



Brussels, 22 September 2017

## Exemptions are necessary in the adhesive and sealant industries

FEICA, the Association of the European Adhesive and Sealant Industry, is a multinational association representing the European adhesive and sealant Industry. With the support of its national associations and several direct and affiliated members, FEICA coordinates, represents and advocates the common interests of our industry throughout Europe. In this regard FEICA aims to establish a constructive dialogue with legislators in order to act as a reliable partner and create a mutually beneficial economic and legislative environment.

In addition to our previous contribution to the public consultation of the Diisocyanate restriction on 6 June 2017, we would like to point out that **the exemption part of the restriction will be an essential part of this regulation.**

We estimate that ca. 1 million professional end users of diisocyanate containing products in Europe use packaged products infrequently and in small volumes (e.g. applying foam to seal doors in building sites). We are strongly of the opinion that it is not warranted to proceed to additional isocyanate specific training for this number of people, where the risk of exposure via inhalation and dermal contact from products can be proven to be very low. In addition to the general exemption for products with a diisocyanate concentration below 0.1%, a second option of exemption, where products can be individually proven to be of equally low risk by evaluating:

- formulation,
- packaging,
- handling
- and tools

and providing quantitative and qualitative justifications, appears to us to be a sensible solution to balance the business impact of the proposed restriction with the goals it is aiming to achieve. Therefore, the **exemption as described in the “Annex Exemptions” of the proposal is a necessary element of the proposed restriction.**

FEICA and its members are in fact currently preparing two dossiers as examples of how the exemption can work and will be able to share these with the authorities in the coming weeks.

## Contact

### FEICA Regulatory Affairs:

Philip Bruce ([p.bruce@feica.eu](mailto:p.bruce@feica.eu))

Nicolás Fuentes ([n.fuentes@feica.eu](mailto:n.fuentes@feica.eu))

FEICA - Association of the European Adhesive & Sealant Industry  
Avenue Edmond van Nieuwenhuysse 4, B-1160 Brussels, Belgium

Tel: +32 (0)2 676 73 20 | Fax: +32 (0)2 676 73 99

[info@feica.eu](mailto:info@feica.eu) | [www.feica.eu](http://www.feica.eu)

**Publication reference: POP-EX-G09-038**

Copyright ©FEICA, 2017 - Reproduction is authorised provided the source is fully acknowledged in the form: 'Source: FEICA Position Paper POP-EX-G09-038, <http://www.feica.eu>'.

*This document has been designed using the best knowledge currently available, and is to be relied upon at the user's own risk. The information is provided in good faith and no representations or warranties are made with regards to the accuracy or completeness, and no liability will be accepted for damages of any nature whatsoever resulting from the use or reliance on this paper. This document does not necessarily represent the views of all member companies of FEICA.*