

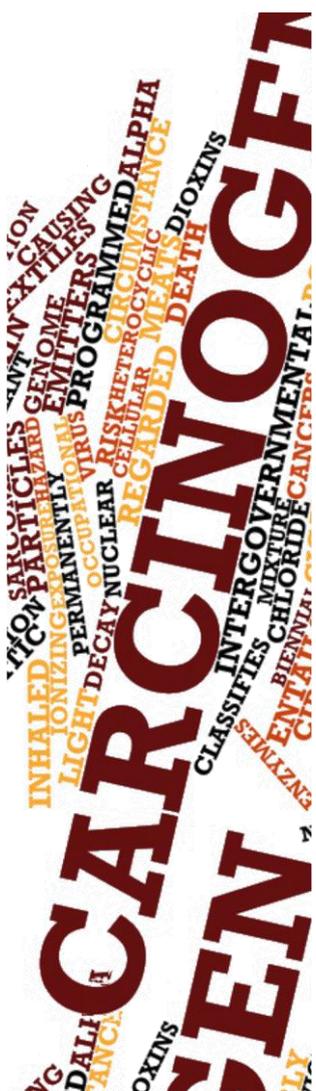
Questionnaire on possible socio-economic impact of classifying TiO2

As informed in EMO Newsflash 07/2016 the **French Agency for Food, Environmental and Occupational Health & Safety (ANSES)** has submitted a proposal to the **European Chemical Agency (ECHA)** to classify titanium dioxide (TiO2) as **Category 1b carcinogen**. At European level the opposition against this legal initiative is led by the **Titanium Dioxide Manufacturers Association (TDMA)** and the **Titanium Dioxide Industry Consortium (TDIC)**. **EMO** supported TDMA's and TDIC's efforts by submitting a [comment to the consultation](#) which closed on 15 July 2016.

Recently we learnt from one of our Dutch experts, that **TDIC contracted Risk & Policy Analysts Ltd (RPA)** with a high-level analysis of the potential socio-economic impacts on EU-based downstream users of TiO2 in case of a classification as Category 1b carcinogen. In order to assess the economic implications, the analysis involves the collection of information on the economic losses for downstream users as a result of the lack of feasible alternatives as well as of the consequences of existing legislation. An example of these consequences is, that mixtures containing >0.1% TiO2 (e.g. white- and bright-coloured paints) would also be classified as Category 1b carcinogen and would not be allowed to be placed on the market for consumer use. To collect the information **RPA has developed an [online questionnaire](#)** and circulated it to individual companies as well as to associations that had previously been identified by TDIC.

Question 5 of the questionnaire refers to the annual volumes and EU market values of the products containing TiO2. This is sensitive information, even if the **organisation answering to the questionnaire shall indicate which information must be handled confidential**. It was therefore suggested that EMO collects all provided input and provides one answer for all, but specially with regards to collecting volumes and market values this is likely to cause anti-trust issues.

The EMO secretariat therefore kindly asks its members to draw the attention of their member companies to the RPA [online questionnaire](#) and to encourage their participation if affected. Companies are kindly requested to feed their input directly into the online questionnaire **until 2 September 2016**. To facilitate studying the





questions and preparing the answers, the EMO requested an offline version of the same questionnaire which may be downloaded [here](#).

In parallel to directly responding to the online questionnaire, **EMO members and/or their company members are welcomed to use the offline version of the questionnaire to provide the secretariat with non-sensitive feedback**. Using this feedback, the **secretariat will try to compile a joint answer to the non-sensitive questions of questionnaire**. With support from members, it will **also try to give a rough estimate/best guess of volumes and values**.

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