



**SVAZ CHEMICKÉHO
PRŮMYSLU ČR**



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OUR COMMITMENT TO SUSTAINABILITY

Interactive meeting on TiO₂ safety and suggested mandatory parameters for consideration of reliability of toxicological studies

Prague, 21 February 2018

Main goal of the meeting

- **Exchange opinions on evaluation system of inert compounds, TiO₂ safety the CLH Proposal to classify titanium dioxide as Category 2- Suspected Carcinogen.**
- **Formulate suggestions and criteria for the evaluation process used by ECHA/RAC and parameters for potential revision of the classification procedure, which would be more objective, robust and less vulnerable to manipulations and abuse.**



TiO₂ in the EU



Production
1100 Ktonnes
(ca. annually)



Market value
€3 billion
(ca. estimated)



Growth
€560 million
(ca. estimated gross added value to EEA economy)



Jobs
8,150 workers &
22,800 support jobs



Paints & Coatings
Architectural: 36%
Industrial: 17%
Inks: 4%,



Plastics
25%



Paper
12%



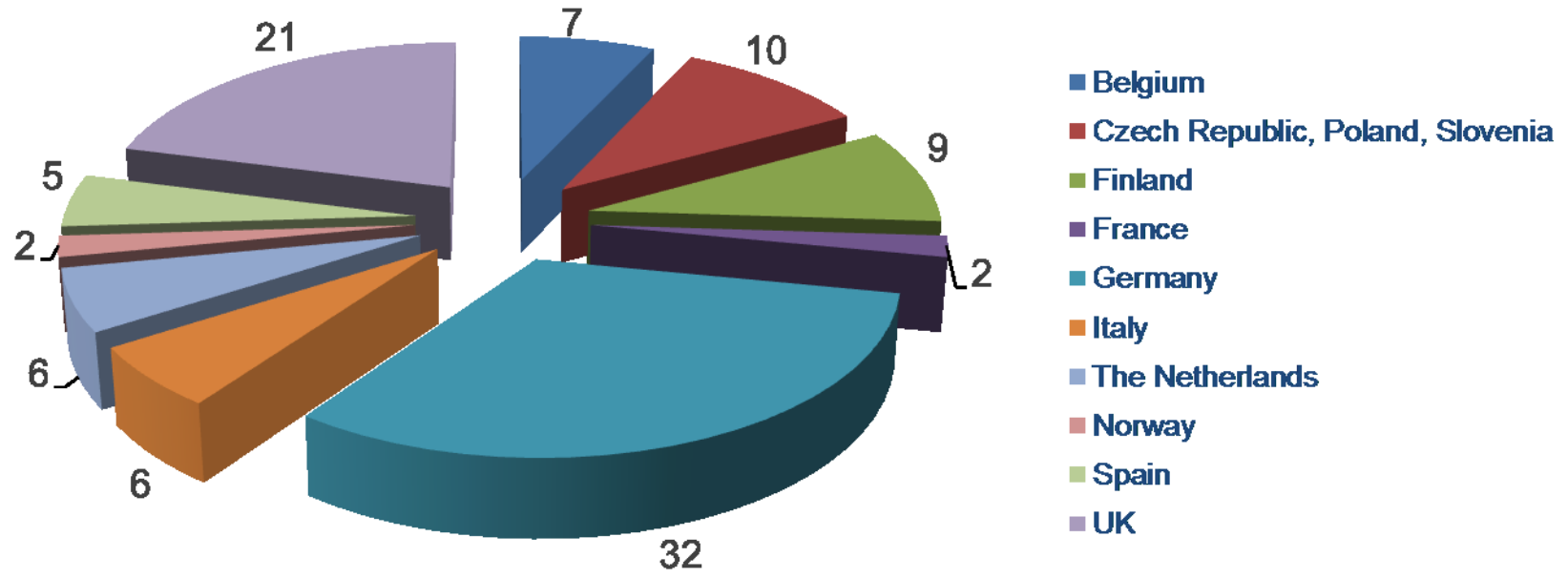
Specialty applications
6%

Source of statistics: Risk and Policy Analysis (RPA), Analysis of the socio-economic impacts of a harmonised classification for titanium dioxide (TiO₂) (2016). Prepared for the Titanium Dioxide Industry Consortium (TDIC)



20% of all TiO₂ produced in EEA

Main TiO₂ producing countries in the EEA



Source of statistics: Risk and Policy Analysis (RPA), Analysis of the socio-economic impacts of a harmonised classification for titanium dioxide (TiO₂) (2016). Prepared for the Titanium Dioxide Industry Consortium (TDIC)



Impacts of the classification of TiO₂

The RAC Opinion suggesting classification of TiO₂ as Category 2-Suspected Carcinogen by inhalation has broad public policy and regulatory impacts beyond the specific substance:

- **Setting a precedent for 300+ substances**
- **Concerns among industry (paint producers, automotive, aerospace, food, pharma, cosmetics, plastics & paper) and consumers about the stigmatisation of products.**
- **Impact on EU wider policy objectives that the EU is promoting, notably a Circular economy as waste streams containing more than 1% TiO₂ become hazardous**
- **Reputational impact on TiO₂ and potential loss of market (approx. 10 - 15%); increased costs for downstream users handling TiO₂ and consumers**

Position of Association of Chemical Industry of the Czech Republic (SCHP ČR) on RAC Opinion

- **SCHP ČR supports the position of TDMA related to the RAC Opinion classifying TiO₂ as Category 2 - Suspected Carcinogen, by inhalation.**
- **In our view, the CLP regulation is not the most appropriate regulatory tool to address issues related to particle toxicity of substances, and raises significant questions about what is “intrinsic toxicity”. The proposed classification of TiO₂, therefore, should not be translated directly into Annex VI**
- **An immediate classification of TiO₂ would have broad regulatory implications beyond CLP in downstream legislation. Moreover, it will set a precedent applicable to a broad range of PSLT substances as highlighted in the RAC Opinion**

Position of Association of Chemical Industry of the Czech Republic (SCHP ČR) on RAC Opinion

- We agree with the concerns on the proposed classification of TiO_2 raised by the Commission and several Member States**
- We strongly support the call by Member States for more time and consideration of the matter before further Commission action**
- We would welcome further discussions among the interested parties to prevent what may be unprecedented and unintended consequences, with broad negative implications beyond TiO_2 .**
- We consider that some of the questions could be considered as part of or parallel to the 2018 CoRAP review**
- We welcome two key activities of TDMA to advance knowledge about scientific and risk concerns- commissioning of an extensive scientific study program to bring new study results into its registration dossier and shadow RMOA**



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