

04/2017

07.06.17



## TiO2 - Update on RAC Meetings

On 1 June 2017 the first of two meetings of the Risk Assessment Committee (RAC) dealing with the proposal to classify TiO2 as carcinogen took place.

The industry was represented by observers and experts from the Titanium Dioxide Manufacturers Association (TCMA), the European chemicals association (Cefic) and other sectors. During this first session on TiO2, which lasted 3 hours, **industry was given the opportunity to present their views and arguments during a 45 min presentation**. Presentations were also given by ECHA, ANSES, the RAC rapporteur and other non-industry experts.

According to the feedback we received from the TDMA expert:



- RAC did not reach a conclusion on the weight of evidence of the studies of TiO2 workers.
- The presentation on the **draft opinion suggested that there is no intrinsic toxicity, but only a particle effect**. In which case industry believes, a classification should take into consideration particle shape/morphology, with a reference to asbestos being classified on physical shape.
- **It became clear that any decision on classifying TiO2 will be applied for all other partially soluble low-toxicity particles (PSLTs) which are proposed for a classification.**
- At the end of the session **the Chair concluded that a classification of TiO2 as a 1B carcinogen is not supported by RAC. The upcoming discussion on 8 June will therefore be about classifying TiO2 as category 2 carcinogen or not classifying it at all.**

In parallel to the ongoing discussion in RAC, CEPE – the European paints association – drafted a [letter to the European Commission \(DG Growth\)](#). Thanks to our contact with EFFC, EMO was invited to co-sign the CEPE letter along with 5 other sector associations.

In the letter **the signatories question whether** “non substance specific effects particles” (i.e. **inert substances/dust like TiO2**) fall under the scope of the CLP Regulation and consequently whether the topic should be dealt by RAC at all. As a bottom line, in case RAC proposes a classification of TiO2 for the inhalation route, **the signatories call for a specific note to take into account the forms or physical states in which a mixture containing TiO2 is placed on the market and it can reasonably be expected to be used.** Such a note could help preventing the classification of many mixtures.

While RAC has time until November to deliver an opinion on a potential classification of TiO<sub>2</sub>, the TDMA observers believe that the extension of the discussion at the upcomming meeting **on 8 June** from 1 hour to 3 hours could be a sign that **RAC might already reach an opinion** at this next meeting. Once RAC has reached an opinion ECHA will publish a press-release and TDMA will react with an own press release, which is currently being drafted for all possible results of the RAC consultation.

The next TDMA advocacy/communication web conference, with the latest update on the outcome of the RAC meetings and information on further advocacy and communication activities, will be on 13 June at 14:30 CET time. The EMO secretariat will participate in this web conference and report back.

If you wish to listen in to the TDMA conference, please contact the secretariat.



## **Registered Address:**

EMO  
68 Boulevard du Souverain  
1170 Bruxelles / Belgium

## **General Secretary:**

Antonio Caballero González

## **Secretariat:**

Alliance of European Associations e.V.  
c/o EMO  
Oberforstbacher Straße 407a  
52076 Aachen / Germany

Telephone: +49 2408 5996207  
Mobile: +49 173 9501590  
Fax: +49 2408 5996208  
E-Mail: acg@euromortar.com