ACSH outlining problems and the **solutions** proposed which we fully share.

Despite some improvements compared to the original 2004 directive, we would like to highlight our serious concerns about the current draft proposal which in our view:

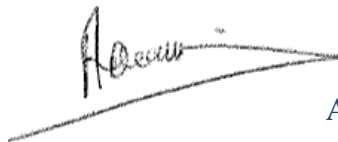
- Will lead once again to the same difficulties in application which led the Commission to revise the existing proposal. There are indeed still a number of technical issues which need to be dealt with. In particular, the values in the annexes and the scientific basis for adopting them need to be reviewed. Without this, we will face the same issues as forced regulators to review the directive.
- Will lead to significant, disproportionate and unnecessary burdens for employers: the nature of the measures which it is proposed to impose on employers and the coherence of the set of obligations in the different zones of exposure need to be adapted to reflect proportionality of prevention measures to real risk.

We therefore hope that the Commission will be able to ensure that the issues which led to the revision of the Directive 2004/40/EC are fully resolved before adopting any proposal.

We remain at your disposal for any further information you might require.



Uwe Combüchen
CEEMET
Secretary General



Adrian Harris
Orgalime
Director General

Cc: Mr. Armindo Silva, Mr. Constantinou, Mr. Herbillon