

To:
Ms. Elżbieta Bieńkowska, Commissioner for
Internal market, Industry, Entrepreneurship and
SMEs

Mr. Karmenu Vella, Commissioner for
Environment, Maritime Affairs and Fisheries

Mrs. Marianne Thyssen, Commissioner for
Employment, Social Affairs, Skills and Labour
Mobility

European Commission
Brussels

By email:
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Brussels, 06 March 2019

Re: 14th adaptation to technical progress (ATP) of the Classification and Labelling (CLP) Regulation – titanium dioxide (TiO₂)

Dear Commissioner Bieńkowska, Commissioner Vella and Commissioner Thyssen,

The regulatory discussions regarding the proposal to classify titanium dioxide (TiO₂) as a suspected carcinogen (cat. 2) by inhalation have not brought any resolution. The recent public [consultation](#) on the 14th ATP showed substantial stakeholder opposition to the Commission's proposal and we understand that several Member States have raised significant reservations about proceeding with the classification.

Our industry is fully committed to working with the EU Authorities to advance an effective and proportional regulatory resolution as quickly as possible.

To resolve this situation, we ask that the 14th ATP to the CLP continues without TiO₂. Our industry would then support the establishment of an appropriate binding EU harmonized occupational exposure limit for TiO₂.

Most importantly, this approach would effectively and proportionately respond to the identified hazard. It would provide added value by applying a consistent level of protection for human health, while setting out a consistent approach within the EU regulatory framework for the wider issues. Moreover, it also

avoids the extensive unintended impacts on the circular economy, important downstream products made using TiO₂ and the public that benefits from such products.

Notably, the approach is aligned with initiatives from DG Employment. TiO₂ has already been prioritized for an occupational exposure limit (OEL) under the EU's Chemical Agents Directive (CAD).

We would very much appreciate the opportunity to meet you to discuss this further at your convenience.

Sincerely,



Simon Turner
President and CEO, Venator



E. Bryan Snell, President - Titanium Technologies, the Chemours Company



Dr. Christian Günther
Executive Vice President, Cristal



Tomaž Benčina
President and CEO, Cinkarna



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