

At a glance: Eurocolour Position on the proposal to set a 10 mg/kg limit for Hexachlorobenzene as UTC in the Regulation (EU) 2019/2021

Hexachlorobenzene (HCB) has been banned globally for manufacture and use under the Stockholm Convention on Persistent Organic Pollutants. However, HCB may be unintentionally formed as a by-product during the production process of some organic pigments and thus remain present in those materials as unintentional trace contaminant (UTC). The European Commission has prepared a draft delegated act introducing a directly applicable UTC limit value of 10 mg/kg. This may be feasible for most substances, but for certain organic pigments and their raw materials it will pose a huge problem.

Our concerns:

- ❖ The UTC limit value is not achievable for Pigment Green 7, Pigment Yellow 138 and the raw material Tetrachlorophthalic anhydride (TCPA), which are particularly important for the printing ink industry.
- ❖ Without these pigments, especially Pigment Green 7 commonly regarded as industry standard, the current array of colours available would be significantly restricted for the European printing ink industry.
- ❖ Nevertheless, the UTC limit will not prevent the continued occurrence of HCB but will shift the problem outside Europe. The chemical substance continues to be imported across international boundaries in articles imported from outside Europe.
- ❖ The regulation will boost the production of these pigments outside Europe and weaken the European location for the colourant manufacturing industry. Supply will be provided through global supply chains with the disruption vulnerabilities we have experienced in the past.
- ❖ Setting the same limit value for raw materials, intermediates and articles is not appropriate and puts European producers at the beginning of the value chain at a severe disadvantage.
- ❖ The foreseen timescales are far too short to clear stocks that are already in the supply chain. They will not be able to be implemented in the value chain.

Our proposed actions:

- ❖ Setting of special UTC limit values for these three substances:
 - ◆ Pigment Green 7 and Pigment Yellow 138: 50 mg/kg
 - ◆ TCPA: 100 mg/kg
- ❖ At least, appropriate transitional periods permitting the implementation at EU manufacturing sites and for downstream users are mandatory.

Eurocolour e. V.

is the umbrella association for manufacturers of pigments, dyes, fillers, frits, ceramic and glass colours, and ceramic glazes in Europe.

Registration No. EU Transparency Register: 90219 263 4607-21

Mainzer Landstraße 55
60329 Frankfurt/Germany

Phone: +49 (0)69 - 2556 - 1351
Fax: +49 (0)69 - 2556 - 1250

www.eurocolour.org
contact@eurocolour.org