**COMMENTS AND RESPONSE TO COMMENTS ON AUTHORISATION**

Substance name: Lead sulfochromate yellow (C.I. Pigment Yellow 34)

EC number: 215-693-7

CAS number: 1344-37-2

Broad information on use applied for (title): Distribution and mixing pigment powder in an industrial environment into solvent-based paints for non-consumer use

Consultation number: 0012-01

Applicant name: DCC Maastricht B.V. OR

Consultation period: 12/02/2014 - 09/04/2014

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 513  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsInMixture | Proprietary Middle Chrome Colour - Yellow |  |  |  | CLP Not Hazardous | <Comment_513_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 513, 514, 515Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34 or PR.104.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. The proprietary middle/medium chrome pigments from three multinational manufacturers, evaluated by Pronto Industrial Paints Ltd, lacked the chroma, cleanliness, shade functionality, opacity and dispersibility to be considered viable PY.34 alternatives. In addition to compensate for its lack of shade functionality, these pigments must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternatives. In other words the proposed alternatives are not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 510  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsInMixture | Proprietary Lemon Chrome Colour - Yellow |  |  |  | CLP Not Hazardous | <Comment_510_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 510, 511, 512Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34 or PR.104.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. The proprietary lemon chrome pigments from three multinational manufacturers, evaluated by Pronto Industrial Paints Ltd, lacked the chroma, cleanliness, shade functionality, opacity and dispersibility to be considered viable PY.34 alternatives. In addition to compensate for its lack of shade functionality, these pigments must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternatives. In other words the proposed alternatives are not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 489  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Anthroquinine Yellow – C.I. Pigment Yellow 195 |  |  |  | CLP Not Hazardous | <Comment_489_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 489, 490, 491Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03 and 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34.  The alternative proposed in this submission, PY.195, is withdrawn from the market and is not commercially available anymore. Therefore not a viable alternative to PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 486  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Benzimidazalone Yellow – C.I. Pigment Yellow 194 |  | 82199-12-0 |  | CLP Not Hazardous | <Comment_486_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 486, 487, 488Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.194.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.194 simply lacks the chroma, shade functionality, opacity and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative is not able to cover the total volume of PY.34 related to the uses applied for. The raw material availability or lack of process capacity could also impact the availability of the proposed alternative PY.194.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 483  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Bismuth Vanadate – C.I. Pigment Yellow 184 |  | 112764-76-8 |  | CLP Not Hazardous | <Comment_483_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 483, 484, 485Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.184 simply lacks the chroma, shade functionality, opacity and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative, PY.184, is not able to cover the total volume of PY.34 related to the uses applied for. Also issues with raw material availability could impact the availability of the proposed alternative, PY.184, as both Bismuth and Vanadium are in limited supply and the global demand for this pigment is increasing.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 472  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | PY.184, PO. 67 | Confidential | Confidential |  | GHS not classified | <Comment_472_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 472Contributing third party: Confidential ECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.184 simply lacks shade functionality, colour strength, dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In support to the submission, the lack of availability of the proposed alternative PY.184 is not able to cover the total volume of PY.34 related to the uses applied for (i.e. limited supply coupled with the global increase in demand). Also issues with raw material availability (i.e. Bismuth & Vanadium) could impact the availability of the proposed alternative PY.184. The manufacturing process of this alternative, PY.184 requires strict handling procedures of the Vanadium pentoxide or sodium vanadate as well as the control of nitrous oxides which are all highly toxic. In other words, process capacity can also impact the availability of PY.184.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 469  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadate - CI Yellow 184 |  |  |  | CLP not classified | <Comment_469_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 469, 470, 471Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the word-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 454  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Benzimidazalone Yellow – C.I. Pigment Yellow 180 |  | 77804-81-0 |  | CLP Not Hazardous | <Comment_454_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 454, 455, 456**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.180.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.180 simply lacks the shade functionality, chroma and opacity to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 451  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Benzimidazalone Yellow – C.I. Pigment Yellow 155 |  | 68516-73-4 |  | CLP Not Hazardous | <Comment_451_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 451, 452, 453**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.155.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.155 simply lacks the shade functionality, chroma, durability, opacity and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.155 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, the raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.155.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 446  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential |  | chrome antimony titanium buff rutile |  | 68186-90-3 |  | CLP not classified | <Comment_446_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 446, 447, 448, 449, 450Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03, 0012-05, 0012-07, 0012-09 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PBr.24.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PBr.24 simply lacks the durability to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 443  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Benzimidazalone Yellow – C.I. Pigment Yellow 154 |  | 66134-22-5 |  | CLP Not Hazardous | <Comment_443_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 443, 444, 445**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.154.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.154 simply lacks the shade functionality, chroma, durability, opacity and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.154 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, the raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.154.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 438  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential |  | bismuth vanadate |  | 14059-33-7 |  | CLP STOT Rep. Exp. 2 H373 | <Comment_438_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 438, 439, 440, 441, 442Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0021-03, 0021-05, 0012-07, 0012-09 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 435  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Benzimidazalone Yellow – C.I. Pigment Yellow 151 |  | 31837-42-0 |  | CLP Not Hazardous | <Comment_435_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 435, 436, 437**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.151 simply lacks the shade functionality, chroma, durability, opacity, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.151 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, the raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.151.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 432  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Isoindoline Yellow – C.I. Pigment Yellow 139 |  | 36888-99-0 |  | CLP Not Hazardous | <Comment_432_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 432, 433, 434**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.139.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.139 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.139 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, the raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.139.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 429  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Chinophthalone Yellow – C.I. Pigment Yellow 138 |  | 30125-47-4 |  | CLP Not Hazardous | <Comment_429_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 429, 430, 431**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.138.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.138 simply lacks the shade functionality, durability, opacity and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.138 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, the raw material availability of 8-aminoquinaldine (ie. BASF is the only supplier) or lack of process capacity could impact the availability of the proposed alternative PY.138.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 426  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Disazo Yellow – C.I. Pigment Yellow 83 |  | 5567-15-7 |  | CLP Not Hazardous | <Comment_426_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 426, 427, 428**  **Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.83.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.83 simply lacks the shade functionality, durability, opacity, solvent resistance and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the submitted comment by Pronto Industrial Paints Ltd also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.83 is not able to cover the total volume of PY.34 related to the uses applied for. Furthermore, raw material availability of 3,3’-dichlorobenzidine (DCB) or lack of process capacity could impact the availability of the proposed alternative PY.83.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 423  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Monoazo Yellow – C.I. Pigment Yellow 74 |  | 6358-31-3 |  | CLP Not Hazardous | <Comment_423_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 423, 424, 425Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.65.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.65 simply lacks the shade functionality, durability, opacity, solvent resistance and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted by Pronto Industrial Paints Ltd that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 419  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | PY184 |  |  |  | CLP non hazardous | <Comment_419_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 419, 420Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.184 simply lacks shade functionality, colour strength, dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 5-6 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In support to the submission, the lack of availability of the proposed alternative PY.184 is not able to cover the total volume of PY.34 related to the uses applied for (i.e. limited supply coupled with the global increase in demand). Also issues with raw material availability (i.e. Bismuth & Vanadium) could impact the availability of the proposed alternative PY.184. The manufacturing process of this alternative, PY.184 requires strict handling procedures of the Vanadium pentoxide or sodium vanadate as well as the control of nitrous oxides which are all highly toxic. In other words, process capacity can also impact the availability of PY.184.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 417  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Y154 |  |  |  | CLP Non hazardous | <Comment_417_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 417, 418Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.154.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.154 simply lacks the shade functionality, durability, chroma, opacity and dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substance increases the overall costs by a factor of 4 in order to achieve the required opacity. This ultimately impacts the profitability of the company.  In support to the submission, the lack of availability of the proposed alternative (few major sources) is not able to cover the total volume of PY.34 related to the uses applied for. In addition, issues with raw material availability (i.e. 2-triflouromethylaniline, AABD) could impact the availability of the proposed alternative, PY.154.  In addition, the manufacturing process of this alternative, PY.154 requires special handling of 2-triflouromethylaniline and handling of the amine which could also impact the processing capacity/availability of this alternative.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 415  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | PY139 |  |  |  | CLP non hazardous | <Comment_415_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 415, 416Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.139.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.139 simply lacks shade functionality and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 10 times higher along with additional costs to achieve equal opacity) compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In support to the submission, the lack of availability of the proposed alternative (<10 major sources) is not able to cover the total volume of PY.34 related to the uses applied for. In addition, issues with raw material availability (i.e. Diiminoisoindoline) and limitations of use (i.e. barbituric acid is regulated is some countries) could impact the availability of the proposed alternative, PY.139.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 411  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | PY83 |  |  |  | CLP non hazardous | <Comment_411_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 411, 412Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.83.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.83 simply lacks the shade functionality, chroma, opacity, dispersibility and rheology to be considered a viable PR.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substance increases the overall costs significantly in order to achieve the required opacity. This will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In support to the submission, issues with raw material availability (i.e. limited suppliers of 3,3’ dichlorobenzidine) could impact the availability of the proposed alternative, PY.83.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 409  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Y74 |  |  |  | CLP non hazardous | <Comment_409_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 409, 410Contributing third party: Confidential  ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.74.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.74 simply lacks the shade functionality, durability, opacity and dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substance increases the overall costs significantly in order to achieve the required opacity. This will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 406  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Arylamide Yellow – C.I. Pigment Yellow 65 |  | 6528-34-3 |  | CLP Not Hazardous | <Comment_406_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 406, 407, 408Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.65.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.65 simply lacks the shade functionality, durability, opacity, solvent resistance and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted by Pronto Industrial Paints Ltd that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 403  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsOnItsOwn | Nickel Antimony Titanate Yellow Rutile – C.I. Pigment Yellow 53 |  | 8007-18-9 |  | CLP Not hazardous | <Comment_403_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 403, 404, 405Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.53.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PY.53 simply lacks the chroma, shade functionality, colour strength and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted by Pronto Industrial Paints Ltd that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 400  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Pronto Industrial Paints Ltd  **Country:**  United Kingdom | SubsInMixture | Chrome Titanate – C.I. Pigment Brown 24 |  | 68186-90-3 |  | CLP Not classified | <Comment_400_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 400, 401, 402Contributing third party: Pronto Industrial Paints Ltd ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PBr.24.  DCC notes that the comments submitted by Pronto Industrial Paints Ltd are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Pronto Industrial Paints Ltd’s submission, PBr.24 simply lacks the chroma, shade functionality and dispersibility to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality, this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted by Pronto Industrial Paints Ltd being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted by Pronto Industrial Paints Ltd that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes that the Pronto Industrial Paints Ltd submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 386  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | C.I. Pigment Yellow 74 |  |  |  | CLP Not classified | <Comment_386_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 386Contributing third party: ConfidentialECHA consultation number 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.74.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.74 simply lacks the durability, & opacity to be considered a viable PY.34 alternative. These pigment mixtures result in poorer coverage when applied as paints, causing an increase in the number of coatings required and therefore contributes to the increased emissions of solvent into the atmosphere.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We also agree to the submitted comment, that due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. In other words an increased burden to human and the environment.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 376  Date: 2014/04/08 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential |  | Bismuth Vanadate Pigment |  |  |  | GHS H373 | <Comment_376_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 376, 377Contributing third party: ConfidentialECHA consultation numbers 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.184 simply lacks the durability, shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. These pigment mixtures result in poorer coverage when applied as paints, causing an increase in the number of coatings required and therefore contributes to the increased emissions of solvent into the atmosphere.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 359  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential |  | Nickel Antimony Titanium |  |  |  | CLP non toxic | <Comment_359_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 359, 360, 361**  **Contributing third party: Confidential**  **ECHA consultation numbers 0012-01, 0012-03, 0012-05**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.53.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.53 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 350  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential |  | Isoindoline |  |  |  | CLP non toxic | <Comment_350_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 350, 351, 352Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.139.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.139 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 347  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential |  | Benzimidazolone |  |  |  | CLP Non toxic | <Comment_347_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 347, 348, 349Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151 (benzimidazolone yellow).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.151 simply lacks the durability, shade functionality, chroma, opacity, dispersibility and alkali resistance to be considered a viable PY.34 alternative. The discolouration in an epoxy resin is just one of many examples that could be demonstrated. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time also increases product cost.  In addition to the increase of costs, the submitted comment also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed PY.151 alternative is not able to cover the total volume of PY.34 related to the uses applied for. Issues with raw material availability or lack of process capacity could impact the availability of the proposed PY.151 alternative.  Due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the material handling willresult in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. This will result in an increased burden to humans and the environment.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 344  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential |  | Bismuth Vanadate |  | 14059-33-7 |  | CLP Non toxic | <Comment_344_Attachment.doc> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 344, 345, 346Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03, 0012-05 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 314  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Will  **Country:**  Netherlands | SubsInMixture | Benzimidazolone |  | 31837-42-0 |  | CLP not classified under CLP regulation | <Comment_314_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 288, 290, 292, 294, 296, 298, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319Contributing third party: Will & Co B.V.ECHA consultation number 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, as well as mixing PY.184 with several organic pigments (PY.110, PY.139, PY.151 and PY.154).  DCC notes that the comments submitted by Will & Co B.V.are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Will & Co B.V.’s submission, mixing the above listed inorganic and organic alternatives is a complex process and at the end the mixture simply lacks the chroma, opacity and colour strength to be considered a viable PY.34 alternative. This Will & Co B.V.’s comment confirms the applicants statement that there is no single pigment which can replace PY.34.  We agree to another important aspect of the comment submitted by Will & Co B.V., being the final cost impact in case an Authorisation is not granted. It is stated that the use of the proposed alternative substances (with prices about 5-7 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of some of the alternatives (PY.184 and PY.139). Also issues with raw material availability or lack of process capacity could impact the availability of the proposed alternatives PY.184, PY.139, PY.151 and PY.154. In other words, the proposed mix of alternatives is not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that Will & Co B.V.’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 308  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Will & Co BV  **Country:**  Netherlands | SubsInMixture | Isoindoline yellow |  | 5590-18-1 |  | CLP not classified under CLP regulation | <Comment_308_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 288, 290, 292, 294, 296, 298, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319Contributing third party: Will & Co B.V.ECHA consultation number 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, as well as mixing PY.184 with several organic pigments (PY.110, PY.139, PY.151 and PY.154).  DCC notes that the comments submitted by Will & Co B.V.are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Will & Co B.V.’s submission, mixing the above listed inorganic and organic alternatives is a complex process and at the end the mixture simply lacks the chroma, opacity and colour strength to be considered a viable PY.34 alternative. This Will & Co B.V.’s comment confirms the applicants statement that there is no single pigment which can replace PY.34.  We agree to another important aspect of the comment submitted by Will & Co B.V., being the final cost impact in case an Authorisation is not granted. It is stated that the use of the proposed alternative substances (with prices about 5-7 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of some of the alternatives (PY.184 and PY.139). Also issues with raw material availability or lack of process capacity could impact the availability of the proposed alternatives PY.184, PY.139, PY.151 and PY.154. In other words, the proposed mix of alternatives is not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that Will & Co B.V.’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 288  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Will  **Country:**  Netherlands | SubsInMixture | Bismuth Vanadates Pigments |  | 14059-33-7 |  | CLP STOT Rep. Exp. 2 H373 | <Comment_288_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 288, 290, 292, 294, 296, 298, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319Contributing third party: Will & Co B.V.ECHA consultation number 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, as well as mixing PY.184 with several organic pigments (PY.110, PY.139, PY.151 and PY.154).  DCC notes that the comments submitted by Will & Co B.V.are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Will & Co B.V.’s submission, mixing the above listed inorganic and organic alternatives is a complex process and at the end the mixture simply lacks the chroma, opacity and colour strength to be considered a viable PY.34 alternative. This Will & Co B.V.’s comment confirms the applicants statement that there is no single pigment which can replace PY.34.  We agree to another important aspect of the comment submitted by Will & Co B.V., being the final cost impact in case an Authorisation is not granted. It is stated that the use of the proposed alternative substances (with prices about 5-7 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of some of the alternatives (PY.184 and PY.139). Also issues with raw material availability or lack of process capacity could impact the availability of the proposed alternatives PY.184, PY.139, PY.151 and PY.154. In other words, the proposed mix of alternatives is not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that Will & Co B.V.’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 282  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Will & Co B.V.  **Country:**  Netherlands | SubsOnItsOwn | Bismuth Vanadates Pigments |  | 14059-33-7 |  | CLP STOT Rep. Exp. 2H373 | <Comment_282_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 282, 283, 284, 285, 286, 287Contributing third party: Will & Co B.V. ECHA consultation number 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted by Will & Co B.V. are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of Will & Co B.V.‘s submission, PY.184 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism, less cleaner shades, lost of durability and less opacity.  We agree to another important aspect of the comment submitted by Will & Co B.V. being the final cost impact in case an Authorisation is not granted. It is stated that the use of the alternative substance PY.184 (with prices about 5-7 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.   In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of the alternative. In other words, the proposed alternative PY.184 is not able to cover the total volume of PY.34 related to the uses applied for. Also issues with the raw material availability, Bismuth and Vanadium, are foreseen as there is limited supply and the global demand for PY.184 is increasing.  There are also major issues in the manufacture of PY.184, such as the handling of the toxic raw materials and the formation of nitrous fumes which can cause harm to workers and the environment. As such, the manufacture of PY.184 also requires special handling controls.  DCC notes that Will & Co B.V.’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 276  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Benzimidazolone, PY151 |  | 31837-42-0 |  | GHS Non hazardous | <Comment_276_Attachment.docx> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 269, 276, 277, 278, 279, 280, 281Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151 (benzimidazolone yellow).  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.151 simply lacks the durability, shade functionality, chroma, opacity, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 3-4 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  We agree to the statement submitted that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation or amending the company’s certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  The submitted comments suggest that PY.151 is currently commercially available. But this does not reflect the impact of the increased demand that would result if Authorisation were not granted. In other words the proposed PY.151 alternative is not able to cover the total volume of PY.34 related to the uses applied for. Issues with raw material availability or lack of process capacity could impact the availability of the proposed PY.151 alternative.  Due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the material handling willresult in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. This will result in an increased burden to humans and the environment.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 270  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadium Tetraoxide, PY184 | 237-898-0 | 14059-33-7 |  | GHS PY184 is not classified as dangerous according to Regulation (EC) No.1272/2008. | <Comment_270_Attachment.docx> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 268, 270, 271, 272, 273, 274, 275Contributing third party: Confidential ECHA consultation number 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.184 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 269  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Benzimidazolone , PY151 |  | 31837-42-0 |  | GHS No hazardous effects known. | <Comment_269_Attachment.docx> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 269, 276, 277, 278, 279, 280, 281Contributing third party: Confidential ECHA consultation numbers 0012-01, 0012-03, 0012-05, 0012-07, 0012-09, 0012-11 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151 (benzimidazolone yellow).  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.151 simply lacks the durability, shade functionality, chroma, opacity, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 3-4 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  We agree to the statement submitted that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation or amending the company’s certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  The submitted comments suggest that PY.151 is currently commercially available. But this does not reflect the impact of the increased demand that would result if Authorisation were not granted. In other words the proposed PY.151 alternative is not able to cover the total volume of PY.34 related to the uses applied for. Issues with raw material availability or lack of process capacity could impact the availability of the proposed PY.151 alternative.  Due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the material handling willresult in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. This will result in an increased burden to humans and the environment.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 268  Date: 2014/04/07 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadium Tetraoxide - PY184 | 237-898-0 | 14059-33-7 |  | GHS This pigment is not classified as dangerous according to Regulation (EC) No. 1272/2008 | <Comment_268_Attachment.docx> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 268Contributing third party: Confidential ECHA consultation number 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.184 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We agree to the statement submitted that especially for the road marking industry, where colour is governed by National Regulations and requiring companies to meet specific certifications, it is even more difficult to replace one substance with another. As the final colour should be within a specified colour box, replacing one component (i.e. pigment) with another component (i.e. pigment) could lead to a mismatch in trying to achieve the desired colour. Changing the Regulation as such or amending the companies certification would be possible but is a long process, increasing costs and is not relevant as a short-term solution.  DCC notes the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 214  Date: 2014/04/03 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Pigment Yellow C.I. 184 |  | 14059-33-7 |  | CLP Not classified | <Comment_214_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 214Contributing third party: Confidential ECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.184 simply lacks shade functionality, colour strength, dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 6 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. In addition, because of this high cost, the use of PY.184 is utilized in few applications such as OEM and exterior architectural paints.  In addition to the increase of costs, the submitted comment also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.184 is not able to cover the total volume of PY.34 related to the uses applied for (i.e. limited supply coupled with the global increase in demand). Also issues with raw material availability (i.e. Bismuth & Vanadium) could impact the availability of the proposed alternative PY.184.  In support of the submission, the manufacturing process of this alternative, PY.184 requires strict handling procedures of the Vanadium pentoxide or sodium vanadate as well as the control of nitrous oxides which are all highly toxic. This leads to an increased burden to human health and the environment.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 213  Date: 2014/04/03 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Pigment Yellow C.I. 151 |  | 31837-42-0 |  | CLP Flammable dust clouds may be formed | <Comment_213_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 213Contributing third party: Confidential ECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.151 simply lacks the shade functionality, durability, chroma, opacity and dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 4 times higher) compared to PY.34 will impact the profitability of the company. Also, due to lower opacity of PY.151, more coating layers are required (i.e. automotive refinish – RAL 1018 and RAL 1021) and this increases the cost significantly. This may force companies to move out of the EU where PY.34 can be used.    In addition to the increase of costs, the submitted comment also supports the applicant’s view on the lack of availability (limited to <10 significant suppliers) for the alternative. In other words the proposed alternative, PY.151 is not able to cover the total volume of PY.34 related to the uses applied for. In support of the submission, issues with raw material availability (i.e. Anthranilic acid, AABD) could impact the availability of the proposed alternative, PY.151.  We also agree to the submitted comment, that due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 212  Date: 2014/04/03 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Downstream User  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Pigment Yellow C.I. 74 |  | 6358-31-2 |  | CLP Not classified | <Comment_212_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 212Contributing third party: Confidential ECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.74.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of the submission, PY.74 simply lacks the shade functionality, durability, solvent resistance, opacity and dispersibility to be considered a viable PY.34 alternative. In addition, to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.    We agree to another important aspect of the comment submitted being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substance itself increases the costs significantly (50% higher in price) and due of the lower opacity of PY.74, more layers of paint is needed to achieve equal opacity of PY.34 which significantly increases the overall costs. This will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In support of the submission, due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 208  Date: 2014/04/03 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | MONO AZO HANSA YELLOW |  | 6358-31-2 |  | CLP Not classified | <Comment_208_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 208, 209Contributing third party: ConfidentialECHA consultation numbers 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.74.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.74 simply lacks the durability, solvent stability & shade functionality to be considered a viable PY.34 alternative.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We also agree to the submitted comment, that due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. In other words an increased burden to human and the environment.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 206  Date: 2014/04/03 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | BISMUT VANADATE |  | 14059-33-7 |  | CLP Not classified | <Comment_206_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 206, 207Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation, opacity and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the word-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 197  Date: 2014/03/28 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Calcium Monoazo |  | 12286-66-7 |  | CLP Not classified | <Comment_197_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 197Contributing third party: ConfidentialECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.62.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.62 simply lacks the durability, technical performance & heat stability to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 195  Date: 2014/03/28 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadate |  | 14059-33-7 |  | CLP Not classified | <Comment_195_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 195Contributing third party: ConfidentialECHA consultation numbers 0012-01 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).    DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation, opacity and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 191  Date: 2014/03/26 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Other  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | bismuth vanadate | 237-898-0 | 14059-33-7 |  | CLP not classified, no labelling requirements | <Comment_191_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 191Contributing third party: ConfidentialECHA consultation number 0012-01 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation, opacity and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.    In addition to the increase of costs, the submitted comment also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.184 is not able to cover the total volume of PY. 34 related to the uses applied for. The world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. The raw material availability or lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 189  Date: 2014/03/26 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | mono azo hansa yellow |  | 6358-31-2 |  | CLP Not classified | <Comment_189_Attachment.PDF> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 189, 190Contributing third party: ConfidentialECHA consultation numbers 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.74.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.74 simply lacks the durability & shade functionality to be considered a viable PY.34 alternative.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We also agree to the submitted comment, that due to the fact the alternative is based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. In other words an increased burden to human and the environment.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 187  Date: 2014/03/26 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismut Vanadate | 237-898-0 | 14059-33-7 |  | CLP Not Clasified | <Comment_187_Attachment.PDF> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 187, 188Contributing third party: ConfidentialECHA consultation number 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation, opacity and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 179  Date: 2014/03/20 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadate |  | 14059-33-7 |  | CLP Not Classified | <Comment_179_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 179, 180Contributing third party: ConfidentialECHA consultation number 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation, opacity and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the word-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 177  Date: 2014/03/20 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Chrome Titanate |  | 68186-90-3 |  | CLP Not Classified | <Comment_177_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 177, 178**  **Contributing third party: Confidential**  **ECHA consultation numbers 0012-01 and 0012-03**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PBr.24.    DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PBr.24 simply lacks the shade functionality, chroma and colour strength to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that the submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 175  Date: 2014/03/20 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Nickel Titanate |  | 68186-90-3 |  | CLP Not Classified | <Comment_175_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| **Applicants reply to comments 175, 176**  **Contributing third party: Confidential**  **ECHA consultation numbers 0012-01 and 0012-03**  DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.53.  DCC notes that this comment submitted is in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.53 simply lacks the shade functionality to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  DCC notes that this comment submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 173  Date: 2014/03/18 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Manufacturer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsInMixture | Benzinidazolone |  | 31817-42-0 |  | CLP No label | <Comment_173_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comment 173Contributing third party: Confidential ECHA consultation number 0012-01 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.151 (benzimidazolone yellow).  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.151 simply lacks the durability, shade functionality, chroma, opacity, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 3-4 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional usage of PY.151 required to achieve desires colouristics such as opacity will also increase product cost. We agree with the comment that this will create higher prices for downstream users as well.  In addition to the increase of costs, the submitted comment also supports the applicant’s view on the lack of availability for the alternative. In other words the proposed alternative PY.151 is not able to cover the total volume of PY.34 related to the uses applied for.  Issues with raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.151.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 169  Date: 2014/03/11 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  ZEUS QUIMICA, S.A.  **Country:**  Spain | SubsInMixture | Isoindoline Yellow | 253-256-2 | 36888-99-0 |  | CLP Not Classified | <Comment_169_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 169, 170Contributing third party: ZEUS QUIMICA, S.A. ECHA consultation numbers 0012-01, 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, as well as a mixture of PY.74 and PY.139.  DCC notes that the comments submitted by ZEUS QUIMICA, S.A are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of ZEUS QUIMICA, S.A’s submission, the listed mixture of PY.74 and PY.139 simply lacks the solvent stability, light fastness, weather fastness and gloss to be considered a viable PY.34 alternative. In addition, the handling of this mixture needs special attention to control the temperature during milling and is unstable to storage.  We agree to another important aspect of the comment submitted by ZEUS QUIMICA, S.A being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 3 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of some of the alternatives (PY.139). Also issues with raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.139. In other words, the proposed mix of alternatives (PY.74 and PY.139) is not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that ZEUS QUIMICA, S.A’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 167  Date: 2014/03/11 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  ZEUS QUIMICA, S.A.  **Country:**  Spain | SubsInMixture | Mono Azo Hansa Yellow | 228-768-4 | 6358-31-2 |  | CLP Not Classified | <Comment_167_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 167, 168Contributing third party: ZEUS QUIMICA, S.A ECHA consultation numbers 0012-01 and 0012-03 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, as well as a mixture of PY.74 and PY.139.  DCC notes that the comments submitted by ZEUS QUIMICA, S.A are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of ZEUS QUIMICA, S.A’s submission, the listed mixture of PY.74 and PY.139 simply lacks the solvent stability, light fastness, weather fastness and gloss to be considered a viable PY.34 alternative. In addition, the handling of this mixture needs special attention to control the temperature during milling and is unstable to storage.  We agree to another important aspect of the comment submitted by ZEUS QUIMICA, S.A being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 3 times higher compared to PY.34) will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  In addition to the increase of costs, the applicant’s AoA also addresses issues with respect to the lack of availability of some of the alternatives (PY.139). Also issues with raw material availability or lack of process capacity could impact the availability of the proposed alternative PY.139. In other words, the proposed mix of alternatives (PY.74 and PY.139) is not able to cover the total volume of PY.34 related to the uses applied for.  DCC notes that ZEUS QUIMICA, S.A’s submission supports its application for authorisation for the continued use of PY.34. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 164  Date: 2014/03/11 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsInMixture | Isoindolinone | 226-999-5 | 5590-18-1 |  | CLP Not Classified | <Comment_164_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 164, 165, 166Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03 and 0012-05 DCC has one of the widest ranges of PY.34 and PR.104 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace both PY.34 and PR.104 due to the compromises in performance that has to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 & PY.110.  DCC notes that the comments submitted are in favour of approving the authorisation of PY.34 to allow for the continued use of PY.34. In support of this submission, PY.184 & PY.110 simply lacks the shade functionality, opacity & hiding power to be considered a viable PY.34 alternative. In addition to compensate for its lack of shade functionality this pigment must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism.  We agree to another important aspect of the comment submitted, being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances (with prices about 2-10 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU.  We also agree to the submitted comment, that due to the fact the alternative is partially based on an organic pigment, with generally speaking a lower density, the whole handling will result in more dust formation, possible product cross-contamination, filter-clogging, increased filter waste generation and contamination of protective clothing. In other words an increased burden to human and the environment.  DCC notes that this submission supports its application for authorisation for the continued use of PY.34]. | | | | | | | | |
| Reference number and date: | Submitter: | Alternative: | | | | | | Attachments: |
| Type | Generic name | EC Number | CAS Number | Description of technical alternative | Classification and Labelling |
| Ref.No: 160  Date: 2014/03/10 | **Affiliation:** BehalfOfACompany  **Type/Role in the supply chain:** Importer  **Name of org/company:**  Confidential  **Country:**  Confidential | SubsOnItsOwn | Bismuth Vanadate - CI Yellow 184 | 237-898-0 | 14059-33-7 |  | CLP Not Classified | <Comment_160_Attachment.pdf> |
| Applicants’ response: | | | | | | | | |
| Applicants reply to comments 160, 161, 162, 163Contributing third party: ConfidentialECHA consultation numbers 0012-01, 0012-03, 0012-07, 0012-09 DCC has one of the widest ranges of PY.34 alternatives, including organic, inorganic and hybrid blend pigments. DCC has been offering these for many years and as such is well versed in the difficulties and complexities in attempting to replace PY.34 due to the compromises in performance that have to be made. The possible alternatives were presented in our Analysis of Alternatives (AoA). This document demonstrated that every alternative had shortcomings that dismissed them as candidates for 1:1 substitution of PY.34, namely PY.184 (Bismuth Vanadate).  DCC notes that the comments submitted are in favour of approving the authorization of PY.34 to allow for the continued use of PY.34. In support of this submission, the PY.184 simply lacks the shade functionality, chroma, dispersibility and alkali resistance to be considered a viable PY.34 alternative. In addition, to compensate for their lack of shade functionality, this pigment class must be mixed with other pigments to attempt to match required shade targets resulting in unacceptable metamerism. The result is a blended product that results in a reduction of desired pigment properties such as colour saturation and weatherfastness.  We agree to another important aspect of the comment being the final cost impact in case an Authorisation is not granted. It is stated that the use of alternative substances with prices about 6 times higher compared to PY.34 will impact the profitability of the company and endanger the competitiveness to companies active outside of the EU. The additional processing time required to make the pigment dispersions will also increase energy use and product cost.  The submitted comment does not address the lack of availability for the alternative, however the applicant noted in its AoA that the world-wide demand for Vanadium and Bismuth raw materials for PY.184 is limited while the demand for PY.184 is increasing. This lack of raw material availability and lack of process capacity could impact the availability of the proposed PY.184.  The manufacture of PY.184 involves using chemicals that require exacting process controls to protect workers and the environment. The key raw materials sodium vanadate and vanadium pentoxide are acutely toxic. As such the manufacture of PY.184 does not result in a reduction of risk to employees in comparison with PY.34.  DCC notes that this submission supports its application for authorization for the continued use of PY.34. | | | | | | | | |