



ETAD Position on the presence of Hexachlorobenzene as an unintentional by-product in certain Colorants.

ETAD is the leading health and environment association representing the organic pigment and dye manufacturers. 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. It is cooperating with regulators like the EU Commission and other national authorities in moving regulatory development for the protection of health and the environment.

Hexachlorobenzene (HCB) is present in products as an unintentional by-product. Our member companies fully support the authorities concerns with HCB and their strategy to reduce the levels present in commercial products. Indeed individual companies have been involved already in discussions with the Japanese authorities.

HCB may be present in the raw materials or in chlorinated solvents used in colorant synthesis when it could be carried over into the final product or possibly it could be formed during production. We advocate the use of Best Available Technique (BAT) reducing the levels of HCB present both in the raw materials used in colorant synthesis and also to reduce the levels in the final products but this will take time, resources and money. Further HCB levels provided by our member companies show that the level of HCB is very colorant type dependant, therefore we would propose not to set a low (and final) limit immediately but agree a program with the authorities with a gradual reduction of the limit as was done with the Coalition of Northeastern Governors (CONEG) heavy metal regulation.

We would also propose that the industry and the authorities work together to carry out risk assessments based on a number of scenarios to allow the setting of realistic levels.

We are convinced that by good cooperation with the authorities we will be able to find a satisfactory solution for all parties involved.

04. April 2006