

Eurocolour's Position on the EU Green Deal

The EU Green Deal is a central aspect of the EU Commission's Strategy for a more sustainable society. Since its first announcement on 19th December 2019, several roadmaps and initiatives have been published to outline the measures planned to transform EU's economy towards more sustainability with one common goal: to be the first climate neutral continent by 2050.

Eurocolour supports the general goal for more sustainability. A target, that is also strived for in the actions already done by EU's pigments, dyes, and fillers producers over the last decades. These products significantly matter improving material's quality and add value, thus, increasing the lifespan of articles and preventing unnecessary littering. All the while, substances are used that have been evaluated thoroughly and handled safely without any burden for human health or the environment.

While there are quite promising approaches within the Green Deal, Eurocolour doubts the benefit of many of the proposed actions with regard to the transition towards a more sustainable economy. Our main concern is an unnecessary tightening of legal obligations. On one side, this would load a huge burden to EU's industry and brings them at disadvantage, in particular, with respect to innovation potentials, but does not bring any benefit for health, environmental or consumer safety on the other side.

Our key remarks and messages:

- Eurocolour supports for the general objective of the Green Deal for a more sustainable industry but
- Many proposed actions lack the required vision and sensitivity, thus, the benefit is doubtful
- Pigments, fillers, and dyes already give a huge contribution to material's quality and lifetime
- Substances deemed inappropriate were phased out in the past leaving only substances which can be handled safely
- Unnecessary higher costs and more bureaucracy should be prevented as it is an innovation barrier and brings EU's industry in a disadvantage

Aim of this position paper

Pigments, fillers, and dyes play an important role in many various applications. Therefore, Eurocolour's members are affected by many of the proposed measures within the EU Green Deal. However, so far, there have only been detailed strategy papers and initiatives on circular economy, food including food additives and packaging, and a pollution-free environment. Last topic covers the Chemicals Strategy on Sustainability, the plan for the revision of EU's chemical's regulation and handling of chemicals in consumer products. As this strategy

naturally affects the chemicals industry Eurocolour focused on this aspect in an additional position statement.¹

This position paper shall highlight the important role of pigments, dyes, and fillers in the context of safety and sustainability in general. Even though EU's Green Deal brought these topics into political focus, industry has been working on improving the quality and sustainability of products all the time. The products represented by Eurocolour may help to achieve this goal in various application fields. However, the regulative framework must give the producers the possibility to further pursue this goal.

Pigments', dyes', and filler's role in safety and sustainability

The most prominent application of pigments and dyes is in the field of lacquers and paints. They make our home, our clothes and almost everything we use colorful and pretty. But they do more. The benefit of pigments, dyes, and fillers is often underestimated. While they are of course used to prettify, they also fulfill important roles in functionality and sustainability themselves.

Specific colorants serve as signal colors for various applications from safety vests in everyone's car to warning signs and markings in occupational safety. Furthermore, these substances may be used to directly increase occupational health for example by minimizing dust formation.

In medical products, color codes are used to facilitate differentiation of specific sizes or functionalities, helping our medical staff in case of an emergency to do their job at fastest speed possible with less risk of confusion. This of course is also true for pharmaceuticals where drugs are combined with other substances to achieve a pleasant form of administration and avoid mixing-up wrong pharmaceuticals.

Pigments and fillers make food not only look more appetizing but also improve their textures and increase the durability. Thus, less food goes bad and gets dumped. The same goes for food packaging. In cosmetics like toothpaste, fillers do not only serve as abrasion means helping our dental care but also improve the uptake of fluoride and so also improve the long-term prophylaxis.

Articles made from plastic would have a much lower lifespan without additives to improve the material's properties. UV-adsorber prevents brittleness, fillers may improve the flexibility making the article more resistant. Such properties are required for long-living materials, even more so if the materials shall be recycled again and again. Recycled papers already have a high content of fillers to ensure appropriate properties. Thus, the importance of products represented in Eurocolour even tends to increase with the transition towards a more circular economy.

The substances used as pigments, dyes, and fillers are well known and have been used for decades. Many studies and publications deal with their properties and their effects on human health or the impact on the environment. Especially substances that also occur in nature are well investigated. Due to even more restrict evaluation in specific application areas like food, cosmetics or food contact materials, we have a thorough understanding of the behavior of these substances under specific conditions and on effects this might have. Therefore, they

¹ [Download](#) available on Eurocolour Homepage.
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have been handled safely throughout all the decades. There is still no evidence for negative effects of the substances on humans or the environment.

Action within the Green Deal even contradict sustainability

There are several aspects within the Green Deal that are in our point of view clearly contradicting to the general aim for sustainability. Maybe due to the ambitious timeframe set for the implementation of all the planned actions and the resulting speed of elaboration of each strategy, some of the proposed measures seem rash and immature.

For example, the safe handling of hazardous substances must be ensured. Therefore, the precautionary principle was introduced. Only by assessing the hazard of each substance in combination with the specific exposure in the aimed form of application, a detailed evaluation of the risk is possible. Due to the huge availability of publications on substances which is still increasing everyday there is always a scenario where hazardous properties arise. Even 500 years ago, Paracelsus recognized this truth in stating that only the dose – or exposure, speaking in modern terms – defines the poison. Furthermore, substitution with less well evaluated and understood substances looms which endangers the health and safety of consumers more than the continued use of well-known and safely handled substances even if they may be classified.

A solely hazard focused approach in evaluation of chemicals contradicts the precautionary principle. It is not considered that we have good experience and know-how on handling chemicals classified as dangerous and have been using them safely for many years. A ban of chemicals solely based on the hazardous properties contradicts the general aim of the Green Deal as a huge variety of available chemicals is a fundamental basis for innovations which are required to achieve the high goals of the EU Green Deal.

By introducing new hazard classes for effects that are already covered in the given regulations or more reporting and documentation requirements, the communication of hazards does not improve, nor will there be a benefit for human health or the environment. But such additional burdens will bring EU's chemical industry in disadvantage and further inhibit innovations and new product developments. Again, this contradicts the aim for a more sustainable economy.

Conclusion

Eurocolour and its member companies support the general goal for a more sustainable economy. However, so far, the proposed actions by the EU Commission lack the vision and sensitivity required to continue the safe handling of chemicals and achieve more sustainable products at the same time.

Especially the pigments, dyes, and fillers industry already improves materials quality and therefore contributes to the sustainability. Substances deemed inappropriate for specific applications were phased-out or limited in their application possibilities in the past. Thus, substances used today are well investigated, evaluated several times according to different application requirements and handled safely for many decades.

We see no benefit in adding additional warnings to substances whose properties have not given a reason of concern over decades, increasing costs and bureaucracy for comply with the

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many different regulations in place. A reduction and deterioration of the available substance base is huge innovation barrier and hurdle for further product developments. Thus, more sustainable products are even hampered by the proposed actions while such innovations are urgently needed to enable a more sustainable economy.

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About Eurocolour:

Eurocolour e. V. is the umbrella association for the manufacturer of pigments, dyes, fillers, frits, ceramic and glass colours and ceramic glazes in Europe.