
Gezondheidsraad

Health Council of the Netherlands



Dr TJ Lentz
Branch Chief
Document Development Branch, Education and Information Division
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health (NIOSH)
1090 Tusculum Avenue, MS C-32
Cincinnati, OH 45226-1998
USA

Subject : Comment on public draft report *Chromium VI compounds*
Your reference :
Our reference : I-969171/SV/jh/543-N16
Enclosure(s) : 1
Date : May 18, 2016

Dear Dr. Lentz,

In 2015, the President of the Health Council of the Netherlands released the draft report *Chromium (VI) compounds*, prepared by the Committee on the Classification of Reproduction Toxic Substances, for public review. This draft report is the first of this committee, that has been prepared taking into account guidelines that are applied for proposals on classification and labelling of chemicals under REACH¹. As a consequence, the outline of the report differs from the regular reports prepared by this Committee. It should be noted that these guidelines have no consequences on the procedures applied by the Committee to reach its conclusions.

The Committee is pleased to note that the reviewers of NIOSH confirm the completeness of the data used, and support the conclusions of the Committee. The reviewers suggested several textual changes, that have been adopted when finalizing the report. The reviewers have also suggested some adaptations to the outline of the report (e.g. adding summaries, tables and a list of abbreviations). As the outline has been defined by guidelines drafted by the Health Council, or guidelines used under REACH, this will not be changed.

The majority of the comments and literature suggestions on the content of the report concern the section on read-across/toxicokinetics and mode of action. The Committee acknowledges that this section can be described in more detail. The Committee however, aimed to keep this section concise by using review document, and provide the basis of the group approach without an indepth assessment of the mechanism of action. The Committee also notes that the literature suggested by NIOSH of chromium cycling is primarily based on the carcinogenic

¹ Registration, Evaluation and Authorisation of Chemicals; the regulation on chemicals of the EU.



Subject : Comment on public draft report *Chromium VI compounds*
Our reference : I-969171/SV/jh/543-N16
Page : 2
Date : May 18, 2016

properties of chromium and does not provide specific information on the reproduction toxic properties.

In response to the suggestion to specify the dose of the control group in the units [mg/kg], the Committee notes that the actual chromium intake of the control groups of animal experiments is unknown. Therefore the Committee does not specify the dose in the control group.

Finally, NIOSH suggested an environmental study on chromium levels in drinking water and the occurrence of late adverse pregnancy outcomes. The Committee has added this study as a reference in the report.

On behalf of the Committee I thank you for taking the time to respond to the draft report, thus enabling the Committee to issue a modified and improved final version. Your comment and this reply will be published on the website of the Health Council.

The final report was published on May 18th, 2016. Enclosed you will find a copy.

Yours sincerely,

S.R. Vink, Ph.D.
Scientific Secretary Committee on the
Classification of Reproduction Toxic Substances



Mevrouw dr. J. Arts
Akzo Nobel

Onderwerp : Reactie op conceptadvies *Chromium VI compounds*
Uw kenmerk : e-mail d.d. 22 januari 2016
Ons kenmerk : I-915558/SV/jh/543-O16
Bijlagen : 1
Datum : 18 mei 2016

Geachte mevrouw Arts,

In november 2015 heeft de Gezondheidsraad het conceptadvies *Chromium VI compounds* van de Commissie Classificatie reproductietoxische stoffen openbaar gemaakt. U hebt gebruikgemaakt van de mogelijkheid om commentaar op het conceptadvies te leveren. Namens de commissie deel ik u mede dat uw commentaar is verwerkt in het advies. Aanvullend op uw commentaar wijst de commissie op het feit dat in het geval van een Categorie 1B classificatie, de H-zin met een hoofdletter wordt weergegeven (H360F).

De Gezondheidsraad dankt u hartelijk voor uw reactie. Het advies is op 18 mei gepubliceerd. Bijgaand treft u een exemplaar aan.

Met vriendelijke groet,

dr. S.R. Vink
wetenschappelijk secretaris