

**From:**

**Sent:** Wednesday, September 13, 2017 6:02 PM

**To:** SG UNITE D3

**Cc:** }

**Subject:** Request for a meeting - on Titanium Dioxide - by CEPE: European Council of the Paint, Printing Ink and Artists' Colours Industry

Dear

as Head of Unit for Resource Efficiency in the Secretariat-General, we would like to raise your attention to the impact on resource efficiency by a classification of Titanium dioxide (TiO<sub>2</sub>) as a substance suspected of causing cancer through inhalation.

Working under the EU's CLP (Classification, Labelling and Packaging) Regulation, the Committee for Risk Assessment (RAC) of the European Chemical Agency (ECHA) on 8 June agreed on a scientific opinion to classify TiO<sub>2</sub> as a category 2 carcinogen. We interpret the application of the CLP criteria to the toxicological data on TiO<sub>2</sub> differently to the RAC. We also question that this substance should have been proposed for harmonized classification under CLP in the first place. It is now up to the European Commission and the REACH Committee to take a final decision.

TiO<sub>2</sub> is a white pigment with the highest opacity and as such the most important raw material in the production of paints, coatings, printing inks and plastic. The substitution of TiO<sub>2</sub> would result in less durable products, the need for additional layers of paint (1-2 layers with TiO<sub>2</sub> or more than 4 layers without TiO<sub>2</sub>), and a more frequent application due to a significantly quicker deterioration. Hence, a classification of TiO<sub>2</sub> will increase the environmental burden of painting houses in Europe.

We would greatly appreciate a meeting with you to address the issue of Titanium dioxide and its impacts on resource efficiency in the near future, possibly next week. Thank you in advance.

Kind regards,



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CEPE - European Council of the Paint, Printing Ink and Artists' Colours Industry

Av. E. van Nieuwenhuysse 6 | E

| Belgium

Tel : +32

| Fax : +32

Email : [info@cepe.org](mailto:info@cepe.org)

Website : [www.cepe.org](http://www.cepe.org)

# CEPE

Annual Conference &  
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