

Mr. Peter H. Schaarup
Chefkonsulent
Miljøstyrelsen
Strandgade 29
1401 København

Friday, 23 January 2015

Dear Mr Schaarup,

The Nickel Institute and the Nickel Producers Environmental Research Association would like to thank you for the opportunity to comment on the Public Consultation Version of the Danish Ministry of the Environment's document entitled "Survey of nickel metal – Part of the LOUS review".

The Nickel Institute supports the role of risk assessment in the evaluation of appropriate uses of nickel and nickel compounds, and we therefore read the document with great interest. In general, we found the document to be well written and based on appropriate scientific information. There are specific areas in the document where corrections and clarifications are needed, and we have identified these specific areas in the attached document. The most important areas in terms of clarification include human health classifications for Ni metal on carcinogenicity, where the IARC current carcinogen classification of nickel metal is incorrectly reported as Group 1 when it is Group 2B.

Please do not hesitate to contact us if you have questions on our comments. We look forward to seeing the final version when it is released.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Veronique Steukers', written over a horizontal line.

Dr Veronique Steukers
Director, H&E Public Policy
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