

## **AUSTRALIAN PAINT MANUFACTURERS' FEDERATION COMMENTS ON PROPOSED ECHA CLASSIFICATION OF TiO<sub>2</sub>**

These following comments are being provided by the Australian Paint Manufacturers' Federation Inc. in response to the European Chemicals Agency (ECHA) open public consultation on the proposal from the French Agency for Food, Environmental and Occupational Health & Safety (ANSES) to classify all forms of Titanium Dioxide as a Category 1B Carcinogen, by inhalation.

Titanium Dioxide is an essential raw material for the paint, coatings and ink industries, and is used in over 85% of our products. It provides key properties to our products, such as whiteness, opacity, brightness, protection from UV light, stability and durability. It is the most efficient and optimal way to provide an opaque white or coloured layer for decoration and protection for walls, metal objects, plastic films, and other substrates.

The evidence provided by the French authorities is disputed by the coatings, plastics, cosmetics and food and drink industries in Europe, as well as the TiO<sub>2</sub> manufacturers. We especially note the expected comments from the Titanium Dioxide Manufacturers Association (TDMA), various individual producers of TiO<sub>2</sub>, and our own affiliated trade association, the International Paint and Printing Ink Council, Inc. (IPPIC). We endorse their comments and urge ECHA to consider them in the development of a final decision on the proposed classification.

The impact of this reclassification would be devastating to our industry. As the majority of architectural and decorative paints and printing inks sold to the public contain TiO<sub>2</sub>, an unfounded classification of TiO<sub>2</sub> as a Category 1B (Human) Carcinogen would see all of these products removed from general sale to the public. Only professional painters would be permitted to use these products under the special controls established for their use.

The cost to the public would be extreme and add \$Billions per annum to existing household budgets in Australia.