

Regulatory Affairs Bulletin (RAB)

TiONA® AT-1	TiONA® R-KB-2	TiONA® 41J
TiONA® 3	TiONA® 813	TiONA® 828E
TiONA® RCL-69	TiONA® 822	TiONA® 113
TiONA® 168	TiONA® 826	TiONA® 121
TiONA® 242	TiONA® 828	TiONA® 122
TiONA® 244	TiONA® 834	TiONA® 128
TiONA® 288	TiONA® 880	TiONA® 134
TiONA® 470	TiONA® 8300	TiKON™ 33
TiONA® 595	TiONA® 8400	TiKON™ 35
TiONA® 696	TiONA® 8870	TiKON™ 36
TiONA® 722	TiONA® 8140	CR-8

The following statements of compliance apply to the above-listed products unless specified otherwise. They should not be interpreted as a guarantee that the product will perform in a particular application. The information provided is correct to the best of our knowledge, information and belief at the date of its publication. The information given is not to be considered a warranty or quality specification. The information contained is subject to change without notice. Regularly check the status of items of interest to you.

Refer to separate Food Contact Bulletins for food contact compliance

Safety Data Sheets for these products may be accessed at:
<https://www.tronox.com/products/titanium-dioxide/>

Should you have any additional questions, please contact your Tronox representative or email us at ChemProdSteward@Tronox.com

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General Restrictions – Medical Device, Food, Drug, Cosmetics and Tobacco Applications

TiONA® and TiKON™ products are not intended for human or animal consumption, pharmaceutical, cosmetic (including soap and personal care) products, or cigarette filters/papers and Tronox will not knowingly offer product for use in these applications. TiONA® and TiKON™ products must not be used in the manufacture of any medical device article intended for implantation in the human body.

EUROPE

End-Of Life Vehicles - European Directive 2000/53/EC

TiONA® and TiKON™ products are compliant with EU Directive 2000/53/EC as amended.

The concentrations of lead, mercury, cadmium and hexavalent chromium materials do not exceed the specified limits.

Packaging Waste - European Directive 2004/12/EC

TiONA® and TiKON™ products are compliant with the EU Directive 2004/12/EC, amending Directive 94/62/EC, Article 11 regarding concentration levels of heavy metals in packaging. Specifically, the sum of the concentrations of lead, mercury, cadmium and hexavalent chromium is less than 100 ppm by weight.

Perfluorooctane sulfonates (PFOS) - European Directive 2006/122/EC

TiONA® and TiKON™ products are compliant with EU Directive 2006/122/EC, amending Directive 76/769/EEC. Specifically, they do not contain any perfluorooctane sulfonates (PFOS) as additives or raw materials.

REACH Substances of Very High Concern (SVHC)

TiONA® and TiKON™ pigments are not manufactured with raw materials or additives known to contain substances listed on the Candidate List of Substances of Very High Concern, as published on the ECHA website on 25th June 2020. Therefore, to the best of our knowledge TiONA® and Tikon™ products do not contain substances included in the Annex XIV ("Authorization List") at levels greater than 0.1% by weight. If any constituent of the above-mentioned products appears on future editions of the Candidate List, we will endeavour to inform our customers.

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REACH Regulation 1907/2006/EC, Annex XVII

TiONA® and TiKON™ pigments are not manufactured with raw materials or additives known to contain substances subject to restrictions. From process knowledge, the restricted substances specified in REACH Regulation 1907/2006/EC, Annex XVII are not expected to be present in these products.

Restrictions on the marketing and use of certain dangerous substances and preparations (phthalates in toys and childcare articles) - European Directive 2005/84/EC

TiONA® and TiKON™ products are compliant with Directive 2005/84/EC of the European Parliament and of the Council of 14 December 2005 amending 2003/11/EC of the European Parliament and of the Council of 6 February 2003 amending Council Directive 76/769/EEC. They do not contain pentabromodiphenyl ether, octabromodiphenyl ether, bis (2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), di-"isononyl" phthalate (DINP), di-"isodecyl" phthalate (DIDP), di-n-octyl phthalate (DNOP) or any other phthalates.

RoHS and WEEE - European Directives 2002/95/EC, 2011/65/EU as amended including 2015/863/EU, and 2002/96/EC recast as 2012/19/EC.

TiONA® and TiKON™ products are compliant with EU Directives 2002/95/EC and 2011/65/EU and with EU Directive 2002/96/EC recast as 2012/19/EC. Specifically, they do not contain any of the cited materials (listed below) at concentrations greater than allowed in Directive 2002/95/EC Article 4(1).

- Mercury / Hg (0.1%)
- Lead / Pb (0.1%)
- Cadmium / Cd (0.01%)
- Hexavalent Chromium / Cr⁶⁺ (0.1%)
- Polybrominated biphenyl / PBB (0.1%)
- Polybrominated diphenyl ethers / PBDE / including DecaBDE (0.1%)
- Bis(2-ethylhexyl) phthalate (DEHP) (0.1 %)
- Butyl benzyl phthalate (BBP) (0.1 %)
- Dibutyl phthalate (DBP) (0.1 %)
- Diisobutyl phthalate (DIBP) (0.1 %)

Toy Safety - European Toy Standard EN71-3:2019 and European Directive 2009/48/EC

European Toy Standard EN 71-3:2019 and Directive 2009/48/EC specify conformance of final toy products with the migration limits laid down for the 19 elements of concern. These limits are

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applicable to the finished toy component and therefore it is not possible to provide declarations of conformity for TiONA® and TiKON™ products. Apart from aluminium, none of the metals or organic compounds cited in the EU Standard and Directive are intentionally added as raw materials or additives in the manufacture of TiONA® and TiKON™ products. In common with most surface treated titanium dioxide products, most TiONA® and TiKON™ products are intentionally coated with aluminium compounds to improve processing and durability properties in the application. Because the titanium dioxide pigment is normally encapsulated by a plastics matrix, or an ink or coating resin, it is not directly available to the consumer. Nevertheless the EU Standard and Directive applies to the toy itself and accordingly the final toy material requires final testing to determine that neither aluminium nor any of the 19 controlled elements migrate above the allowable limits. Please refer to our technical data sheet for surface chemistry.

AMERICAS

California Proposition 65

Titanium dioxide products contain a chemical known to the State of California to cause cancer: '*titanium dioxide (airborne, unbound particles of respirable size)*'. Titanium dioxide used in applications such as paint, plastics, and paper is fully encapsulated within a solid or liquid matrix and accordingly, non-respirable. As a result, such applications do not require warning statements as they do not meet the listing requirements.

Conflict Minerals

No "conflict minerals", as defined by Section 1502 (e) (4) of HR 4173, the Dodd-Frank Wall Street Reform and Consumer Protection Act (columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives), or any other ores/minerals sourced from Democratic Republic of the Congo (DRC) or neighboring countries (contiguous nation states of South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, Angola, Congo, and the Central African Republic are used to produce TiONA® and TiKON™ titanium dioxide pigments.

Frank R. Lautenberg Chemical Safety for the 21st Century Act

All components of TiONA® and TiKON™ products are exempt from, implicitly included, or designated as "active" substances in U.S. commerce in the U.S. EPA's Toxic Substances Control Act's (TSCA) Chemical Substance Inventory, as required by EPA's TSCA Inventory Notification (Active-Inactive) Rule (82 FR 37520) promulgated under TSCA, as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act (P.L. 114-182).

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Ozone Depleting Substances Status

TiONA® and TiKON™ products do not contain, and are not manufactured with ozone depleting chemicals as defined in 40 CFR Part 82, Appendices A and B of Subpart A.

Toy Safety - ASTM F963-11

TiONA® and TiKON™ products are compliant with the metals extraction limitations cited in ASTM F963-11. Note that the manufacturer of any toy product has the responsibility to ensure that the finished article complies with this directive including the migration limits.

TPCH - Toxics in Packaging Clearing House (Heavy Metals)

TiONA® and TiKON™ products are compliant with the CONEG Model Legislation regarding heavy metals content. Specifically, the sum of the concentrations of lead, mercury, cadmium and hexavalent chromium is less than 100 ppm by weight.

NSF / ANSI 14: Plastics Piping System Components and Related Materials

Tronox offers the following titanium dioxide products which have been certified to NSF/ANSI 14: Plastics Piping System Components and Related Materials. Listed products comply with NSF/ANSI/CAN 61 health effects requirements when tested at 73°F. To confirm the status of any Tronox product which is NSF listed, visit NSF [Product and Service Listings](#).

TiONA® 470/ CR-470	TiONA® 826/ CR-826	TiONA® 834/ CR-834
TiONA® 822/ CR-822	TiONA® 828/ CR-828	

OTHER CLAIMS / INFORMATION

Shelf-life and Storage

TiONA® and TiKON™ product have an essentially indefinite shelf life provided no adverse storage conditions are encountered. Titanium dioxide, sold in a dry powder form, can pick up moisture from the environment potentially having an adverse effect on pigment performance. We recommend storing TiONA® and TiKON™ titanium dioxide products on the original plastic wrapped pallets indoors in a dry place, away from rain, wet floors, and protected from warehouse condensation. Titanium dioxide pigment will not freeze. Excessive compaction may also adversely affect pigment performance. For this reason and for safe handling, Tronox recommends that pallets be stacked no more than two high. Tronox recommends that product be used on a first-in first-out basis from receipt of the shipment.

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Bovine Spongiform or Transmissible Spongiform Encephalopathy (Mad Cow Disease)

TiONA® and TiKON™ products are not manufactured with any ingredient of bovine origin, including gelatin and blood derivatives.

CITES - Convention on International Trade in Endangered Species Of Wild Fauna And Flora

TiONA® and TiKON™ products are not manufactured with any species listed in the latest CITES Appendix.

Dust Explosion

Titanium dioxide being a fully oxidized substance cannot initiate or support combustion or participate in a dust explosion.

Food Allergens

TiONA® and TiKON™ products do not contain any of the below referenced food allergens nor the essential proteins derived from them. These products are inorganic pigments.

- Milk, eggs, fish, crustacean shellfish, tree nuts, wheat, peanuts, and soybeans (USA)
- Wheat, rye, barley, oatmeal and hybridized strains, crustacean shellfish, eggs, fish, peanuts, soya bean, milk from any species of mammals, almonds, hazelnuts, cashew nuts, Brazilian nuts, macadamia, nuts, pecan nuts, pistachio, pinoli/pine nuts, chestnut, natural latex (South America - RDC N° 26 "Alergênicos" of 07/02/2015)
- Hickory nuts, walnuts, refined or unrefined oils
- Milk products, dairy products, dairy derivatives, lactose with protein, soy flour, any soy product
- Fish (e.g. cod, salmon) or fish products, shellfish, crustaceans (e.g. shrimp, crabs, lobsters, oysters, clams, scallops, crayfish), molluscs (e.g. snails, clams, squid, octopi) or mollusc products
- Sulfites, food colors, carmine, cochineal, corn, celery or celery products, wheat (gluten) or wheat products, seeds (e.g. cotton, poppy, sesame, sunflower, mustard) or seed products, aspartame;
- Monosodium (MSG), caffeine, hydrogenated vegetable protein (HVP), hydrolysed protein
- Grains (e.g. rye, barley, oats), lecithin, lupine or lupine products

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Genetically Modified Organisms (GMO)

TiONA® and TiKON™ products do not contain, and are not made from, genetically modified organisms.

Global Automotive Declarable Substance List (GADSL)

TiONA® and TiKON™ products are compliant with the latest GADSL reference list. The materials listed in the reference list are not intentionally added as raw materials or additives. From process knowledge their presence is not expected or in the case of metal impurities, our monitoring shows that the specified maximum levels are not exceeded.

Global Chemical Inventory Compliance

See the relevant Safety Data Sheet (SDS) Section 15 for the compliance status of individual products. SDSs for TiONA® and TiKON™ products may be accessed at <https://www.tronox.com/products/titanium-dioxide/> to select the products, select Titanium Dioxide Pigment, then select Application (Paint & Coatings / Plastics / Paper / Printing Ink) and Region.

Halal Status

TiONA® and TiKON™ products do not have any Halal status as the products and the process have not been reviewed and blessed by an Imam. They do not contain any animal derived ingredients.

Heavy Metals (Please note that the below representation does not apply to TiONA®AT-1. Please contact your Tronox representative for information on the purity of TiONA®AT-1).

Acid extractable testing (0.1M hydrochloric acid) of representative samples of TiONA® and TiKON™ products have shown the following are not present at the limits of detection listed in parenthesis: antimony (1 ppm), arsenic (5 ppm), barium (1 ppm), cadmium (1 ppm), chromium (10 ppm), lead (2 ppm), mercury (1 ppm), selenium (1 ppm).

Certificates of analysis from an accredited third-party laboratory are available upon request.

IARC

In February 2006, the International Agency for Research on Cancer (IARC), an agency of the United Nations World Health Organization, changed the classification of TiO₂ to possibly carcinogenic to humans (2B). This Monograph was published in January 2011 as Monograph 93. It can be accessed at:

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<http://monographs.iarc.fr/ENG/Monographs/vol93/index.php>. The Titanium Dioxide Manufacturers Association (TDMA), a European Chemical Industry Council (CEFIC) sector group, of which Tronox is a member, has issued a paper explaining the background and its opinion of this listing, and this can be accessed at <http://www.tdma.info/positions-statements>. Safety Data Sheets for TiONA® and TiKON™ products refer to the IARC listing in section 11 and they may be accessed at <https://www.tronox.com/products/titanium-dioxide/> to select the product, select Titanium Dioxide Pigment, the select Application (Paint & Coatings / Plastics / Paper / Printing Ink) and Region.

Kosher Status

TiONA® and TiKON™ products do not have any Kosher status as the products and the process have not been reviewed and blessed by a Rabbi. They do not contain any animal-derived ingredients.

Latex Content

TiONA® and TiKON™ products do not contain natural rubber latex, dry natural rubber or synthetic latex or synthetic rubber that contains natural rubber.

Biocides, Fungicides and Preservatives

TiONA® and TiKON™ products are offered as dry powder with some products also available in liquid slurry form. Tronox does not add biocides, fungicides, synthetic fungicides, preservatives, or fumigant pesticides in the manufacture of our dry titanium dioxide pigment products. However, Tronox titanium dioxide slurry products do contain a proprietary biocide package to inhibit microorganism growth in these aqueous formulations. Tronox slurry processes are segregated from pigment manufacturing processes with no potential for cross contamination.

Manufacturing Restricted Substances List (MRSL)

TiONA® and TiKON™ products are compliant with the latest Zero Discharge of Hazardous Chemicals (ZDHC) MRSL reference list. The materials listed in the reference list are not intentionally added as raw materials or additives.

Nanomaterials

ISO/TC229 defines nanoparticles as particles having all external dimensions in the size range 1 – 100nm. The European Commission recommended definition of nanomaterial¹ is *“A natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm - 100 nm.”* The mean particle size of TiONA® and

¹ Commission Recommendation of 18 October 2011 on the definition of nanomaterial (2011/696/EU)

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TiKON™ products is larger than 100nm but as with all particulate materials there is a distribution of particle sizes around the mean with a minor, unintended and unavoidable fraction of the particles that have one or more dimensions in the 1-100nm size range. The fraction is less than 50% by number and accordingly we consider that TiONA® and TiKON™ products do not meet the EU Commission recommended definition of nanomaterial.

Nike Inc. Restricted Substance List

TiONA® and TiKON™ products are compliant with the latest Zero Discharge of Hazardous Chemicals (ZDHC) MRSL reference list. The materials listed in the reference list are not intentionally added as raw materials or additives.

Sony Technical Standard SS-00259

TiONA® and TiKON™ products are compliant with Sony Technical Standard SS-00259. The materials listed in Table 4.1 (list of Environment-related Substances to be Controlled) are not intentionally added as raw materials or additives in the manufacture of TiONA® and TiKON™ products.

UN Drug Control Conventions

TiONA® and TiKON™ products do not contain any component that is listed as a narcotic on the "Yellow List", as a psychotropic substance on the "Green List", or as a precursor substance on the "Red List".

Other regulated chemicals

The chemical materials listed below are not used in the manufacture of, or intentionally added to TiONA® and TiKON™ products. Our knowledge of the manufacturing process is that they are not present in TiONA® and TiKON™ products and accordingly analysis is not conducted.

Chemical	Common Name/Family	CAS #
1,2-dihydro-acenaphthene	PAH	83-32-9
1,3, 5-Triazine-2,4,6-triamine	Melamine	108-78-1
1,4-dichlorobutane		
1H-benzotriazole		
1-methyl-2-pyrrolidone	NMP	372-50-4
1-naphthol		90-15-3
2-(2H-1, 2, 3-Benzotriazol-2-yl)-4,6-di-tert-butylphenol	Benzotriazole	3846-71-7
2-(3,5-Di-tert-butyl-2-hydroxyphenyl)-2H-benzotriazole		3846-71-7
2,4,4'-trichloro-2'-hydroxydiphenyl ether	Triclosan	3380-34-5

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Chemical	Common Name/Family	CAS #
2-mercaptobenzothiazole	MBT	149-30-4
2-naphthol		135-19-3
5-tert-butyl-2,4,6-trinitro-m-xylene	Musk xylene	
9H-fluorene	PAH	86-73-7
Absorbable Organic Halogens (AOX)		
Acenaphthylene	PAH	208-96-8
Acrolein	Propenal	107-02-8
Acrylamide		79-06-1
Acrylonitrile		
Adipic acid		
Alkylphenols		
Alkylphenol Ethoxylates	APEOs	
Amine compounds generated from Azo compounds		
Ammonium pentadecafluorooctanoate	APFO	3825-26-1
Animal-origin ingredients		
Anthracene	PAH	120-12-7
Aromatic amines, including		
6-amino-2-ethoxynaphthalene		293733-21-8
4-amino-3-fluorophenol		399-95-1
Para-phenylenediamine (PPD)		106-50-3
2,4-xylidine		95-68-1
2,6-xylidine		87-62-7
Artificial color		
Artificial flavor		
Asbestos		
Aspartame sucralose		
Azodicarbonamide / Azobisformamide	ABF	123-77-3
Azo Dyes and Pigments		
Benzidine		
Benz(a)anthracene	PAH	56-55-3
Benzo(a)pyrene	PAH	50-32-8
Benzo(b)fluoranthene	PAH	205-99-2
Benzo(e)pyrene	PAH	192-97-2
Benzo(ghi)perylene	PAH	191-24-2
Benzo(j)fluoranthene	PAH	205-82-3
Benzo(k)fluoranthene	PAH	207-08-9
Benzonitrile, 2-hydroxy		
Benzophenone		
Beryllium copper		

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Chemical	Common Name/Family	CAS #
Beryllium oxide		
Biocides		
Bis(2-methoxyethyl)ether	BMEE	111-96-6
Bisphenol compounds including (but not limited to) A, B, and S		
Butylated hydroxyanisole	BHA	121-00-6 & 25013-16-5
Chlorinated benzenes and toluenes		
Chlorinated paraffins		
Chlorinated phenols		
Chloropropanol		
Chrysene	PAH	218-01-9
Cobalt chloride		1332-82-7
Corn products		
Cyanide		
Dibenz(a,h)anthracene	PAH	53-70-3
Dimethylformamide	DMFA	68-12-2
Dimethyl fumarate	DMF	624-49-7
Diphenyl ketone, Diphenylmethanone		
Dioxins		
Drometrizole		
Dyestuffs classified as allergenous		
Dyestuffs classified as carcinogenic		
Epichlorohydrin	ECH	106-89-8
Ethyl alcohol		
Extractable Organic Halogens (EOX)		
Fluoranthene	PAH	206-44-0
Fluorene	PAH	86-73-7
Fluorocarbons		
Fluorotelomers		
Formaldehyde		50-00-0
Formamide		75-12-7
Glutaric Acid		
Glycerides, castor-oil mono-, hydrogenated, acetates		736150-63-3
Halogens		
Halogenated hydrocarbons, including CFC, HCFC, HFC		
Indeno(1,2,3-cd)pyrene	PAH	193-39-5
Isothiazolinone	BIT, CIT, MIT	2634-33-5, 26172-55-4, 2682-20-4

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Chemical	Common Name/Family	CAS #
Long-chain perfluorinated chemicals	LCPFCs	
Mercaptobenzothiazole		149-30-4
Mineral oils		
Monosodium glutamate		
N-isopropyl-N-phenyl-4-phenylenediamine		101-72-4
Naphthalene	PAH	91-20-3
Natural color additives		
Nitrosamines		
Nonylphenol		25154-52-3
Nonylphenol ethoxylates		
Octadecanoic acid		
Organotin compounds		
Pentachlorophenol and its esters and salts	PCP	
Pentadecafluorooctanoic acid	PFOA	335-67-1
Per- and polyfluoroalkyl substances	PFASs	
Perfluorinated alkyl acids		
Perfluorinated chemicals		
Perfluoroalkyls		
Perfluorochemicals	PFCs	
Perfluorooctane sulfonate	PFOS	1763-23-1
Perfluorooctanoic acid	PFOA	335-67-1
Phenanthrene	PAH	85-01-8
Phenols		
Phthalates		
Polybrominated biphenyls	PBBs	
Polybrominated diphenyl ethers	PDBEs	
Polybrominated terphenyls	PBTs	
Polychlorinated biphenyls	PCBs	
Polychlorinated naphthalenes	PCNs	
Polychlorinated terphenyls	PCTs	
Polycyclic aromatic hydrocarbons		
Polyfluorinated chemicals		
Polyfluorinated compounds		
Polystyrene		
Polyvinyl chloride	PVC	9002-86-2
Potassium dichromate		7778-50-9
Preservatives	BHT	
Propolis		85665-41-4
Pyrene	PAH	129-00-0
Radon		10043-92-2

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Chemical	Common Name/Family	CAS #
Refractory ceramic fibers		
Rye, Oats, Barley		
Sodium aluminium phosphate-acidic		10305-76-7
Sodium aluminosilicate		1344-00-9
Stearamide		
Seeds		
Styrene monomer		100-42-5
Succinic acid		
Succinic anhydride		
Sulfites		
TALC		
Tertiary Butylhydroquinone	TBHQ	1948-33-0
Toluene		108-88-3
Tributyltin compounds	TBT	
Triphenyltin compounds	TPT	
Tris-nonylphenol phosphite	TNPP	26523-78-4
Tropical oils		
Turpentine		8006-62-2
Vinyl chloride		75-01-4
Volatile Organic Compounds		

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