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FEICA input to the Restriction on the use of Diisocyanates

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.

FEICA and its members are continually working with all actors in the polyurethane value chain to improve the safe use of PU products, and support this Restriction as a harmonised solution across Europe.

1. Impact of the proposed restriction on FEICA members

What are diisocyanates used for?

Diisocyanates are used in adhesives and sealants across a diverse set of markets and applications as a result of the performance advantages they bring, as illustrated in the attached graph.

Diisocyanate containing products are in many of the above examples the only, or the preferred, products for their applications, and FEICA supports the Restriction condition to ensure that their usage can continue to benefit industry in Europe.

Are PU products containing diisocyanates safe?

Based on its long-term commitment to product safety, the adhesives and sealants industry is convinced that PU products can be handled safely in industrial and professional applications if the recommendations in the safety data sheets are followed.

Due to the close relationship with our customers, we advise and support end-users of polyurethane products in implementing appropriate protective measures for the safe handling of diisocyanates. In addition, the polyurethane industry continuously makes efforts to supply the market with environmentally-responsible, lower-emission products using state-of-the-art technology.

The decline in the number of sensitisation cases in relation to the increasing high number of users is the result of these ongoing endeavours of the adhesive and sealant industry.

Are there any alternatives to diisocyanates?

Polyurethanes cannot be produced without aromatic or aliphatic diisocyanates. Therefore, there is currently no commercially viable alternative to MDI, TDI, HDI, IPDI or H12MDI and others. Competitive technologies have not been found to be able to replace polyurethane properties in most of the respective articles.

2. Key messages on the proposed restriction

Responsibilities

FEICA acknowledges that diisocyanate producers (Manufacturers/Importers), representing the industry at the start of the chain, should bear the main legal responsibilities and guidance role for the entire process. FEICA members support a fair sharing of responsibilities and strong collaboration between all actors of the value chain for the preparation of training content.

Supply Chain

Adhesives and sealants are used by a large number of very small to very large companies throughout Europe, which are active in a wide variety of industries. Therefore, the practicability of implementing the restriction is of utmost importance. This includes the necessity to use existing training schedules and to have the possibility to integrate the training on diisocyanate use with other topics. Such training schedules also vary from country to country and this organisational variation has to be taken into account.

FEICA would seek a situation where a trained person from one European country would be able to work with PU products in another country, provided he or she is in possession of relevant documentation.

Exemptions

To limit the potential number of people that need to be trained out of the roughly one million users of PU products, it is also essential for the adhesives and sealants industry to be able to offer exempted PU products which have been proven to be safe to use without the risk of sensitisation by diisocyanates by design, thus making additional training of their users unnecessary.

FEICA members would like to express their strong support for the current set of criteria to grant exemptions as foreseen in the Annex Exemptions. In addition, an Exemption should be recognised in all EU countries.

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