

Statement on RAC opinion on Synthetic Amorphous Silica (SAS)

On October 27, 2025, the Committee for Risk Assessment (RAC) of ECHA published its opinion on Synthetic Amorphous Silica (SAS), recommending its classification as STOT RE 1 (respiratory tract) (inhalation).

ASASP, the Association of Synthetic Amorphous Silica Producers, a Sector Group of Cefic, has identified significant concerns regarding RAC's analysis and conclusions, noting fundamental flaws and questioning the scientific validity and justification of its findings. The issues observed in the RAC evaluation of SAS further highlight the persistent confusion around particles and CLP, as evidenced by considerable interest and outcomes from the 2nd Particles Platform Workshop held on October 2, 2025.

The proposed classification is expected to be discussed at the next CARACAL meeting scheduled for January 28–29, 2026.

ASASP requests that:

- The European Commission pauses the SAS classification process until an appropriate framework is developed to address both scientific and regulatory complexities surrounding particulate materials.
- In alignment with recommendations from the Particles Platform, ASASP supports the formation of an ECHA expert group with representatives from ECHA, academia, and industry as the most effective approach moving forward.

ASASP continues to engage with the European Commission and Member State authorities to present our detailed position and communicate these requests.

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