**Association of Chemical Industry of the Czech Republic (SCHP ČR), Czech Association of Nanotechnology Industry (ANP ČR) and Czech Association of Applied Photocatalysis (ČSAF)** organized **Interactive meeting on TiO2 safety and suggested mandatory parameters for consideration of reliability of toxicological studies.** The meeting was organised in connection with the RAC Opinion proposing harmonised classification and labelling at EU level of titanium dioxide on 21 February 2018.

The invited speakers were Prof. Harald F Krug, *Empa, International Research Cooperations Manager NanoCASE GmbH St. Gallen, Switzerland;* Jan Prochazka, Ph.D.; *Czech Association of Applied Photocatalysis ,* Dr. David B. Warheit, *The Chemours Company, USA* , *Technical Fellow, Toxicology and Risk Assessment,* Dr. Rodger Battersby, *EBRC Consulting GmbH, Hannover, Germany, toxicology expert in TDMA,* Dr. David Lockley, *Venator Materials Plc,*  *Product Defence and Toxicology Manager, Global Product EHS an* Prof. Damjana Drobne, *University of Ljubljana, Head of the Research group for Nanobiology and Nanotoxicology at Biotechnical Faculty.*

SCHP ČR, ANP ČR and ČSAF, following the detailed assessment of the professional aspects of the RAC Opinion presented by the speakers - internationally leading experts in the field, took the following position:

**Position of Association of Chemical Industry of the Czech Republic (SCHP ČR), Czech Association of Nanotechnology Industry (ANP ČR) and Czech Association of Applied Photocatalysis (ČSAF) on the RAC Opinion suggesting harmonized classification and labelling of titanium dioxide (TiO2 ) at the EU level.**

The RAC issued an Opinion suggesting classification of TiO2 as Category 2- Suspected Carcinogen by inhalation, as defined in Regulation (EC) No 1272/2008 of the EP and of the Council (CLP). RAC's justification is primarily based on the studies of **extreme and** **prolonged lung overload by inert dust**, potentially causing fibrosis and even tumors.

1. The RAC Opinion suggesting classifying TiO2 as Category 2- Suspected Carcinogen by inhalation is not adequately technically justified and its inclusion in Annex VI of the CLP Regulation would harm both the Czech industry and the EU industry as a whole and reduced its competitiveness at the global level. It would have also caused a serious economic downturn, mainly due to the significantly reduced quality of plastics and paints (estimates show over 10%).
2. The current valid regulations applied to the manufacturing and handling of TiO2  (including its nano-form) and inert dust in the Czech Republic and in the EU are completely sufficient in the terms of protection of human health and the environment. There is no rational and scientifically grounded reason to believe that the classification of TiO2 as Category 2- Suspected Carcinogen by inhalation will bring additional benefits for human health or the environment. Using the existing dust control regulations addresses the described problem of **preventing long term overload of lungs by inert dust** **more appropriate, moreover without any weakening of our own economy**. The permissible exposure limit for TiO2 dust in the working environment is 10 mg/m3 (Table 3 - Dusts with predominantly nonspecific effect in Government Decree No. 361/2007 Coll., laying down the conditions for the protection of health at work, as amended)
3. In line with other proposals from the organizations that have expressed their opinion on the proposed harmonized classification, we recommend that the representatives of the Czech Republic in the EU propose a review and update of this part of the legislation, especially the stages of expert evaluation of the harmonized classification proposal and subsequent public consultation procedures.

SCHP ČR, ANP CR and ČSAF therefore urge the Czech Government and the Czech representatives in the EU to represent their justified and legitimate opinion with the support published in this joint statement.

Technical justification is part of the above-mentioned joint opinion of SCHP ČR, ANP ČR and ČSAF.

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