



# EU Bureaucracy Madness: Notifications to “**Poison Centres**”

## **Harmonisation of notification requirements: Well-intended, badly done**

The harmonisation of requirements for notifications to national “Poison Centres” was intended to make it easier for manufacturers of chemical mixtures to place their products on the single market. There are poison centres in all EU Member States. Their task is to support doctors, in particular, in the treatment of poisoning cases by providing information on product ingredients over the telephone. However, the new harmonized rules of Annex VIII to the CLP Regulation put enormous time and cost pressure on the mostly mid-sized paint manufacturers with their many thousands of formulations for different colour shades.

## **Cost wave threatens the existence of mid-sized paint manufacturers**

The costs of the new notification requirements cannot be calculated precisely at present, because central notification tools are still not activated at ECHA. However, it is clear that each notification will remain time-consuming, especially as information from raw material producers needs to be obtained. Cost estimates for German paint manufacturers range from 350 million euros to several billions per year. Obviously, such costs would threaten the very existence of an industry with total sales of just under 7 billion euros.

## **Dramatic increase in the number of notifications is expected**

The results of a workability study carried out for the EU Commission show that the paint and coatings industry is by far the hardest hit due to its wide range of products: The study estimates that the number of new notifications by European paint and coatings manufacturers will rise from 150,000 to 44.5 million per year – an increase of 300 times! For German manufacturers, about 11 million notifications would be expected.

## **Postponement is necessary**

After a postponement of notification deadlines by one year was already achieved with the 1st amending regulation, the Commission has adopted adjustments for a 2nd amending regulation based on the results of workability study. In the field of paints and coatings, the introduction of an Interchangeable Component Group (ICG) and simplifications for individually mixed paints and coatings are important. These adaptations are meant to facilitate the implementation of notification requirements and to reduce the number of notifications. However, not all the necessary IT tools, which will then include the newly determined adjustments, are yet available. Therefore, another postponement of notification deadlines becomes inevitable.

**This is  
what  
we are  
calling  
for**

### **✓ Adapt the rules for paint manufacturers**

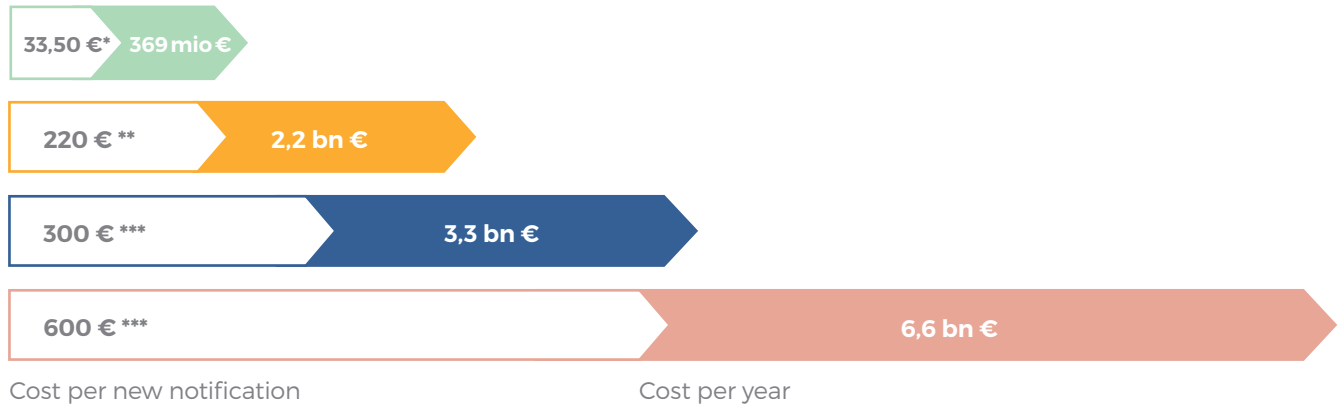
We are in favour of the further review of the CLP Regulation to bring about a workable solution for the paint, coatings and printing ink industry. We support concepts such as the Interchangeable Component Group (ICG) and facilitations for individually mixed paints tailored to customer specifications.

### **✓ Postpone the entry into force of the new rules**

In order to enable the implementation of the new rules, the introduction of the necessary IT tools and conversions of paint mixing stations, we expressly speak for postponing the entry into force of provisions under the 2nd amending regulation.



## Cost estimate for new notifications per year for the German paint and printing ink industry\*

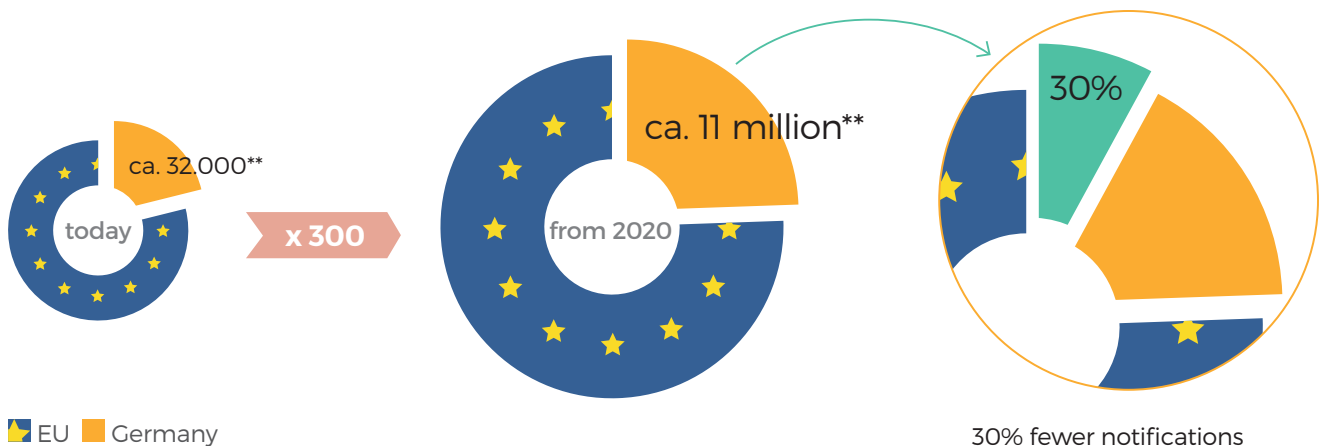


\* German Federal Statistical Office 2015 for notifications according to §16e ChemG.

\*\* Source: European Commission, study, 2015 (mean value in the EU).

\*\*\* VdL estimate based on contributions from German paint and coating manufacturers to the workability study

## Number of expected new notifications for the paint and printing ink industry per year\*



\* Source: Wood, Study on workability issues concerning the implementation of Annex VIII, Second Interim Report 2019

\*\*VdL estimate

30% fewer notifications through adaptation of planned requirements (2nd amending regulation)



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