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BCF Submission to the Public Consultation on the Harmonised Classification and Labelling of 1,2-benzisothiazolin-3-one (BIT) (CAS 2634-33-5)

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The British Coatings Federation is the sole UK trade association for manufacturers of decorative coatings, printing inks, industrial coatings and wallcoverings, representing a £4 billion value industry and the interests of over 200 member companies. The majority of BCF members are SMEs, formulating coatings and inks for a wide range of consumer and industrial use, a significant number are owned by European companies, who have integrated supply chains between the UK and the EU. We welcome the opportunity to provide comments on the proposed harmonised classification and labelling of 1,2-benzisothiazolin-3-one (BIT), and in particular with regards to the proposed Specific Concentration Limit (SCL).

The use of in-can preservatives is vital to protect coatings and inks from microbial attack, to ensure product stability and to avoid unnecessary waste, supporting the aspirations of the EU's Circular Economy Action Plan. Preservatives continue to play an important role in the development of water-based technologies as alternatives to solvent-based formulations and in recent years, coatings and ink manufacturers have done a considerable amount of work in this area.

BIT has been used commercially for over 30 years to ensure adequate protection during manufacture and product storage and is one of the few remaining in-can preservatives available to our industry. Due to the decreasing availability of preservatives that are compatible and effective with our sectors products, the continued use of BIT at levels that are effective is critically important. In the past, the Risk Assessment Committee has decided to lower the SCL for other isothiazolinones to 15ppm. If an SCL of 15ppm were to be set, this would mean that BIT would no longer be a viable preservative for use in coatings and inks, as the concentration would be insufficient to effectively protect products from microbials. Therefore, a lower SCL would present a threat to the manufacture of water-based coatings and inks.

We would urge consideration of the skin sensitisation potential of BIT as an individual substance, rather than setting a generic SCL in line with other isothiazolinones which have different potencies. Several local lymph node assays (LLNAs) presented in the dossier show that BIT is a moderate skin sensitiser (EC3>2%). We would also call for the distinction between the **induction** of skin sensitization and the **elicitation** of skin sensitization to be carefully considered when the evidence is reviewed. This is of particular importance for products such as coatings and inks as they are not intended to be applied to skin, meaning that direct contact with the preservatives used in these products is extremely low.

The BCF supports the proposal to set the Specific Concentration Limit (SCL) at 500ppm.