

Information from **LEONHARD KURZ Stiftung & Co. KG on the “Reclassification of Titanium Dioxide”**

1. How to use Titanium Dioxide (TiO₂)

As a universal white pigment, Titanium Dioxide has been used for decades in paints & coatings, for products such as toothpaste and sunscreen, in adhesives, plastics and even as a food additive.

2. What does the reclassification of Titanium Dioxide mean?

After lengthy discussions at EU level, the European Commission adopted the 14th adaptation of the CLP Regulation as Delegated Regulation (EU) 2020/217 on October 4, 2019, which was published in the Official Journal of the European Union on February 18, 2020. This Regulation will enter into force on 9 March 2020 and must be implemented by 9 September 2021 at the latest.

The Regulation classifies Titanium Dioxide as carcinogenic (suspect substance, category 2) in powder form with at least 1 % particles of aerodynamic diameter $\leq 10 \mu\text{m}$ and introduces additional EUH statements.

- **The classification applies only to pure Titanium Dioxide powder and to all powder products containing at least 1% Titanium Dioxide in particle form or incorporated in particles with an aerodynamic diameter $\leq 10\mu\text{m}$ in the mixture.**
- **It does NOT apply to products, i.e. articles such as wallpaper, paper or transfer products containing titanium dioxide.**

3. Is Titanium Dioxide contained in KURZ transfer products?

In principle, KURZ transfer products can contain Titanium Dioxide. The Titanium Dioxide is bound in a solid matrix and is therefore an insoluble component of the transfer material, even after application to the end product.

Wallpaper and finished plasters, for example, are not affected by this classification either, because there also Titanium Dioxide is incorporated and fixed in a solid matrix.

4. Do KURZ transfer products have to be labeled additionally?

The additional labeling according to EUH212 for mixtures containing $\geq 1\%$ Titanium Dioxide particles, as required by the Regulation, is not applicable for our transfer products, but only for solid or liquid mixtures (e.g. powder coatings, paints).

Our transfer products are classified as articles under the EU Regulation 1907/2006 of 18.12.2006 (REACH VO) and are therefore not subject to registration. The preparation of a safety data sheet is therefore not mandatory for our KURZ transfer products.