

- **To the Members of the REACH Committee**

Re: Harmonised classification of Titanium dioxide

Dear Committee Member,

Further to my letter dated 8 June 2018, I'm contacting you again in relation to the harmonised classification of Titanium dioxide (TiO₂) under the CLP regulation.

The European Trade Union Confederation (ETUC) urge you to include all forms of TiO₂ in Annex VI of Regulation (EC) No 1272/2008 with a harmonised classification as a category 2 carcinogen (H351, suspected of causing cancer) through inhalation.

This harmonised classification and labelling at EU level has been proposed by ECHA's Risk Assessment Committee (RAC) in their opinion on TiO₂ adopted in September 2017.

ETUC strongly supports the RAC opinion to classify as a category 2 carcinogen all forms of TiO₂ and call on the members of the REACH Committee to reject the last European Commission's proposal to classify and label only powder forms or only TiO₂ particles above a certain size and to exclude the liquid form. Workers exposed to liquid particles of TiO₂ (e.g. through spray paints) should not be deprived of essential and comprehensive information to adequately protect themselves.

It would be in deep contradiction with RAC opinion and a very bad precedent if forms of a hazardous substance are excluded from a harmonised classification. The CLP regulation is clear that the harmonised classification is based solely on the (intrinsic) hazardous properties of a substance or mixture.

Workers exposed to TiO₂ (whatever its forms) have the right to be informed that this substance is suspected of causing cancers. This is particularly important for workers across the EU since labelling and safety data sheets are the only information tools available to them. These tools allow them and their employers to perform a proper risk assessment and take the necessary risk management measures.

Yours sincerely



ETUC Confederal Secretary