

# Industry Regulatory Drivers

- USEPA Premanufacturing Notices (PMN) - no guarantee of commercial use in EU or Asia with PMN
  - FIFRA Registrations
  - USFDA Food Contact Notifications
  - Canada New Substances Notifications (NSN)
  - PMRA Registrations
  - EU REACH Dossiers
  - Turkey REACH, Korea REACH, Taiwan, China, Etc.
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- Limited timelines for registering new substances that are commercially viable

# Color Pigments Characteristics & Customer Requirements

- ✓ Chroma ✓ Broad shade functionality
- ✓ Durability/lightfastness
- ✓ Opacity/transparency ✓ Low metamerism
- ✓ Dispersibility
- ✓ Heat stability
- ✓ Solvent resistance
- ✓ Gloss retention
- ✓ Color strength
- ✓ Fitness for purpose (performance level)
- ✓ Regulatory status
- ✓ Cost ✓ Availability

- Good Dispersibility
- Good Durability
- Bad Dispersibility
- Bad Dispersibility
- Poor Durability
- Poor Durability
- Poor Durability

- PCB Chemical Action Plan (2015)
- DOE PCBs in Products Study (2015)
- EPA Region 10 Water Quality Regulations (2016)
- Orca Whale Task

Force (2018)

- Environmentally Preferable Purchasing Guidelines (2019)
- Safer Products Legislation (2019)
- EPA Region 10 Water Quality Regulations (2019)

Northwest Green Chemistry, 16 October 2018. Inadvertent PCBs in Pigments: Market Innovation for Circular Economy, Final Report.

# Practical Considerations

➤ Very low limits for PCBs in NPDES permits → not feasible for regulated entities

➤ Current Washington State water quality testing (Spokane River) incomplete → not all sources of PCBs have been identified

➤ Current Washington State regulatory approach inconsistent with existing global regulatory landscape and global supply chain requirements

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# Thank you!

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