

Review Article

## Setting Evidence-Based Occupational Exposure Limits for Manganese

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1 **Abstract**

2 In 2004, a review by the Institute of Environment and Health (IEH) made recommendations  
3 on occupational exposure limits (OELs) for manganese and its inorganic compounds for  
4 inhalable and respirable fractions respectively. These OELs were based on a detailed  
5 comprehensive evaluation of all the scientific data available at that time. Since then, more  
6 published studies have become available and a number of occupational standard-setting  
7 committees (EU SCOEL, US ACGIH-TLV, and Germany MAK) have proposed OEL's for  
8 manganese and its inorganic compounds that are somewhat lower than those proposed in the  
9 2004 review.

10

11 Based on current understanding, the key toxicological and human health issues that are likely  
12 to influence a health-based recommendation relate to: neurotoxicology; reproductive and  
13 developmental toxicology; and mutagenicity/carcinogenicity. Of these, it is generally  
14 considered that neurotoxicity presents the most sensitive endpoint. As such, many of the  
15 studies that have been reported since the IEH review have sought to use those  
16 neurofunctional tests that appear to be particularly sensitive at identifying the subtle  
17 neurological changes thought to associate with manganese toxicity. These recent studies  
18 have, however, continued to be limited to a significant extent by reliance on cross-sectional  
19 designs and also by use of unreliable exposure estimation methods. Consequently the  
20 strength of the potential association between manganese exposure and these subtle  
21 subclinical cognitive or neuromotor changes is still poorly characterised and the relevance of  
22 these minor differences in terms of either their clinical or quality of life consequences remains  
23 unknown.

24

25 Based upon the overall evidence, it is concluded that the 8-hr time weighted averages (TWA)  
26 for respirable (0.05 mg/m<sup>3</sup> as Mn) and inhalable (0.2 mg/m<sup>3</sup> as Mn) fractions as  
27 recommended by the SCOEL in 2011 are the most methodologically-sound, as they are based  
28 on the best available studies, most suited to the development of health-based OELs for both  
29 respirable and inhalable fractions. The dose-response characterisation informed by the  
30 examined studies used can be considered to establish a true human NOAEL for all the  
31 neurofunctional endpoints examined within the selected studies.

32

33 **Keywords**

34 manganese; occupational exposure limit; neurotoxic; respirable; inhalable

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## 38 **1 Introduction**

39 The purpose of this paper is to review and describe the development of contemporary  
40 recommended or set occupational exposure limits (OEL) for manganese and its inorganic  
41 compounds by a number of authoritative OEL-setting bodies in Europe and the USA. The  
42 process ,as will be shown, is complex as the most informative studies are those using groups  
43 of exposed workers who have been exposed to a range of different manganese compounds  
44 of differing solubility and particle size and measured by different sampling metrics (respirable,  
45 inhalable and total). Unfortunately, airborne exposure of workers cannot reliably be validated  
46 by biological monitoring as, due to the homeostatic control of manganese by the liver, there  
47 is no clear correlation between long-term exposure to manganese and its inorganic  
48 compounds and the biological monitoring of manganese in the urine or blood (Zheng et al.  
49 2011; Laohaudomchok et al., 2011; Gil et al., 2011). To add to this complexity, none of the  
50 worker studies of the subtle neurofunctional (cognitive and motor) effects reported have  
51 used the same battery of tests with a standardised protocol. This makes comparison of the  
52 studies somewhat problematical.

53

## 54 **2 Overview of OEL setting**

55 Occupational Exposure Limits (OELs) have now been a feature of the industrialised world for  
56 many decades. The objective of OELs is to set limits for exposure via the airborne route such  
57 that exposure, even when repeated on a regular basis throughout a working life, will not lead  
58 to adverse effects on the health of exposed persons and/or their progeny at any time (as far  
59 as can be predicted from the contemporary state of knowledge). OELs may be established  
60 using human and/or animal data and are intended to be protective under realistic workplace

61 exposure conditions (e.g. by mandating controls on the maximum exposure during a working  
62 day or on peak short-term exposures) (EC, 2013). The EU Scientific Committee on  
63 Occupational exposure Limits (SCOEL) advises that OELs may principally be used 'to provide  
64 standards or criteria against which measured exposure levels in existing workplaces may be  
65 compared in order to ensure that, as far as the current state of knowledge permits, control is  
66 adequate to protect health'. However, OELs can also be used for designing new plants and  
67 processes to ensure that they 'are engineered in such a way that exposures can be controlled  
68 at levels which will not damage health' (EC, 2013). In general OELs are used by risk managers  
69 to ensure that workers are not exposed to substances above the OEL whether it is an 8-hr  
70 TWA or 15min STEL. This often results in exposures well under the OEL (guideline or  
71 statutory).

72

73 Various but similar approaches exist for setting OELs and, depending on the particular  
74 socioeconomic, legislative and political environment, different regulatory bodies (e.g. SCOEL<sup>1</sup>  
75 in the EU, MAK<sup>2</sup> in Germany and the American Conference of Governmental Hygienists<sup>3</sup>  
76 (ACGIH) in the US) may reach somewhat differing conclusions as to what constitutes the  
77 appropriate OEL for a substance.

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## 79 **2.1 Health based vs. risk based OELs**

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<sup>1</sup> <http://ec.europa.eu/social/main.jsp?catId=148&intPageId=684&langId=en>

<sup>2</sup> [http://www.dfg.de/en/dfg\\_profile/statutory\\_bodies/senate/health\\_hazards/](http://www.dfg.de/en/dfg_profile/statutory_bodies/senate/health_hazards/)

<sup>3</sup> <http://www.acgih.org/tlv-bei-guidelines/policies-procedures-presentations/overview>

80 **Health based OELs:** these are established where the available scientific data base leads to the  
81 conclusion that it is possible to identify a clear threshold dose/exposure level below which  
82 exposure is not expected to lead to adverse effects (EC, 2013). These OELs do not take into  
83 account socioeconomic or achievability factors.

84 **Risk-based OELs:** these are established when it is not possible on present knowledge to define  
85 a threshold of activity (e.g. genotoxicity, carcinogenicity and respiratory sensitisation) it must  
86 be assumed that any level of exposure, however small, might carry some finite risk (EC, 2013).  
87 In the EU it is the responsibility of the Commission to set 'risk-based' OELs, which requires  
88 consultation with interested parties (EC, 2013). Alternatively, a health-based limit could be  
89 set but socioeconomic and/or achievability are taken into account. In practical terms, this  
90 means that the available data would allow the establishment of a health-based limit but, the  
91 stakeholders (government, trade unions and industry) may negotiate to establish an OEL  
92 above the concentrations(s) of the health-based limit due to socioeconomic or practical  
93 reasons.

94

### 95 **2.1.1 General procedure for setting health-based OELs**

96 For chemicals where a threshold of adverse health effect (immediate or delayed) has been  
97 identified from good quality human and experimental studies, OELs are established by  
98 application of an uncertainty factor (Dankovic et al., 2015) to a point of departure (e.g.  
99 N(O)AEL, L(O)AEL or BMD) for the most sensitive adverse health effect in this case  
100 neurotoxicity. Expert judgement is usually needed by these OEL-setting committees on a case-  
101 by-case basis to determine an appropriate uncertainty factor. OELs are established in relation

102 to a reference period of **8 hours**, for a **40-hour working** week and for a **working lifetime** (8-  
103 hour TWA<sup>4</sup> OEL) and expressed as ppm or mg/m<sup>3</sup>.

104

105 For some threshold chemicals, compliance with an 8-hour TWA does not adequately control  
106 the adverse health effects, and short-term exposure limits (15 min. STELs) are set. This is  
107 likely to arise for substances for which a critical effect is observed following a brief exposure  
108 (e.g. CNS depression) and where the 8-hour TWA OEL is established at a level not very much  
109 lower than exposures at which there might be a risk of short-term effects occurring.

110

111 In addition, for chemicals where biological monitoring data is available, biological limit values  
112 (BLVs) can be set. These define levels of substances in humans, their metabolite, or indicator  
113 of effect e.g. in blood, urine or breath in workers exposed to the chemical in question at the  
114 level of the OEL. Although biomonitoring provides information about total exposure from all  
115 routes (inhalation, ingestion and dermal), in an occupational setting inhalation is most likely  
116 to be the predominant route of exposure, particularly when considering Mn industries. . BLVs  
117 do not indicate a sharp distinction between hazardous and non-hazardous exposures. For  
118 many substances, the data are too limited to support a biological monitoring method, or a  
119 metabolite or indicator cannot be defined.

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<sup>4</sup> TWA – time weighted average for the exposure to a chemical can be used when both the chemical concentration and time for exposure varies. For gases the units are in [parts per million](#) (ppm) and for [particulates](#) such as [dust](#), [smoke](#) and [mist](#), units are in milligrams per cubic meter (mg/m<sup>3</sup>).

121 Where data is inadequate to set a BLV, a biological guidance value (BGV) can be established.  
122 This refers to the upper concentration of the substance (or a metabolite) in biological medium  
123 corresponding to a certain percentile (generally 90th or 95th percentile) in a defined  
124 reference population. These values can be helpful in identifying where risk management  
125 measures may be introduced to reduce exposure.

126

### 127 **2.1.2 OEL procedure for non-threshold chemicals**

128 There is growing recognition that carcinogenic risk extrapolation to low doses (and standard  
129 setting) must consider the mode of action of a given chemical. To date there is a general  
130 agreement to distinguish between genotoxic and non-genotoxic chemicals, but further  
131 differentiation based on mode of action also seems appropriate (Bolt & Huici-Montagud,  
132 2008). This means that a threshold approach may be applied for some carcinogens. In the EU,  
133 SCOEL distinguishes 4 types of carcinogen on mechanistic grounds, namely:

134 *Group A:* Non-threshold genotoxic carcinogens - for low-dose risk assessment linear non-  
135 threshold (LNT) modelling is applied;

136 *Group B:* Genotoxic carcinogens – where a threshold cannot be sufficiently established, LNT  
137 modelling is used as a default assumption;

138 *Group C:* Genotoxic carcinogens - for which a practical threshold is supported; and

139 *Group D:* Non-genotoxic carcinogens and non-DNA reactive carcinogens - a true threshold  
140 may be established associated with a NOAEL.

141



142 SCOEL seeks to derive health-based OELs for carcinogens in Groups C and D and, if possible,  
143 apply risk-based assessments to Category A and B substances (Bolt & Huici-Montagud, 2008;  
144 Bolt et al, 2004; EC, 2013).

145

### 146 **2.1.3 Additional notations**

147 In addition to recommending an 8hr TWA and 15 min. STELs, OEL-setting committees also use  
148 additional notations, where appropriate, to assist in risk management decisions; these  
149 include, skin notation, respiratory sensitisation and noise. In the case of the latter notation,  
150 there is evidence that demonstrates a link between certain organic solvents and excessive  
151 noise in the workplace, leading to hearing loss in workers (Unlu et al., 2014).

152

## 153 **3. Occupational exposure to manganese**

154 The world-wide mine production of manganese ore was estimated by the US Geological  
155 Survey to be around 18 million metric tonnes in 2014. Of that, 61% was produced in the  
156 Gabon, 16% in Australia, 14% in South Africa, 4% in Ghana, and 5% in a number of other  
157 countries (USGS<sup>5</sup>).

158

159 The main uses of manganese continue to be for the production of alloys (ferrous and non-  
160 ferrous), particularly in the steel making industry, and it is estimated that around 89% to 94%

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<sup>5</sup>US Geological Survey (USGS);<http://minerals.usgs.gov/minerals/pubs/mcs/2015/mcs2015.pdf>

161 of manganese ore is used as feedstock for manganese alloys (CPM, 2011). The remaining  
162 manganese ore is used in foundry and welding, accounting for less than 10% of manganese  
163 ore (CPM, 2011). It is estimated that 6% to 11% of manganese ore is used in the production  
164 of electrolytic manganese metal (EMM), electrolytic manganese dioxide (EMD), lithium  
165 manganese oxide, manganese sulphate, and other chemicals. As noted above, the key  
166 metallurgical uses of manganese are in steel, aluminium and copper, while the key non-  
167 metallurgical uses of manganese are in batteries and agricultural feed and fungicides.

168

169 A review of workplace exposure to manganese was carried out by the Institute of  
170 Environment and Health (IEH) in 2004, and reported within a Criteria Document<sup>6</sup> produced  
171 for the International Manganese Institute (IMnI). The review found that there was substantial  
172 variability in exposure levels to manganese both between and within individual industry  
173 sectors. The three sectors for which most data were available were mining, manganese metal  
174 and alloy production and battery manufacture. The highest and most variable exposures were  
175 in mining with a maximum concentration (arithmetic mean) of 114 mg/m<sup>3</sup> as manganese in  
176 total dust reported for miners in an Iranian study (Boojar and Goodarzi, 2002). In comparison,  
177 the highest exposure concentration reported in a study of South African miners in a modern  
178 mine was 1.5 mg/m<sup>3</sup> (Myers et al., 2002). These two studies, although contemporaneous,  
179 show very large differences in exposure levels. This must be largely due to differences  
180 between modern high technology mining operations using efficient control measures, such  
181 as use of water sprays, good ventilation, and isolation of workers from sources of dust, and

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<sup>6</sup> Available at: [http://www.iehconsulting.co.uk/IEH\\_Consulting/IEHCPubs/HumExpRiskAssess/w17.pdf](http://www.iehconsulting.co.uk/IEH_Consulting/IEHCPubs/HumExpRiskAssess/w17.pdf)

182 what must be assumed to be older, less controlled methods of extraction. Some high  
183 exposures were also reported for manganese metal and manganese alloy production with a  
184 maximum exposure concentration of 27 mg/m<sup>3</sup> (inhalable) reported in a Norwegian smelter  
185 (Johnsen *et al.* 2010) though typical levels were much lower (geometric mean = 0.254 mg/m<sup>3</sup>).  
186 Exposure concentrations associated with battery manufacture ranged up to 11 mg/m<sup>3</sup> as  
187 inhalable manganese in a Belgian study (Roels et al., 1992).

188

189 Importantly, the IEH review (IEH, 2004) specifically examined information about the  
190 concentrations of manganese in different size fractions, to derive conversion factors that  
191 could be used to assist in the interpretation of epidemiological studies in which different  
192 fractions of manganese in air had been measured (respirable, inhalable or total dust). The  
193 authors concluded that only a small proportion of inhalable manganese was of respirable size,  
194 although this varied by process (with exception of welding). A conversion factor of 1.2-3.2  
195 was proposed to convert 'total' to 'inhalable' concentrations and a factor of 0.1-0.5 to convert  
196 'total' concentrations to equivalent 'respirable' concentrations (to allow cross study  
197 comparison).

198

199 The IEH review (IEH, 2004) also assessed the limited biological monitoring data that was  
200 available at the time of publication. The data showed considerable interindividual variability  
201 in blood manganese levels, although manganese exposed workers generally had higher blood  
202 manganese than unexposed. The data did not however, establish a clear relationship between  
203 exposure concentrations of manganese in air and blood manganese, and there was little

204 evidence to support the use of blood manganese as a reliable exposure index. Over the range  
205 of studies reviewed, urinary manganese levels also varied substantially, even among the  
206 controls, however, almost all of the studies reported significant differences between controls  
207 and exposed workers. No clear relationship between airborne exposure and urinary levels on  
208 an individual basis was demonstrated.

209

### 210 **3.1 OEL setting for manganese**

211 In their review of the literature regarding occupational exposure to manganese in 2004, the  
212 IEH proposed OELs of 0.1 and 0.5 mg Mn/m<sup>3</sup> for respirable and inhalable fractions  
213 respectively. Consideration of the levels and duration of exposure in the studies by Gibbs et  
214 al. (1999) and Myers et al. (2002), which found no neurological effects in exposed workers,  
215 and the study by Roels et al. (1992), which showed adverse neurological effects, was used as  
216 a basis for determining a NOEL and the proposed OELs; these were considered protective  
217 based on knowledge at the time.

218

219 However, an updated search of studies and reviews around the exposure and uptake of  
220 manganese and of neurotoxic effects in workers, published subsequent to the IEH 2004  
221 review (as detailed in Appendix A), suggest that some non-clinical neurofunctional adverse  
222 effects may be occurring around the OELs proposed by the IEH 2004 review.

223

#### 224 **3.1.1 Availability of robust exposure data**

225 For OEL setting, as in all risk assessments, often the weakest component of key occupational  
226 studies for manganese has been the exposure assessment, which is as important a  
227 consideration as the toxicological health outcome. For manganese, cross study comparisons  
228 of data also remain limited by the variable approach taken to sampling by the authors.

229

230 A number of investigators have reported exposure measurements for the respirable,  
231 total/inhalable or other size fractions of manganese which are expected to have different  
232 bioavailabilities (ATSDR, 2012). The particle size of inhaled manganese would be anticipated  
233 to affect uptake and distribution and it is conventionally assumed that a much higher  
234 absorption of inhaled material in the respirable fraction is deposited in the lungs than of  
235 coarser material, which is largely swallowed. Several studies provide information about  
236 particle size in individual workplace environments (Ellingsen *et al.*, 2003; Harris *et al.*, 2005;  
237 Pearson and Greenway, 2005; Berlinger *et al.*, 2007; Michalke *et al.*, 2007; Berlinger *et al.*,  
238 2008; Ellingsen *et al.*, 2008; Ross *et al.*, 2009; Keane *et al.*, 2010; Lehnert *et al.*, 2012). As  
239 would be anticipated, there are substantial differences in the size distribution of airborne  
240 manganese in different workplace environments with processes that generate fume giving  
241 rise to aerosols with a much higher respirable content (as a percentage of total/inhalable  
242 manganese) than activities such as breaking up ore or cutting manganese containing  
243 materials. However, the ratio of respirable to inhalable Mn in workplace air is generally in the  
244 range 0.1-0.5.

245

246 A further issue for manganese regarding exposure monitoring methodology is the  
247 unexplained variability observed in mean blood manganese levels reported for non-exposed  
248 controls in workplace studies, as well as in studies of the general population. Currently,  
249 therefore, it is not clear whether real differences in mean blood manganese levels exist  
250 between different population groups; potential causes for such differences could include  
251 factors such as dietary intake of manganese and iron. Alternatively, the differences may arise  
252 from differences in measurement protocols, including the sampling regimes adopted by the  
253 authors as it was notable in the identified literature that the validated NIOSH methods for  
254 metals in urine and blood were not widely used.

255

256 Significant exposure via the skin is unlikely in most workplaces where manganese is present  
257 as the nature of the tasks being undertaken means that workers are likely to be wearing  
258 gloves and protective clothing and there is limited potential for direct skin contact to occur.  
259 Inadvertent ingestion is most likely to arise in individuals with poor personal hygiene,  
260 particularly where there are no strict procedures to ensure that workwear is removed and  
261 exposed skin washed prior to breaks in the working day and at the end of the work shift (IEH,  
262 2004).

263

### 264 **3.1.2 Assessment of available neurotoxicity data**

265 In their review, the IEH (IEH, 2004) noted that the available evidence at the time of publication  
266 indicated that subtle subclinical neurological effects in humans were the most critical  
267 endpoint associated with chronic low-level occupational exposure to manganese. This is

268 suggested to be linked to the accumulation of manganese in brain tissue following inhalation,  
269 with the basal ganglia region being a primary target of toxicity. These changes were, and still  
270 are, considered a suitable basis for setting an OEL. Indeed there is a reasonable body of  
271 evidence from human cohort studies that occupational manganese exposure may induce  
272 subtle neurotoxic changes and that current occupational levels of manganese may be  
273 associated with the onset of some symptoms of manganism (EC, 2011; ATSDR, 2012).

274

275 Whilst there is a growing body of evidence that occupational exposure to manganese at levels  
276 below those associating with the onset of manganism may elicit subtle neurofunctional  
277 perturbations (Meyer-Baron et al., 2009 and 2013), such changes are only detectable using  
278 specialised testing and represent sub-clinical effects. Studies that support the existence of  
279 such an association are subject, to varying extent, to methodological limitations. However,  
280 recent work has strengthened the evidence base that there is a lack of progression (or, in  
281 some cases, regression) of the subtle changes once the occupational exposure is reduced or  
282 stopped (Bouchard et al. 2007b and 2007c; Wastensson et al, 2012). Furthermore, there is  
283 now a possible explanation for the varying levels of recovery observed, with evidence  
284 suggesting that different brain loci may show varying degrees of susceptibility and recovery  
285 potential (Bowler et al., 2011).

286

287 Many of the studies that have been reported since the IEH review (IEH, 2004) have sought to  
288 use those neurofunctional tests that appear to be particularly sensitive at identifying the  
289 subtle neurological changes thought to associate with manganese toxicity. These recent

290 studies have, however, continued to be limited to a significant extent by continued reliance  
291 on cross-sectional designs and also by use of potentially unreliable exposure estimation  
292 methods. Consequently the strength of the potential association between manganese  
293 exposure and these subtle subclinical cognitive or neuromotor changes is still poorly  
294 characterised and the relevance of these minor differences in terms of either their clinical or  
295 quality of life consequences remains unknown (SCOEL, 2011; ACGIH, 2013).

296

### 297 **3.2 Current and proposed OELs for manganese**

298 Since the OELs were proposed in the review by the IEH (IEH, 2004) there has been much  
299 activity around the setting of OELs for manganese by a number of the key OEL setting bodies.  
300 In addition, the EU SCOEL has published recommendations for OELs for manganese and its  
301 inorganic compounds<sup>7</sup>. Table 1 shows current OELs from the OEL setting bodies, with the OELs  
302 proposed by the IEH in 2004 included for comparison. It should be noted that the recent  
303 evaluations of the SCOEL, MAK and the ACGIH suggest that it may be possible to establish  
304 reliable health-based OELs for neurofunctional changes which can be considered true NOAELs  
305 for these effects.

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<sup>7</sup>It should be noted that at the time of writing, this recommendation has not yet passed through the EU DG Employment, Social Affairs and Inclusion's appropriate committee procedures and thus, it is not known whether the document and its recommended OELs will be accepted or modified.



309

310

311 **Table 1. Current and proposed OELs for manganese**

	<b>Respirable OEL (mg Mn/m<sup>3</sup>)</b>	<b>Inhalable OEL (mg Mn/m<sup>3</sup>)</b>
<b>IEH (2004)</b>	<b>0.1</b>	<b>0.5</b>
<b>OEL Setting Committees</b>		
<b>SCOEL IOELV (2009 - 2011)</b>	<b>0.05</b>	<b>0.2</b>
<b>MAK Commission (2010)</b>	<b>0.02</b>	<b>0.2</b>
<b>ACGIH TLV-TWA (2011 - 2013)</b>	<b>0.02</b>	<b>0.1</b>

312 IEH – The Institute of Environment and Health; SCOEL – The Scientific Committee on Occupational Exposure  
 313 Limits; IOELV – indicative occupational exposure limit value; MAK - Permanent Senate Commission for the  
 314 Investigation of Health Hazards of Chemical Compounds in the Work Area (Germany); ACGIH - The American  
 315 Conference of Governmental Industrial Hygienists ; TLV-TWA - Threshold Limit Value–Time-Weighted Average.

316

317 The derivation of each of these OELs is discussed below, with details of individual studies  
 318 given in Table 2.

319

320 **3.2.1 The Scientific Committee on Occupational Exposure Limits**

321 The Scientific Committee on Occupational Exposure Limits (SCOEL) recommendations note  
 322 that there is a substantial literature on the effects of manganese on the human nervous  
 323 system and that high exposures can result in severe neurotoxic signs and symptoms, some of  
 324 which resemble those of idiopathic Parkinson’s disease. It concludes the clinical symptoms

325 associated with manganism, such as movement disorders and neurological dysfunction, have  
326 generally been reported at exposure levels above 5 mg/m<sup>3</sup>. However, it noted that more  
327 recently, several studies on lower occupational exposures to manganese have reported less  
328 severe, subtle, non-clinical neurofunctional effects. These subtle effects usually consist of  
329 deterioration in motor function and co-ordination and, as such, may constitute manganese-  
330 induced changes in the same area of the brain as manganism, that is the basal ganglia and, in  
331 particular, the globus pallidus.

332

333 In their findings, SCOEL state that it was not possible to identify one study on which to base  
334 the IOELVs as the data is highly heterogeneous (e.g. different types of industry, different  
335 manganese compounds and particle sizes, different study designs and different  
336 neurofunctional measurements). They recommended a global approach using the most  
337 methodologically-sound studies (i.e. showed adverse neurological effects and identified a  
338 point-of-departure (POD) in the dose-effect/response relationship), as used by IEH (2004).  
339 The SCOEL Recommendation, based on studies by (Roels et al., 1992; Gibbs et al., 1999; Myers  
340 et al., 2003; Young et al., 2005; Bast-Pettersen et al., 2004; Ellingsen et al., 2008; Lucchini et  
341 al. 1999 in HC, 2008) was thus as follows:

342 “A reasonable **respirable IOELV of 0.05 mg/m<sup>3</sup>** can be recommended, and a reasonable  
343 **inhalable IOELV of 0.2 mg/m<sup>3</sup>** is also recommended. While recommending these values,  
344 SCOEL recognises that the overall systemic absorption of coarser particles (>respirable) is  
345 probably substantially lower than for the respirable fraction. Thus, SCOEL recommends both  
346 a respirable and an inhalable IOELV which would need to be observed conjointly”.

347 SCOEL are thus drawing attention to the fact that these recommended values were highly  
348 precautionary and would protect against any neurofunctional change. Indeed, SCOEL noted  
349 that the changes reported are subtle early neurofunctional effects which are non-clinical in  
350 nature and are only detected at a statistical level between groups of workers. In addition,  
351 some of the subtle neurofunctional effects of manganese on the CNS are reversible although  
352 the degree of reversibility has not been defined.

353

354 In addition to these airborne IOELVs, SCOEL agreed with the views on biological monitoring  
355 in the 2004 CD (IEH, 2004) on which the SCOEL/SUM is mainly based. That it was not possible  
356 to recommend a health based biological monitoring standard due to the poor correlation  
357 between airborne manganese and either blood or urine concentrations of manganese.  
358 However, they noted that in Germany, a Biologischer Arbeitsstoff-Referenzwert (BAR) value  
359 of 15 µg/l blood has been established by the MAK Commission. This value represents  
360 manganese concentrations in the general population (95<sup>th</sup> percentile) not occupationally-  
361 exposed to manganese, but of working age (EC, 2011).

362

### 363 **3.2.2 The Permanent Senate Commission for the Investigation of Health Hazards of** 364 **Chemical Compounds in the Work Area**

365 The Permanent Senate Commission for the Investigation of Health Hazards of Chemical  
366 Compounds in the Work Area (MAK Commission) in Germany revised their MAK values for  
367 manganese and its inorganic compounds in 2010. They followed the recommendations of the  
368 IEH (IEH, 2004) with regards to setting values for both respirable and inhalable fractions.

369 Although a comprehensive evaluation, they noted that “as toxic effects on the airways and  
370 lungs (so-called manganese pneumonia) after repeated exposure to manganese are not  
371 induced below concentrations of at least 1 mg/m<sup>3</sup> (IEH 2004), its neurotoxic effects will be  
372 used for derivation of the MAK value”. They thus concentrated almost entirely on human  
373 neurofunctional investigations and classified these studies into those to be considered for  
374 OEL setting, for inhalable and respirable fractions separately, which met the following criteria  
375 (Category A studies): exposure to manganese at the workplace by inhalation, application of  
376 standardised neuropsychological test procedures, parallel investigation of a non-exposed  
377 control group, valid data on manganese concentrations in the ambient air, as well as the  
378 control of major confounders. Studies that did not meet all criteria were assigned as Category  
379 B, with studies of welders assigned to Category C. The derivation of the MAK value was  
380 established on the basis of studies in Category A, with those in Categories B and C used as  
381 supporting evidence (Chia *et al.*, 1993; Lucchini *et al.*, 1999; Mergler *et al.*, 1994; Gibbs *et al.*,  
382 1999; Young *et al.*, 2005; Myers *et al.*, 2003; Bast-Pettersen *et al.*, 2004; Meyer-Baron *et al.*,  
383 2009).

384

385 As with other recently-active OEL-setting committees, the MAK considered that the most  
386 sensitive endpoint for deriving workplace threshold concentrations for manganese was the  
387 occurrence of preclinical neurotoxic effects after inhalation. They examined in detail exposure  
388 with measurements in motor and cognitive function and looked for concordance between  
389 studies. For the derivation of a MAK value based on neurofunctional toxicity data, the MAK  
390 stressed that it needs to be shown that (a) no single effect is involved in only one study, (b)  
391 different studies provide evidence of a similar effect at comparable dose ranges, (c) the

392 observed performance impairments are compatible with the proposed neurotoxic  
393 mechanisms and (d) the impairments in performance observed can be seen as indicators of  
394 clinical changes in exposures either extremely high or lasting for many years. If these  
395 prerequisites are met in the case of manganese, the impairments in performance are to be  
396 classified as adverse effects, as they constitute early signs of clinically-relevant changes.

397

398 They also stress that in deriving a MAK value from epidemiological cross-sectional studies,  
399 unlike animal investigations, no direct derivation of a NOAEC or LOAEC is possible, as only an  
400 average value is available for manganese exposure in the exposed group.

### 401 **3.2.3 The American Conference of Governmental Industrial Hygienists**

402 The American Conference of Governmental Industrial Hygienists (US ACGIH) have had a  
403 number of Draft notices of intended changes (NIC) for manganese, elemental and inorganic  
404 compounds, published over the last few years, with a final accepted version being published  
405 in 2013 (ACGIH, 2013). It is important to note that ACGIH also propose both respirable and  
406 inhalable values.

407

408 In the development of their recommendations, the ACGIH first cite the study by Roels *et al.*  
409 (1992) which proposed that a respirable OEL of 0.036 mg Mn/m<sup>3</sup> would protect most workers  
410 from neurological effects. Further analysis of this study data by the ATSDR (ATSDR, 2012)  
411 using a benchmark dose approach, allowed the ACGIH to calculate a BMDL<sub>10</sub> of 0.07 mg  
412 Mn/m<sup>3</sup> as a NOAEL.

413

414 In their recommendation, the ACGIH also noted the analysis by Crump and Rousseau (1999)  
415 of the follow-up study by Roels (1987) which showed that after 11 years further exposure to  
416 Mn, there was some evidence that the previously reported sub-clinical neurological effects  
417 were not progressing. Next, they cited the study by Mergler *et al.* (1994) in which workers  
418 were exposed to a median level of 0.032 mg Mn/m<sup>3</sup> (respirable). The workers in this study  
419 were examined 14 years *following cessation* of exposure and it was noted that some of the  
420 previously reported neurobehavioural changes were still persisting (Bouchard *et al.* 2007a  
421 and b). The study by Lucchini *et al.* (1999) showed an LOAEL for neurological effects of about  
422 0.1 Mn/m<sup>3</sup> (total dust) after an average of 11.5 years. This corresponded to a respirable  
423 geometric mean concentration of 0.036 mg Mn/m<sup>3</sup>.

424

425 The ACGIH noted that the Bast-Pettersen *et al.* (2004) study reported tremor (impaired hand  
426 steadiness) at a geometric mean level of 0.036 mg/Mn/m<sup>3</sup> (respirable), whilst in a study on  
427 South African manganese smelters, Young *et al.* (2005) showed increased neurobehavioural  
428 changes in workers exposed to 0.01-0.04 mg Mn/m<sup>3</sup> (respirable).

429

430 In developing the rationale for their TLV, the ACGIH noted that the LOAELs for neurological  
431 effects derived from the studies of Bast-Pettersen *et al.* (2004), Lucchini *et al.* (1999), Mergler  
432 *et al.* (1994) and Roels *et al.* (1992) which are respectively, 0.036, 0.032, 0.038 and 0.036 mg  
433 Mn/m<sup>3</sup> (respirable) are in close agreement. Thus, **a TLV-TWA of 0.02 mg Mn/m<sup>3</sup> respirable**  
434 **particulate matter** was recommended for manganese and its inorganic compounds “to

435 reduce the potential for preclinical, neurophysiological and neuropsychological effects in  
436 manganese-exposed workers.” It was noted by the ACGIH that this value is 1.5-2.0 times lower  
437 than the range of LOAELs observed.

438

439 However, the ACGIH also stated that in some occupational situations, exposure to manganese  
440 was to aerosols with a substantial fraction greater than 4 µm MMAD (respirable range) and  
441 thus a supplementary TLV-TWA of 0.1 mg Mn/m<sup>3</sup> inhalable particulate matter was  
442 recommended for conditions where particles >4 µm are anticipated. They note that the ratio  
443 of inhalable to respirable mass may vary from 1:1 to 10:1 but, have used a midpoint ratio for  
444 conversion of 5;1, and cited the previous IEH Criteria Document (IEH 2004 ), which also gave  
445 this ratio, in support of their approach. They finally note that if the inhalable TLV-TWA is used,  
446 then this should be *in addition* to the respirable TLV-TWA.

447

### 448 **3.3 Assessment of key studies used for derivation of OELs**

449 As discussed previously, often the weakest component of key studies has been the exposure  
450 assessment, which is as important as the toxicological health outcome. In the case of  
451 occupational exposure to manganese and its inorganic compounds, usually the  
452 neurofunctional tests although very variable and many without defined normative data, have  
453 been reasonably well described and with the use of appropriate control groups. However, in  
454 many cases the studies have contained unreliable estimates of long-term exposure often  
455 based upon limited exposure data.

456

457 An outline of the studies that have been included in the derivation of OELs by the IEH (IEH,  
458 2004) and the OEL setting bodies, SCOEL, MAK and ACGIH is given in Table 2. In assessing  
459 these studies, one of the key considerations must be the reliability of the exposure  
460 assessments undertaken and what influence that may have on the overall OEL.





**Table 2 Critique of exposure assessment in studies considered by OEL setting committees to derive OELs for manganese and its inorganic compounds**

Study Author	Included in OEL derivation	Comments on Exposure Assessment
Lauwreys <i>et al.</i> , 1985	IEH 2004	<p>Only current (not historical) exposure data available. Exposures ranged from 1-19 years (mean 7.9), 8 hour TWA ranged from 0.07-8.61 mg/m<sup>3</sup> (arithmetic and geometric mean values 1.33 and 0.94 mg/m<sup>3</sup> respectively) – 80 samples – authors indicated that past exposures may have been lower as production rates were lower (however industrial hygiene has generally improved through time), fertility effects only examined for exposed group as a whole, not in relation to relative current exposure levels or any sort of cumulative exposure index (CEI).</p> <p><b>Critique: study considered not helpful to establishing an OEL.</b></p>
Roels <i>et al.</i> , 1992	IEH 2004; EC 2011; ACGIH 2013	<p>Personal measurements of respirable and inhalable exposures to Mn. Inhalable measurements based on grit pots in cyclone samplers which is not an approved sampling method. Cumulative exposure estimated on basis of current exposure levels and job history - some potential to under-estimate cumulative exposure, if exposures were less well controlled in the past however, specific statement to effect that work processes have not been modified over previous 15 years is included and measurements would therefore be expected to be representative of past exposure.</p> <p>Exposure response relationship illustrated for lifetime cumulative exposure as a continuous variable in a non-threshold model, and also for exposure categorised as &lt;600, 100-1200, &gt;1200 ug Mn/m<sup>3</sup>.years with apparent effects in &lt;600 group - nothing to pinpoint a threshold. The upper bound estimated ED05 level of the investigated endpoints were 3575 ug Mn/m<sup>3</sup>.year total and 730 ug Mn mg/m<sup>3</sup>.year respirable - these levels are subsequently described as threshold for effects.</p> <p><b>Critique: study did not use an approved sampling method which may impact on exposure estimates.</b></p>
Mergler <i>et al.</i> , 1994	ACGIH 2013	<p>Static samples at 13 representative locations through facility, sampling and analytical procedures described, no QC details – may not be closely related to actual personal exposure; total and respirable Mn measured. Only 38 samples were collected – not many to characterise exposure across workplace and no evidence that investigators tried to establish levels of exposure associated with different job functions. It is stated that dust levels had previously been much higher.</p>

		<b><i>Critique: the relationship between MnAir and neurobehavioural effects does not appear to have been investigated and the study is not helpful to the setting of an OEL</i></b>
Gibbs <i>et al.</i> , 1999	IEH 2004; EC 2011	<p>Current (1997) respirable and total concs of Mn were measured for 12 job categories (not given) and arithmetic mean used to estimate pre-1997 exposure levels for each job category, taking account of process and work practice changes and the results of 15 minute compliance samples collected before and after such changes. Job histories derived from personnel records, interview and pay roll records and used to calculate cumulative exposures. The sampling and analysis procedures are described but no QC information provided. The number of samples collected does not appear to be stated and there is no information about the variability of the exposure estimates for each job category. There is a small uncertainty around the back projection of exposure concentrations from 1997 measurements – possibility that past exposures could be under-estimated. Results of neurobehavioural tests assessed against previous 30 days, years and lifetime exposure – treated as continuous variable – no artefacts associated with grouping of exposures.</p> <p><b><i>Critique: It is not certain how much confidence to ascribe to the exposure estimates.</i></b></p>
Lucchini <i>et al.</i> , 1999	IEH 2004; EC 2011; Health Canada 2012; MAK 2010; ACGIH 2013.	<p>Air sampling performed 1 month before neurobehavioural testing, respirable and total Mn concentrations determined using personal and stationary sampling – methods are described, no QC details, Cumulative exposure index (CEI) calculated by multiplying average annual airborne Mn concentration characteristic of each job performed by the subject during his work history and years exposed with adjustment for inhalation rate for different task workloads. No adjustment made for any changes in work practice – possible that measured exposures would be less than historic exposure concentrations. MnB and MnU determined for samples collected at time of neurobehavioural test. Plot of CEI and MnB indicates an apparent relationship – no information is provided as to the relationship between CEI and current exposure levels or MnB and current exposure levels.</p> <p><b><i>Critique: the neurobehavioural test results are not analysed in relation to MnAir or CEI, so the paper is not informative about the exposure levels that give rise to effects versus those that don't – some effects seen in a group with current exposures that range from 0.026-0.75 mgm-3 as total Mn. Unlikely to be helpful in setting an OEL.</i></b></p>
Crump & Rosseau , 1999	IEH 2004	<p>No Mn Air data and results not assessed in terms of cumulative exposure to Mn – could be assumed that air Mn concentrations similar to those described by Roels <i>et al.</i>, in earlier study at same plant.</p> <p><b><i>Critique: overall not helpful to setting an OEL – confirms previously described levels of exposure at plant have adverse effects but not enough to derive a NOAEL or LOAEL.</i></b></p>

Myers <i>et al.</i> , 2002	IEH 2004	Base-line cross-sectional study in miners working in deep mining and opencast. Largest study, modern technology. Well conducted and described. Inhalable fraction = 1.4 times total dust. No correlation between MnA and MnB. <b><i>Critique: good quality exposure data recorded.</i></b>
Clewell <i>et al.</i> , 2003	ACGIH 2012	Calculation of BMD for datasets underlying Roels <i>et al.</i> , (1992) and Gibbs <i>et al.</i> , (1999) studies. Some approximations required to derive exposure concentrations for individual workers. Analysis based on current exposure concentrations (based around arithmetic mean), given the likely interindividual variability in exposure in each exposure group, there could be significant under or overestimates of exposure at an individual level) – CEI was not investigated (which seems a major weakness). <b><i>Critique: the elegance of presentation hides considerable uncertainty in the most appropriate way to handle the exposure data.</i></b>
Myers <i>et al.</i> , 2003a	EC 2011;	Exposure assessment based on measurements made to meet regulatory requirements with some additional measurements made to confirm reliability of routine measurements. NIOSH methods of analysis - no detail on QC but no reason to anticipate that data would not be reliable. Measurements made for individuals representative of task being assessed - data collected over 4 years - should have a reasonable long term average TWA for each occupational group. Individual mean and cumulative exposure assessments made by multiplying concentration for each job times years worked in that job and average exposure intensity and average exposure intensity calculated from cumulative exposure divided by service life. Exposure treated as a continuous variable in analysis of exposure-response relations. <b><i>Critique: unsure how representative measurements are of historical exposure which may have been higher.</i></b>
Myers <i>et al.</i> , 2003b	MAK 2010;	Analytical methods and QC well described, but time period over which sampling conducted not given. <b><i>Critique: implication that exposure assessment based on a snapshot of exposure concentrations rather than being representative of long term mean exposure levels.</i></b>
Bast-Pettersen <i>et al.</i> , 2004	ACGIH 2013; EC 2011	Mn Air - personal full shift sampling for 3 days for each individual on days close to their neuropsychological examination. No information about long term variation in individual exposure levels. Urine and Blood samples taken. Exposure data treated as continuous variable. Plots of data as groups with differing duration of exposure. Data examined against low, medium and high MnB. <b><i>Critique: exposure data may be unrepresentative of past exposures - potential for effects of exposure to low concentrations to be over-estimated.</i></b>

Young <i>et al.</i> , 2005	BD 2013; EC 2011; ACGIH 2013	<p>Related to Myers (2003b) smelter study - not sure whether same source of exposure data. 310 inhalable dust concentrations, 98 personal dust concentrations - suspect single measurement campaign - not clear whether representative of historical exposure levels - cumulative exposure indices developed but then divided by duration of exposure to give average intensity. Study focussed on respirable Mn - estimation of respirable Mn where gaps in job exposure measurement. Link given to more detailed description of how exposure estimates were derived is broken.</p> <p><b><i>Critique: response examined by exposure category by average intensity of exposure rather than cumulative exposure - so issue of whether central tendency, upper or lower bound concentration most relevant plus issues of whether cumulative exposure and/or peak exposures more relevant. Authors state that only the intensity groupings presented as cumulative exposures gave similar results - which seems surprising.</i></b></p>
Ellingsen <i>et al.</i> , 2008	EC 2011	<p>Details of sampling and analysis in Ellingsen et al (2006). Sampling conducted as a single survey- blood and urine samples for 96 welders - 180 air samples collected on preceding 2 days for each welder providing biological samples, QC for analysis described, evidence of a methodological approach to the sampling.</p> <p><b><i>Critique: no information about day to day variability of the exposure of any individual - measurements reflect average for group; analysis examined MnB, MnAir and duration of exposure but not cumulative exposure. Exposure data may be unrepresentative of past exposures - potential for effects of exposure to low concentrations to be over-estimated. No information that would confirm MnB, MnAir for individuals that were used in the analysis were actually representative of long term exposure for those individuals. The study tells you about the average level of neurobehavioural impairment versus an average cumulative exposure as MnAir but is not going to provide reliable dose-response information beyond that - the determination of MnAir, however, is likely to be reliable.</i></b></p>
<p>Meyer-Baron <i>et al.</i>, 2009 (meta-analysis) 13 studies included:</p> <p>Bast-Pettersen <i>et al.</i>, 2004</p> <p>Blond &amp; Netterstrom, 2007; Blond <i>et al.</i>, 2007</p>	MAK 2010	<p>See above</p> <p>No details given of how Mn measurements made. Dust measurements made in 1970s varied from 0.7-62.2 mg/m<sup>3</sup> as total dust, Mn 1-3%, Mn in air assumed to have been between 0.01 and 1.9 mg/m<sup>3</sup>, median 1.1 mg/m<sup>3</sup>. Personal and static measurements of Mn made in 1990s - personal inside airfed helmets, static outside, much higher, stated that</p>

		<p>compliance with use of air fed helmets was &lt;100% - total Mn 0.01-0.84 mg/m<sup>3</sup>, median 0.03. Median PbB in 1989 was 0.79 umol/l = &lt;2 ug/dL.</p> <p><b>Critique: comparison made between exposed and unexposed groups - no exposure response information in terms of threshold of effects, contribution of higher levels of historical exposure or consideration of cumulative exposure.</b></p>
Chia <i>et al.</i> , 1993		<p>Regular annual monitoring of exposure had been undertaken for many years – personal samples for a representative selection of workers. Neurobehavioural effects not considered in relation to airMn or CEI – air monitoring results show steep decline in air Mn through time – so workers received historical exposures that were vastly greater than those experienced at the time of the study.</p> <p><b>Critique: study not informative about relationship between air Mn and neurobehavioural effects.</b></p>
Ellingsen <i>et al.</i> , 2008		See above
Lucchini <i>et al.</i> , 1997		<p>Exposures quoted as total dust. No differentiation by job function or location reported.</p> <p><b>Critique: Well-conducted study but small sample size and lacking detail.</b></p>
Mergler <i>et al.</i> , 1994		See above
Myers <i>et al.</i> , 2003a		See above
Roels <i>et al.</i> , 1992		See above
Roels <i>et al.</i> , 1987		<p>Cumulative exposure unable to be accurately estimated. Exposure categories derived from supervisors estimations of past exposure. There was a significant rank correlation between this subjective estimation of cumulative exposure and blood manganese levels but not urinary levels. On an individual basis, neither blood nor urinary manganese correlated with current exposure or with duration of exposure.</p> <p><b>Critique: Well-conducted study with some indication of adverse effect of Mn exposure on respiratory system; however, respiratory findings not backed up in Roels <i>et al.</i>, 1992.</b></p>
Sjögren <i>et al.</i> , 1996		<p>Exposure assessment based on exposure times provided by Welders and the reported time spent on TIG or MIG welding - the welders appear to have been questioned some years after exposure - only 13 welders had been exposed to Mn and had welded for more than</p>

	<p>100 hours in high alloy Mn steel - small information base. Exposure to particles in breathing zone of welders measured in mid 1970s was 10 mg/m<sup>3</sup> for MIG and 1 mg/m<sup>3</sup> for TIG - fumes from electrodes used contain 2-8% Mn. Study focussed on biological monitoring - no relationship between MnB and former Mn exposure. Exposure response relationship reported for Al.</p> <p><b>Critique: no detailed investigation of exposure response relationships reported and no clear information provided about the levels of Mn exposure that were associated with neurobehavioural impairment.</b></p>
Wang <i>et al.</i> , 2006	<p>Details of exposure measurements not given – not clear whether personal measurements of whether respirable or total (welding so probably predominantly respirable anyway); routine surveillance data from 1995-2002 showed concs of Mn ranging from 0.1-0.5 mgm-3.</p> <p><b>Critique: effects not looked at in relation to air Mn – probably not helpful in setting an OEL.</b></p>
Yuan <i>et al.</i> , 2006	<p>20 air samples were collected during welding – 10 minute samples collected at height of breathing zone – implies not true personal samples - particularly as welders would have been wearing helmets – from these samples cumulative Mn exposures were calculated based on exposure duration – given the small number of measurements on which these estimated cumulative exposures are based, there is considerable uncertainty in their reliability. It is not stated how 8 hour TWAs were assessed on the basis on ten minute measurements.</p> <p><b>Critique: although the study establishes neurobehavioural effects in the exposed workers (with an estimated mean exposure level) it does not provide information as to the level of exposures associated with NOAELs and LOAELs – neurobehavioural endpoints are not analysed against air Mn or CEI.</b></p>

462

463

464 From the critique of available exposure assessments carried out for the studies utilised by  
 465 SCOEL, MAK and ACGIH, it is possible to identify the key studies *based on reliability of the*  
 466 *exposure data* (although it should be noted that some have other remaining limitations) as  
 467 those reported by Roels et al. (1992), Gibbs et al. (1999), Myers et al. (2003a), Bast-Pettersen  
 468 et al. (2004) and Ellingsen et al. (2008).

469  
 470 An important limitation of the above studies is a lack of standardisation of some test  
 471 methodology to identify response/effects, especially subtle non-clinical neurotoxicological  
 472 effects. For others with standardised methodologies, the interpretation of results can be  
 473 subjective. The main finding(s) from the neurological testing carried out as part of the above  
 474 studies is detailed in Table 3.

475

**Table 3 Outcome of neurological testing in key studies.**

Study	Occupational Group	Neurological testing	End-point
Roels <i>et al.</i> , 1992	Battery workers	<ul style="list-style-type: none"> <li>• audioverbal short term memory test.</li> <li>• simple visual reaction time measurement over 4 x 2 minutes using a chronoscope (EAP, Issy-les-Moulineaux, France).</li> <li>• hand steadiness test (3 x 7 holes, 15 seconds per hole, hole diameter 8 to 3-5 mm) using the hole tremormeter</li> <li>• eye-hand coordination test (2 x 1 min) using the orthokinesimeter of the apparatus of Bize (EAP, Issy-les-Moulineaux, France).</li> </ul> <p>The last three tests were performed with the dominant hand only. For the eye-hand coordination test the subject was requested to perform the test at a</p>	<p>Decline in visual reaction time, eye-hand coordination, hand steadiness.</p> <p>LOAELs of:            0.22 mg/m<sup>3</sup> (resp)            0.95 mg/m<sup>3</sup> (total)            Based on increased risk of hand tremor.</p> <p>Logistic regression            LOAELs:            increased risk of peripheral tremor (5% abnormal response increment) when the lifetime integrated exposure to:            respirable manganese dust exceeded 3.575 (p=0.029) and to total</p>



**Table 3 Outcome of neurological testing in key studies.**

Study	Occupational Group	Neurological testing	End-point
		speed imposed by a metronome (1 hit/s).	dust exceeded 0.730 mg/m <sup>3</sup> x years (p=0.054).
Gibbs <i>et al.</i> , 1999	Smelters	<ul style="list-style-type: none"> <li>• hand steadiness (movemap steady; movemap square; EAP tremometer)</li> <li>• Hand-eye co-ordination (EAP Orthokinisimeter)</li> <li>• Rapidity of motion (4 choice reaction time; finger tapping)</li> <li>• mood and neuropsychological health questionnaire.</li> </ul>	NOAELs of: 0.04 mg/m <sup>3</sup> (resp) 0.11 mg/m <sup>3</sup> (total) Based on lack of neurobehavioural changes at this level of exposure.
Myers <i>et al.</i> , 2003a	Miners	<ul style="list-style-type: none"> <li>• Maximum forward digit span</li> <li>• Maximum backwards digit span</li> <li>• Digit symbol score</li> <li>• Mean reaction time.</li> </ul>	NOAEL of: 0.2 mg/m <sup>3</sup> (total) based on lack of neurobehavioural changes at this level of exposure.
Bast-Pettersen <i>et al.</i> , 2004	Smelters	<ul style="list-style-type: none"> <li>• Neuropsychiatric questionnaire.</li> <li>• Wechslers adult intelligence scale.</li> <li>• Digit Symbol.</li> <li>• Trail-making test.</li> <li>• Stroop test.</li> <li>• Digit Span.</li> <li>• Benton test.</li> <li>• Kløve-Matthews Motor Steadiness battery.</li> <li>• Tremor test.</li> <li>• Finger Tapping.</li> <li>• Foot Tapping.</li> <li>• Dynamometer.</li> <li>• Grooved Peg-board test.</li> <li>• CATSYS System.</li> <li>• Luria-Nebraska Thumb/Finger Sequential Touch.</li> <li>• Simple Reaction Time test.</li> <li>• Hand Eye Coordination test.</li> </ul>	LOAELS of: 0.036 mg/m <sup>3</sup> (resp) 0.301 mg/m <sup>3</sup> (inhal) Based on hand tremor.
Ellingsen <i>et al.</i> , 2008	Welders	<ul style="list-style-type: none"> <li>• Questionnaire Q 16.</li> <li>• Digit Symbol.</li> <li>• Digit Span.</li> <li>• Finger Tapping.</li> <li>• Foot Tapping.</li> </ul>	LOAELs of : 0.338 mg/m <sup>3</sup> (respirable) 0.423mg/m <sup>3</sup> (total)  NOAELs of: 0.110 mg/m <sup>3</sup> (respirable)

**Table 3 Outcome of neurological testing in key studies.**

Study	Occupational Group	Neurological testing	End-point
		<ul style="list-style-type: none"> <li>• Dynamometer.</li> <li>• CATSYS Postural Sway test.</li> <li>• CATSYS Maximum Frequency test.</li> <li>• Kløve–Matthews Static Steadiness test.</li> </ul>	<p>0.137 mg/m<sup>3</sup> (total)</p> <p>Based on impaired finger Tapping speed</p>

476

477

478 For some of the neurofunctional tests used in the above investigations there are clear NOAELs  
 479 and for others there are LOAELs. In the case of LOAELs it is sometimes difficult to appreciate  
 480 what the significance of the functional outcome may be, as all the findings are considered  
 481 sub-clinical at worst. This is further complicated by the fact that for many of these  
 482 neurofunctional tests (e.g. eye-hand coordination) there is little or no normative data in order  
 483 to give any changes seen in some of these studies a ‘real-life’ context. Where such data does  
 484 exist, such as for visual reaction time, the significant differences in mean RT between control  
 485 and exposed groups noted in the study by Roels *et al.* (1992) are well below those seen with  
 486 aging (Sprenn *et al.*, 2006). It is therefore difficult to judge whether the non-clinical effects for  
 487 visual reaction time described by Roels *et al.* (1992) would impact on the quality of life of  
 488 exposed workers.

489

490 **4. Conclusions**

491 The evidence base described above highlights the continued concerns that exist with regard  
 492 to several potential adverse health effects that may occur following occupational exposure to  
 493 manganese and its inorganic compounds. However, as previously discussed, the most critical  
 494 effect for humans associated with chronic low-dose occupational exposures remains some

495 subtle non-clinical neurological changes in neuromotor and cognitive functions (shown by  
496 endpoints of tests associated with motor speed and speed of information processing). These  
497 are considered to be the lead effects since they are detectable at the lowest occupational  
498 exposure scenarios available. Hence, any health-based OEL based on these endpoints will be  
499 fully protective against any other possible health effect. It should be noted however, that  
500 interpretation of such subtle changes may be subject to variability both between tests and  
501 within study groups, making precise judgement of associated exposure levels difficult.

502

503 Although all the reviewed studies relating to neurological changes in workers have concluded  
504 that the effects are subtle and non-clinical in nature, it is apparent that there has been a  
505 tendency across regulatory guideline-setting bodies to establish somewhat lower OELs than  
506 those proposed in the review by the IEH (IEH, 2004); this applies to both inhalable and  
507 respirable fractions. The recent OELs proposed by the ACGIH in 2013, the SCOEL in 2011 and  
508 the MAK in 2010 are health-based in nature and relate to establishing a level at which no  
509 effect, even if extremely subtle in nature, would be anticipated to occur over a working  
510 lifetime of 40 years; i.e., they are essentially derivations of a NOAEL.

511

512 Additional evidence from a few new longitudinal investigations has reinforced the suggestion  
513 that subtle neurological effects detected in some repeated studies may not progress once  
514 exposure has ceased or been reduced. However, it is now clear that not all changes are fully  
515 reversible once established.

516

517 There is still some question as to the significance of the small non-clinical neurological  
518 changes seen in exposed workers regarding their consequences in terms of both human  
519 health and well-being. That is, it remains unclear if they represent key early markers of an  
520 increased risk of developing more serious neurological disorders (including manganism) in  
521 later life or if they are of little or no consequence to the individual worker.

522

523 Based upon the overall evidence base, it is concluded here that the 8-hr time weighted  
524 averages (TWA) for respirable and inhalable fractions as recommended by the SCOEL in 2011  
525 are the most methodologically-sound, as they are based on the best available studies most  
526 suited to the development of health-based OELs for both respirable and inhalable fractions.  
527 The dose-response characterisation informed by the studies used can be considered to  
528 establish a true human NOAEL for all the neurofunctional endpoints examined in the selected  
529 studies. There is no requirement for short-term exposure limits and as noted in the review by  
530 the IEH (IEH, 2004), there is no reliable biological exposure limit that can be recommended  
531 either based on a health effect or equivalence to an airborne exposure. However, research is  
532 underway to validate useful specific biomarkers of exposure to manganese, in particular for  
533 recent exposure.

534

535 It should be noted that as these recommended OELs are based on very subtle neurofunctional  
536 perturbations which represent the earliest detectable, potentially adverse changes arising  
537 from occupational exposure to manganese adherence to the proposed OELs will therefore  
538 provide protection to workers from all of the other reported effects of occupational exposure

539 to manganese and its inorganic compounds. However, it is also important to highlight that  
540 although the recommended OEL will provided protection to all workers, workers in different  
541 fields – alloying, battery production, fertiliser production, mining, welding etc., could be  
542 protected with less stringent OEL's as the valency, toxicokinetics, solubility, bioavailability of  
543 different inorganic manganese based substances are not the same. Although this lends itself  
544 to the concept of setting 'sector-specific' OELs, data is insufficient at the present time for the  
545 derivation of pragmatic OEL's for each working group sector.

546

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750

751 **Appendix A - Literature search strategy**

752 **Web of Science**

753 **TOPIC** ("BaMnO4" OR "KMnO4" OR "FeMn" OR "Mn2O3" OR "Mn3O4" OR "Mn3O7" OR "Mn5O8"  
754 OR "Mn(NO3)2" OR "Mn(SO4)2" OR "Mn2(SO4)3" OR "MnCl2" OR "MnO" OR "MnO2" OR "MnSO4"  
755 OR "Na3MnO4" OR "SiMn" OR siliconmanganese OR "manganous salt\*" OR braunite OR cianciulliite  
756 OR hausmannite OR polianite OR pyrochroite OR pyrolusite OR ramsdellite) AND **TOPIC** (toxic\* OR  
757 exposure\* OR manganism OR parkinson\* OR poison\* OR teratogen\* OR mutagen\* OR carcinogen\*  
758 OR genotox\* OR neurotox\* OR repro\*) AND **TOPIC** (worker\* OR workplace OR occupation\*)

759

760 **Scopus**

761 TITLE-ABS-KEY ({BaMnO4} OR {KMnO4} OR {FeMn} OR {Mn2O3} OR {Mn3O4} OR {Mn3O7} OR {  
762 Mn5O8} OR {Mn(NO3)2} OR {Mn(SO4)2} OR {Mn2(SO4)3} OR {MnCl2} OR {MnO} OR {MnO2} OR  
763 {MnSO4} OR {Na3MnO4} OR {SiMn} OR siliconmanganese OR {manganous salt} OR {manganous  
764 salts} OR braunite OR cianciulliite OR hausmannite OR polianite OR pyrochroite OR pyrolusite OR  
765 ramsdellite) AND TITLE-ABS-KEY (toxic\* OR exposure\* OR manganism OR parkinson\* OR poison\* OR  
766 teratogen\* OR mutagen\* OR carcinogen\* OR genotox\* OR neurotox\* OR repro\*) AND TITLE-ABS-  
767 KEY (worker\* OR workplace OR occupation\*)

768