

ANNUAL REVIEW 2020

Working together for safer colorants



ETAD

The Ecological
and Toxicological
Association
of Dyes
and Organic
Pigments
Manufacturers

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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 behaviour with respect to health and the environment.



Preface from the President

Dr. Mehmet Emre Şener
(Setaş Kimya Sanayi A.Ş.)

Dear friends of ETAD,

With the pandemic that none of us could foresee, we are experiencing a period of great turbulence. As ETAD, we watched this period and tried to learn and understand. We tried to fulfil our responsibilities at the maximum level at the point of getting in contact with the "New Normal" of the business world.

This period has also demonstrated that no institution or individual alone can address the economic, environmental, social and technological challenges of our complex, interdependent world.

Following this principle, ETAD has always been an organisation in cooperation with regional and international governmental organizations in assessing the hazards of dyes on the environment and human health and determined the methods and limits towards development of safer chemistry.

Now, by adding brands and NGOs to our work over the last couple of years, we have enabled ETAD to take an active role in policymaking by collaborating with all key players in the different value chains of our industry.

In particular, we also participate in the chemical advisory group CSAG, which ZDHC established in order to include the contributions of chemical manufacturers in its activities on hazardous chemicals in the apparel and footwear value chain. This collaboration with ZDHC has ensured that ZDHC's recommendations in the upcoming new version of MRSL are in correlation with the ETAD limits, and new substances and determination methods proposed for the MRSL candidate list are discussed in detail with the colorant industry.

Additionally, we continued our projects on dyes and pigments (and started new ones) in collaboration with national authorities and intensified our lobbying activities for dyes threatened by the EU proposal for a restriction of sensitizers. At the same time, we kept adapting our strategies to the new requirements for nano materials, so that we can provide corresponding information on our organic pigments.

In general, we continued to make progress in all our ongoing and newly launched projects, which we continued via online platforms, the "New Normal" of the business world.

I would like to end this preface by thanking all ETAD members, Committee members and the Basel staff for the efforts they have done to keep projects and communication going smoothly during this challenging time.



From the Executive Director

Dr. Pierfrancesco Fois
ETAD Executive Director /
ETAD NA Executive Director

Dear all,

For ETAD, even without considering going through the effects of the Covid-19 pandemic, it has been quite an eventful year, and I decided to contribute with a few words to this Annual Report in my new role as Executive Director.

My first important message is to thank all our member companies for staying on board during this strange and difficult 2020. Apart from the impossibility to meet each other in person, we experienced no change in the overall commitment of our ETAD members. On the contrary, we achieved not only to continue our existing projects, but even to start new ones, and this was possible because of the availability of our companies to keep investing time and resources in the association's activities.

This participation is more than ever a crucial component of our daily work, since, as we all noticed, there has been no slowing down in the activities of all stakeholders who influence our business. From the discussion in Europe on the properties of sensitising dyes and nano pigments to the development of the Turkish, Korean and US REACH we had already much on our plates, and now we have, among many other things, to prepare ourselves to the upcoming Green Deal in the EU, to adjust to the Brexit and to work out a good compromise with the big fashion brands as regards sustainable chemistry within ZDHC.

I am quite confident that we can do all that, because of the dedication and expertise of the people in our association. I would like to mention a couple of them, who joined or left our association and could not get a proper presentation/goodbye at our General Assembly or during F2F meetings:

- Felix Grimm, our new Board member from Clariant;
- Hans-Rudolf Uebersax and Tucker Helmes, our lawyer and ETAD North America Director, respectively, who retired after many years of working for us;

- Karin Beck and Daniela Finkenauer, two long-time members of POC, who left the committee in 2020. Karin retired, while Daniela found a new work opportunity;
- Oscar Olano, our new lawyer.

I thank all of them for their past or present competent and reliable work, which is what makes ETAD successful and able to react to all new challenges with readiness and flexibility.

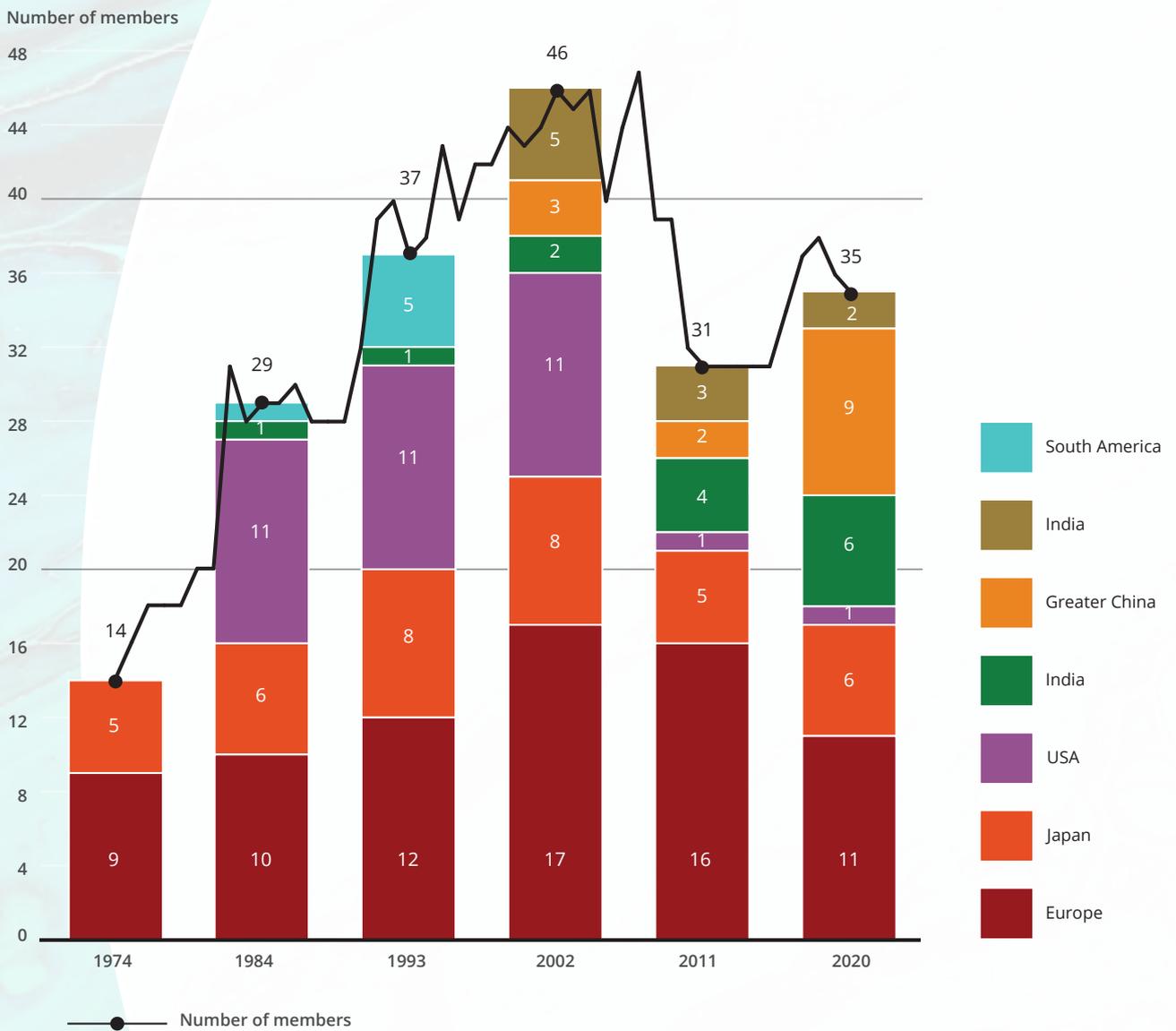
A special mention deserves Walther Hofherr, my predecessor in the function of Executive Director: as you know, end of 2019 he got suddenly ill and, even if he is currently much better, he is not expected to re-join the ETAD staff. We wish him all the best and thank him for the almost 20 years he dedicated to our association, especially by moving forward our presence and activity in China and improving our financial situation in the last years.

My last but not less important thanks go to my colleagues at the Basel office Heidi, Gecheng and Stefka (our new staff member since May 2020), who share with me the fundamental role of, in the words of our former Executive Director Eric Clarke, "oiling the wheels" of the complex communication between our industry and all our different partners.

Membership

There were no changes in the membership during 2020.

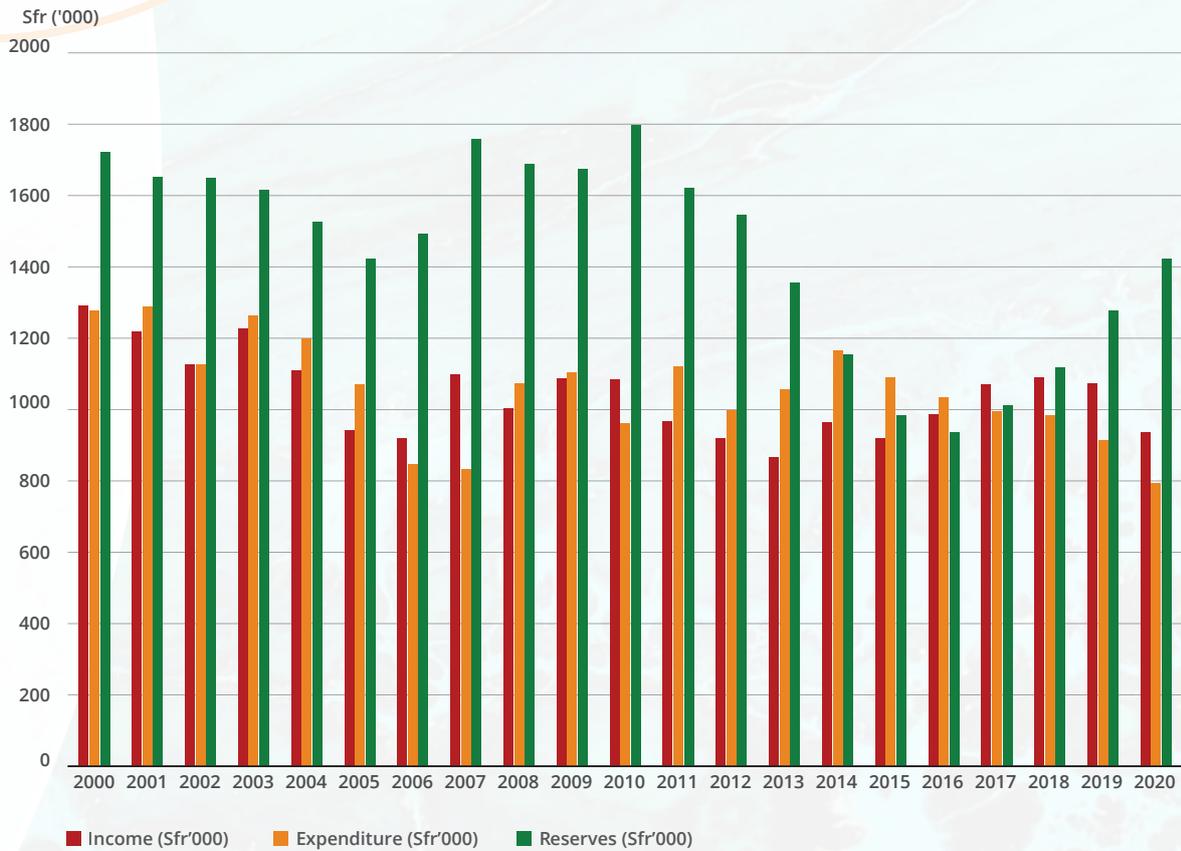
Fig. 1 – Growth and changing regional composition of the ETAD membership



Finance

ETAD is a non-profit association. The operating expenses are recovered mainly by means of payments by the ETAD members. In 2020, total income was SFr. 936'000 compared with total expenditure of SFr. 792'000, resulting in a profit of SFr. 145'000.

Fig. 2 – Summary of income / expenditure 2000 – 2020



46th General Assembly

46th Ordinary General Assembly

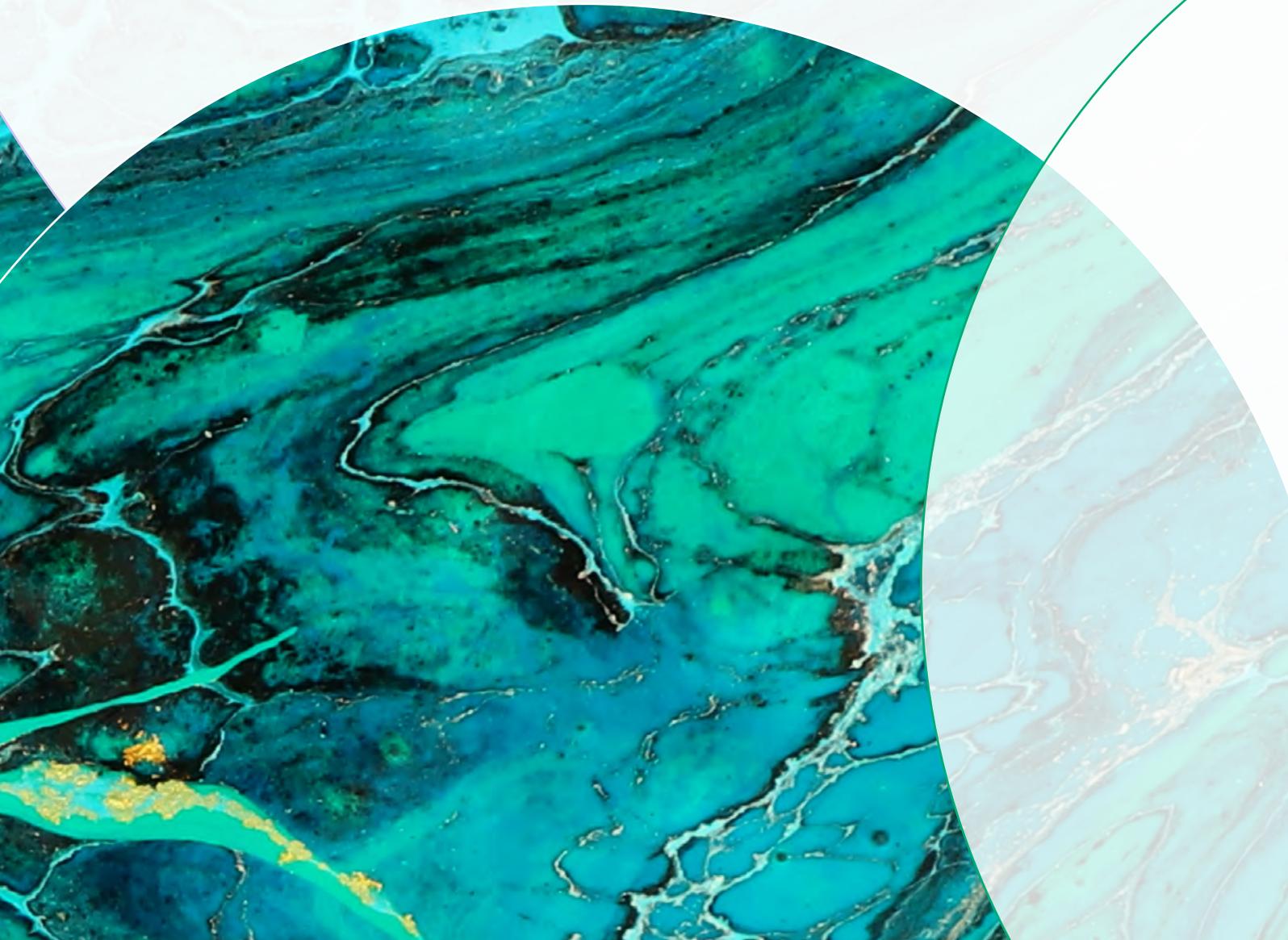
Due to the travel and meeting limitations caused by the Covid-19 pandemic, the General Assembly had to be held in written form at the ETAD office in Basel. The appropriate procedure had been indicated by ETAD's legal counsel, H.R. Uebersax, in order to still guarantee compliance both to basic legal requirements and to ETAD's By-Laws.

Member companies had received on May 25th, 2020 all necessary documentation and information on the upcoming General Assembly.

The General Assembly took place on June 25th, 2020 with the participation of P. Fois, ETAD Executive Director, H.- R. Uebersax and R. Hubli, ETAD's trustee and bookkeeper. P. Fois chaired the meeting, based on the proxies received by the member companies and the president.

H.- R. Uebersax verified that all member companies had been informed in due time about the GA and the received proxies and votes had been properly compiled and signed by the member companies.

Out of the current ETAD membership of 34 companies, 24 were represented by proxy; of the current total vote entitlement of 78 votes, 67 votes were represented at the meeting (86%).



According to the votes received from the member companies:

- The minutes of the 45th Ordinary General Assembly 2019 as well as the Annual Report 2019 were approved unanimously.
- The financial report by PriceWaterhouseCoopers AG indicated, in 2019, a total income of SFr. 1'072'000 compared with total expenditure of SFr. 912'000, resulting in a profit of SFr. 160'000. This financial report was approved unanimously, as well as the re-appointment of PriceWaterhouseCoopers AG as auditors for the 2020 accounts.
- The Board proposal for the Budget 2020 was approved unanimously.
- It was proposed that the official name of the organisation would be changed to ETAD (Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers). This would allow using the acronym as official name. This change was approved unanimously by the General Assembly; ETAD's By-Laws and the ETAD entry in the official Commercial Register in Basel will be amended accordingly.
- The proposal to introduce a flat rate of SFr. 500 per company per year instead of the current specific database fee was accepted with one abstention and all other companies in favour.

The Board proposal for its composition for 2020/2021 was accepted with one abstention and all other companies in favour as follows:

Dr. Mehmet Emre Şener	Setaş Kimya Sanayi A.Ş.	President
Dr. Stefan Ehrenberg	CHT Switzerland AG	Vice president
Mr. Georg Roentgen	Huntsman Textile Effects GmbH	Treasurer

Dr. Felix Grimm	Clariant Produkte (Deutschland) GmbH
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

The new Board, i.e., all Board members will be inscribed in the Commercial Register of Basel.

Dyes Operating Committee (DOC)

During 2020, the DOC decided to increase the number of regular meetings (held as web-meetings). The EU regulatory proposal on sensitizers on textiles and leather articles as well as two projects in collaboration with by the German authorities were a special focus of activity. However, also new broad topics emerged which need careful monitoring, since they might affect the dye industry strongly in the coming years.

BfR project – non-regulated amines

The project is moving to a crucial point, since ETAD received all the information sheets on the azo dyes in the tonnage band 100-1000 t/y registered by ETAD/TEGEWA companies; the files were double-checked by an external toxicologist. ETAD will now finalize the files and send them to BfR, which will evaluate them internally and organise a meeting to decide on further steps.

Additionally, ETAD is preparing short summaries about the amines identified as a concern by B. Brüscheiler of the Swiss BLV. The BLV still focuses its attention on the amines as a danger for the population wearing dyed textiles, and the aim of the amine-centred summaries is to show that, at least for some of these amines (e.g., sulfanilic acid), there is enough evidence of no concern.

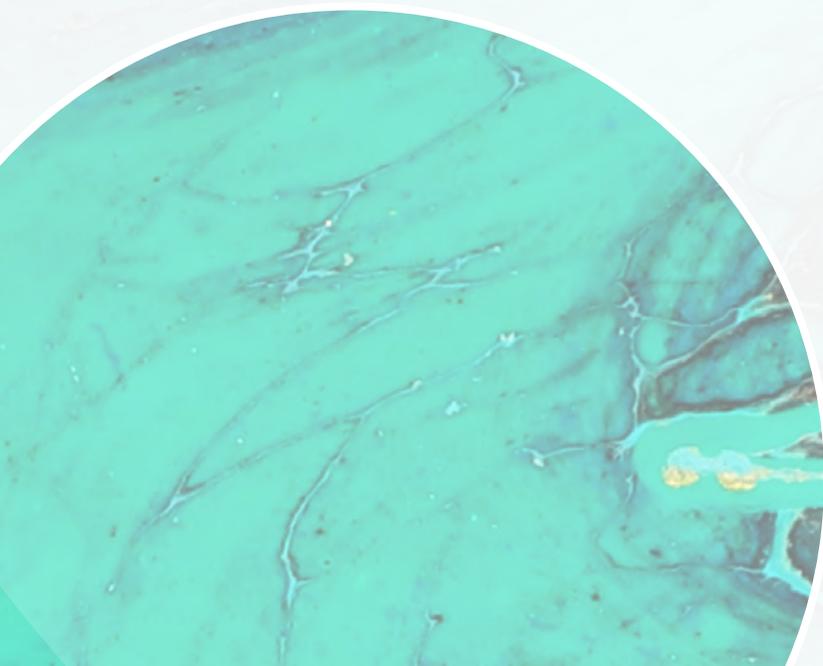
New BfR-project – Dyes migration from dyed textiles

In May, the BfR invited ETAD and TEGEWA to a brainstorming about a new planned project on dyes migration from dyed textiles. It was decided to focus on the most used fibers: polyester and cotton, with wool as a possible third candidate for a later phase. These fibers also determine the dyes of choice: typically disperse for polyester and reactive for cotton (and acid for wool).

With the input of its member companies, ETAD prepared a list of most common disperse and reactive dyes and agreed with BfR on a selection of the most relevant ones as well as on a selection of representative textiles for the dyeing. At the current stage of the project, the participating companies are preparing both dyes and dyed textile samples. All samples will be anonymized and forwarded to the German authorities.

Restriction proposal for sensitizers in textile/leather

During 2020, the DOC provided to ETAD all up-to-date data on REACH/market relevance, uses and properties of dyes potentially affected by the restriction proposal. ETAD provided this consolidated information to both public consultations on the proposal (for the Risk Assessment Committee RAC and the Socio-Economical Assessment Committee SEAC). As a further action, ETAD joined a group of other interested parties and worked with the consultant group KREAB to create a presentation on the industry position on the proposal and to bring it to the attention of as many EU authorities as possible. The goal of this advocacy work is to convince the different states not to accept the proposal in its current form. At the end of the year ETAD had already had meetings with representatives of around ten EU member states as well as with DG Environment and DG Grow. A document with additional dyes-specific comments was provided to the Swedish and French competent authorities and is available for future communication. Further meetings with national authorities are planned for 2021.



Microplastics discussion

As mentioned on the ECHA page “Microplastics can be unintentionally formed through the wear and tear of larger pieces of plastic, including synthetic textiles.” This aspect could have indirect effects on dyes typically used in synthetic fibers (e.g., disperse dyes). It was decided that this topic will be followed, and actions will be decided depending on its developments. In particular, the DOC decided to start the dialogue with other associations which are directly affected by the current discussion (e.g., PlasticsEurope).

ZDHC activities

The DOC provided dyes-specific feedback on different activities in ZDHC, where ETAD is an active participant. In particular, detailed information was needed on some substances in the Candidate List of the MRSL, as well as on the possible presence of impurities in dyes. ETAD also submitted the DOC input for the updating process of the “smart testing table/grid”, which is a guidance for users of textile/leather chemicals on suitable testing requirements for these products.

An additional very important topic which is still in discussion is the proper approach for the goal of a “sustainable chemistry”. The chemical industry has proposed an alternative approach to the current screening methodologies and is looking for an alignment of the two approaches or, at least, for acceptance from the brands of the equivalence of the two systems.

Ecolabels

A public consultation was published on the proposed update of the Nordic Swan, where some difference in wording between textile and leather could lead to misinterpretation. Official comments to the proposal were submitted by ETAD.

Analytical projects

The draft of the method for the determination of Cr(VI) as impurity in Cr(III)-complex dyes was prepared and the analytical experts are revising it. It was also decided, in line with the newest developments in the determination techniques, to expand the part on the determination through IC/PDA and to check in detail the performance of the two methods on samples of the same dye.

The DOC also decided to explore the possibility of revamping the development of a method for the determination of free Co in Co-complex dyes, in particular allowing a differentiation between Co(II) and Co(III). External service providers with analytical experiences were identified and contacted as possible partners for the project.

Analytical Expert Team members (status as for end 2020)

Dr. Oszkar Keray	CHT Switzerland
Dr. Thomas Otten	Huntsman
Ms. Hikari Chiu	OGD Taiwan

Pigments Operating Committee (POC)

In 2020 the POC was faced with various challenges related to the safe use of pigments in different applications, in particular the use of pigments in food contacts material as well as test methods for regulatory purposes. The developments of the ongoing nano debate and its effect on organic pigments remained in the POC focus as well.

Nano

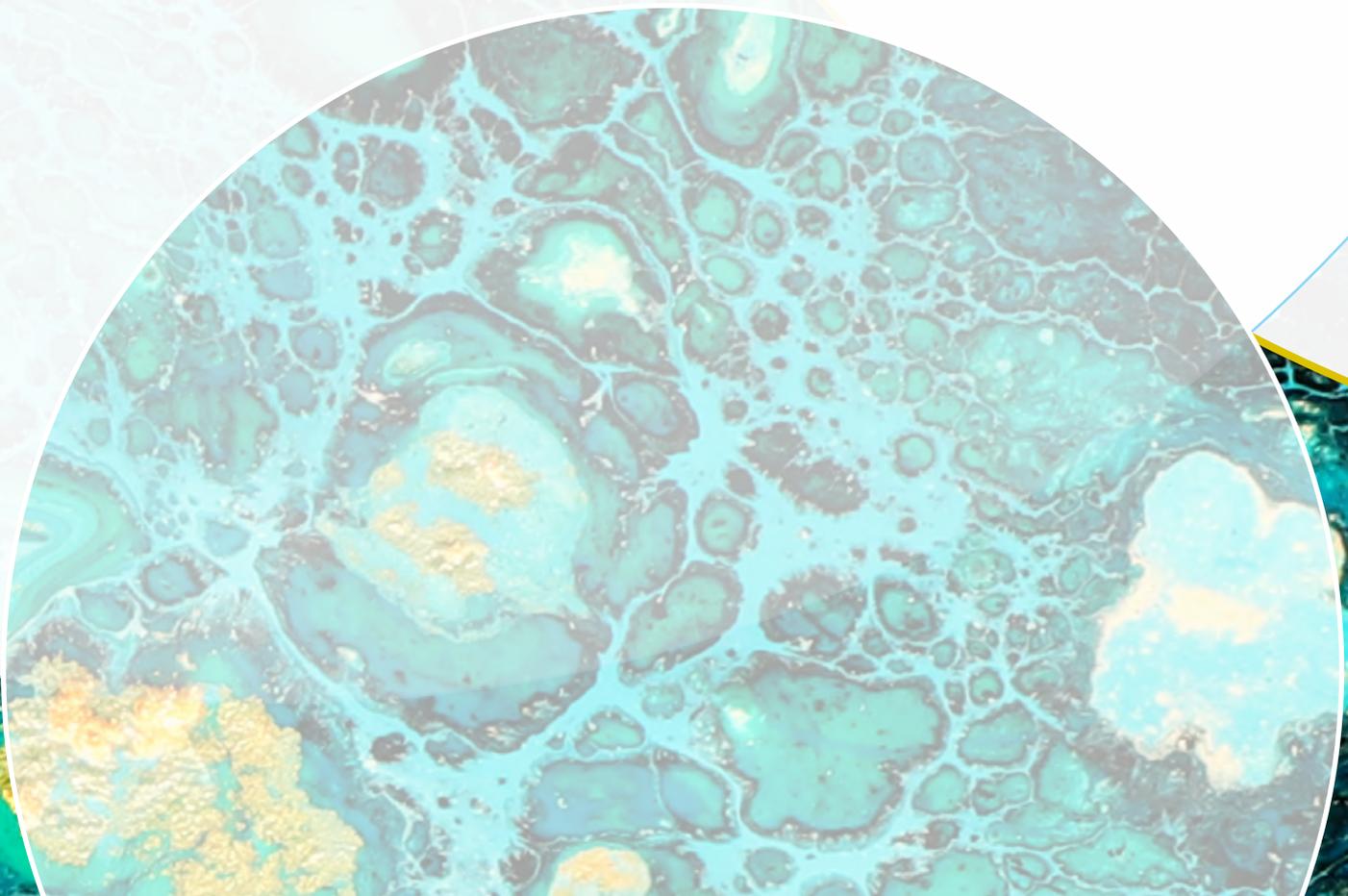
ETAD's pigment manufacturing companies continued their discussion on the use of the „set of nanoforms“ description for organic pigments. After considering in detail the “Guidance on Registration and Substance Identification” and its application to the specific case of organic pigments, the companies concluded that the single nanoform is a better descriptor for their products. It should be possible to define one wide boundary composition covering the co-registrants and have the corresponding dossier as representative for the organic pigments including their variable nano components.

ETAD's nano working group drafted a specific disclaimer to be used for the dossier update. The disclaimer aims to clarify that different nanoforms or sets of similar nanoforms cannot be distinguished/ separated and that there is still no standardized methodology to assess their particle size.

Currently, ETAD companies are testing dustiness of nanomaterials according to different methods, since these measurements are required to describe nanoforms. The majority of pigments tested belong to the category “low dustiness” (under 50mg/kg). However, individual tests results differ greatly (big standard deviations) and are not comparable. ETAD collected available dustiness data in order to assess the current situation and to draft RRT test.

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.

In order to avoid issues of pigments as nanomaterials with the food contact legislation or other regulations ETAD POC members started the preparation of a template summarizing all possible regulations that could have an impact.



Pigment Yellow 110 in the SIN List

In the current SIN list, the substance with CAS Nr. 5590-18-1 (Pigment Yellow 110) was reported to be a PBT (persistent, bioaccumulative, and toxic). However, the structure shown for the substance was not the structure of PY 110. After ETAD signaled the mistake, ChemSec reviewed the structure and adjusted it accordingly, but kept the PBT classification for the pigment, in contradiction with available data. ETAD decided to prepare a short position paper to clarify that, although the pigment is classified as persistent, all available data do not support either bioaccumulation or toxicity.

Release of amides from printed FCMs

ETAD continued to follow the discussion in Germany on the reported release of amides from printed FCMs. Information on the used detection methods and on the possible relevance of specific pigments were exchanged between ETAD and the German association VdL as well as the German Federal Institute for Risk Assessment (BfR). In particular, the German authorities did not accept a negative Ames test as sufficient proof to exclude genotoxicity, and further discussion is needed to clarify which alternative approaches could be agreed upon (such as use of hydrolysis tests in stomach acid conditions or in-vitro micronucleus tests). ETAD's POC and VdL will continue to work together on this topic and are planning to commission a study to clarify the status for organic pigments.

Revised ETAD position paper on PCBs

ETAD updated its position paper on the presence of inadvertent traces of PCBs in some organic pigments, particularly taking in consideration the newest data provided by ETAD members as well as input by CPMA, Eurocolour and EuPIA. The paper clarifies that the exemption of mono- and di-CBs is considered no longer applicable, "Zero limit" is not feasible for unintentional PCB in organic pigments and a limit of 50 ppm is proposed. Furthermore, the analysis method ISO 787-28:2019 or DIN EN 787-28:2020-12 is proposed for control and law-enforcement purposes.

German Printing Ink Ordinance

In 2020, the POC continued its monitoring and communication with the German authorities to bring forward the finalization of the ordinance. Important are in particular the discussions on Pigment Blue 15:2 and 15:4, Pigment Red 272 and Pigment Yellow 150, plus the introduction of important pigments missing from the positive list. ETAD also continued to collaborate with EuPIA on the generation of migration data for Pigment Red 245 and Pigment Orange 34.

Further activities

Publications about pigment-related topics as well as any regulatory news relevant for organic pigments (e.g., amendment to the EU plastic regulation, the discussion on microplastics or relevant activities related to PCB in the US) are carefully reviewed. Appropriate measures are developed by the POC and other pigment-manufacturing ETAD members.

Regulatory Affairs Committee (RAC)

In 2020, the RAC increased the regularity of its meetings 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.

New EU Regulations

The European Commission announced the European Green Deal roadmap which sets an objective to deliver the EU's 'chemicals strategy for sustainability'. Expected are increased legislation on endocrine disruptors, hazardous chemicals in products/articles, combination effects and very persistent chemicals. Furthermore, an industrial strategy for a clean and circular economy is proposed, including a sustainable products initiative and particular focus on resource intense sectors such as textiles, construction, electronics, and plastics. The publication of the textile strategy is expected in 2021.

EU member states voted in favour of a draft regulation amending REACH Annex XVII to restrict certain hazardous substances in tattoo inks and permanent make-up. The restrictions will apply 12 months after entry into force, though, for Pigment Blue 15:3 and Pigment Green 7.

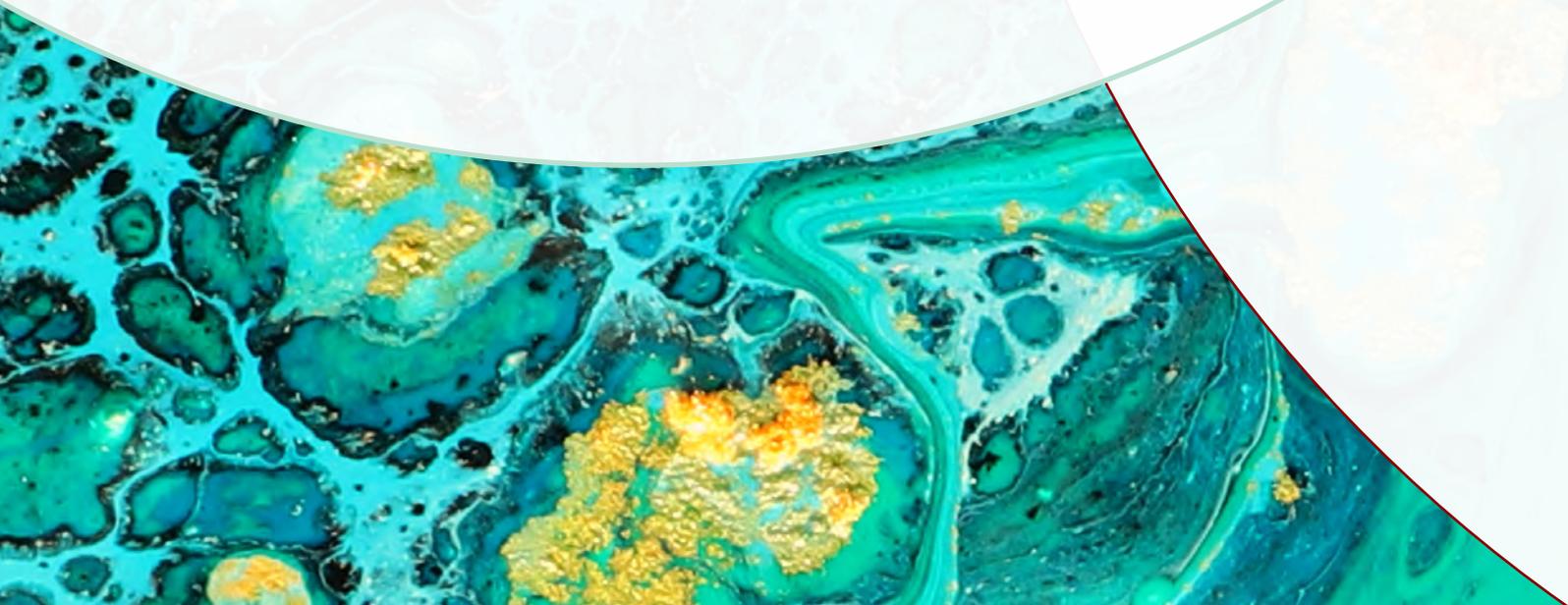
The EU restriction on CMRs in clothing, textiles and footwear entered into force in November 2020.

Nanomaterials

In November, the European Commission published a new version of its guidance on the safety assessment of nanomaterials, including new subsections on coatings, nano-carriers and encapsulated nanomaterials.

Some disperse dyes have notifications as having a nanoform, as have some water-soluble and solvent-soluble dyes. The assignment as nano was taken based on listing on REACH registration, the EU cosmetics inventory as well as the Belgium and French nano inventory. From approx. 180 nano-status substances at ECHA, there are 55 dyes, where the reason for reporting them as "nano" is not clear. The RAC reported these findings to the POC and the DOC for further action.

As of November 2020, companies in the EU must give ECHA a name for the nanoforms or sets of nanoforms of their substance when registering them under REACH. A new registration manual is available with advice on preparing registration dossiers that cover nanoforms.



REACH and CLP

The European Commission adopted the 14th adaptation to technical progress (ATP) of the CLP Regulation, which includes the classification of inhalable powder forms of cobalt as a category 1B carcinogen and removal of the harmonized classification of Acid Black 210. The deadline for implementation is September 2021.

The 13th ATP started applying from May 1st, 2020 and includes new classification limits on preservatives as sensitizers. The 15th ATP was also adopted with further preservative classification limits (implementation March 2022).

In June 2020, the European Commission published Regulation (EU) 2020/878, which amends Annex II of the REACH regulation and sets out the content and format for Safety Data Sheets (SDSs). Changes include the inclusion of the Unique Formula Identifier (UFI), the requirements for nanoform declaration, new multiplication factors for ecotoxicity and new classification limits on skin and respiratory sensitizers. Existing safety data sheets remain valid until December 2022.

Companies importing products to the EU that contain substances from the REACH Annex XIV Authorisation List must now provide information about these chemicals in their customs documents.

Completeness checks of REACH Chemical Safety Reports was launched in April 2020 and an updated version of IUCLID announced.

The European Commission adopted new deadlines on updates to REACH registrations by regulation 1435/2020. Specific timelines for dossier updates of both an administrative and technical nature have been defined.

ECHA intention of restricting sensitizers in textile/leather

In 2019, the intended restriction on the use of skin sensitizers, skin irritants and corrosive substances in textile and leather articles, hides and furs was launched. Many points of the proposal which are particularly critical for dyes are still under discussion. During 2020, ETAD participated in discussions with ECHA, where the association presented argumentation for disperse dyes such the over-estimation of migration and the variability of potency, especially in a dyed textile compared to a free chemical. The potential impact of the restriction if unmediated, could be an immediate ban on three disperse dyes (Disperse Violet 93, Disperse Blue 291 and Disperse Yellow 64) plus effectively a general ban on disperse and reactive dyes in the long-term through a dynamic link to the CLP regulation.

Concerns on the future of the three specific dyes already resulted in monitoring activities by some brands and on wrong rumours about their already enforced ban.

During 2020, the proposal went through the evaluation from both ECHA's Risk Assessment Committee (RAC) and Socio-Economical Assessment Committee (SEAC). After the final SEAC opinion is published, the proposal will be discussed and elaborated within the European Commission by the Member States.

Toys

Two amendments to the EU Toy Safety Directive were published in late 2019, which lower the permitted aluminium content and also give limit values for formaldehyde. The International Organization for Standardization also published an update to its safety standard for the migration of certain elements from toys. There is also a restriction proposal for aniline by reductive cleavage in toys, which would effectively restrict aniline in a similar way to the known carcinogenic amines.

EU Printing Ink Regulation

Since the EU printing ink regulation project was not going forward, the German authorities started working again on their final draft of a German national ordinance. This document is expected to include a positive list for food contact plus a second list of substances allowed during a four-year transition period. The RAC kept following the development of the ordinance in parallel with possible similar activities on the EU level, which could bring about a re-discussion of the responsibility for this regulatory project.

Microplastics

Public consultation on Directive 2019/904/EC about the restriction of intentionally added microplastics is under way. Some pigment preparations as masterbatches may fit into the microplastics definition, and possible effects of the proposal on these products are being evaluated by ETAD members. A final decision is expected in 2021.

Additionally, the RAC is monitoring the expected developments of the discussion on unintentionally produced nano plastic, which could indirectly impact the very important application of plastics (for dyes) and synthetic fibres (for pigments).

Food Contact

The 15th amendment to the plastic FCM Regulation was published in March 2020, introducing, in particular, new heavy metal migration limits for plastic articles.

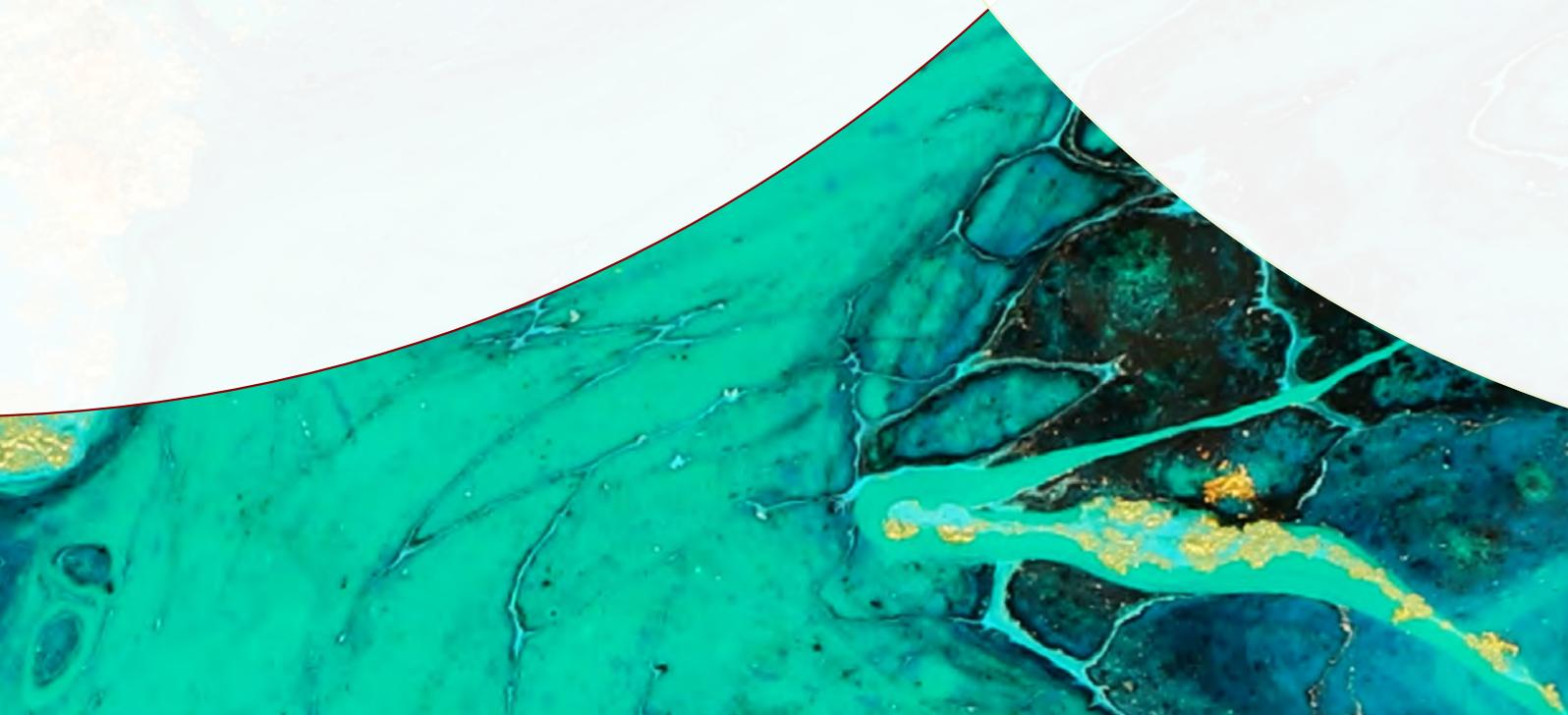
REACH-like regulations

UK

The UK will have a separate system post-BREXIT but will aim to guarantee high compatibility with the EU-REACH. The UK government has extended the deadlines for full data submissions giving businesses up to six years to complete registration dossiers. Registrations will be staggered over a six-year period from October 28th, 2021. EU companies can appoint an OR to become that registrant rather than the actual UK downstream user. The UK will create a national system for CLP, independent of the EU but will continue to adopt GHS as in the EU CLP Regulation.

REACH, CLP, BPR, Pic and POPs Regulations will continue to apply in Northern Ireland, but not in Britain.

REACH registrations in Britain will become void if they are not transferred to the EU/EEA before the end of the transition period. There is the potential for data sharing disputes where registrants previously paid for an access which included the UK. The RAC is following the UK REACH closely.



Turkey

An update of the classification and labelling regulation is planned to align with the EU CLP Regulation.

Pre-registration for Turkish REACH (KKDIK) is required by the end of 2020. Registration starts in January 2021 with a submission deadline of December 2023 for all substances above 1t. A candidate list is also expected to be released in 2021 for implementation in 2024.

Eurasian Economic Union

The Eurasian Economic Union (EEU) member states – Armenia, Belarus, Kazakhstan, Kyrgyzstan and Russia – will each create inventories of existing substances. Non-listed chemicals will be classed as new substances which require registration with a comprehensive hazard dossier prior to sale in the region. The regulation is expected to come into force in 2021.

Russia published it's an interim inventory of chemicals, which will feed into the overarching Eurasian-REACH regulation. Any chemical not nominated to the Russian inventory will be considered to be a new substance once Eurasian-REACH comes into force. Only companies based in Russia can make submissions to the national inventory.

South Korea

The requirement for K-REACH experimental data to comply with GLP may complicate the transfer and validity of reports from European REACH. A list of 106 existing substances was also released, where government support will be given for low-cost hazard test data for K-REACH registration. A list of available governmental hazard data was released (including 29 dyes and 12 pigments). Overseas companies can also apply for access.

USA

The US EPA finalised its selection of 20 high-priority substances that will undergo a TSCA risk evaluation plus also scope documents for the assessments. The EPA extended the comment period on the revised draft TSCA risk evaluation for Pigment Violet 29. ETAD and CPMA are pushing for a reasonable risk evaluation and acceptance of a reasonable approach for all pigments.

ETAD North America (ETAD NA)

ETAD's presence in North America continued in 2020, albeit at a lower level than in the past, with the aim of monitoring regulatory developments and related issues of potential relevance to the dyes industry.

U.S. Environmental Protection Agency (EPA)

EPA's progress on initiatives under the Toxic Substances Control Act (TSCA) in 2020 was hampered because of administration priorities, staff losses, and budget constraints. For example, about 250 new chemical notifications (i.e., PMNs) remain under review currently with significant delays on over half of them. Risk evaluation of the initial 10 priority chemicals has been slow with only one risk management approach proposed by the June deadline.

Companies faced numerous hurdles in complying with the November 30th deadline for the Chemical Data Reporting rule, including new requirements for substantiating confidential business information (CBI) and lower reporting thresholds.

In May, ETAD NA submitted comments to the EPA on the Agency's draft scope of risk evaluations for ortho- and para-dichlorobenzene. The draft scoping documents cited the possible use of both compounds in dye manufacturing. ETAD NA clarified that those uses had been phased out in the 1970's and, based on surveys of member companies, confirmed that neither substance is associated with any current or recent use in dye manufacturing, nor is present in even trace quantities in any commercial dye.

With no further development or follow up from the EPA, ETAD NA discontinued further efforts to propose using more realistic (i.e., lower) default values for residual dye concentrations in empty drums when the Agency assesses new chemicals.

Canada

The Canadian government basically shut down for a number of months because of the Covid-19 pandemic. Although ETAD had provided data in 2019 to help refine Canada's draft screening assessment of anthraquinone dyes, a final assessment still has not been published. The final screening assessment was published for the triarylmethane group of dyes. Of the substances considered, only Malachite Green was concluded to meet the criteria under CEPA Section 64 to constitute a danger in Canada to human life. Further, Basic Violet 3, Malachite Green, Basic Violet 4, and Basic Blue 7 were found to meet the persistence criteria but not bioaccumulation in the environment.

Canadian officials have issued publications to address single use plastics and removing substances from the Confidential Domestic Substances list. No dyes have been removed yet from that list but still it is important to keep information updated.

The government was to present a webinar on November 24 to review regulatory deadlines and reimbursement policies.

ETAD continued its support and membership in the Industry Coordinating Group (ICG) for CEPA. In November the ICG submitted a letter to Canadian officials, including the Ministers of Environment and Climate Change and of Health, to provide industry comments on the renewal and modernization of CEPA.

California Safer Consumer Products Regulation (CalSAFER)

ETAD NA continued monitoring developments under CalSAFER. Product Categories currently being reviewed in the Priority Product Work Plan that may include dyes are household, school, and workplace furnishings and décor and consumable office, school, and business supplies. However, no dyes are in the scope of Priority Products adopted or proposed so far for evaluation and risk management.

Zero Discharge of Hazardous Chemicals (ZDHC)

ETAD's Secretariat in Basel kept ETAD NA members informed of ZDHC activities. Among developments of interest to ETAD NA, the ZDHC Advisory Council is considering new substances to add to Version 3.0 to the Manufacturers Restricted Substances List (MRSL).

Management of ETAD NA

The management of ETAD NA was coordinated by Dr. P. Fois, ETAD Executive Director, and Dr. T. Helmes, Program Manager North America, with legal counsel by R. Bidstrup, Washington, DC.

Indian Operating Committee (IOC)

2020 was a challenging year and in many ways changed the world maybe forever. The ETAD values that we all share have been highlighted and can draw parallels with life as it has been lived: we saw more than ever the need to sustainable and safe practices and use of science in using the resources we have, reducing and managing our waste in the most responsible manner and finally finding the right equilibrium in the way we live, work and play.

We need to respect our environment and tackle climate change and environmental degradation with quick and decisive action. Sustainable development is key for future and ETAD must play a pivotal role in it.

IOC members held two virtual meetings in 2020, where the topics presented below were discussed.

IOC's co-operation with the Bureau of Indian standards

A specific working group was formed within the IOC to deal with various official standards related to raw materials affecting dyes and pigment manufacturing. During this tight collaboration, the committee members reviewed and gave feedback to all proposed tests methods. The process is still ongoing, and the final adoption of the standards depends upon the results of Round Robin Tests (RRT), aimed to check whether the reproducibility of the analytical methods and the results correlation are satisfactory. An overview of the present status is presented in the table below.

Summary of BIS activities

	Nos.
Total substances considered for revision	29
Published	4
Revision completed & standard under final reading	11
Draft under wide circulation	5
RRT in progress	9

India's new Chemical Regulation (India REACH)

India is in the process to enforce a new Chemical Regulation which is similar to EU REACH, but the modality of implementation would vary. The Government of India proposed a draft of this regulation for comments to all the stakeholders, which was discussed extensively in the IOC.

Additionally, because of the importance of this draft regulation, the IOC organized a virtual meeting on October 14th, 2020 with wide participation from ETAD companies across the globe. The Keynote speech was given by Mr. Ravi Kapoor, Managing Director of Heubach Colour Pvt. Ltd & President of the IOC. The second presentation of the meeting was related to the India REACH, which was presented by Dr. Dileep Wakankar, an acknowledged expert in the field of Product Stewardship & Regulatory. He has been instrumental in drafting Chemicals (Management and Safety) Rules (India REACH) and provided comprehensive details including highlights of six chapters

and nineteen schedules of draft rules, preparations required for notification and registration etc. After Q & A session vote of thanks was given by Mr. J.I. Sevak.

Communication with the ETAD office

During the virtual meeting in October, Dr. Pierfrancesco Fois, ETAD's Executive Director, also held a presentation summarising the current regulatory scenario for pigment and dye companies. Topics discussed included REACH Dossier evaluations of organic pigments, Draft Community Rolling Action Plan (CoRAP) updates, nanomaterials, FCM activities in the EU, ECHA proposal for restricting sensitizers in textiles, dyes in the Taiwan list of CMRs and ZDHC. This was an excellent presentation and drew wide appreciation from all the listeners as it was found extremely useful.

Future plans and present wishes

2020 was a year of intense participation and commitment to ETAD-related activities; the IOC also decided it should expand its reach and include more activities for the benefit of its members.

As a closing note, the IOC would like to wish all its colleagues in ETAD and the colorant world as well as all our fellow people the best of health and urge all to take good care of themselves, take the due precautions and not let their guard down until we are all sure that the pandemic is in control.

Chinese Operating Committee (ChOC)

Under the shadow of Covid-19 globally, 2020 was a year of unprecedented paramount challenges and changes, despite other interesting opportunities especially for new growth areas in Fintech, Medtech and Greentech and for those ready. Alongside many had to change plans or fold.

The global political and economic outlook ahead remains highly uncertain. Widespread adoption of digitalisation is needed even more now to allow businesses to transact across borders. Business leaders also restructured their companies to seize opportunities in a post-pandemic world.

In China, the colorant industry and its supply chain have had to reshuffle accordingly to stay afloat. Our strength must be in the flexibility to adapt to the changing needs and buying patterns. The will to work closer and to better communicate issues and requirements through the potential ChOC digital platform became a key focus point.

Collaboration with other associations/stakeholders

Despite a bumpy head start that saw China's initial lockdowns, the country managed to unite and come out quicker and stronger. For example, The China Printing and Dyeing Industry Association shared with us the overall printing and dyeing industry showed a negative growth trend in the first half as a result. In the second half of 2020, recovery signs were present leading to increased industry activity concentrations. Market demand picked up as a result leading to domestic and foreign textile industry orders showing better signs of recovery. The local Chinese economy had thus seemed to generally develop in a better than expected situation.

In addition, the national environmental protection policy will also foreseeably accelerate the supply-end reforms of the colorant industry and investment in EHS (Environment, Health and Safety) compliances. The recent 20th China Interdye Exhibition held in Shanghai in November encouragingly attracted more than 500 companies from 12 countries to participate in the exhibition, and held 9 technical exchange meetings and 6 industry events. Discussions and research on current hot topics such as new technologies for emission reduction were launched. The Asian Dyestuff Industry Federation (ADIF) launched 2 new so-called "Asian Standards" at the exhibition.

ChOC and its members thus had another fruitful year despite the difficulties, intermingling and keeping tabs of these activities to stay current and widen its engagement with various stakeholders. The systematic monitoring of new and/or amended regulations/standards also continued as were efforts to recruit potential new ETAD members for ChOC.

Regulations and standards

The ChOC regulatory group continued to systematically monitor latest developments on regulations and standards related to colorant industry. The key outcome of the newest developments is summarized as follows:

Dyes

The "Industrial Structure Adjustment Guidance Catalog (2019 Edition)" was implemented on January 1st, 2020. The state encouraged the development of high-performance environmentally friendly dyes/pigments and manufacturing processes and their applications. The "Petroleum and Chemical Industry Development Plan" also provided guidance on the betterment of the dye/pigment industry.

Guiding opinions had been given in "Classification of Strategic Emerging Industries", "Dyeing and Pigment Industry 13th Five-Year Development Rules". The 2020 new standard review meeting was held in Guilin, Guangxi Province, in October. The meeting reviewed 24 standards this year and made preparations for the further revision of standards next year. The meeting introduced the development of the green standard system for the dye/pigment industry.

At the recent 20th China Interdye Exhibition held in November, ADIF released their first two Asian dye standards after the establishment of ADIF: the inspection method for the shade intensity of disperse dyes and reactive dyes, filling the gap in the Asian dye industry standard, and providing initial steps to the standardization of the Asian dye industry.

The newly revised content of the REACH regulation this year to other environmental protection and safety laws and regulations related to the dye industry. Laws, regulations and policies related to the downstream industries: mainly leading to the eventual development planning and guidance of the textile industry users.

Organic pigments

Modification and formulation of existing regulations/standards and the introduction to the revision of 5 standards was shared, including GB 18581-2020 (Limit of Harmful Substances of Woodenware Coatings), GB 18582-2020 (Limit of Harmful Substances of Architectural Wall Coatings), GB 24409-2020 (Limit of Harmful Substances of Vehicle Coatings), GB 30981-2020 (Limit of Harmful Substances of Industrial Protective Coatings), GB 38507-2020 (Limits of Volatile Organic Compounds (VOCs) in Printing Ink).

Environmental protection & safety

The revision and formulation of existing regulations/standards on safety: "The People's Republic of China on the Safety of Hazardous Chemicals (Draft for Solicitation of Comments)" (Draft for the Second Solicitation of Comments) released. The main content is the implementation of "three certificates in one", the integration of safety

conditions and safety facility reviews of hazardous chemical construction projects, etc., "Occupational Exposure Limits for Hazardous Factors in the Workplace Part 1: Chemical Hazardous Factors" (third revision), "Fireproof Design Standards for Fine Chemical Enterprises" and the revision and customization of six other safety regulations and standards.

The revisions of environmental protection regulations/standards, mainly the release of the new version of the "Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes" and the introduction of the revised content were some of the key matters through the year.

Chemical Substance Registration

"Measures for the Environmental Management and Registration of New Chemical Substances" (Order No. 12 of the Ministry of Ecology and Environment), "Announcement on Linkage Matters Concerning the Environmental Management Registration of New Chemical Substances", and introduced the Order No. 12. The difference from the previous version Order No. 7 and the challenge to the test and evaluation of dye/pigment products: the requirements for test data increase and related test costs increase. Another challenge is the issue of information protection, testing time limit, etc. The list of priority control chemicals (the second batch), which included 18 categories of chemicals, and proposed possible environmental risk control measures were some of the highlights observed.

Testing and method

ChOC member companies have increasingly taken advantage of ETAD as a global platform to address local issues. Recently, an issue of false positive results for 3-chlorophenol was reported by a member company. This happened when testing fabrics according to AFIRM method. The treatment of fabrics is under much harsher conditions than the real life, so that an unexplainable amount of 3-chlorophenol were reported. To help the member company solve the problem, ETAD secretariat contacted AFIRM to discuss the issue. The clarification of the testing method, mainly the procedure of sample treatment, is in progress. We hope that a solution could be established soon.

Recruitment of new members

This continues to remain an important task for ChOC. To increase ETAD's contribution and visibility to the colorant industry and among the downstream user industry. The work-out of the audit report for one candidate has been in good progress. Its membership is supposed to be accepted in 2021, subject to approval by the Board.

Japanese Operating Committee (JOC)

The JOC, ETAD's Japanese Operating Committee, had online meetings for the first time since its activation in 2010 due to the spread of COVID-19 infection this year.

Even in such a difficult situation, the Japanese regulations related to dyes and pigments industry were discussed and updated and JOC carried out its work in collaboration with the Japan Dyestuff and Industrial Chemicals Association (JDICA). The latest status is as follows:

Amendment in Law concerning Pollutant Release and Transfer Register (PRTR)

The criteria of hazardous substances under this law are being revised, and the JOC members are waiting for the newest version. In particular, it has been announced that the substance lists which are already defined as Class 1 and 2 Designated Chemicals will be renewed. The amended lists are expected to be finalized soon, then enter into force from April 1st, 2022.

Amendment in Notification of small volume exemption of Chemical Substance Control Law (CSCL)

An important issue in the implementation of the CSCL for small volume exemption was identified and discussed by the ChOC. The risk assessment by QSAR and chemical structural similarity was presented to approve substances of small volume exemption, but it was reported that, from last fiscal year 2019, submission for these cases had been rejected if the substances have potential concern of PBT property according to a QSAR check. Such decision was made based on the Article 3 (1)5 of CSCL for the first time, hence manufacturer or importer will have to pay attention to occurrence of similar cases.

Positive list (PL) system for FCM

The Food Sanitation Law, which was promulgated on June 13, 2018, has introduced a positive list (PL) system that allows only substances that have been evaluated for safety to be used for food utensils, containers and packaging (UCP) (Enforced on June 1st, 2020). The list was published on May 29th, 2020 and includes in Table 1 a list of base polymers for plastics, coatings as well as a list of trace monomers and a list of additives.

The JOC members were able to clarify the specific requirements which apply to colorants in the framework of the law: Colorants, including surface treatment agents, that are used only for the purpose of colouring UCPs are not specified in the PL, because provisions are already given in the Ministerial Notification No. 370. Colouring agents need to comply with the provisions.

However, if colorants are used for a purpose other than colouring (e.g., as fillers or slip agents), such substance is required to be listed in the PL.

A period of transitional measures of five years (until May 31st, 2025) applies to the UCP manufactured or imported prior to the effective date of the PL. Substances used in these UCPs can be nominated to be added in the PL within this period.

JOC Activities Plan for 2021

As a JOC activity plan for 2021, we will continue monitoring Japan-specific regulatory issues mentioned below in close collaboration with JDICA:

- PCBs
- PAAs
- Nano Materials
- FCM
- other legal revisions affecting organic pigments industry

Clariant will take the chair of JOC in 2021.

Taiwan Operating Committee (TOC)

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

The companies in the TOC keep following ZDHC developments and are continuously monitoring trace amounts of the restricted substances in their colorants. TOC members also provide through their input on new substances submitted for inclusion, reporting about relevance and including proposals for suitable limits. In this way, also the sometime specific characteristics of the Asian market can be properly incorporated in the feedback.

California Proposition 65

California Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, is a reference currently used worldwide. Companies need to take responsible for determining whether substances of concern might be present as residues in the colorants to cause finished consumer product needs to be labeled in compliance with the Prop 65.

One recent case reported to the ETAD office affected cobalt complex dyestuffs, which will face false-positive results when tested with available methods, and will be wrongly identified such as cobalt sulphate. ETAD's Analytical Expert Team is working on a method development to deal with this issue.

Taiwan regulatory activities

Taiwan Initiated the Annual Reporting of New and Existing Substances

In accordance with the requirements of Provisions on the Registration of New and Existing Substances (2019), registrants must report the actual manufacturing/ import volume of last year of the new and existing substances between April 1st and September 30th annually since April 1st 2020. Information that shall be reported include registrant information, the registration number, annual manufacturing/import volume, etc.

Taiwan Priority Management Chemicals

The 2nd CMR list published on Dec. 2018 included some colorants, which had been listed although no information on a CMR concern was available. In Dec. 2019, the TOC organized a meeting between Dr. Fois, OSHA and its technical supporting organization, SAHTECH. The authorities agreed on evaluating the cases of the listed dyes based on corresponding dossiers prepared by ETAD. During 2020, the authorities received all the available data: for the most relevant dyes, it was clarified that they are not CMR; for some others, the data might need refinement, but it should be first checked whether they still are on the market.

Taiwan Hygienic Masks Seminar Concerning Colourants

In the end of 2020, TNFIA (Taiwan Nonwoven Fabrics Industry Association) and TDIPA organised a seminar on colorants in protection masks in order to clarify if they might represent a consumer's concern. ETAD was a co-organiser of the meeting and invited Dr. Fois as well as the TOC member company Everlight Chemical to hold specific presentations. The presentations clarified which characteristics of the chemical profiles of dyes (and pigments) should be considered for these specific applications, depending on the substrate. Additionally, it was underlined how both the chemical product quality and the good manufacture of the final article are, together, crucial for the final evaluation.

Information and external activities

Presentations and publications

ETAD NA's comments to the Draft Scope of the Risk Evaluation for o-Dichlorobenzene (CASRN 95-50-1) and to the Draft Scope of the Risk Evaluation for p-Dichlorobenzene (CASRN 106-46-7)
Submitted to the US EPA, May 2020.

ETAD's Information Notice on the EU proposal for restriction on sensitising substances (status June 2020)
Information for member companies, June 2020.

Comments on the EU restriction proposal on sensitisers in textiles – Focus on Disperse Blue 291, Disperse Violet 93 and Disperse Yellow 64
Information provided to different EU authorities, June – July 2020.

Assessment of potential aniline exposure from use of azo dyes in dyed textiles/leather (August 2020)
Information for member companies.

ETADs Kommentare zu den Anforderungen an Pigmente im Blauen Engel für Druckerzeugnisse (Entwurf August 2020)
Comments sent to Blue Angel on the draft requirements on pigments for printed articles, September 2020.

ETAD's comments to the Swedish proposal for a chemical tax on clothing and footwear
Submitted to the Swedish authorities in October 2020.

ETAD focus 2020 – Overview of activities on key issues
Presented at the IOC Virtual Meeting, October 2020.

Short communication on the EU proposal for the restriction of sensitisers in textiles, leather, hide and fur articles
Document in English and Chinese, distributed to the members and shared with the Chinese associations CDIA und CDPA, December 2020.

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

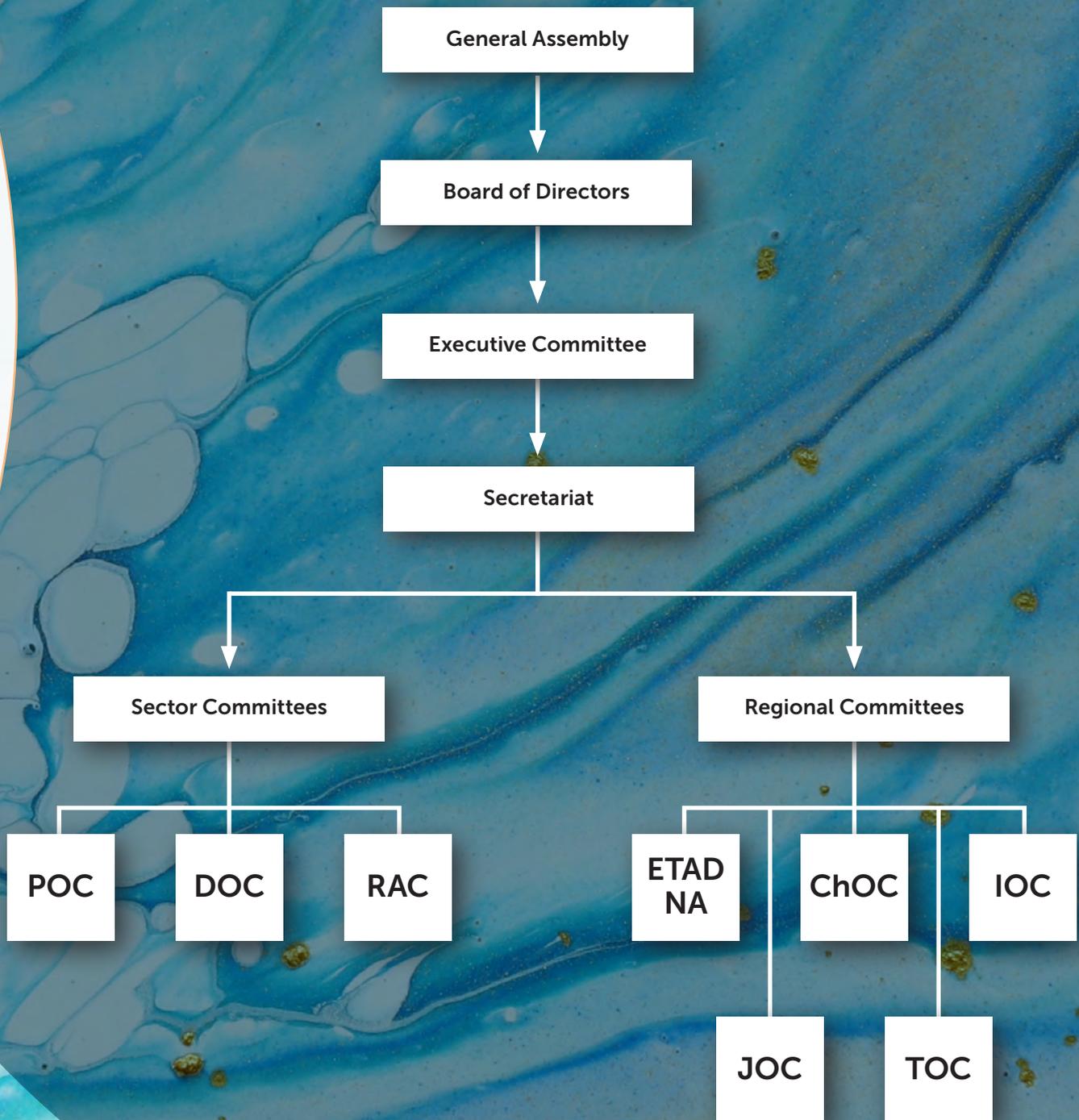
External activities

During 2020, ETAD continued or started its activities in different projects with external groups and associations. The most relevant collaborations included:

- Participation in different Zero Discharge of Hazardous Chemicals (ZDHC) groups/teams as representative of the colorant manufacturers
- General input to the nano debate and corresponding national and international activities
- Advocacy work on the EU Commission restriction proposal on sensitisers in textiles
- Project on azodyes with the Swiss and German authorities
- Project on dyes migration with the BfR in Germany
- Collaboration with VdL in the discussion with the German authorities on amides in FCM
- 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.

Organisation chart



Committee members*

Dyes Operating Committee

Mr. Mark Dohmen
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

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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.

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Dr. Ulrich Veith
BASF Colors & Effects Switzerland AG
Mr. Josef Wieland
CINIC CHEMICALS EUROPE Srl
Dr. Klaus Kund
Clariant Produkte (Deutschland) GmbH
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Dainichiseika Color & Chemicals Mfg.
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Dainichiseika Color & Chemicals Mfg.
Co., Ltd.
Mr. Takeshi Suzuki
Dainichiseika Color & Chemicals Mfg.
Co., Ltd.
Mr. Masashi Ui
DIC Corporation
Ms. Elena Bothe
Heubach GmbH
Mr. J. I. Sevak
Heubach Colour Pvt. Ltd.

Ms. Aurélie Lemetais
Sensient Cosmetic Technologies
Dr. Caroline Bradley
Sun Chemical Ltd.
Dr. Kateřina Vyňuchalová
Synthesia, a.s.
Mr. Daniel Ymbernon
Daicolorchem EU, S.A.

Chinese Operating Committee

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Ms. Xu Fang
Archroma Chemicals (China) LTD
Mr. Max Zou
CINIC Chemicals Co. Ltd.
Mr. Lu Xingao
Hubei Color Root Technology Co., Ltd.
Dr. Crane Ji (till September 2020)
Huntsman Chemical China
Ms. Amy Li (from October 2020)
Huntsman Chemical China
Mr. Chen Yuewen
Matex International Limited
Mr. Dro Tan
Matex International Limited
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Mr. Wu Zhenjin
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Senior Consultant
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Legal Counsel of ETAD North America
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Mr. Reto Hubli
Fidares Treuhand

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Ms. Carole Mislin
Archroma Management GmbH
Mr. Pat Tilli
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

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Atul Ltd.
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Mr. Ravi Kapoor
Heubach Colour Pvt. Ltd.
Mr. Amol Sawant
Huntsman International (India) Pvt.
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Mr. Vilpesh Yadav
Jay Chemical Industries Ltd.
Mr. Meet Patel
Meghmani Dyes Ltd.
Mr. Atul Ashthekar
Meghmani Dyes Ltd.
Ms. Raziya Sayyad
Pidilite Industries Ltd.
Mr. H. M. Thombare
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Heubach Japan K.K.
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Toyocolor Co., Ltd.
Mr. Katsuhito Miura
Toyocolor Co., Ltd.

Taiwanese Operating Committee

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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 2021

Code of Ethics

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 2021)

Archroma Management GmbH
Switzerland

ATUL Limited
India

BASF Colors & Effects GmbH
Germany

CHT Switzerland AG
Switzerland

Chroma Chemical Corp.
Taiwan

CINIC Chemicals Co. Ltd.
China

Clariant International AG
Switzerland

Colourtex Industries Ltd.
India

**Dainichiseika Color & Chemicals
Mfg. Co., Ltd.**
Japan

DIC Corporation
Japan

Everlight Chem. Industrial Corp.
Taiwan

Farbchemie Braun GmbH & Co. KG
Germany

Heubach GmbH
Germany

**Hubei Color Root Technology
Co., Ltd.**
China

Huntsman Textile Effects
Switzerland

**Hwa-Tai Industry Co., Ltd
(associate member)**
Thailand

**Jay Chemical Industries Private
Limited**
India

Matex International Limited
Singapore

**Meghmani Dyes and Intermediates
LLP**
India

Nippon Kayaku Co., Ltd.
Japan

OHYOUNG Inc.
Korea

**Oriental Giant Dyes & Chemical
Ind. Corporation**
Taiwan

Pidilite Industries Ltd.
India

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USA

Setaş Kimya Sanayi A.Ş.
Turkey

Sudarshan Chemicals Ind. Ltd.
India

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Denmark

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Czech Republic

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Taiwan

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Germany

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Thailand

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China

Current list of members under:
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ETAD

The Ecological
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