

**ETAD Considerations regarding the designation of Colorants for the Nomination List of the Chinese Hygienic Standard GB 9685-2003**

ETAD is the leading health and environment association representing the organic pigment and dye manufacturers. It represents 43 companies internationally and have close links with other national organisations representing organic colorant suppliers. ETAD is committed to working closely with Authorities to ensure a high degree of safety both to workers, consumers and the environment.

On behalf of our member companies we would like to make some comments to the current discussions regarding the use of CAS numbers and Colour Index designations to describe substances proposed for inclusion in this standard.

Especially in the case of colorants it is not the colorant moiety *per se* that migrates but rather the impurities, byproducts and/or residual starting materials.

CAS Number:

In both TSCA and EINECS/ELINCS inventories an individual molecule present at > 80% defines a single component substance listed as that one molecule name only. This convention is also used in other inventories (e.g. Australia, Canada, etc.) and we would expect that a similar convention was used in the Chinese inventory. The consequence of this convention is that a substance defined by a CAS Number can be associated with a number of impurities, the chemical nature of which is dependent upon the manufacturing process.

C.I. Generic Name (may be applied to describe pigments and dyes):

This is a "simple" generic designation to allow the exchange of information about the chemistry of colored substances without going into detail. The C.I. generic name assigned to a product describes only the essential colorant. Thus a sales product described by e.g. C.I. Pigment Yellow 13 may contain only 60 to 70 % of colored molecule, the remaining material will be auxiliaries or other substances added to improve the overall application performance of the product. This neglects any impurities, by-products, etc. formed during the manufacturing process.

Thus, we respectfully suggest that including a colorant in this Hygienic Standard described by either its CAS number or C.I. generic name will not be adequate to ensure the health and safety of the consumer. On one hand impurities are not addressed and on the other hand the presence of intentionally added substances to improve colorant performance are not covered.

In the list of submissions from the ETAD members the active ingredients are separately nominated from the additives.

Therefore we strongly recommend that in all cases some purity limits are required for the active colorants (e.g. trace metals, free amines, PCBs, etc.).

We remain at your disposition for any questions and would be willing to offer assistance in the future.