

From: [REDACTED] (GROW)
Sent: vendredi 18 octobre 2019 18:19
To: [REDACTED] (EP)
Cc: [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW); GROW D2
Subject: RE: Nachfrage Titandioxid

Dear [REDACTED]

Thank you again for your message. Below you will find some background the delegated regulation:

In September 2017 the Risk Assessment Committee (RAC) of the European Chemicals Agency (ECHA) delivered their opinion on the hazard classification of titanium dioxide (TiO₂). They did this in the context of the process of harmonised classification and labelling as set out in Regulation (EC) 1272/2008 on the classification, labelling and packaging of chemical substances and mixtures ('CLP Regulation'). The classification process set out in the CLP Regulation is purely hazard-based. In this process, an assessment is made whether the substance fulfils the hazard classification criteria set out in the CLP Regulation. Such assessment is – by legal obligation – based on all available relevant information, including inter alia test results generated according to standardised or internationally recognised test methods or sound scientific principles. The age of a study is no reason to disregard it in the assessment, provided that it is well conducted, validated, and of good reliability.

In the case of TiO₂, the hazard assessment focused on the potential carcinogenicity of the substance. Results of several experimental studies and human evidence were available, and a weight of evidence approach was applied. Despite the proposal by the dossier submitter to classify TiO₂ as a presumed human carcinogen ('Category 1B'), RAC concluded that the available results do not support classification of TiO₂ in that Category. On the question whether the substance should be considered as a suspected carcinogen ('Category 2') or should not be classified as a carcinogen at all, RAC concluded that based, inter alia, on the results of a study conducted in 1995 – considered by RAC to be reliable and relevant, yielding results consistent with carcinogenicity findings of other, similar, chemicals – TiO₂ should be classified as a suspected human carcinogen ('Category 2') by inhalation. The opinion on the harmonised classification and labelling of TiO₂ was adopted by RAC by consensus.

In general, only if new and relevant scientific information becomes available on a substance it is possible for a Member State to submit to ECHA a new dossier for revision of a harmonised classification and labelling with a view to obtain a new opinion by RAC.

I hope this clarifies, and remain at your disposal for any further information on this topic.

Best regards,

[REDACTED]

[REDACTED]
[REDACTED]



European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs
Unit GROW.D.2 – Chemicals

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http://ec.europa.eu/growth/sectors/chemicals_en
https://ec.europa.eu/growth/industry/policy/circular-plastics-alliance_en

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From: [redacted] >
Sent: Friday, October 18, 2019 10:33 AM
To: [redacted] GROW) <[redacted]>
Cc: [redacted] (GROW) [redacted] >; [redacted] (GROW) [redacted] >; [redacted] (GROW) <[redacted]>
Subject: RE: Nachfrage Titandioxid

Dear [redacted]

Thank you for your email and for the information.

Could I kindly follow up with you to see whether you could already send me some information that you might have already received on this matter, which I could forward to Mr [redacted] by today? Please do excuse that I am getting back to you already even though I can imagine everyone is very busy and working on many things at the same time.

Thank you very much for your assistance and best regards,

[redacted]

From: [redacted] <[redacted]>
Sent: 15 October 2019 12:56
To: [redacted] >
Cc: [redacted] (EC) [redacted] >; [redacted] (EC) [redacted] >; [redacted] (EC) <[redacted]>
Subject: RE: Nachfrage Titandioxid

Dear Ms [REDACTED]

This is just to let you know that we are working on your request. I will get back to you as soon as I have received all the information from the colleagues here in DG GROW, ENV and ECHA.

Kind regards,



European Commission

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From: [REDACTED] <[REDACTED]>
Sent: Thursday, October 10, 2019 5:47 PM
To: [REDACTED] (GROW); [REDACTED]
(GROW); [REDACTED] (GROW)
<[REDACTED]>
Subject: RE: Nachfrage Titandioxid

Sehr geehrter Herr [REDACTED] vielen Dank.

Dear Ms [REDACTED],
dear Ms [REDACTED]

Within the EP, questions have been rising regarding the recently published delegated regulation on titanium dioxide and its labelling on products. It seems that the EC decision is based on test results that are around 20 years old. Could I kindly ask you to send us some background information on this/some justification why – if so – specifically these test results have been used?

Thank you very much for your assistance and with kind regards,

[REDACTED]

From: [REDACTED] >

Sent: 10 October 2019 17:32

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]

Subject: Re: Nachfrage Titandioxid

Dear Ms [REDACTED] this subject is dealt with by our sister unit. I would therefore direct you to [REDACTED]

and her [REDACTED] (in cc)

Kind regards

[REDACTED]

Sent from my iPhone

On 10 Oct 2019, at 17:09, [REDACTED]
[REDACTED] > wrote:

Sehr geehrter Herr [REDACTED]

als (neue) Kollegin von [REDACTED] aus dem Büro von Herrn [REDACTED] wende ich mich mit einer Frage an Sie. Zur Zeit herrscht recht große Aufregung im EU-Parlament um das Thema Titandioxid, für das am letzten Freitag, 4.10., der delegierte Rechtsakt veröffentlicht wurde. Es wird oft vermutet, dass in diesem Falle Tests, die 20 Jahre alt sind, verwendet wurden bzw. als Grundlage der Entscheidung dienen. Dürften wir Sie höflich um weitere Hintergründe/Begründungen in diesem Falle bitten?

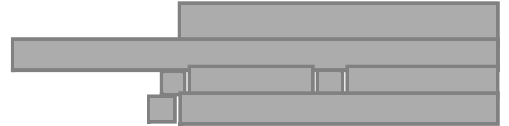
Ich bedanke mich sehr für Ihre Unterstützung im Voraus.

Mit freundlichen Grüßen



<image001.png>

<image002.png>



<image003.png>