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## **Position of the Swedish Association of Mines, Mineral and Metal Producers (SveMin) on SCOELs recommendation for IOELVs on nitrogen oxides (NO and NO<sub>2</sub>) and carbon monoxide (CO)**

Sweden is a significant ore producer in EU accounting for between 80 and 90 percent of the EU's iron ore. Even with respect to other metals such as copper, zinc and silver Sweden is among the major producers in the EU. The mining industry in Sweden contributes to 13 000 direct jobs and 35 000 indirect jobs.

The ambient concentration of NO, NO<sub>2</sub> and CO in workplaces in the underground mines arises predominately from the ordinary utilization of explosives and from vehicles and mobile machines equipped with diesel engines. In metal mining the use of diesel engines is necessary. Today there are no alternatives for some operations. For example a fully loaded rock truck can have a weight more than 500 tons. Under these circumstances it's not possible to use electric alternatives. The majority of metal mines in Sweden are very deep, 1000 meters or more. The ventilation system is very complicated in a mine and change from one day to another because of the mining procedure. The proposed short time level of 1 ppm is completely impractical with current technology due to machinery achieving peak levels at start up.

In the Swedish mining industry all employees regularly are monitored by the occupational health service and no evidence has been found for health effect caused by these substances. In case that the occupational exposure limits for NO, NO<sub>2</sub> and CO recommended by the SCOEL and proposed in the 4<sup>th</sup> list of IOELV's were to be ultimately adopted at these levels it would lead to economically unjustified investments and higher operation costs which would give problems for the mining industry to be competitive in a global market.

SveMin has taken part and supports the position papers of Sectorial Social Dialogue Extractive Industries and of Euromines (European Association of Mining Industries, Metal Ores & Industrial Minerals) on the recommendations for IOELVs for nitrogen oxide, nitrogen dioxide and carbon monoxide.

SveMin considers the recommended occupational exposure limits to be scientifically insufficiently justified, technically and economically unfeasible and not measurable. The Swedish mining industry can't accept the proposed levels for NO, NO<sub>2</sub> and CO.

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