

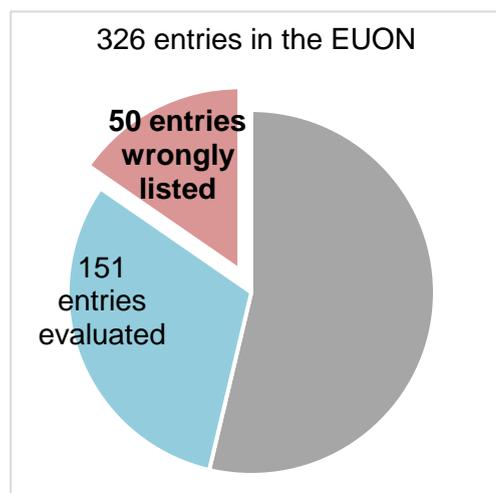
## **Eurocolour's results of a detailed evaluation of pigments, dyes and fillers listed on EUON as nanomaterials: 30 % of entries wrong**

Eurocolour e. V. represents manufacturers of pigments, dyes, and fillers in Europe. As pigments and fillers exhibit best properties in the form of small particles, they are often produced with particle sizes in the range of a few hundred nanometers. With the introduction of nano definitions and nano specific requirements in respective legal texts, some of these materials faced new challenges even though the product itself did not change at all.

To give an overview of nanomaterials on the market, their uses, and regulations, ECHA launched the European Union Observatory for Nanomaterials (EUON) in 2017. Since then, the platform was gradually expanded to its today's status. This includes a database, listing materials reported as nanomaterial in different countries or inventories. However, these sources do not necessarily have the same definition or reporting obligations for nanomaterials. As a result, a substance listed for example in the French national nano inventory does not necessarily need to be reported as a nanomaterial in Belgium or under the EU cosmetics inventory but still appears on EUON.

Lately, the database was used by ECHA as a basis for an approximation of the expected dossier updates under REACH Regulation concerning so-called nanoforms. Nanoforms follows the definition of a nanomaterial in 2011 (Recommendation on the definition of a nanomaterial (2011/696/EU)) and need to be reported separately in the registration dossier since 1<sup>st</sup> January 2020. With increasing legal requirements for nanoforms, downstream user and customers look for the EUON database for reliable information. But with not all data of the used sources available, incorrect entries may occur. Therefore, Eurocolour evaluated the entries associated with the represented products and thus, tried to improve the data quality.

In June 2020, the EUON database contained 326 unique substance entries. About half of these entries are related to pigments, dyes, and fillers. Eurocolour evaluated these 151 entries and checked the data sources for correctness. Overall, 50 entries were identified as wrongly listed. Two reasons for a wrong inclusion were identified. First of all, many substances were reported to the French national inventory based on surface measurements alone as a precautionary measure. Subsequent available data on the actual particle diameter clarified that these substances were not nanomaterials. However, the entries in the national inventory as well as in the EUON list were not removed.



The second main reason for wrong listing concerned dyes. Dyes are per definition substances which need to be soluble in water and/or other solvents in order to be used in their application processes. Due to their solubility, dyes cannot be considered nanomaterials and should in general not be listed in a nano inventory.

The results found by Eurocolour including a full list of all evaluated entries were presented to ECHA in September 2020. ECHA appreciated the effort and promised to check and correct the wrong entries.

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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