Mission statement

The purposes of the association are to:

• Coordinate and unify the efforts of manufacturers of synthetic organic colorants to minimize possible impacts of these products on health and the environment.

• Achieve these ends by the most economic means without reducing the level of protection of health and the environment.

• Encourage harmonization of health and environmental regulations in key geographical areas.

• Represent the positions and interests of the manufacturers of organic colorants towards authorities, public institutions and media.

• Promote responsible environmental and health risk management during manufacture, transport, use and disposal.

• Enhance the recognition of the commitment of ETAD members to responsible behavior with respect to health and the environment.
Dear friends of ETAD,

While starting the new year with the happiness of successful works in 2019, I believe that we will meet the sustainable transformations of 2020 with the same team spirit. Transparency, information-sharing and solution partnership are among the top priorities of the industry. I encourage our valuable ETAD members to have an active role in this transformation by sharing their profound know-how in dyes and pigments chemistry within the value chain.

When we look at what we achieved in 2019, we see, once again, that the collaboration with stakeholders is the key for having an impact on the changes affecting our industry; in the following paragraphs, I would like to outline specifically some of our activities.

First of all, we saw very clearly that, after REACH’s third registration phase, the work for our companies was far from done. ETAD provided them with information on ECHA’s latest plans and updates on the registered colorants and remained a platform where our members can share their experience on the practical aspects of the post-REACH activities and decide on the appropriate preparatory work.

Additionally, the REACH experience can be used to deal with similar systems in other jurisdictions such as Turkey and Korea, or even adjusted to the BREXIT case; here as well it is ETAD’s job to assist its companies in the understanding and implementation of these new regulatory requirements.

In particular as regards REACH-registered pigments, a big success for ETAD companies were the final results from the inhalation studies of organic pigments, which showed no nano-related toxicity. These results are even more important now that the nano status and properties of registered substances are coming under a stricter scrutiny by ECHA.

Collaboration with authorities continued also on a national level. ETAD’s project on unregulated aromatic amines in collaboration with TEGEWA and with the German and Swiss authorities proceeded very well in 2019 thanks to the commitment of our dye-producing member companies, which prepared detailed feedback on selected REACH-registered dyes.

In Taiwan, ETAD started the discussion with the authorities on the unclear hazard evaluation of some dyes and provided to them available data to support the lack of hazardous properties.

As always, standard issuers were important communication partners for our association. In particular, as a member of ZDHC’s MRSL Advisory Group, ETAD worked on the update of the MRSL v2.0 and provided the updated table for “smart testing” of impurities in organic colorants used in clothes and apparel applications, in order to minimize the recommended testing to a sensible and reasonable level. ETAD is also following closely the developments of the announced ZDHC’s Safer Chemistry project.

Last but not least, in 2019 ETAD was confronted with the case of one of our members having seriously breached the Code of Ethics. After a careful evaluation of all available information as prescribed by ETAD Rules for the Implementation of the Code of Ethics, we had to ask the company to resign. This is an unfortunate case, and we hope that we will not have other such cases in the future.

I would like to end this preface by thanking Dr. Hofherr, Dr. Fois, Dr. Xie, Ms. Geary and Mr. Uebersax for the hard work they have done in the past and also thank them in advance for what they will do in the future.

Fig. 1 – Growth and changing regional composition of the ETAD membership
ETAD is a non-profit association. The operating expenses are recovered mainly by means of payments by the ETAD members. In 2019, total income was SFr. 1'071'800 compared with total expenditure of SFr. 912'000, resulting in a profit of SFr. 159'800.

**Fig. 2 – Summary of income / expenditure 2000 - 2019**

**NOTA BENE**: Due to the extraordinary circumstances of spring 2020, at the date of publication these financial results had not been reviewed by ETAD’s external revisors yet. Corrections to the these numbers, if necessary, will be communicated to the members before the General Assembly 2020 and reported in next year’s Annual Review.
45th General Assembly and joint meeting

45th Ordinary General Assembly
The 45th Ordinary General Assembly of ETAD was held in Porto, Portugal on May 24th, 2019.

Out of the ETAD membership of 35 companies at the time of the General Assembly, 22 were present or represented by proxy; of the total vote entitlement of 86 votes, 69 votes were represented at the meeting (80%).

The participants approved unanimously the minutes of the 44th Ordinary General Assembly 2018 as well as the Annual Report 2018.

The Treasurer Mr. Roentgen presented the financial report for 2018, which had been sent in due advance to all member companies. In 2018, total income had been SFr. 1'089'000 compared with total expenditure of SFr. 982'000, resulting in a profit of SFr. 108'000. This financial report was approved unanimously.

The Board proposal for the Budget 2019, also presented by Mr. Roentgen, and the re-appointment of PriceWaterhouseCoopers AG as auditors for the 2019 accounts were approved unanimously by the General Assembly.

Dr. Şener presented to the Assembly ETAD’s main goals for 2019. Two specific and quite important projects will be carried on: the assessment of azo dyes potentially cleaving to unregulated aromatic amines and the organic pigments in the CoRAP list. Collaboration with other associations along the value chain will continue, in order to address common issues (e.g., new regulations on textiles, restrictions of specific chemicals). In Eastern countries, ETAD will continue the active recruitment of potential new members and on their onboarding in ETAD committees. As a specific task, ETAD will also develop and apply new strategies to increase its external visibility, on the basis of the marketing study performed last year.

Joint meeting of ETAD Board, DOC and POC members
The ETAD joint meeting is meant as an opportunity for the different committee members and the Board members to have a deeper insight into each other’s activities and discuss topics of common interest.

Prior to the joint meeting Board members also have the opportunity to take part in the specific committee meetings and have a first-hand experience of the committees’ work and approach to colorant issues. Additionally, they can directly provide their comments to the committee members on crucial topics which strongly affect the colorant manufacturing industry.

The ETAD joint meeting covered the following main topics:
- Results of the marketing study on ETAD's position and visibility in the supply chain;
- Feedback from Board members on their visit in the morning session of the committee meetings.

Marketing study on ETAD’s position and visibility in the supply chain
W. Hofherr presented the main results of the study carried out by Ms. Lela Deronja, under the supervision of the Institut for Marketing und Business Management of the Bern University. The study analysed the internal perception of ETAD by its Basel staff, Board members and selected members of the different committees. After the evaluation of all feedback received, Ms. Deronja developed recommendations on possible future actions aimed to improve ETAD’s visibility by focusing on specific messages and target groups in the colorant supply chain.

The study identified following points which need to be addressed and improved:
- Although having been active for more than 40 years, ETAD is not well known in the supply chain;
- The internet website does not provide a clear picture of what ETAD does;
- In particular Asian members expect a more direct communication from the ETAD office;
- No one could recall the ETAD logo in detail.
First recommendations based on these key points were:

- Simplify ETAD’s website content in order to allow a faster access to relevant and clear information (implementation already started);
- Be more present in Asia through enhanced communication with Asian stakeholders;
- More often direct communication by calling ETAD companies not present in committees.

Feedback from Board members of their visit at the morning committee meetings

C. Mislin referred to the EU proposal for the restriction of substances classified as sensitizers, irritant or corrosive, on which ETAD is already providing feedback, and underlined the necessity of defending dyes from the foreseen strong restriction/ban, which is based on quite debatable assumptions.

C. Grund reported about the proposal that the project on the selective identification of free Co(II) as impurity in cobalt-complex dyes should be restarted.

At the time, the project had concluded that the state-of-the-art of analytical methods did not allow a clear distinction between free Co(II) and Co(III); it should be checked whether new knowledge is available which could help improve the past results.

From the Board members participating in the POC came the general feedback that the nano debate on organic pigments is expected to need even more attention in the future: discussions on the concept of “sets of similar nanoforms” among ECHA, the European Commission and industry have started on an informal basis. The details of the approach and the possible impact on REACH-registered pigments have to be carefully evaluated.

The Board proposal for its composition for 2019/2020 was presented to the Assembly. There were no additional nominations in response to the invitation by ETAD Legal Counsel, Dr. Uebersax. The Board was elected unanimously as follows:

- Dr. Mehmet Emre Şener, Setaş Kimya Sanayi A.Ş., President
- Dr. Clemens Grund, DyStar Colours Distribution GmbH, Vice president
- Mr. Georg Roentgen, Huntsman Textile Effects GmbH, Treasurer
- Dr. Stefan Ehrenberg, CHT Switzerland AG
- Mr. Jashvant Sevak, Heubach Colour Pvt. Ltd.
- Ms. Carole Mislin, Archroma Management GmbH
- Dr. Yoshitaka Koshiro, Dainichiseika Color & Chemicals Mfg.
- Dr. Ulrich Veith, BASF Colors & Effects Switzerland
- Dr. Rüdiger Walz, Clariant Produkte (Deutschland) GmbH

Annual Review 2019
The EU regulatory proposal focused on textiles and leather articles as well as the project on non-regulated aromatic amines in collaboration with the Swiss and German authorities remained hot topics also in 2019. The communication with different standard issuers also kept the DOC members occupied with new or recurring issues. Outside the EU, in particular the Taiwanese scrutiny of specific dyes considered as CMRs required immediate action.

**Communication with authorities**

**EU**
The restriction dossier according to article 69 of REACH on the use of skin sensitizers, skin irritants and corrosive substances in textile and leather articles, hides and furs intended to come into direct and prolonged contact with the skin was officially published in 2019; ETAD immediately started to submit its input to the discussion in collaboration with other associations from the textile/leather supply chain. In particular, the DOC members provided their comments against the proposed approach to disperse dyes, based on extremely conservative and scientifically unfounded assumptions; from the point of view of the implementation, the committee also strongly objected to the proposed automatic link of the restriction to the CLP classification. The restriction in its proposed form would impact not only disperse dyes, which are especially in the focus of the text, but potentially also other dyes with a current self-classification as skin sensitisers. ETAD’s comments were brought to the attention of ECHA’s Risk Assessment Committee and Socio Economical Assessment Committee. The discussion will continue in 2020.

**Turkey**
Through the DOC member Setaş, ETAD members received updated information about developments of the Turkey-REACH. In particular, as for end of 2019, the committee members were informed that the IT system was almost surely not going to allow a bulk upload of registrations. This requirement, together with the expected lack of competent translators of specific technical language (information has to be submitted in Turkish) and the need to create additional information (high-tier data) for substances known to have a higher volume in Turkey than in the EU, is due to cause an extreme slowing down of the registration process. Therefore, it is very unlikely that the foreseen period of two years to complete the KKDIK-registration would be enough. This message was communicated to the Turkish authorities.

**Taiwan**
As part of Phase II lists of priority management chemicals (PMCs) published in December 2018 the Taiwanese authorities also included 24 colorants considered to be CMR; however, for at least 13 listed dyes there is no publicly available evidence of CMR properties. On the contrary, the available studies showed no indication of potential hazard.

The DOC confirmed the lack of evidence for this classification and recognized the risk of having such an arbitrary reference in the public domain as part of a national regulation; P. Fois started the communication with the Taiwanese authorities to clarify the classification source and provide updated information on the 13 affected dyes.

**Non-regulated amines**
In 2019, ETAD continued the discussion with the Swiss and German authorities on the properties of amines potentially cleaving from commercial azo dyes, particularly as regards information about their mutagenicity. Six data summaries were prepared for the six azo dyes registered for a total tonnage of more than 1000 tons/year and discussed with the authorities in order to agree on a suitable format for the dyes/amines’ information. The proposed format was refined based on the DOC input and communicated to the lead registrants of the azo dyes in the second tonnage band (100-1000 tons/year).
The registrants prepared the summaries for the azo dyes based on the submitted REACH dossiers, whereas ETAD added the available information on the potential cleavage products.

In the meantime, the German BfR provided its first feedback on the received data summaries, outlining some points which, in its opinion, needed improvement of the provided information. This feedback will be evaluated by the registrants and by their representative associations ETAD and TEGEWA, in order to decide on further actions.

### Activities with standards’ issuers

#### GOTS
ETAD contributed to the 6th revision of the Global Organic Textile Standard, in particular clarifying quite important dye-related parameters (e.g., a suitable method for free aniline in textiles). Almost all ETAD’s proposal were accepted into the new revision; however, an open point of concern is the proposed ban of microplastics, which might seriously affect pigments and pigment-based preparations used in textile applications. The microplastic proposal is linked to the corresponding restriction currently discussed in the EU.

#### ZDHC
During 2019, ETAD continued its work as part of ZDHC’s MRSL Advisory Committee and provided them the DOC input on all dye-relevant substances evaluated for inclusion in the new version of the restricted substance list. Most substances were adopted into the MRSL with appropriate limits agreed upon with the other stakeholders in the MRSL Advisory Committee; others were put into the Candidate List and will be further evaluated as future inclusions in the MRSL.

The DOC also followed the activities on Screened/Safer Chemistry. ZDHC established in 2019 a specific Task Team for Safer / Screened Chemistry, expected to start the work of convergence with the existing elements of the ZDHC Program. ETAD is a member of this Task Team. In the meantime, ZDHC has been working with the service providers Tox Services, Scivera and NSF on a common scoring document on auxiliaries and on a new scoring approach for dyes and pigments (current scoring system do not work for the differentiation of colorants in separate “hazard levels”). The DOC (as well as ETAD companies in general) communicated their concerns about the use of this kind of oversimplified scoring as a deciding tool on dyes formulations. The results of the scoring discussions are expected to be presented soon to the Task Team for Safer / Screened Chemistry.

#### Analytical project on Cr(VI) in chromium-complex dyes
The Analytical Expert Team continued its work on a method able to determine with precision Cr(VI) as impurity in Cr(III)-complex dyes. In the final steps of the development, the companies’ experts tested the method performance in the presence of a relatively high concentration of Cr(VI) ion. After further refinements, it was decided that enough information and results are available to write down the method. The ETAD office is preparing a first draft.
In 2019, the most important topics of the POC were current authority initiatives related to organic pigments which affected the situation of REACH-registered pigments. The developments of the nano debate and its effect on organic pigments remained in the POC focus as well, in particular as new adaptations to the REACH annexes created additional concerns to the registrants of these substances. As a special achievement in this year’s activities, ETAD Method 229 was adopted as an official ISO method.

Community Rolling Action Plan (CoRAP)

The draft Community Rolling Action Plan (CoRAP), updated by end of 2018, proposed as substances for evaluation 11 colorants (2 dyes and 9 pigments) to be covered from 2019 to 2021. Since, according to the update, most pigments are suspected to be PBT/vPvB and/or CMR, a PBT Working Group was set up within ETAD, under the POC supervision. The group started to tackle the first pigments on the list and organize the communication with the national authorities appointed to their evaluation. In particular, it is important to (re)-submit the specific arguments which were developed by ETAD in the past to advocate for the non-PBT status of organic pigments.

Dossier evaluation activities by ECHA

End of 2018 and beginning 2019, several organic pigments were targeted by ECHA’s dossier evaluation activities. The category argumentation provided in their REACH dossiers by ETAD members which are lead registrants for the pigments was no longer accepted, and affected companies worked together to develop a strategy to confirm the non-bioavailability of organic pigments as a key to counter these activities.

The non acceptance of the arguments for the non-bioavailability is a big concern, since they were the basis of the general approach for deciding about grouping, waiving and read-across among many REACH-relevant pigments.

Nano

Adapted REACH annexes addressing the new terms “nanoform of a substance” and “set of similar nanoforms” were published in November 2018. The ETAD Nano Working Group was re-activated in order to evaluate their potential impact on organic pigments, to discuss required actions and harmonise further proceeding.

A new REACH guidance for the implementation of the adapted REACH annexes was developed by ECHA with involvement of different stakeholders including industry representatives. Unfortunately, the industry input was overruled, and the resulting guidance even exceeds the requirements described in the regulation. A final version of the guidance was published beginning December 2019.

Analytical Expert Team members (status as for end 2019)

- Dr. Ulrich Veith: BASF Colors & Effects Switzerland
- Dr. Martina Hirschen: Clariant Produkte (Deutschland) GmbH
- Ms. Heather Robinson: Sun Chemical Ltd
- Mr. Constantinos Nicolaou: Sun Chemical Ltd
- Mr. Yukio Shinagawa: Dainichiseika Color and Chemicals Mfg. Co., Ltd.
- Mr. Takeshi Suzuki: Dainichiseika Color and Chemicals Mfg. Co., Ltd.
- Mr. Akira Kasai: DIC Corporation
- Mr. Yasufumi Imae: DIC Corporation
- Mr. J. I. Sevak: Heubach Colour Pvt. Ltd
- Dr. Thomas Wagner: Heubach GmbH
- Dr. Kateřina Vyňuchalová: Synthesia, a.s.
Additionally, easy and readily available measurement methods to prove that a powdered material is not a nanomaterial are still missing. Therefore, the ETAD Nano Working Group started discussions to harmonise within the association measurement methods used for organic pigments and their interpretation related to the nano status.

The development of further national nano product registers as well as the evaluation of their potential impact on organic pigments was further carried on as an important task of the POC. The communication with authorities on different levels inside and outside the European Union (EU Commission, Member State Competent Authorities, ECHA, and so on) and NGOs as well as a close industry cooperation including downstream users continued, specifically advocating for pigments as safe nanomaterials.

Food contact legislation

In 2019, the European Commission (EC) placed on hold its work on a measure proposing to harmonize the regulation of printed food-contact materials (FCMs) in the European Union, which had been started in May 2017. The Commission decided to focus on a broader effort to evaluate the EU food-contact legislation as a whole, to assess its overall effectiveness, efficiency, relevance, coherence, and EU added value. The EC will not conduct any further work on the Draft Measure on Printed FCMs, until it has completed the evaluation of EU food-contact legislation more broadly. The current timeline for the completion of this latter evaluation is early 2020.

Following the start of the EU work on the harmonization, Germany had placed its Draft Printing Inks Ordinance on hold. With the EU efforts having been tabled, the Germany authorities could re-commence this work on its draft ordinance, although, until now, they have not opted to do so.

The POC is following closely the developments both on the European and the German level, in order to reach promptly to any new changes possibly impacting organic pigments.

Analytical methods

ETAD companies performed additional Round Robin Test on specific pigments samples following the 2016 version of Method 212 (Identification and Quantification of Primary Aromatic Amines in Organic Pigments by HPLC), after which a third-party laboratory will check its robustness. The Analytical Expert Team is evaluating the results obtained by the new tests.

ETAD Method 229 (Determination of total content of polychlorinated biphenyls (PCB) by dissolution, cleanup and GC-MS) was officially published by ISO under ISO 787-28:2019 on May 15th, 2019.

Further activities

Publications about pigment-related topics like PCB analyses in the environment as well as any regulatory news relevant for organic pigments (e.g. the impact of the potential classification of titanium dioxide on other substances used as powder, substance evaluations related to the new TSCA as well as ECHA’s restriction proposal for microplastics) are carefully reviewed. Appropriate measures are developed by the POC and other pigment-manufacturing ETAD members.
Regulatory Affairs Committee (RAC)

The representatives of the six member companies in the RAC met three times in 2019 to exchange information about and interpret the impact of emerging and changing global or national legislation. The most relevant changes in regulations which affected colorants during the year are summarized below.

EU REACH

*Current activities*

ECHA announced a plan to screen the data for all REACH registered substances above 1 ton by 2027. This followed an announcement that information was considered to be missing from 75% of the inspected dossiers during 2018. Substances registered over 100 tpa will be reviewed by the end of 2023, and ECHA also identified 1300 high priority substances where assessment is required, or further data needs to be generated.

In 2019, ECHA began to send draft evaluation decisions to all the registrants of a noncompliant dossier, rather than just to the lead registrants. Additionally, once a draft decision has been issued, ECHA will no longer consider dossier updates such as changes to tonnage band. Many organic pigments received draft decisions which questioned the approach based on the low availability of these substances. ETAD companies are discussing appropriate strategies to answer the decisions.

Additionally, the European Commission proposed that companies with an SVHC authorization should apply for a review of this if use volumes increase.

Finally, an important reminder for the registrants is that REACH pre-registration numbers (and therefore SIEF membership) only remain active until the end of 2019. After this date, all attempts at a new registration must first be preceded by an ECHA inquiry dossier. Volumes for new substances are now also on a single-year basis with the 3-year average no longer being used.

*Use of REACH LoA outside the EU*

Different REACH-like regulations around the world (Korea, Turkey, post-Brexit UK) will bring about the renegotiation of data sharing and the price of corresponding Letters of Access. The RAC members inspected CEFIC’s Best Practice guide and concluded that decisions on this subject must be left to the individual companies and their consortia/SIEFs. However, the RAC asked that the valuation of ETAD-owned studies to be discussed at ETAD Board level.

CLP Regulation

The 12th, 13th as well as draft 14th and 15th ATP were published. Amendments of particular relevance for colorants are the expected removal of the current obligatory classification on Acid Black 210 and the proposals for biocides, since the new limits may encourage the reduction of levels as in-can preservatives to concentrations below that of efficacy. Concerns were also raised in consideration of the latest proposals on skin sensitizer restrictions as this is a common label for biocidal compounds.

Last but not least, the controversial proposal in the 14th ATP to classify titanium dioxide as a carcinogen contributed to the already ongoing intense debate. The RAC is following this discussion carefully, since the legislative process could be a precedent for other substances in fine powder state with a nano status in the EU.

Nano

The amendments of the REACH Annexes including specific requirements for nanoforms were officially published. It can now be publicly seen which materials have been declared as nanomaterials in some way during non-REACH activities such as in the Belgian and French nano registers or also in cosmetics submissions. This expands the viewable nano list from 34 (REACH registrations) to a potential number of 339. Though the technical validity of the presence on the list may be debatable, concerns were expressed as to potential public perception. Many pigments are included, such as several members of the diarylide family, as well as a few dyes.

PIM

The proposed 14th PIM amendment covers some additions in Annex II relevant for pigments, including new migration limits for antimony, arsenic, cadmium, chromium, lead and nickel. Based on the feedback received by ETAD so far, the new proposed limits will not have a remarkable effect on organic pigments.
New requirements are also included for primary aromatic amines (PAAs): The original summed limit of 10ppb for non-critical PAAs will be reduced to individual limits of 2ppb each, with an overall 10ppb total. This could have an impact on organic pigments. ETAD submitted its feedback via Eurocolour and CEFIC.

Toys
The RAC members discussed the necessary overall changes to the ETAD Guidance on toy safety. Suggestions from the committee members were incorporated in the pre-final version of the ETAD Guidance and distributed to all RAC members for additional checks. Minor changes to the document were discussed and agreed. Regarding PCBs impurities, the reference to US regulation needs was checked.

EU printing ink regulation
The discussion on the planned EU-wide printing ink regulation is ongoing and the important decision on the kind of control on substances used in the application is still pending. Proposed alternatives are:

- A completely new substance list, including only evaluated substances (the EFSA evaluation has been proposed but it is quite problematic);
- No list at all, but substances will be accepted on the basis of a risk assessment carried out by industry and audited by competent bodies.

However, it is still not clear whether an EU measure on printed food contact materials will come into place. In the meantime, German public consultation on the need for a new law was completed, which might lead to renewed German initiatives for a national law.

Other European regulatory updates

EU intention of restricting sensitizers in textile/leather
A proposal has been submitted to ECHA for the restriction of skin sensitisers in textiles, furs and leather. This might impact disperse and reactive dyes due to applied very conservative and unrealistic assumptions, particularly having as consequence the complete ban of many disperse dyes. A public consultation on the proposals was launched. ETAD is already active in a group of associations from the textile value chain dedicated to this issue.

EU consultation on food contact legislation
The European Commission began a public consultation on the evaluation of the EU’s food contact materials (FCM) legislation. Results of the consultation are now available and show differing opinions between the general public and the NGOs.

Microplastics
ECHA prepared a restriction dossier under REACH which targets intentionally added microplastics in products. Public consultation is now under way. The restriction has to be followed closely and commented by ETAD because of its possible impact on organic pigments, since additives for pigments and preparation may fall under the proposed definition of microplastics. Masterbatches and laser printer toners might be similarly affected. Dyes might also be impacted indirectly through their use in synthetic fibres. The current definition of a microplastic is a size between 1nm and 5mm.

Cobalt(II) salts restriction
Simple cobalt (II) inorganic salts face heavy restriction and may need to be distanced from cobalt-based dye complexes. Discussions in the RAC and in the DOC concluded that the dyes, though made from Co(II) salts, should only contain Co(III) once complexed, thus giving a direction for separation from Co(II) effects and allowing reliance on REACH dossier conclusions. However, the manufacture of the dyestuffs may still be affected by hazard conclusions on Co(II) salts.
Specific countries updates

Germany
Three pigments are mentioned on the new draft MAK list (PY12, PY13 and PY83) for water hazard (WGK). Discussions concluded that the inclusion does not mean that a specific and deliberate classification attempt on these three substances is under way. ETAD will continue its communication with the authorities on the topic.

BfR also published an information notice on the results of official food control investigations, where release of amides (naphthol AS, N-acetoacetyl-m-xylidine) was tested by extract from various printed food contact articles. ETAD gave feedback regarding affected pigments as well as substance clarification. Based on ETAD’s feedback, the association EuPIA approached the German Federal Ministry of Food and Agriculture with a request to provide the detailed test results.

Turkey
The registration deadline for KKDIK is the end of 2023, with pre-registrations to be completed by end of 2020. ETAD members and the industry in general are concerned about the achieveability of this goal, e.g., since the registration scheme requires that certification work on the dossiers and safety data sheets must be performed by an expert accredited by the Turkish Agency. Additionally, latest information suggests that no bulk upload feature for pre-registration will be provided.

Taiwan
The Taiwan Toxic and Chemical Substances of Concern Control Act passed into law. Secondary legislation is now expected. The start of registration for the 106 Priority Existing Chemicals will now take place in January 2020. The deadline for >100t is end-2021 and for <100 end-2022.

Korea
Official documents on registration obligation for CMRs in 2021, registration exemptions and priority control substance lists were released for K-REACH. An additional revision allows the temporary submission of test plans, rather than completed data, in support of registrations till the end of 2021.

A final version of the rules of the Korean Biocidal Products Regulation were released, including details on approval procedures. Further details were also released on the government intention to seek data on the existing biocidal substances by 2022. In addition, details were released on the testing requirements for pre-market biocidal substances and products approval.

USA
The updated US TSCA inventory, covering over 40,000 substances, was released after having been reduced from the original set of over 80,000 items. This new ‘active’ list is the basis for manufacture or import. Prior reactivation of any of the non-active substances will be required before manufacture or import and a Pre-Manufacture Notice submitted for any substance not on the larger list.

The next Chemical Data Reporting obligation under TSCA will occur in 2020 and will be applicable to substances over 25,000 lbs/year (or over 2,500lbs if associated with actions such as SNURs).

In collaboration with CPMA, ETAD also continued to monitor discussions on PCBs, by which the actual role of organic pigments still has to be clarified.

Canada
Four triarylmethane dyes have been provisionally concluded as harmful to human health or the environment. Two further dyes were assessed though did not meet the classification criteria.
ETAD provided to the Canadian authorities its comments to the draft screening assessment of the “Anthraquinone group” dyes. In particular, it was communicated that data which had become available through the REACH registration in the EU had not been taken into account in the Canadian assessment and might help fill some data gaps addressed in the assessment. ETAD organized the data transfer between the EU lead registrants of the affected products and the Canadian authorities, which are now evaluating the additional information.

Cobalt and soluble cobalt compounds were added to Schedule 1 of the Canadian Environmental Protection Act. Included are compounds used in the manufacture of cobalt-complex dyes. Regulation can now be introduced to control these substances.

Other relevant developments worldwide

National inventories of chemicals
The collection of information for new chemical inventories was started in Russia, while the creation of an inventory of existing chemicals was announced in China and in Mexico. A draft national chemical list is also expected to be further developed in Vietnam.

Cosmetics regulations
Simplification to the Chinese cosmetics regulation was announced, which reduces data requirements for ingredients and products. However, listed high-risk ingredients also included colorants and hair dyes.

The Thai cosmetics regulation was updated, including additions to the permitted preservatives and prohibited substance lists, while Colombia’s lower chamber agreed on a ban on animal testing for cosmetics and their ingredients. Indonesia published a draft update for cosmetics requirements, including lists of allowed colouring agents.

India published draft cosmetic rules for which public consultation is currently under way. ETAD continued monitoring any possible impact on colorants (e.g. heavy metal limits) as well as providing feedback though the Indian Operating Committee.

A bill to ban the use and sale of cosmetics which have been tested on animals was introduced in Canada.
ETAD North America (ETAD NA)

Representing the global dyes industry, ETAD NA is recognized by government agencies, industry groups and trade associations, customers, media, academic and research organizations, and the public as the authoritative voice of the industry in North America. In coordination with the ETAD headquarters office in Basel, ETAD NA serves the North American member companies by monitoring regulatory and industry developments, managing technical projects, facilitating networking opportunities, and disseminating information concerning the environmental, health and safety aspects of the North American dyes industry.

U.S. Environmental Protection Agency (EPA)

The primary regulatory issues tracked by ETAD NA were EPA initiatives under the Toxic Substances Control Act (TSCA), including prioritization and risk evaluation of existing chemicals, review of new chemical notifications (i.e. PMNs), confidential business information (CBI) procedures, chemical data reporting, and PBT activities.

Efforts by ETAD NA remain ongoing to request that EPA, when assessing new chemicals, use a more realistic (i.e. lower) default value for residual dye concentrations in empty drums.

Canada

Among the Canadian activities being followed, ETAD NA continued to monitor the status of the draft screening assessment of anthraquinone dyes. After a conference call meeting with Canadian officials, arrangements were made to provide data through the EU REACH framework to help refine the assessment. Other issues followed by ETAD NA included the new fee structure and reporting form for New Substance Notifications (NSN), Canada’s National Pollutant Release Inventory (NPRI) program, the review of substance identity confidentiality claims on the Domestic Substance List (DSL), the guidance for notifying and testing of new substances, and general Chemicals Management Plan updates.

California Safer Consumer Products Regulation (CalSAFER)

ETAD NA continued to monitor developments under CalSAFER. None of the product categories currently being reviewed contain priority products that are of particular interest to dye manufacturers. CalSAFER is expecting to propose a new three to five-year work plan in 2020.

Sustainable Apparel Coalition (SAC)

The SAC remains of interest to ETAD NA because it continues to refine tools for measuring a company’s sustainability efforts. Having a strong overlap with ZDHC, it uses the Higg module to measure and improve upon environmental and social impact programs while integrating with manufacturers restricted substances lists (MRSLs).

Zero Discharge of Hazardous Chemicals (ZDHC)

With regular reports from the ETAD Basel office, ETAD NA stayed abreast of developments under the ZDHC program. These reports were helpful to follow activities of the Chemical Industry Advisory Group, a new expert group established in ZDHC, and to stay informed on the alignment of MRSLs within ZDHC.

The management of ETAD NA was coordinated by Dr. P. Fois, ETAD Deputy Executive Director, and Dr. T. Helmes, Program Manager North America, with legal counsel by R. Bidstrup, Washington, DC.
The year 2019 was particularly affected by the unfortunate explosions in the Chemical Parks in China that left traces in more stringent safety and environment scrutiny, regulations and tougher overall economic conditions. The markets and the industry continued to recalibrate and adapt to the present situation.

The ChOC had another fruitful year, with activities which included in particular the widening of its engagement with various stakeholders through a closer interaction with the Asia Dyestuff Industry Federation (ADIF), the China Dyestuff Industry Association (CDIA), the China Dyeing and Printing Association (CDPA) and China’s National Textile & Apparel Council (CNTAC). This was done to better understand the evolving business conditions, opportunities and supply chain impacts.

The systematic monitoring of new and/or amended regulations/standards also experienced a good start. Last but not least, the effort to the recruitment of new ETAD members for ChOC continued, while an on-site audit was successfully carried out in the reporting year.

**Collaboration with other associations/stakeholders**

In June 2019, CDIA, ADIF and CDPA representatives visited the ETAD office in Basel for the purpose of enhancing mutual collaboration. At the meeting, Dr. Walther Hofherr, Mr. Shi Xianping (Chairman of CDIA), Mr. Tian Liming (Secretary-General of ADIF) and Mr. Chen Zhihua (Chairman of CDPA) gave an overview of their associations and discussed the areas where cooperation can be established and deepened.

The CDIA agreed on a collaboration in the future establishment of standards and in the joint organization of related events, e.g. seminars and workshops; the CDPA expressed its interest in increasing mutual communication, e.g., by participating in events jointly organized by both parties. The meeting participants also discussed the idea of a joint wastewater workshop.

In November, ChOC’s Chairman Mr. Dro Tan participated in the inaugural meeting of ADIF’s Standards Committee in Shanghai. The meeting highlighted a broader need to have more collaborations across Asia in the areas of common standards and regulations.

ChOC members also continued to be interested in ways to develop their relationships with downstream users. The parallel local activities of ZDHC and CNTAC were followed in order to evaluate the feasibility of a cooperation, since, although ZDHC is quite active in China, many Chinese brands still do not strictly adhere to its requirements. This situation might change quickly as a consequence of ZDHC’s alliance with Bluesign and other testing bodies, while CNTAC is said to intend to launch its own standards for chemicals and textiles. At the 3rd ChOC meeting, it was decided to put effort to strengthen the relationship with CNTAC.

During this meeting the ChOC also invited Ms. Lydia Lin, East Asia Director of ZDHC, to make a presentation about current ZDHC’s activities. A common concern raised by the audience was ZDHC’s Gateway: use-related points needing clarification were addressed, as well as practical implementation problems (such as the repeated testing required by brand owners which causes high cost burden on the suppliers).
It was emphasized that ChOC members should take advantage of ETAD to forward their consolidated feedback and constructive suggestions to ZDHC.

As regards the “hot topic” of the One Belt, One Road initiative (OBOR), the ChOC Chairman Mr. Dro Tan attended “The Belt and Road Textile Conference” organised by CNTAC, which reported about key developments in two main areas: the cooperation between the CNTAC and high-quality clothing enterprises in the Belt and Road Initiative, and the cooperation with different countries in the Lan Mei–Zhou Delta Region. The identified major challenges currently facing the textile industry are the lack of momentum for a healthy and sustainable development of the global economy, the economic globalization with serious challenges to trade liberalization, and the digital transformation at both the suppliers and the consumers sides.

As priorities and development levels are very different across the OBOR countries, there are many open questions at this stage, e.g. understanding the local regulations/standards, maintaining compliance with ETAD’s CoE, balancing economic priority and sustainable development, and so on. The ChOC will follow the development of OBOR topic and provide its input whenever possible.

The cooperation with relevant authorities remained a main point on ChOC’s agenda. ChOC will work on establishing a relationship with the new Ministry of Ecology and Environment (MEE), successor of the former Ministry of Environment Protection (MEP). A good opportunity to identify a suitable contact person will be the “Environment Day” of MEE, scheduled in 2020.

Regulations and standards

The ChOC regulatory group set up in 2018 systematically monitored the current situation on regulations and standards. The outcome of the newest developments is summarized as follows:

Dyes: As of 2019, a total of 617 standards have been established in China, including 29 important hazardous substance detection methods. Examples are G/T 19601-2013 (The limit and determination of 23 harmful aromatic amines in dye products), GB 20814-2014 (The limit and determination of heavy metal elements in dye products) and GB/T 24165-2009 (The polychlorinated chloride in dye products - Determination of benzene).

Organic pigments: According to the “Directory of Industrial Structure Adjustment Guidance, Draft 2019” by the National Development and Reform Commission, organic pigments are listed in the 8th and 9th sub-items of the 11th largest category in the encouraged category (high light fastness, high weather fastness, low aromatic amine, no heavy metals, easily dispersible, pure color organic pigments, using the above-mentioned dyes, pigments produced by aqueous liquid colorants) and the 11th sub-item of the fourth largest category of restricted categories (newly-built dyes, organic pigments and intermediates, printing and dyeing auxiliaries production equipment (except encouragement and adoption of encouragement technology)).
Environmental protection: the “Technical Specification for Sewage Permit Application and Issuance (coatings, inks, pigments and similar products manufacturing industry), draft 2019-September” (HJ xxx-2019), the “Law of the People's Republic of China on Prevention and Control of Environmental Pollution by Solid Wastes (Revised Draft) (Draft for Consultation on July 5, 2019)”, the “National Inventory of Hazardous Waste (Revised Draft) (For Soliciting Opinions) (September 5, 2019)”, and the “Measures for the Administration of Emission Permits (Trial), (2018, Order No. 48 of the Ministry of Environmental Protection)”, as well as other new regulations were issued for comment. Additionally, the explanation of the amendments in the “Environmental Management Measures for New Chemical Substances (Revised Draft for Comment)” (July 9, 2019), and other related environmental protection regulations have also issued corresponding new trial texts or comments draft.

Safety: There were two major amendments to the “Law of the People's Republic of China on Occupational Diseases Prevention (2018 Amendment) (the fourth revision; promulgated and implemented on December 29, 2018)”; the “Identification of Major Sources of Hazardous Chemicals (GB18218-2018) (The first revision: implemented on March 1, 2019)” has three major changes. The “Regulations on Emergency Response to Production Safety Accidents” were implemented on April 1, 2019, the “Administrative Measures for Emergency Response Plans for Production Safety Accidents” were implemented on September 1, 2019.

Other amendments refer to laws and regulations on the extraction and use of corporate safety costs, safety regulations for special operations of chemical production units, amendments to the Fire Protection Law of the People's Republic of China, fire engineering design review and acceptance management regulations for construction projects. The new laws and regulations include the implementation of several related laws and regulations on the management of public security of explosive explosives, guidelines for the inspection and control of safety risks in chemical parks, and special catalogues of hazardous chemicals.

Chemical Substance Registration: Presently, China’s existing chemical substance catalog contains a total of 45,612 substances (including 3270 classified confidential substances); however, there is still a gap compared with the actual number of chemicals used. China has developed various chemical inventories for targeted management based on chemical hazard characteristics. The WTO Draft of Environmental Risk Assessment and Management of Chemical Substances has a total of 6 chapters and 51 articles, which are applicable to environmental risk assessment of chemical substances and their mixtures and the implementation of environmental risk control activities. Substances are incorporated into environmental management, and regulations regulate the hierarchical management of chemical substances.

The so-called three major lists* are identified and included according to the different risk levels of different substances. The state issues and formulates relevant measures for management.

The latest National Standard “Discharge standard of water pollutants for textile industry” (Draft), which is designed as replacement of GB 4287-2012, GB 28936-2012, GB 28937-2012, GB 28938-2012, was distributed to ChOC members for comment.

Substances for Priority Environmental Management* issued by MEE, “Inventory of Strictly Restricted Chemical Substances* issued by MEE

Recruitment of new members

This is an important task for ChOC, whose strategy is based on increasing ETAD's visibility to the colorant industry and among the downstream user industry. In the reporting year, ETAD successfully carried out an on-site audit in July 2019 for a candidate member. The preparation of the audit report is in progress. The work of identifying / approaching other candidates continues.

* "Inventory of Existing Chemical Substances in China” issued by MEE, "Inventory of Chemical Substances for Priority Environmental Management” issued by MEE, "Inventory of Strictly Restricted Chemical Substances” issued by MEE
Japanese Operating Committee (JOC)

The JOC, ETAD’s Japanese Operating Committee, has been operating since its re-activation in 2010. This year four meetings were held, on one hand assessing the impact of the important topics discussed in the POC, on the other hand addressing upcoming new Japanese regulations related to dyes and pigments. JOC carried out its work in collaboration with the Japan Dyestuff and Industrial Chemical Association (JDICA).

Control of unintentional PCBs in organic pigments

In 2019, the JOC continued the communication with the Japanese authorities about the industry approach to manage the presence of unintentional PCBs in organic pigments. Authorities would prefer that, through improvement of best available technology, companies are able to lower the current upper limit of PCBs (50ppm); in fact, every company regularly checks the performance of its BAT against its analytical data from the pigments, and in-house targets for management are based on these analytical results. These in-house targets for management satisfy the request from authorities to lower PCBs content, without having to designate a new legal limit. The authorities accepted this approach.

Chemical Substance Control Law (CSCL)

The CSCL was amended in 2018, with the consequence that not only new substances but also existing substances need to be checked for compliance to the updated requirements.

In general, manufacturers and importers in Japan are legally obliged to submit annual notifications of all chemical substances which have been manufactured and/or imported in quantities of more than 1 ton in the previous fiscal year.

Following the amendment, it is now particularly important to check the application code, its category and the notification rules for the specific types of chemical substances, since they were also revised.

Amendment of the Food Sanitation Act (Implementation of PL legislation)

After the promulgation of partial amendments to the Food Sanitation Act, public comments were accepted from September 9 to October 10, 2019, followed by the notification of the proposed amendments to the World Trade Organization (WTO) by the Ministry of Health, Labor and Welfare (MHLW).

As a first target, a positive list system for synthetic resins and their additives should be introduced; the introduction a similar list for rubber (thermosetting elastomer) was postponed.

The final positive lists are expected to be published in February 2020, with the official implementation of the amended Food Sanitation Act announced for June 1, 2020.

In the last two years, the JOC carried on in cooperation with JDICA a dialogue with the MHLW, in order to define a suitable framework for colorants in the amended Act. This communication was very successful and resulted in the following:

- Colorants are included as a comprehensive group and not listed as individual chemical substances in the Positive List system;
- Colorants can be used in food contact materials under the current regulation system, in particular according to the Ministerial Notification No. 370 (Specifications and Standards for Food, Food Additives, etc.);
- Surface treatment agents on pigments are considered as a part of the whole pigment, as specifically clarify by item No. 16 in the official Q&A published by MHLW. As a consequence, they are also included comprehensively in the Positive List system.
However, it has to be noted that, in the case of masterbatches, even if colorants do not need to be in the Positive List, it is necessary that all other substances used in processing the masterbatch are listed.

**JOC activities plan for 2020**

In 2020, the JOC will continue the monitoring of Japan-specific regulatory issues mentioned below in close collaboration with JDICA:

- PCBs;
- PAAs;
- Nano materials;
- FCMs (in particular the development of guidance documents for Japanese legislation on FCMs);
- Other legal revisions affecting the organic pigments industry.

Toyocolor will take the chair of JOC in 2020.
The TOC monitors worldwide chemical regulations that impact Taiwan’s dyestuffs and pigments industries; it works closely with the Taiwan Dyestuffs and Pigments Industrial Association and the ETAD office in Basel.

**ZDHC**

In November 2019, ZDHC published the updated version of its MRSL. The companies in the TOC keep following ZDHC developments and are continuously monitoring trace amounts of the restricted substances in their colorants; end of December, in order to have a detailed update on the new MRSL and on the current activities at ZDHC, the TOC organized together with the TDPIA a meeting with ZDHC Foundation’s Asia Director, Lydia Lin. A specific item of discussion was how ZDHC could adapt its program to the specificity of the Asian market with the help of local companies; it was suggested that ETAD companies in Taiwan could be of assistance to this task.

**Global Recycle Standard (GRS)**

The GRS is an international, voluntary, full product standard that sets requirements for third-party certification of recycled content, chain of custody, social and environmental practices and chemical restrictions. Taiwan has progressed in its recycling technology, and its textile manufacturing skills are innovative. Through ETAD, the TOC established a contact with the GRS’ issuers and was able to clarify some open points related to the chemical management of colorants.

**California Proposition 65**

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, is a legislative program which has worldwide relevance and it is used as a negative list by many customers of the colorant industry. In particular, colorant manufacturers are requested about the presence of substances residues in their products, which, above a certain limit, would cause finished consumer articles to be labeled with a warning in compliance with the Proposition.

In 2019, the TOC discussed the specific the case of cobalt-based metal complex dyestuffs refused because of false-positive results. In the communication with analytical laboratories and brands, carried out through the ETAD Basel office, it was clarified that metal complex dyes need to be treated differently, because common analytical methods will often provide a total metal content in form of equivalents of a restricted species (e.g., Co metal or Co sulphate). In such cases, it is always necessary, on one hand, that the manufacturers provide the information upfront about the products being metal complexes and, on the other hand, that analytical bodies and brands know about the right approach to these products.

**Taiwan’s existing substances standard registration**

In March 2019, Taiwan’s Environmental Protection Administration released the Amended Regulation of New and Existing Chemical Substances Registration. This regulation will screen out substances with high risks for priority registration. Appendix 6 to the Regulation listed 106 substances as the first batch of existing substances subject to standard registration. The Regulation takes effect as of the date of issue, but it will grant an appropriate grace period to the first batch; the standard registration for existing substances formally starts from January 1, 2020.

The TOC co-ordinated its activities with TDPIA members on organizing joint registrations and assisting Taiwan dye and pigment companies to understand the regulation.
Colorants in Taiwan’s Priority Management Chemicals list

The second CMR list published on December 2018 included some commercially available colorants for which, however, no studies/information on a possible CMR concern was known to the TOC. The committee members started a dialogue with the authorities to clarify the basis of this classification and, at the same time, asked the ETAD office to check in detail existing toxicological information. The ETAD office confirmed the unfoundedness of a CMR concern for the colorants and, in December 2019, the TOC organized a meeting in Taiwan to discuss with the authorities (both OSHA and its technical supporting organization, SAHTECH) the best approach to this issue. Dr. P. Fois and the TOC member companies presented their information and clarified with the authorities some key points:

- The reference for the supposed CMR properties, the service provider ChemWatch, had used a scientifically quite debatable approach to decide on the classification of the affected dyes;
- The inclusion of the colorants in the list did not meant a definitive classification, only an indication that the substance needed more scrutiny;
- The authorities would welcome any assistance from the industry to decide on the colorant status.

The ETAD office will prepare a first information summary on one of the affected dyes and provide it to the Taiwanese authorities.

The meeting was an important first step in starting a fruitful communication between the Taiwanese companies and the authorities, as well as the opportunity to establish ETAD as a reference for colorant-related topics that will represent and support the Taiwanese colorants industry.
Information and external activities

Presentations and publications

Regulatory and not-regulatory challenges - What to expect in 2019
Presentation at Pulcra’s Chemicals Textile meeting, Geretsried (Germany), March 2019.

Beyond all limits: ETAD’s activities from heavy metals to MRSIs
Presentation at the AICTC Symposium, Urgnano (Italy), April 2019.

Genotoxicity (carcinogenicity) information on azo dyes registered in REACH

ETAD update on pigment-related activities
Presentation at the Eurocolour Meeting, Hamburg, July 2019.

Beyond all limits: ETAD’s activities for safer products

Update zum laufenden Projekt zu nicht-regulierten Azofarbstoffen und deren Spaltprodukten

ETAD focus 2019 - Overview of activities on key issues
Presentation at the IOC meeting, Vadodara, December 2019.

Taiwan list of CMR substances: dyes concerns
Presentation to OSHA and SAHTECH, Taipei, December 2019.

ETAD Highlights
Bi-monthly information leaflet for ETAD members

ETAD’s brochure
Overview on ETAD’s structure, membership and current activities, regularly updated and distributed at external events

Other

Videointerview at ZDHC’s Annual Meeting on the role of ETAD in ZDHC since its foundation, November 2019.

External activities

During 2019, ETAD continued or started its activities in different projects with external groups and associations. The most relevant collaborations included:

- Participation in the Zero Discharge of Hazardous Chemicals (ZDHC) group as representative of the colorant manufacturers;
- Participation in ISO groups dealing with pigments standards;
- Study on residual dyes in containers with the US EPA
- General input to the nano debate and corresponding national and international activities;
- Input to the EU Commission project on sensitisers in textiles;
- Project on azodyes with the Swiss and German authorities;
- Participation in the Colour Index Pigments and Solvent Dyes Technical Board;
- Clarification of the CMR status of colorants with the Taiwanese authorities.

Further information on the most relevant projects can be found in the single committees’ reports.
Committee members*

**Dyes Operating Committee**
- Mr. Mark Dohmen
  Archroma Management GmbH
- Ms. Carole Mislin
  Archroma Management GmbH
- Dr. Martin Schopferer
  Archroma Management GmbH
- Dr. Elena Schramm
  CHT Switzerland AG
- Mr. Richard Lee
  European OGD Ltd.
- Dr. Thomas Otten
  Huntsman Textile Effects
- Dr. Mehmet Şener
  Setaş Kimya Sanayi A.Ş.
- Ms. Kateřina Vyňuchalová
  Synthesia a.s.

**Regulatory Affairs Committee**
- Dr. José Juan Regaño
  Archroma Management GmbH
- Dr. Helga van Wyk
  BASF Colors & Effects Schweiz AG
- Dr. Pia Hornbach
  Clariant Produkte (Deutschland) GmbH
- Mr. Emmanuel Fauster
  Huntsman Textile Effects
- Mr. Stuart Niven
  TFL Leather Technology Ltd.

**ETAD North America**
- Ms. Johanna Diaz
  Archroma Management GmbH
- Mr. Pat Tili
  Clariant (Canada) Corp.
- Mr. Chien-Ming Chen
  Everlight USA, Inc
- Ms. Lynne McCall
  Huntsman Corporation
- Ms. Sue Ann McAvoy
  Sensient Industrial Colors
- Ms. Melissa Albritton
  Sensient Industrial Colors

**Pigments Operating Committee**
- Dr. Karin Beck
  BASF Colors & Effects GmbH
- Dr. Nicole END
  BASF Colors & Effects Switzerland
- Mr. Josef Wieland
  CINIC CHEMICALS EUROPE Srl
- Dr. Klaus Kund
  Clariant Produkte (Deutschland) GmbH
- Mr. Kentaro Aida
  Dainichiseika Color & Chemicals Mfg. Co., Ltd.
- Mr. Susumu Isoda
  Dainichiseika Color & Chemicals Mfg. Co., Ltd.
- Mr. Yorikatsu Otsuki
  Dainichiseika Color & Chemicals Mfg. Co., Ltd.
- Mr. Masashi Ui
  DIC Corporation
- Ms. Daniela Finkenauer
  Heubach GmbH
- Mr. J. I. Sevak
  Heubach Colour Pvt. Ltd.
- Ms. Marianne Peltier
  Sensient Cosmetic Technologies
- Dr. Caroline Bradley
  Sun Chemical Ltd.
- Dr. Kateřina Vyňuchalová
  Synthesia, a.s.
- Ms. Marine Ribert
  Toyo Ink Europe Speciality Chemicals
- Mr. Daniel Ymbernon
  Daicolorchem EU, S.A.

**ETAD Staff**

**Basel and Washington staff**
- Dr. Walther Hoffherr
  ETAD Executive Director
- Dr. Pierfrancesco Fois
  ETAD Deputy Executive Director / ETAD NA Executive Director
- Ms. Heidi Geary
  Project Manager
- Dr. Gecheng Xie
  Senior Consultant
- Dr. C. Tucker Helmes
  Senior Consultant for ETAD North America

**Legal Counsel**
- Dr. Hans-Rudolf Uebersax
  Legal Counsel of ETAD International
- Mr. W. Richard Bidstrup
  Legal Counsel of ETAD North America
- Cleary, Gottlieb, Steen & Hamilton

**Trustee and accounting**
- Mr. Reto Hubli
  Fidares Treuhand
Chinese Operating Committee
Mr. Liu Tiesheng
Archroma Chemicals (China) LTD
Ms. Xu Fang
Archroma Chemicals (China) LTD
Mr. Max Zou
CINIC Chemicals Co. Ltd.
Ms. Ying Ye
CINIC Chemicals Co. Ltd.
Mr. Lu Xingao
Hubei Color Root Technology Co., Ltd.
Dr. Crane Ji
Huntsman Chemical China
Mr. Chen Yuewen
Matex International Limited
Mr. Dro Tan
Matex International Limited
Dr. Gong Guoliang
Yorkshire Chemicals Ltd.
Mr. Wu Zhenjin
Yorkshire Chemicals Ltd.

Indian Operating Committee
Dr. Rajesh Rammurthy
Archroma India Pvt Ltd
Dr. Mujeeb-ur Rahman
Atul Ltd.
Dr. Sunil Deval
Clariant Chemicals (India) Ltd.
Dr. Pankaj Desai
Colourtex Industries Pvt. Ltd.
Mr. Ravi Kapoor
Heubach Colour Pvt. Ltd.
Mr. P. S. Kulkarni
Jay Chemical Industries Ltd.
Mr. Samir Mehta
Meghani Dyes Ltd
Mr. H. M. Thombre
Sudarshan Chemicals India Ltd

Japanese Operating Committee
Mr. Kazuhisa Iwasa
BASF Colors & Effects Japan Ltd.
Mr. Tomohiro Chino
Clariant Plastics & Coatings (Japan) K.K.
Mr. Kentaro Aida
Dainichiseika Color & Chemicals Mfg. Co., Ltd.
Mr. Toshifumi Hori
Dainichiseika Color & Chemicals Mfg. Co., Ltd.
Mr. Susumu Isoda
Dainichiseika Color & Chemicals Mfg. Co., Ltd.
Mr. Yorikatsu Otsuki
Dainichiseika Color & Chemicals Mfg. Co., Ltd.
Mr. Masashi Ui
DIC Corporation
Mr. Yasumasa Matsumoto
Heubach Japan K.K.
Mr. Wataru Miyabe
Heubach Japan K.K.
Ms. Megumi Sekiguchi
Toyocolor Co., Ltd.
Mr. Katsuhito Miura
Toyocolor Co., Ltd.

Taiwanese Operating Committee
Mr. Tong-Han Tsai
Chroma Chemical Corp.
Mr. Chris Chen
Everlight Chem. Industrial Corp.
Ms. Amy Huang
Everlight Chem. Industrial Corp.
Ms. Hikari Chiu
Oriental Giant Dyes & Chemical Ind. Corporation
Mr. C.D. Yang
Oriental Giant Dyes & Chemical Ind. Corporation
Mr. Chin-Yu Huang
T&T Industries Corporation
Mr. Ming-Yih Lin
T&T Industries Corporation

* These lists give membership as in March 2020

President
Dr. Mehmet Şener
Setaş Kimya Sanayi A.Ş.

Vice President
To be elected at the General Assembly 2020

Treasurer
Mr. Georg Roentgen
Huntsman Textile Effects

Dr. Stefan Ehrenberg
CHT Switzerland AG
Dr. Yoshitaka Koshiro
Dainichiseika Color & Chemicals Mfg.
Ms. Carole Mislin
Archroma Management GmbH
Mr. Jashvant Sevak
Heubach Colour Pvt. Ltd.
Dr. Ulrich Veith
BASF Colors & Effects Switzerland

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Preamble

The aim of ETAD is to minimize possible negative effects on health and the environment arising from manufacture and use of synthetic organic colorants and to ensure information on the best practicable protection is provided to the purchasers of these products.

To achieve this goal and to promote the image of a responsible and safety minded manufacturing industry, it is necessary that in all aspects related to human and environmental safety, members be encouraged to adhere worldwide to a high ethical standard.

Therefore, at the proposal of the Board, the General Assembly of ETAD approves this Code of Ethics as a key policy of the Association. All ETAD member companies are obliged to comply with this Code of Ethics.

1. Principles of responsible care

ETAD members are committed to support a continuing effort to improve the industry’s responsible management of synthetic organic colorants. Members shall develop, produce and distribute products in a responsible manner which protects human health and the environment from unacceptable risks during manufacture, transport, use and disposal. Specifically, members shall implement a responsible care program in which the member undertakes to manage its business in accordance with the following principles:

- To recognise and respond to any community concerns about synthetic organic colorants and its manufacturing operations;
- To produce only synthetic organic colorants that can be manufactured, transported, used and disposed of safely;
- To make health, safety, employee training, quality assurance and environmental considerations a priority in planning for all products and processes;
- To provide employees, distributors and customers information on the health or environmental effects of synthetic organic colorants and recommend appropriate protective measures to ensure their safe use, transportation and disposal;
- To operate all facilities in a manner that protects the environment and the health and safety of employees and the public;
- To promote research on the health, safety and environmental effects of its products, processes and waste materials;
- To cooperate with public authorities in establishing well-founded environmental, safety and health regulations; and
- To promote these principles of responsible care to others who produce, handle, use, transport or dispose of synthetic organic colorants.

The responsible care program shall fulfil, but not be limited to, the specific obligations described under paragraphs 2-5 below.

2. Product Safety Policy

It is the policy of ETAD members to take all reasonably practicable steps in order to ensure human and environmental safety in the use of the dyestuffs and organic pigments (synthetic organic colorants), manufactured or distributed by them. Members shall comply worldwide with all applicable laws and regulatory requirements dealing with the safety and the environmental impact of synthetic organic colorants.

ETAD recognizes that the legal requirements for hazard communication differ considerably in various regions where organic colorants are marketed. A primary objective of this Code of Ethics is to ensure that such differences do not deprive customers in countries with less stringent requirements of hazard information which is made available to their counterparts in countries with more comprehensive regulations. To achieve a common high standard of hazard communication ETAD members shall:

- Fully inform all customers about all known significant hazards;
- Adopt policies to assure an equivalent level of hazard communication worldwide concerning their product.
3. Products Safety Information

3.1. Safety Data Sheets
Member companies shall ensure that for each of the synthetic organic colorants on their selling range, there is a safety data sheet with appropriate information content and that it is supplied to all customers.

3.2. Labeling
The EU regulations provide an appropriate basis for classification and labeling of organic colorants. Where the laws of the country the products are sold to, require more stringent or mandate different labelling, the members shall adhere to such required or mandated labelling. In countries with less stringent requirements the labelling shall be in accordance with the EU system or an equivalent consistent with the policy of achieving a uniformly high standard of hazard communication.

3.3. Education and Awareness Programs
ETAD members shall endeavour to inform customers of the safe handling procedures best suited to the products involved.

4. Cessation of manufacture and sale of certain dyes and organic pigments
The manufacture and sale of dyes, which:

- are identified as particularly hazardous by regulation or classification by expert bodies or
- contain certain hazardous impurities above specific limits,

is incompatible with ETAD membership. These dyes are specified in Annexes A and B.

The manufacture and sale of organic pigments, which contain certain hazardous impurities above specific limits, is incompatible with ETAD membership. These pigments are specified in Annex C.

5. UN Global Compact
Member companies shall also embrace, support and enact, within their sphere of influence, core values in the areas of human rights, labour standards, the environment and anti-corruption, as laid down in the UN Global Compact. Members have to register as a member of the UN Global Compact, or issuing an own binding Code of Conduct, embracing as a minimum the standards and values of the UN Global Compact.

6. Compliance
Member companies shall comply with the Code of Ethics and shall make every effort to ensure that their subsidiaries do so.

Annex A
Dyes or preparations of dyes used in textile and leather articles, which may come into direct and prolonged contact with the human skin or oral cavity.

These dyes:

- contain, or release by reductive cleavage of azo bonds to any of the specified amines*;
- contain any of the specified organic impurities*;
- contain any of the specified trace metals*.

Annex B
Individual Dyestuffs*

Annex C
Organic pigments or preparations used in toys, food contact materials as well as textile and leather articles which may come into direct and prolonged contact with the human skin or oral cavity.

These pigments contain any of the specified trace metals*.

* The corresponding amines, trace metals, other organic impurities and dyes are listed with the applicable limit values in "Guidance to ETAD Member Companies on the Implementation of the Code of Ethics", which is regularly updated to the current state of scientific knowledge.
Benefits of ETAD membership

Recognition
We are recognised by regulatory authorities, customers, and the public as the authoritative source of information on health, safety, and environmental issues relating to organic colorants.

Representation
We represent the interests of members and customers to government authorities, the media, other industries, public interest groups, organised labour, academia, and research/testing/consulting organisations.

Harmonisation
We advocate, where regulations are necessary, a harmonisation of the requirements, so that compliance costs are reduced.

Code of Ethics
We encourage members to adhere worldwide to a high ethical standard and promote the image of a responsible and safety-minded manufacturing industry.

Guidance
We provide guidance to ETAD member companies on interpretation of new regulatory requirements and recommends specific measures to implement the ETAD Code of Ethics.

Education and training
We develop and publish education and training materials pertaining to organic colorants, e.g. for safe handling practices, product stewardship, and pollution prevention.

Research and testing
We allow cost-sharing of research and testing programs aimed at a better understanding of the health and environmental aspects of dyes and organic pigments.

Information
We respond to inquiries about the colorants’ industry, provide information on topical issues and disseminate comments and position papers.

Database
We maintain a computerised database of literature pertaining to the health and environmental aspects of dyes.
## ETAD member companies (status March 2020)

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Region</th>
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<tbody>
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<td>ATUL Limited</td>
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<td>Huntsman Textile Effects</td>
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<td>Matex International Limited</td>
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<td>Meghmani Dyes and Intermediates Ltd.</td>
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<td>Nippon Kayaku Co., Ltd.</td>
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<td>OHYOUNG Inc.</td>
<td>Korea</td>
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</tbody>
</table>

Current list of members under: [www.etad.com](http://www.etad.com)
Marianne joined our team in Basel in 2014, after a long experience in the chemical company Lonza. Officially, she was just our bookkeeper, a task she perform quite well, but she also immediately integrated into our “small office approach”, where everybody steps up, when needed, to any odd job.

Thanks to her experience in a big company setting, she helped us re-organize our bookkeeping in a more efficient way and, as our members might have noticed, she also had a strict control on the incoming as well as missing payments. She proposed special locations for our team trips and organized them, and generally helped us smooth the day-to-day life at the office with her assistance and her proposals for improvements. Last but not least, she immediately agreed to do additional organization work for all our meetings when we experienced a man-power shortage. All of this she did in her good-natured and down-to-earth way, making working with her a pleasure even in stressful times.

Marianne passed away unexpectedly and peacefully in her sleep in February 2020. We miss her and will remember her not only as a valuable colleague but also as a good friend.
Basel
Mailing Address: ETAD
Stadthausgasse 18
CH-4051 Basel, Switzerland
Telephone: +41 61 690 99 66
e-mail: info(@)etad.com
Internet: http://www.etad.com

Baroda
Mailing Address: Indian Operating Committee of ETAD
c/o Heubach Colour Pvt. Ltd.
Landmark Building - 2nd Floor
Race Course Circle, Baroda - 390007
Gujarat, India
Telephone: +91 265 235 48 24 / 231 48 60
Telecopy: +91 265 235 48 27 / 234 16 82
e-mail: annamma(@)heubach-india.com

Taipei
Mailing Address: Taiwanese Operating Committee of ETAD
c/o Taiwan Dyestuffs and Pigments Industrial Association (TDP)
7F, no.137, Fu-Hsing South Road, Sec. 1
106 Taipei, Taiwan, R.O.C.
Telephone: +886 2 2731 8131
Telecopy: +886 2 2731 8132
e-mail: dye.pgm(@)msa.hinet.net

Tokyo
Mailing Address: Japanese Operating Committee of ETAD
Fukuyoshizaka Building
c/o Kaseihin Kaikan
Akasaka 2-17-44
Minato-ku
Tokyo 107-0052, Japan
Telephone: +81 3 3585 3374
e-mail: hamanakai(@)kaseikyo.jp

Great Falls
Mailing Address: ETAD North America
10302 Elizabeth Street
VA 22066 Great Falls
U.S.A.
Telephone: +1 703 759 6747
e-mail: thelmes(@)etad.com