

Follow up to the 27th CARACAL – CLP-part:

Classification of TiO₂ and mixtures containing TiO₂ (CA/45/2018)

We strongly support further discussions on this topic in an expert group. The proposal from UK and SLO (document CA/MS/48/2018) appears a good way forward to us.

Furthermore, we are of the opinion that in this discussion process there should be also room for considerations regarding economic impacts and downstream-impacts. These elements are crucial for the choice of the best risk-management-instrument that shall implement the RAC-opinion and any other relevant information, as well as for ensuring the proportionality of the applied legal action.

Looking at CLP, we do not consider that the discussed particle-properties are in the scope of this regulation. In our opinion, an inclusion of this approach into CLP would require a change of the regulation's scope and consequently the scope of the UN-GHS, if we want to keep the global harmonisation intact.

We consider OSH as the better RMO. As a support to OSH in terms of risk/hazard communication art. 32 of REACH could be exploited more efficiently.