

Dear Mrs. Cann,

Thank you for your additional feedback. All relevant information related to the vote on TiO2 objection are included in our previous response. We responsibly consider all relevant aspects in all votings.

Kind regards,

Martina Dlabajová, Coordinator RE in ITRE Committee

Ondřej Knotek, Member of ENVI Committee



Martina DLABAJOVÁ

Member of the European Parliament

Renew Europe

From: Vicky Cann

Sent: 19 February 2020 18:42

To: DLABAJOVÁ Martina

Cc: Knotek Ondrej

Subject: Re: Classification, labelling and packaging of substances and mixtures – titanium dioxide

Dear Ms Dlabajová and Mr Knotek,

Thank you very much for your prompt reply.

I note that the only titanium dioxide producer in the Czech Republic is Precheza which is owned by Agrofert which has close links to Prime Minister Babiš. I have two further questions:

1. What bearing did this have on your vote?
2. Did you have discussions with the Czech Permanent Representation and / or the Czech Government about the position to take on this vote?

I look forward to your reply. Thank you in advance.

Yours sincerely,

Vicky Cann

On 19/02/2020 09:15, DLABAJOVÁ Martina wrote:

Dear Mrs. Cann,

please find bellow answers to your questions:

1+2) We agreed to support this objection

3)

a) ECHA classified titanium dioxide based on its particle toxicity which is not an exclusive characteristic of TiO₂ and ECHA clearly confirmed that their finding is not based on exclusive properties of TiO₂. The problem is that CLP classification requires only the exclusive characteristics. So COM probably abused its implementing power when included TiO₂ in CLP Annex.

b) Commission did not follow the Agreement on Better Law-making when as they didn't make impact assessment before the delegated act. Impact assesments are required when social, environmental or economical impacts are expected - and here are expected.

c) legislative and implementation gaps:

- New warning labels will have to be applied even if the product is not classified and on products from which it is not possible to inhale, like toys, cosmetics, paper*

d) potential negative impacts of TiO₂ classification:

- higher costs and misleading of consumer*
- EU circular economy strategy will be affected (recycling of 600 kT of long life plastics every year is in danger)*
- other +- 300 widely used compounds have simillar particle toxicity - with this delegated act COM makes very dangerous precedens.*

e) existing alternative:

Unification of OEL limits on the EU level

4)

a) CEFIC

b) ARNIKA

Kind regards,

Martina Dlabajová, Coordinator (Renew Europe) in ITRE Committee
Ondřej Knotek, Member of ENVI Committee



Martina DLABAJOVÁ

Member of the European Parliament

Renew Europe

From: Vicky Cann

Sent: 13 February 2020 15:14

To: DLABAJOVÁ Martina

Subject: Classification, labelling and packaging of substances and mixtures – titanium dioxide

Dear Ms Dlabajova,

I work for Corporate Europe Observatory and I am looking into the recent vote in the European Parliament on the Objection pursuant to Rule 111(3): Classification, labelling and packaging of substances and mixtures – titanium dioxide:

[https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2019/2843\(DEA\)](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2019/2843(DEA))

- Did you vote in favour of the ECR objection at the plenary vote on 30 January?

- Was this an agreed position within the ANO delegation?

- What were the reasons for you to adopt this position on the file?

- What lobbying did you encounter on this file?

Thank you in advance. I look forward to hearing from you.

Yours sincerely,

Vicky Cann

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Vicky Cann, Campaigner

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