

9 REACH update ADCA and TiO₂

ADCA

- Proposal to list ADCA on REACH ANNEX XIV due to its classification as a respiratory sensitizer
- This would mean that authorisation would be needed to use ADCA
- Extensive lobbying by ERFMI in conjunction with EUPC and REACH Committee
 - 3 letters to commission
 - EUPC report on impact of authorisation
 - Submitted response to public consultation

Socio-economic impact of listing ADCA

	Formulators/ Compounders		Plastics Converters		Rubber converters	
	Annex XIV	Non-use	Annex XIV	Non-use	Annex XIV	Non-use
Revenue loss (turnover/year) (billion €)	0.1	0.3	1.3-2.2	3.4-3.5	0.5	0.8
Job loss (#workers)	250	1,500	3,750-6,100	15,900-16,400	1,940	5650

Annex XIV : immediate impact of inclusion in annex XIV regardless if authorization would eventually be granted

Non use :

Impact if ADCA not available following not granted authorization

	Total	
	Annex XIV	Non-use
Revenue loss (turnover end use/year) (billion €)	1.8-2.7	4.2-4.3
Job loss (#workers)	5,940-8,290	23,050-23,550

Current status

- Public consultation is open , ERFMI has responded and sent template for affected companies to respond
- EUPC taking legal argument as ADCA is one of 11 substances which is listed in the document.
- Taking view that this is not legal as the substances should be voted on separately.
- .Please remember to submit your responses on the online portal using [this hyperlink](#) by 22nd May

TiO₂

- Commission Proposal to classify TiO₂ as suspected (category 2) carcinogen by inhalation, as a part of the 14th adaptation technical progress (ATP) of the EU's Classification, Labelling and Packaging (**CLP**) Regulation
- On REACH Committee Agenda for 3rd and 4th June 2019. Not sure if will be discussed as no agreement so tendency to constantly postpone decision

Proposal

'2.12. Mixtures containing titanium dioxide.

- The label on the packaging of liquid mixtures containing 1% or more of titanium dioxide particles with a diameter equal to or below 10 µm shall bear the following statement:
 - EUH211: 'Warning! Dangerous droplets may be formed when sprayed. See information supplied by the manufacturer. Comply with the safety instructions.'
- The label on the packaging of solid mixtures containing 1% or more of titanium dioxide shall bear the following statement:
 - EUH212: 'Warning! Dangerous dust may be formed when used. See information supplied by the manufacturer. Comply with the safety instructions.'
- The label on the packaging of liquid and solid mixtures not intended for the general public and not classified as hazardous which are labelled with EUH211 or EUH212, shall bear statement EUH210 in addition.