

### Minority position taken regarding the Asbestos Restriction by Stavros Georgiou

Minority position taken for the following reasons:

The time limited derogation for Chrysotile is unjustified on economic efficiency (cost-benefit) grounds. As clearly indicated within the opinion by SEAC and RAC, the costs of limiting the derogation (until 2025) will impose costs to DOW (and to society) of €5.8 million per year without any reduction in material risk (according to RAC opinion the risks are low and adequately controlled given the control measures in place). As such, the time limited derogation imposes large net welfare costs to society overall. Moreover the opinion is analytically inconsistent and contradictory with SEAC's position on, for example, the recent opinion on cadmium in artists paint – this restriction was found not to be appropriate on the grounds that the risks were negligible whilst costs were actually negative (if only substitution costs are considered) or a maximum of €3.4 million per year If consumer surplus losses are considered. SEAC's position is thus unjustified on pure socioeconomic analytical grounds.

Stavros Georgiou