



EUROPEAN COMMISSION  
DG Employment, Social Affairs and Inclusion  
Employment and Social Legislation, Social Dialogue

**Health and Safety**

**The Advisory Committee on Safety and Health at Work**

**Opinion**

**Opinion on an EU Occupational Exposure Limit value for  
4,4'-Methylene-bis(2-chloroaniline) (MOCA) under Directive 2004/37/EC (CMD)**

**Doc. 1336/17**

**Adopted on 19/10/2017**

**4,4'-Methylene-bis(2-chloroaniline) (MOCA)**  
**(CAS No. 101-14-4, EC No. 202-918-9)**

This Opinion updates an earlier ACSH Opinion on MOCA<sup>1</sup> which was based on a scientific evaluation carried out by SCOEL<sup>2</sup>.

In the meeting of the Working Party of Chemicals on 21<sup>st</sup> – 22<sup>nd</sup> June 2017, the recently provided evaluation of the ECHA Risk Assessment Committee<sup>3</sup> on MOCA was discussed.

The three interest groups agree that:

The major exposure route of MOCA is the dermal route. Therefore there should be a skin notation in annex III. The three interests groups agreed that biomonitoring is currently the best method to assess the total exposure to MOCA in occupational settings. However biomonitoring can be complemented with air monitoring. The three interests groups agreed an EU occupational airborne limit value for MOCA set at 10µg/m<sup>3</sup> (8hrs TWA). Biomonitoring can be used to show compliance with this limit value.

The ACSH strongly recommends the Commission to adopt a skin notation preferably with a footnote and recital advising on the importance of biomonitoring under Directive 2004/37/EC.

The ACSH recognizes the challenge of establishing in the existing legal framework the most appropriate approach to effective risk management practice for MOCA, where biomonitoring is the best method for exposure assessment.

The BGV of 5 µmol/mol creatinine stated in the previous opinion remains appropriate.

---

<sup>1</sup> ACSH Supplementary opinion No. 2 Doc. 2016/13 adopted on 28/11/2013.

<sup>2</sup> SCOEL/SUM/174 June 2010/Annex March 2013.

<sup>3</sup> ECHA/RAC/A77-O-0000001412-86-147/F.