

**From:** Manuel Breva[Redacted]

**Date:** Wednesday, July 22, 2015 10:52 AM

**To:** Lori White <[whiteld@niehs.nih.gov](mailto:whiteld@niehs.nih.gov)>

[Redacted]

**Subject:** FW: Inorganic Pigments Consortium - support to CDI comments on RoC for Co and compounds

Dear Dr. White,

With this e-mail, the Inorganic Pigments Consortium would like to express its support to the comments issued by the CDI, regarding the draft NTP Report on Carcinogens for cobalt and certain cobalt compounds.

As the organization in charge of managing the REACH registration process of complex inorganic pigments in Europe, the IP Consortium has generated substantial toxicological and ecotoxicological data for certain inorganic pigments that contain cobalt. A key part of the work performed for hazard assessment has been based on the bioelution/bioaccessibility tests, in which the dissolution of metals from each pigment has been determined under specific human surrogate fluids. For this reason, we consider that it is essential that available information on bioavailability is taken into consideration when establishing conclusions or recommendations on classification and labelling of any cobalt compound, particularly when results show that no significant bioavailability of cobalt will occur in relevant conditions of exposure.

As you are probably aware, summaries of the information available for registered substances can be found in the ECHA dissemination website.

We remain at your disposal for any further comment or clarification that you may require.

Best regards,

**Manuel Breva**

General Secretary

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