

EU OCCUPATIONAL EXPOSURE LIMITS FOR COBALT:

from adoption to compliance

Cobalt Institute actively supports the new EU occupational exposure limits of $20 \mu\text{g Co/m}^3$ inhalable and $4.2 \mu\text{g Co/m}^3$ respirable during the transition period.

We oppose the subsequent reduction to permanent limits of $10 \mu\text{g Co/m}^3$ inhalable and $2.5 \mu\text{g Co/m}^3$ respirable.



**$10 \mu\text{g Co/m}^3$
LIMIT IMPACT
ON EU:**

€19.3 bil
↑ additional costs due to stricter limits.

≈ 30%
↓ of EU cobalt recycling capacity at risk of closure.

≈ 70%
↓ of battery precursor manufacturing capacity at risk of closure.

No measurable additional worker-protection benefits comparing with $20 \mu\text{g Co/m}^3$.

OUR ASK:

Use the transition period to assess the $10 \mu\text{g Co/m}^3$ and $2.5 \mu\text{g Co/m}^3$ limits against real-world evidence on costs, feasibility and worker protection, and **reassess these before 2032** if the evidence does not support the additional burden.

The new EU Occupational Exposure Limits (OELs) for cobalt are moving towards final adoption. Member States will have two years after the EU law enters into force in **Q4 2026** to transpose these values into national law. Between **Q4 2026** and **Q4 2032**, transitional limits of $20 \mu\text{g Co/m}^3$ inhalable and $4.2 \mu\text{g Co/m}^3$ respirable will apply, before the permanent limits take effect at the latest Q4 2032. The permanent limits will be **$10 \mu\text{g Co/m}^3$ inhalable and $2.5 \mu\text{g Co/m}^3$ respirable**, reached through a staged transition.

For industry, the critical step is the shift from 20 to $10 \mu\text{g Co/m}^3$, with operators having only six years to prepare. Those already at $20 \mu\text{g Co/m}^3$ will need to halve exposure by 2032, while those currently above $20 \mu\text{g Co/m}^3$ will face two successive adjustments within the same relatively short timeframe. In addition, the accompanying low respirable values are as legally valid as the inhalable ones, and it is the first instance of these being implemented (globally). The potential consequences are significant: the permanent limits could put around 30% of EU cobalt recycling capacity and 71% of battery precursor manufacturing capacity at risk of closure, with approximately €19.3 billion in additional costs. There is no measurable additional worker-protection benefit compared with the transitional limits.

This turns implementation into a wider industrial policy issue. The EU is seeking to expand domestic critical raw material processing and recycling, yet tighter limits could require significant retrofitting, additional investment in ventilation and dust-control systems, more space and production downtime, as well as higher ongoing costs for energy, maintenance and monitoring. For operators, the question is whether those additional capital and operating costs could make existing facilities, or new processing and recycling capacity, less viable in Europe.

For policymakers, the challenge is therefore to ensure that implementation of the cobalt OEL supports worker protection without undermining the EU's parallel objective of building a secure and competitive domestic critical raw materials value chain.