



Preventing an unjustified harmonised classification of talc as Carc. 1B (H350) and STOT RE 1 (H372) under the EU CLP Regulation

Statement by downstream users of talc

As associations of European minerals and mining operators and downstream users of talc across strategic value chains – including pre-painted metals, printing inks, paints and coatings, paper and pulp, dry mortars and construction products, fertilisers, and recycling– we are deeply concerned about the proposed harmonised classification of talc not containing asbestos or asbestiform fibres (CAS 14807-96-6) under the EU Classification, Labelling and Packaging (CLP) Regulation as Carcinogen Category 1B and STOT RE 1.

Talc is not a simple mineral commodity. It is a multi-functional performance mineral delivering properties – as an inert filler, lubricant, whitening agent, and water repellent – that are irreplaceable across critical European industries. With 850,000 tonnes consumed annually in the EU, talc underpins €40 billion in downstream markets, supports 110,000 indirect jobs, and is 85% sourced and consumed within Europe. It is, by any measure, a strategic and sovereign raw material.

The European Chemicals Agency's (ECHA) Committee for Risk Assessment (RAC) [published](#) its Opinion on talc in July 2025, proposing the aforementioned classification. **The proposed classification lacks a sufficiently robust scientific and legal basis and risks setting up a far-reaching precedent and creating disruption across European value chains.** RAC has failed to integrate the totality of available evidence, favouring a narrow selection of studies over a comprehensive, objective weight-of-evidence assessment. The result is a proposed classification that does not meet the legal thresholds set by the CLP Regulation.

This matters beyond talc. The TiO₂ precedent stands as a direct warning: an erroneous classification was overturned by the EU General Court only after causing years of unnecessary industrial disruption and legal uncertainty. Notably, the final legal decision on TiO₂ was issued only after RAC had published its Opinion on talc; consequently, the court's legal findings on classification could not have been taken into account in RAC's talc Opinion. Europe cannot afford to repeat that mistake. **A Carc. 1B and STOT RE 1 classification would trigger a cascade of regulatory restrictions with immediate, far-reaching and potentially irreversible consequences across multiple sectors.** In practice, an unjustified classification would impose immediate, significant costs on downstream users through mandatory re-labelling and packaging changes and extensive product reformulations, with knock-on impacts on production continuity and market supply. Companies would face intense pressure to reformulate products or abandon talc entirely – not because safer alternatives exist, but because no single substitute can match talc's unique technical properties. Forced substitution will degrade product performance, increase carbon footprints, raise consumer costs, and disrupt recycling flows for talc-containing materials in automotive, plastics, and ceramics – directly undermining the EU's circular economy objectives. For plastic recycling, for example, the classification would directly impact the quality and viability of recycle streams for copolymers.



Most critically, this classification risks accelerating the relocation of talc-dependent manufacturing outside the EU. At a moment when the Union is actively pursuing strategic autonomy in raw materials and industrial production, such an outcome would be self-defeating. It would hollow out European value chains while creating no corresponding safety benefit. Where genuine concerns exist regarding occupational exposure to talc dust, the appropriate and proportionate regulatory response is to address these through robust risk management measures – including, where warranted, the setting of occupational exposure limits (OELs) – rather than through a hazard classification that treats talc as a carcinogen and triggers sweeping downstream restrictions unsupported by weight of evidence.

With the talc dossier expected to be discussed in the ongoing CARACAL discussions, we call on the European Commission to request a second review by RAC of the proposed talc classification, mandate full transparency on how the evidence meets CLP legal thresholds, and refrain from adopting a harmonised classification until these fundamental scientific questions are resolved.

