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# Notification tools: paint industry perspective

**MARC WILLEMSE (CHUGOKU PAINTS B.V.)**

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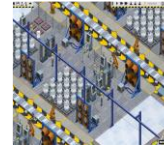
# CHUGOKU PAINTS B.V. THE NETHERLANDS



**Marc Willemse**  
Manager Regulatory Affairs



Mother company in Japan  
Production location for EU in  
Heijningen, The Netherlands  
Production facilities and sales  
offices all over the world.



Production in NL almost 10  
million liter per year



Sales offices / agents EU - EEA  
in U.K., Germany, Spain, Italy,  
Greece, Norway, Turkey,  
Bulgaria, Russia

# Corporate Profile

## Description of Main Business



Paints for vessels



Paints for fishing boats & fishnet



Paints for pleasure boats & yachts



Paints for containers



Heavy duty coatings



Paints for building materials





High performance paints for plastics



Caulking material for railways

# About CEPE

## CEPE is the EU collective body that represents:

<u>Companies</u>	<u>Value</u>
Approx. 800 paint producers	13 billion EUR/y
75 printing ink 	3 billion EUR/y
20 artists' colours 	0.3 billion EUR/y
110,000 people directly employed	85% of market value
<b>20 national associations</b>	

# CEPE's affiliations

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## CEPE is...

A member of the *World Coatings Council*



Affiliated to *Cefic*, the European Chemical Industry Council



A member of the downstream users' platform *DUCC*



# Strategy



Being pro active, not waiting till last moment



Learn from the ECHA Submission Portal system,  
test and provide feedback to ECHA



First foreseen deadline 2020, not expected to have  
a company S2S in place by then

# 2 means to an end



Art.45 to CLP  
National  
notifications,  
different per MS

Annex VIII to CLP  
Notification via  
portal,  
Unified notification



# ECHA Submission Portal (1)



Dashboard > Guided dossier preparations



Guided dossier preparations



ECHA  
Submission portal

**1<sup>st</sup> testing  
phase October  
2018**

**2<sup>nd</sup> testing  
phase  
November  
2018**

**Live on 24  
April 2019**

**Chugoku  
Paints BV  
started  
submitting  
notifications  
same day**

**Update UCLID  
cloud services  
July and  
October 2019  
January 2020**

# ECHA Submission Portal (2)



## Steps for industry



English (en) Sign In ECHA

Poison Centres

Search the Poison Centres website

About us **Steps for industry** Tools Support

Poisoncentres > Steps for industry

f t e m + 19

1 Know your obligations

2 Know the standard information requirements

3 Know your portfolio

4 Generate your UFI's

5 Adapt your data

6 Prepare your submission

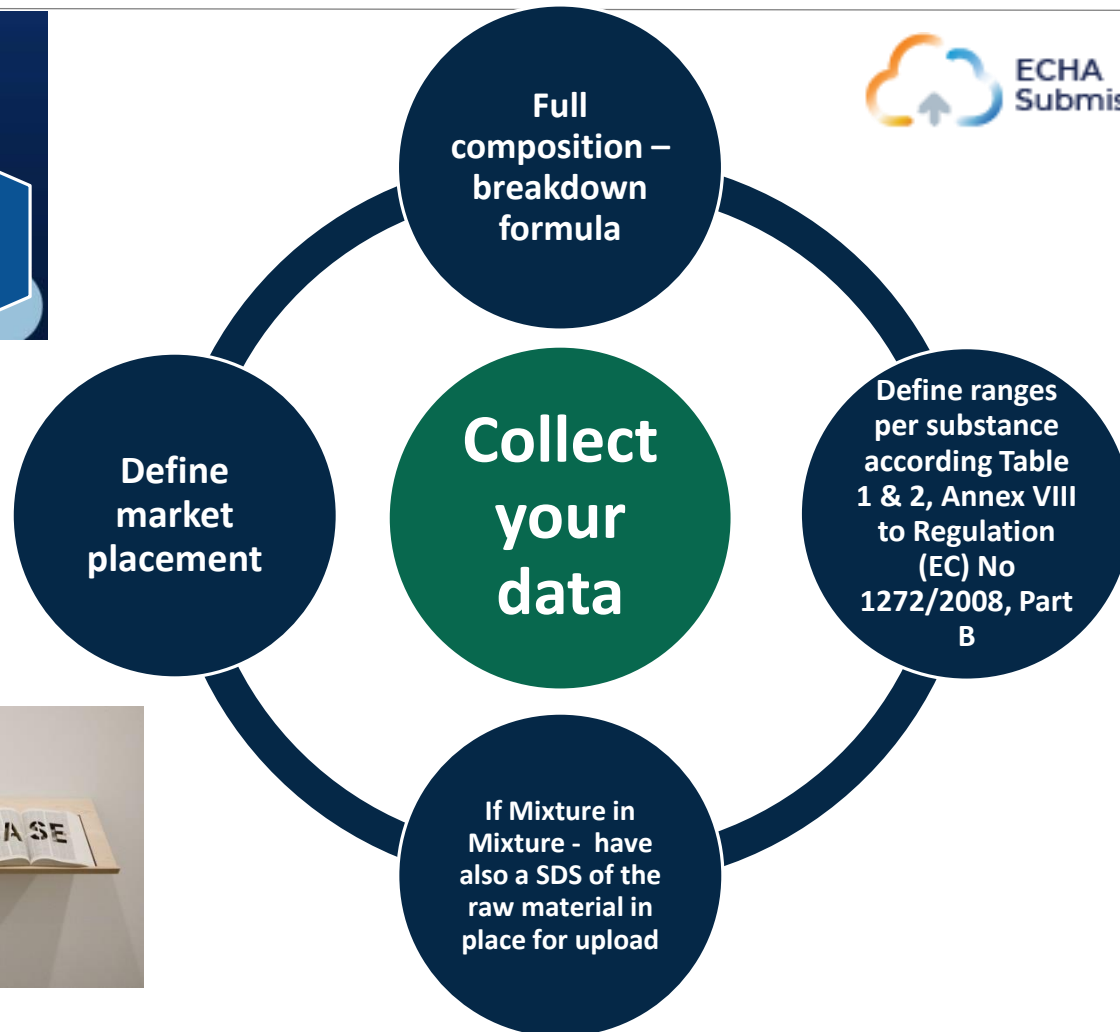
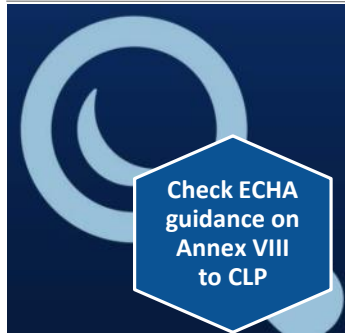
7 Keep the information up to date

Step by step guide for industry on how to get started with preparing a notification available on our poison centres website [poisoncentres.echa.europa.eu](http://poisoncentres.echa.europa.eu)

[echa.europa.eu](http://echa.europa.eu)

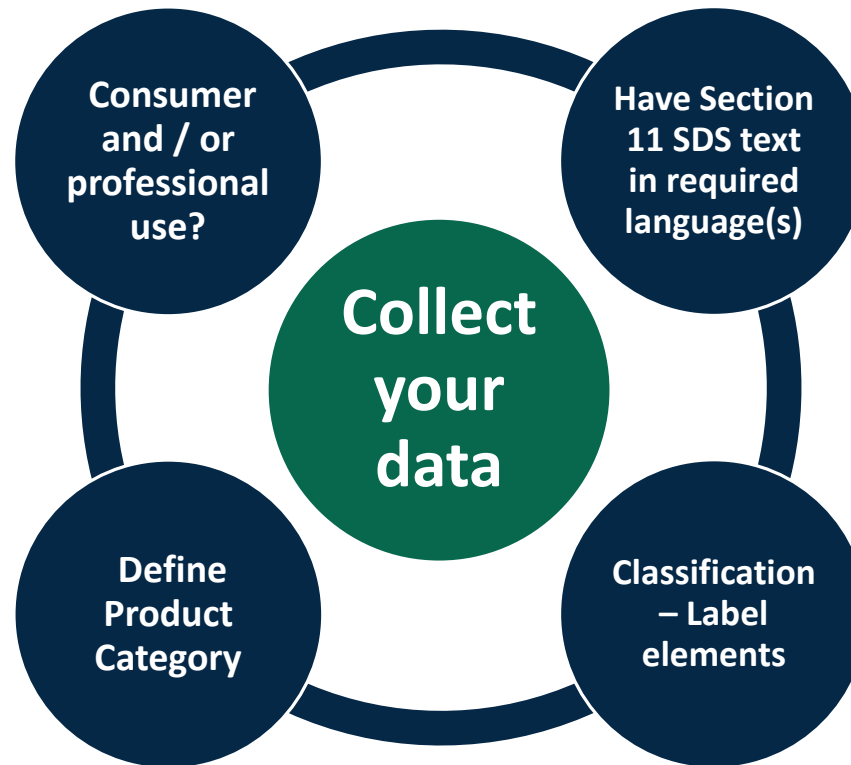
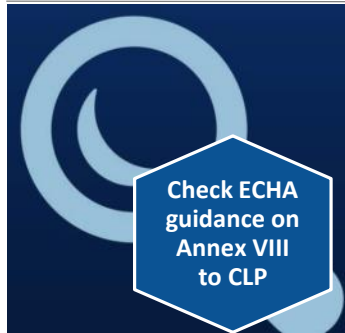
# Main attention points to get started (1)

## Guided Dossier Preparation

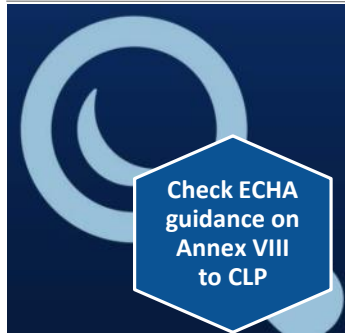


# Main attention points to get started (2)

## Guided Dossier Preparation



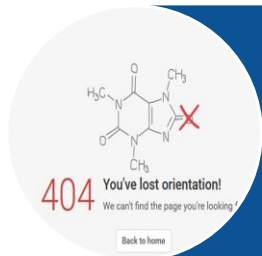
# Main attention points to get started (3) Guided Dossier Preparation



DATA ENTRY



# Working with the ECHA Submission portal (1)



Navigation is complicated, too many clicks



Duplicate data entry



Not always directly clear if you made a wrong input, validation at the end of process

# Working with the ECHA Submission portal (2)



Preparing a file, depending on accessibility of data  
time spent approx.1 hour (average)



All data available and all reference substances in place,  
Notification via Guided Dossier Preparation  
took approx. 2 - 3 hours



Apr./May 2020 PCN related improvements

# Challenge



## Titaniumdioxide – ATP14

No longer a non-dangerous colourant (GPI)

Concentration ranges apply (Article 45 and Annex VIII to Regulation (EC) No 1272/2008, Part B, Table 2)

Maximum width of the concentration – range to be used in the submission

- ≥ 25 - < 100 - 20% units
- ≥ 10 - < 25 - 10% units
- ≥ 1 - < 10 - 3% units
- > 0 - < 1 - 1% unit

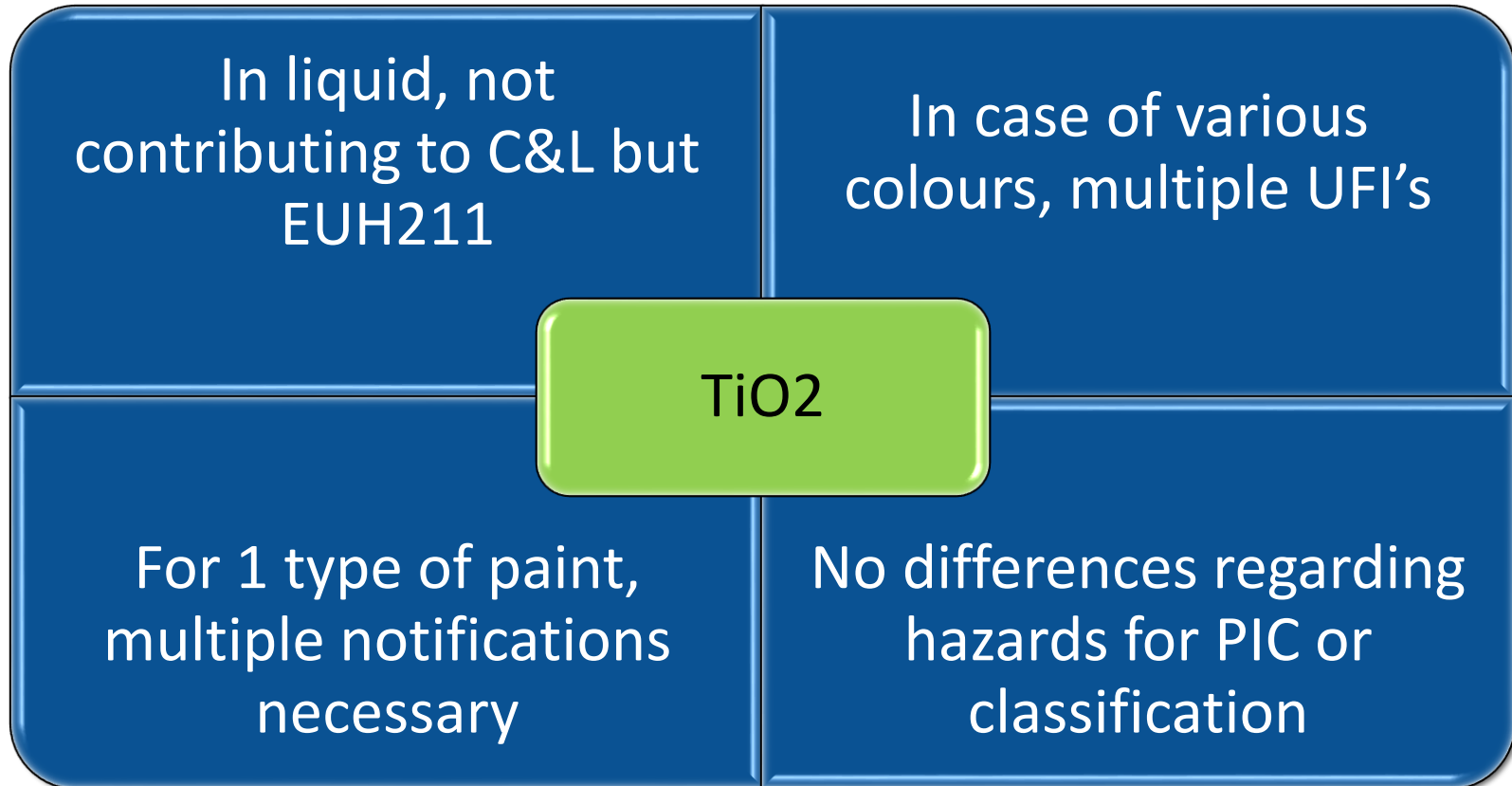


# Challenge (2)

## Titaniumdioxide – ATP14

Paint produced in multiple colours	No TiO <sub>2</sub> e.g. Black	UFI 1
	≥ 1 - < 10 % e.g. Cream, Grey	UFI 2
	≥ 10 - < 25 % e.g. Blue	UFI 3
	>25% e.g. White	UFI 4

# Challenge (3)



Disclaimer: At the moment of this recording we have no confirmation that the interpretation is (entirely) correct, or if there will be a derogation, so it is possible that the outcome will be different.

# Concerns

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When will MS accept submission via the portal?



Will the MS request a fee?



Is this fee reasonable to market a product?

# Concerns (2)



- Companies can control market placements, not consumers (responsible care background)
- Will the MS AP be able to check in case of poisoning if not notified in a MS?
- What would be the best timing to start notifying versus acceptance by a MS?

# CONCLUSION



A lot of work has already been done  
but  
for all stakeholders  
a lot of work will follow



THANK YOU  
FOR  
YOUR ATTENTION

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