

General comments for the ECHA public consultation on the proposed harmonised classification and labelling of zinc pyrithione

The following represents a statement of the European Polymer Dispersion and Latex Association - EPDLA – a Cefic sector group.

The members of EPDLA welcome the opportunity to comment on the proposed harmonised classification and labelling of zinc pyrithione (ZnPT – CAS 13463-41-7). We are aware that the ECHA consultation on the harmonised classification and labelling (CLH) of ZnPT mainly aims to collect comments on the proposed hazard classes. For this purpose, we fully support the scientific and technical arguments brought forward by the ZnPT Industry CLH Consortium. We urge that all available data relevant to the substance along with the key data, concepts and parameters of reproductive toxicity are reviewed and considered during the future discussions on ZnPT.

Zinc pyrithione is under review for approval as an in-can preservative (product-type 6) under the BPR and may be used as a co-biocide for such purpose in polymer dispersions, especially in combination with isothiazolinones. Zinc pyrithione is also a key biocide for dry-film preservation in paints and coatings, one of our main downstream applications.

The proposed environmental classification (M factors for Aquatic impact) would also affect the current applications for ZnPT in our industry.

For this purpose, we fully support the additional/new scientific and technical arguments on the aquatic toxicity brought forward by the ZnPT Industry CLH Consortium in July 2018.

The CLH proposal for ZnPT therefore challenges the availability of ZnPT as a solution for future preservation systems and adds to the increasing complexity which industry is facing to ensure sustainable in-can preservation of waterborne products.

The difficulties linked to the one-by-one disappearance of key in-can preservatives have been highlighted to the responsible authorities together with other industry associations¹. It is clear that the already limited number of available in-can preservatives is being reduced one by one via the technical and regulatory requirements of the BPR and the CLP. We call for a holistic view on in-can preservatives under the BPR to avoid the negative consequences of losing adequate in-can preservation, such as impacts for consumer's health, the environment, businesses and irreversibly the European market. We also urge to follow a more risk based approach to evaluate substances, particularly preservatives, rather than to focus on a pure hazard based approach.

We therefore ask you to consider our comments in future discussions of the proposed harmonised classification and labelling of zinc pyrithione.

¹ AISE, CEPE, EBPF, EDANA, EFCC, EPDLA, FECC, FEICA: A holistic approach to the evaluation of in-can preservatives: <https://circabc.europa.eu/d/d/workspace/SpacesStore/831a39cc-ca5b-41ac-b0b7-74138a89043d/CA-March17-Doc.5.2 - Review of PT 6 in-can preservatives-Industry position-Final 02 03 2017.pdf>

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About EPDLA

EPDLA (European Polymer Dispersion and Latex Association), a Cefic Sector Group founded in 1991, is dedicated to promote the safe manufacture, transportation, distribution, handling and use of waterborne polymer dispersions, in compliance with regulatory requirements and industry guidelines. EPDLA members are committed to Responsible Care® principles and have implemented risk management according to the precautionary principles.