

CLASSIFICATION TITANIUM DIOXIDE

Information for our customers

Dear Ladies and Gentlemen,

on 4 October 2019, the European Commission decided to classify the white pigment titanium dioxide in powder form as a „substance with suspected carcinogenic effects by inhalation“.

The classification under the 14th ATP was published on 18th February 2020 after the expiry of the review period of the Council and Parliament and entered into force on 9th March 2020. After an 18-month transitional period, the products concerned must be classified and labelled by **1th October 2021 at the latest**.

Legally classified (CLP Regulation, Annex VI) **are classified as powdered titanium dioxide** with an aerodynamic particle diameter of **10 microns** and powder mixtures having a titanium dioxide content of 1 % in the form of such particles or incorporated into other particles with such external dimensions.

Powders affected by this classification must be provided with the GHS symbol (GHS08), a signal word (attention!) and a hazard warning (H351: Suspected of causing cancer by inhalation).

In addition, mandatory warnings (CLP Regulation, **Annex II**) are provided for liquid and **solid mixtures** containing 1 % titanium dioxide, even if these will not fall within the classification of powdered titanium dioxide.

While **liquid mixtures** containing TiO₂ particles of 10 microns must be warned against the formation of **hazardous droplets during spraying (EUH211)**, in **solid mixtures, hazardous dusts (EUH212)** are warned regardless of particle size.

In both cases, the packaging must also indicate the availability of the safety data sheet on request (EUH210), unless other ingredients lead to a classification of the mixture.

The classification makes the titanium dioxide powders concerned hazardous substances. However, it should be borne in mind that in Germany titanium dioxide dusts were considered hazardous material/dust by applying the general dust limit value TRGS 900, even before the reclassification. Compliance with occupational exposure limits is designed to protect the health of workers from exposure to exposure to substances.

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Insofar as working with powdered titanium dioxide thus complies with the workplace limit value (general dust limit value according to TRGS 900: 10 mg/m³ E-dust, 1.25 mg/m³ A-dust), there is no change in Germany, as this has also been observed while working. As a result, employees were already protected from the particle effects that occur due to the strict dust limits in Germany.

The solid and liquid mixtures which only have to bear the warning in **Annex II** do not become **hazardous substances** or mixtures.

Article 6 of the Hazardous Substances Regulation requires the employer to determine, in the context of a risk assessment, whether a hazardous substance is being used or whether it may be produced or released. The risk assessment must also include a review of the possibilities of substitution and must be recorded in writing.

In addition, Article 14, paragraph 2 provides for at least annual training for all employees working with hazardous substances, which must be documented in writing.

The activity with the relevant substance may not be commenced until the risk assessment has been carried out and any protective measures derived from it have been taken. It is therefore advisable to take action before the classification is applied.

Best regards

FABRINO Produktionsgesellschaft mbH & CO. KG