

Connect with Color

Table of Contents

CPMA • Connect with Color



2	Calendar of Events
3	Strengthening the Voice of the Color Pigments Industry
4	CPMA Committees & Advocacy Priorities
5	CPMA Members Meet with Key Government Officials During CPMA Committee Week
6	EPA's Risk Evaluation of C.I. Pigment Violet 29
8	Connect with the Color Value Chain
10	CPMA Leadership & Industry Recognitions
11	CPMA Membership

Calendar of Events:

CPMA Fall Meeting September 10, 2019

Clariant Plastics & Coatings
Mexico City, Mexico

CPMA 90th Annual Meeting December 3, 2019

EMD Performance Materials
Philadelphia, PA

For more information about upcoming events, visit www.pigments.org.

For more about CPMA, contact:

David Wawer
Executive Director
davidwawer@cpma.com
(571) 348-5106

Tatiana Letcheva
Manager
tatianaletcheva@cpma.com
(571) 348-5124

President's Message:

Strengthening the Voice of the Color Pigments Industry

Over the last year and a half, I was tasked with leading the implementation of CPMA's strategic plan to strengthen the association as the voice for the color pigments industry in North America. Elements of CPMA's strategic plan include proactively engaging with key regulators and stakeholders on behalf of the industry, advocating for the use of sound science in the assessment of color pigments and promoting public awareness about the importance of color pigments in commerce.



Advocacy & Stakeholder Engagement:

CPMA continues to be recognized by government agencies and other stakeholders as the industry expert for technical, regulatory and public policy matters impacting the color pigments value chain. CPMA's technical knowledge about color pigments manufacturing processes and supply chain components has been displayed in forums and discussions with the U.S. Environmental Protection Agency, Environment & Climate Change Canada, Health Canada, U.S. Department of Commerce, U.S. Department of Health & Human Services, California and Washington State governments, and others. CPMA committees and staff increased public policy advocacy engagement with North American trade association partners resulting in significant policy "wins" for the color pigments industry in 2018 and 2019.

Sound Science and PV29 Assessment:

The most prominent example of CPMA's expertise in sound science has been demonstrated throughout the risk assessment of Pigment Violet 29 as one of the first 10 chemicals evaluated under the Lautenberg Chemical Safety for the 21st Century Act. As the industry voice for manufacturers, suppliers and distributors of color pigments in the U.S., CPMA took the lead in the dialogue with EPA and value chain stakeholders. CPMA worked with downstream industries, including printing inks, plastics, paints and coatings, to provide information about PV29 uses and manufacturing processes. After extensive review of technical information and substantial stakeholder input, EPA published the PV29 draft risk assessment in the fall of 2018, finding no unreasonable risk.

Public Awareness & Industry Trends:

As part of CPMA's strategic objectives, the CPMA Board launched a new initiative in 2018 to promote awareness of the value of the color pigments industry with stakeholders and the public. The CPMA Industry Branding Task Force was created to develop short and long-term solutions to enhance the CPMA brand, promote the importance of color in the value chain, and increase company knowledge of factors influencing color trends. As one of its first projects, the Task Force launched an industry trends survey in the spring 2019.

Strategic Direction:

During the latter half of 2018, CPMA conducted a review of its strategic plan to assess progress, evaluate external factors impacting the industry and enhance the association's long-term strategic goals. The review affirmed that CPMA is strategically positioned as the recognized industry leader in North America.

I want to thank the CPMA Board of Governors, both current and past, as well as Committee Chairs, for their valuable support and leadership. Implementation of the 2018-2020 strategic plan continues to enhance CPMA's value proposition and make the association a stronger voice for the members.

Eric Christman

CPMA President, 2018-2019

CPMA Committees & Advocacy Priorities

Below are key priorities and recent highlights for all CPMA committees.

General Issues Committee

Assessing Chemicals Under New TSCA:

CPMA was actively engaged during the implementation of the amended Toxic Substances Control Act (TSCA), on issues including the process for assessing chemicals and the establishment of user fees. As a result, the final TSCA user fees rule incorporated industry recommendations in establishing a fair fee process for future TSCA risk evaluations.

Nanomaterials Regulations in North American:

In collaboration with the Canada Industry Coordinating Group (ICG), CPMA continues to advocate for consistent regulations concerning the reporting and assessment of nanomaterials in the U.S. and Canada.

Industry Branding Task Force

Industry Trends: In 2019, CPMA launched a survey focused on economic and policy trends, an initiative to keep members informed about trends impacting their businesses and the industry.

Public Awareness: CPMA is working to increase public awareness about the safety and importance of color pigments within the value chain.

Organic Pigments Committee

TSCA PV29 Evaluation: Since 2017, CPMA has taken the lead in the dialogue with EPA and stakeholders in the precedent-setting risk evaluation of PV29. CPMA partnered with downstream associations, providing EPA with information about the pigment's uses, manufacturing processes and worker safety.

Water Quality Regulations: CPMA engaged with federal and state government officials and stakeholders to provide industry expertise and advocate for reasonable water quality requirements. In May 2019, EPA announced its plans to amend water quality regulations imposed on Washington State, resulting in a positive regulatory outcome for the color pigments value chain.

Inorganic Pigments Committee

Assessment Approach for Inorganic Pigments: CPMA continues to work with Canadian Ministries to ensure the accurate and informed assessment of inorganic pigments in the third phase of the Chemicals Management Plan. To avoid the improper use of read across and unnecessary regulatory restrictions, CPMA is advocating for an improved risk assessment approach for inorganic pigments.

Global Partnerships: CPMA continues to work with the Society of Dyers and Colourists to ensure information in the Colour Index is accurate and up-to-date. In addition, CPMA has increased engagement with international trade associations to address technical and regulatory issues impacting the inorganic pigments supply chain.

Committee Leadership

General Issues Committee

Chair, Steve Camenisch, BASF Colors & Effects USA
Vice Chair, Grace Manarang-Pena, DCC-Lansco

Organic Pigments Committee

Chair, Earl Seibert, Sun Chemical, Performance Pigments
Vice Chair, Philip Adams, Clariant Plastics & Coatings USA Inc.

Inorganic Pigments Committee

Chair, Gary Strassell, The Shepherd Color Company
Vice Chair, Mike Kletter, EMD Performance Materials

Industry Branding Task Force

Co-Chair, Brandon Devis, Clariant Plastics & Coatings USA Inc.
Co-Chair, Aram Terzian, EMD Performance Materials

CPMA Members Meet with Key Government Officials During Committee Week

Alexandra Dunn, EPA Assistant Administrator for the Office of Chemical Safety and Pollution Prevention, headlined a slate of key regulators and policymakers who addressed CPMA members during this year's Committee Week. Dunn discussed EPA's chemicals assessment process under the amended Toxic Substances Control Act (TSCA) and ongoing PV29 evaluation. CPMA members provided recommendations to enhance the regulatory process.

Senior officials from Environment & Climate Change Canada (ECCC) and Health Canada (HC) provided insight on the third phase of the Canada Chemicals Management Plan, the new substance notification process and the assessment of nanomaterials in Canada.

CPMA members also met with a representative from the Office of Business, Liaison at the U.S. Department of Commerce to share trade challenges and the impact of the United States-Mexico-Canada Agreement on the industry.


Karl Palmer, Acting Deputy Director for the California Department of Toxic Substances Control's Safer Products and Workplaces Program, informed members about progress and implementation of the Safer Consumer Products Program.

In 2018, committee members met with key EPA officials to discuss implementation of the new regulatory framework under amended TSCA, including the assessment of chemicals, the TSCA inventory reset and the establishment of a TSCA user fees rule.



Top photo: CPMA members met with Mark Hartman, Acting Deputy Director of EPA's Office of Pollution Prevention & Toxics, to discuss the TSCA fees rule and impact on the color pigments industry, May 2018.

Bottom photo: Members met with Alexandra Dunn (center), Assistant Administrator for EPA's OCSP, to discuss the TSCA risk evaluation process and provide industry recommendations, April 2019.



EPA's Risk Evaluation of C.I. Pigment Violet 29 Why?... and Lessons Learned

In 2016, Congress overhauled the Toxic Substances Control Act (TSCA) to require EPA to prioritize existing chemicals for risk evaluations, and it told EPA to start right away on 10 chemicals – presumably among the riskiest. More than a few people were surprised to find C.I. Pigment Violet 29 on EPA's "first 10" list. Only one U.S. company manufactures it above reportable quantities (~600,000 lbs/yr), 90% of that production is consumed onsite, the balance is used in commercial paints and plastics, and it's basically inert. How did PV29 end up on this list, and what lessons can we learn from its ongoing risk evaluation?

Why? The 2016 TSCA update sets complicated rules for which chemicals EPA must evaluate, several tied to EPA's 2014 "TSCA Work Plan for Chemical Assessments." Half of EPA's evaluations have to come from this list of 90 chemicals, until it's exhausted – and PV29 is on the list. Why was that? The Work Plan said its list represented "chemicals having the highest potential for exposure and hazard," but EPA's rough screens for those features have often turned out to be wrong. For example, the Work Plan said PV29 was "widely used in consumer products," when less than 1 percent of production is, and has high aquatic toxicity, when guideline studies show no acute toxicity to fish, daphnids or aquatic plants. EPA might ultimately have assigned PV29 as a low priority for risk evaluation, but possibly considered it to be about the simplest risk evaluation the agency might conduct, so it went on the "first 10" list.

Lessons Learned. The PV29 risk evaluation is still ongoing – EPA's Science Advisory Committee on Chemicals is currently reviewing EPA's draft risk evaluation. EPA will then revise that evaluation and determine whether to affirm its proposed finding of no unreasonable risk. That decision is due by December 2019, unless EPA grants itself an extension of up to six months. Nonetheless, several conclusions can be drawn now:

How did PV29 end up on this list,
and what lessons can we learn from its
ongoing risk evaluation?

Errors are the rule for the Work Plan.

As noted, EPA is going to have to prioritize all the Work Plan chemicals and conduct risk evaluations of the high priorities. Unfortunately, the mischaracterizations of hazard and exposure that were true of PV29 are also true of other Work Plan chemicals. Three color pigments remain on the Work Plan (PR52, PY65 and PY83) and CPMA plans to file additional comments on each by the end of the year. It will be important for these comments to include the best available data on hazard and exposure.

Expect fights over reasonably foreseeable conditions of use.

To its credit, EPA used a screening approach to focus on the highest-exposure conditions of use for PV29. Environmentalist critics hate this practice, are litigating it generically now in the 9th Circuit, and can be expected to challenge it in every risk evaluation that finds no unreasonable risk. In its comments on EPA's draft risk evaluation, CPMA pointed out that EPA can do more than assume use of personal protective equipment – it can (and should) recognize that the OSHA standard for nuisance dusts (like PV29) requires use of administrative and engineering controls wherever feasible. Use of these controls is reasonably foreseeable.

EPA is trying to protect health and safety studies that are proprietary.

The key studies of PV29 were conducted by a European company for REACH purposes. The company allowed the foreign parent of PV29's U.S. manufacturer to submit them to EPA, but claimed them as confidential business information (CBI). EPA has continued to protect the key CBI features of the studies, and CPMA has supported it. This issue will also be litigated.

The PV29 risk evaluation is still ongoing – EPA's Science Advisory Committee on Chemicals is currently reviewing EPA's draft risk evaluation.

EPA is exhibiting guts in following the science.

EPA has issued two more draft risk evaluations. One also proposed to find no unreasonable risk (the cyclic aliphatic bromine or "HCBBD" cluster) and the other would find no unreasonable risk to the environment (1,4-dioxane). EPA's critics in Congress and elsewhere are not happy. But EPA is going where its interpretation of the science and the law leads it. While that's what it should do, it takes courage in any political environment, particularly the current one.

About the author: Jamie Conrad is the principal of Conrad Law & Policy Counsel, a D.C.-based legal and lobbying practice. He represents CPMA and several other associations in environmental, health & safety and regulatory reform matters.

Connect with the Color Value Chain

Throughout the year, CPMA members have the opportunity to connect with industry thought leaders and subject-matter experts by participating in quarterly meetings, networking events, and webinars. Below are just a few brief highlights from recent industry events, including our 89th Annual Meeting in New York in 2018.

Join us in Philadelphia on December 3, 2019, as we celebrate CPMA's 90th Anniversary and industry accomplishments with another outstanding lineup of key industry stakeholders. Don't miss an opportunity to connect with peers in the value chain!



Color Trends
Judith van Vliet



Global Regulatory Trends
Heike Liewald



Color Trends

Judith van Vliet, President of the Color Marketing Group, shared insights about global color trends and factors impacting color forecasting at CPMA's Summer Meeting, 2018.

(Pg 8, far left photo)

Global Regulatory Trends

Heike Liewald, Executive Director of Eurocolour, provided an update on current and emerging regulatory trends and challenges in the EU and opportunities for industry collaboration at CPMA's Annual Meeting, 2018.

(Pg 8, 2nd photo from left)

Supply Chain Trends

Jim DeLisi, President of Fanwood Chemical, shared a wealth of knowledge on the latest trade developments and impact on the industry supply chain in North America at CPMA's Annual Meeting, 2018.

(Pg 8, 3rd photo from left)

Policy Trends

Robert Helminiak, VP Legal & Government Relations at SOCMA, provided a look at the current political climate and policy trends for the specialty chemical sector at CPMA's Board Meeting, 2019.

(Pg 9, left photo)

CPMA Partnerships

CPMA consistently partners with industry organizations and allied associations to create dialogue around issues of mutual interest. Here are a few of the value chain organizations CPMA works with:

- American Coatings Association
- Canada Industry Coordinating Group
- National Association of Printing Ink Manufacturers
- Plastics Industry Association
- Specialty Graphic Imaging Association

CPMA participates in a number of key industry events on behalf of the color pigments industry in North America. You can find CPMA at the following 2019 events:

- ACA Fall Meeting
- Eurocolour International Technical Conference
- ETAD General Assembly
- European Coatings Show
- CAD-RETEC
- NAPIM Spring Convention
- NYSCC Suppliers' Day

Webinars

CPMA webinars provide insight from subject-matter experts about latest regulations and emerging trends impacting your business and the industry value chain. Recent webinar topics include:

- EPA's Risk Assessment Process & Industry Requirements
- Trade – Where We Are & What is Next *(sponsored by King & Spalding)*
- For additional information about future webinars, visit www.pigments.org.



Supply Chain Trends
Jim DeLisi



CPMA Partnerships
John Copeland



Policy Trends
Robert Helminiak



CPMA Leadership & Industry Recognitions

2019 Officers & CPMA Executive Committee:

President

Eric Christman

Head, Pigment Manufacturing NA
BASF Colors & Effects USA

Vice President

Ronald Levi

President
Bruchsaler Farbenfabrik GmbH
& Co KG

John Marten

President
The Shepherd Color Company

Luiz Vieira

President & Managing Director
EMD Performance Materials

2019 Board:

Alexandre Baron

Vice President BU Pigments NA
Clariant Plastics & Coatings USA Inc.

Alan Burt

Global Technical Director
Flint Group

Susan Caggiano

Americas Product Stewardship
Manager
Ferro Corporation

Brooke DiDomenico

Technical Manager
Nation Ford Chemical Co.

Grace Manarang-Pena

Global Regulatory Affairs Manager
DCC-Lansco

Edward Polaski

Vice President Sales - Americas
Sun Chemical

Mike Sansonetti

President
United Mineral & Chemical Corp.

Koichi Tanaka

President
TOMATEC America, Inc.

David Thompson

Coatings Industry Manager
Heucotech Ltd.

Top: Former Board Member Bernhard Ehrenreich (middle), was recognized for his leadership at CPMA's Board Meeting, March 2019.

Middle: CPMA recognized long-time CPMA Board Member, Frank Gillette (left), for his leadership during CPMA's Summer Meeting, June 2019.

Bottom: Long-time CPMA Committee chair & industry expert, Robert Mott, Sun Chemical, was recognized for his years of valuable service to the color pigments industry at CPMA's Summer Meeting, June 2019.



We would like to thank former 2018-2019 CPMA Board Members for their valuable leadership and service in advancing the color pigments industry.

Bernhard Ehrenreich

Clariant Plastics & Coatings
USA Inc.

Frank Gillette

Flint Group

Earl Seibert

Flint Group

Mark Vincent

DCC-Lansco

CPMA Membership

CPMA is the only trade association representing the color pigments industry in North America. CPMA members include:

- **Manufacturers:** Companies engaged in the manufacture of color pigments sold in North America.
- **Distributors:** Companies that distribute pigments or are engaged in the flushing, dispersing, grinding or suspending of pigment color.
- **Suppliers:** Companies that manufacture or supply intermediates used in the synthesis of pigments or supply equipment, instrumentation and other products used by pigment manufacturers.
- **Service Providers:** Any business that provides consulting, advertising, accounting, legal or other services used by the color pigments industry.


Become a CPMA Member

- **Join the industry voice** – participate in the dialogue with government officials and public stakeholders to inform policy decisions and set industry standards.
- **Stay informed** – gain insight into the latest policy and industry trends impacting your business from subject-matter experts.
- **Work together** – collaborate with industry value chain partners to provide public policy solutions.
- **Grow your business** – participate in CPMA events to create connections with industry leaders and downstream customers.

For more information about CPMA membership, contact us at (571) 348-5130 or cpma@cpma.com.

Meet our Members:





Connect with Color



1400 Crystal Drive, Suite 630
Arlington, VA 22202
571-348-5130
www.pigments.org