A safe future for polyurethane products

A diverse product

Polyurethane (PU) adhesives and sealants are versatile, innovative and safe. They are used in a wide variety of applications in construction, packaging, automotive, furniture, engineering, marine, transportation, and many more.

PU products are made by reacting **diisocyanates** and **polyols**.

YOUR STAFF WILL NEED TO BE TRAINED TO KNOW HOW TO APPLY PU PRODUCTS SAFELY

A new regulation has been adopted

REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. On 4 August 2020, a new restriction on **diisocyanates** was published in the Official Journal of the European Union. It targets respiratory and dermal sensitisation potentially caused by diisocyanates and requires training prior to use.

The EU REACH Regulation was brought into UK law on 1 January 2021 (known as UK REACH). In addition, the restriction on diisocyanates (EU 2020/1149) was carried into UK legislation, unchanged from the original EU regulation. It was subsequently modified by SI 2021 No. 904 on 30 September 2021 to make the restriction operable in a GB-only situation.

What does the restriction mean, how is the training developing and what is the timeline for implementation?

Your staff will need to be trained and certified by 24 August 2023 in how to handle products containing diisocyanates safely. This will apply to all professional and industrial users of products with a total monomeric diisocyanate concentration of > 0.1%. Since 24 February 2022, such products have to carry a phrase on the label indicating the requirement of training. FEICA, in coordination with ISOPA and ALIPA, the diisocyanate manufacturers' industry associations, prepared training material for use by its members and by adhesive or sealant users, which is available via FEICA's dedicated PU Training webpage www.feica.eu/PUinfo.

The PU Training Platform, available in six languages, can be accessed via www.safeusediisocyanates.eu. The training platform will be available in all EU languages by the end of 2022.

Holding a certification to prove attendance to the training, including a final exam, will be mandatory for all professional and industrial users applying the product by 24 August 2023. The adopted legal text requires the training to be provided by an expert in occupational Health & Safety. Employers must keep records of the training provided to their employees.

Labelling requirements on pack	All users trained and certified
24 February 2022	**24 August 2023**

As of 24 August 2023 adequate training is required before industrial or professional use.

"The industry is strongly committed to the safe use of diisocyanates and safety in the workplace."

Frequently asked questions

Are diisocyanates safe?

Like that of any other substances, diisocyanates' use is safe when chemicals are handled according to relevant risk management and safety measures. It is also important to stress that virtually no diisocyanates can be found in finished articles. Diisocyanates are only used as reactive chemicals; they react with the polyol to form the PU product and are used up during the reaction.

What is respiratory sensitisation?

Sensitisation means that after exposure, a person could become allergic to the substance. If sensitised, each time the person is in contact again with the substance (even at very low concentrations) the person could have a high allergic reaction with respiratory impacts (e.g. asthma). The majority of individuals with diisocyanates-related asthma show improvement or total recovery after exposure has ceased.

Is there a standard available for measuring 0.1% free monomeric diisocyanate? Will FEICA provide support?

There is more than one possible method. The method CAM-0642303-18E is owned by CURRENTA GmbH & Co OHG, and FEICA has a non-exclusive and non-transferable license. As FEICA holds a license, its members can refer to this license to receive a customer-specific discount. However, as a non-member, please note that you can buy a license at full price from CURRENTA.

I am a reseller/distributor. What do I need to do?

Pass the information you receive from your product supplier on to your customers.

What about PU products for consumer use?

The new regulation only applies to professionals and industry. A separate restriction for consumer use came into force several years ago.

On what date will this regulation come into force?

The new regulation was adopted on 4 August 2020 and came into force on 24 August 2020. So, after a three-year transition phase, by 24 August 2023, all users of PU products should be trained and certified.

When do I have to update the labelling of my packaging?

The legal requirements should appear on the packaging as of 24 February 2022.

Will PU adhesives and sealants remain on the market?

The restriction is targeted at avoiding unsafe handling of diisocyanates, not on restricting product availability. Due to their unique properties in many applications PU adhesives and sealants will remain widely available.

Does the customer have to send its supplier confirmation of receipt of the information concerning the restriction?

No, the supplier must ensure that the professional or industrial customer is provided with information about the training requirements. Whether the customer or user reads that information or even acknowledges receipt of it is not required by the regulation. Furthermore, the supplier must put the following statement on the packaging: 'As from 24 August 2023, adequate training is required before industrial or professional use.' A confirmation of receipt from the customer is not required.

How are the training sessions organised? Does the supplier have to provide the training?

The supplier has to make sure that the training according to the requirements of the restriction is available to the users. Suppliers do not need to organise training sessions themselves. To this end, FEICA, together with ISOPA and ALIPA, the diisocyanate manufacturers' industry associations, is preparing training material in line with the legal requirements in all the European Union languages. The training material will be made available via an e-learning platform which accommodates online training, webinar sessions or classroom training given by external trainers or organised in-house. While the supplier is responsible for providing his customer with information about the training, the employer is responsible for ensuring that the training is completed by his employees and that this completion is documented.

In the case of a trainer account for the subdivisions of a company, e.g. Company X Germany GmbH and Company X France SA, should there be one account for each subdivision, or should there be a single account to cover the group of subdivisions?

Company X Germany GmbH, having a trainer account, is allowed to train all employees of Company X on a group level, including, e.g. employees of Company X France SA. Company X France SA could also request its own trainer account; however, there would be a charge for this. It is a business decision by Company X whether to have one training account for the entire group or to have multiple training accounts for several legal entities. For further info on receiving a trainer account, please contact ISOPA/ALIPA or check out https://www.safeusediisocyanates.eu/

Whom should I contact if I have questions?

Your supplier will help you with any product-related questions. If you would like to learn more about the status of training developments or other related general topics, please contact FEICA at info@feica.eu or check out www.feica.eu/PUinfo.

Is there an exam foreseen to show approved knowledge?

A certificate will be issued to show successful completion of the training. The test questions come from a large pool of questions related to the training material, and if you have successfully passed the tests, then you will receive the certificate.

Where can I find more information about diisocyanates?

The diisocyanates industry provides information about diisocyanates and their safe handling on its website http://www.safeusediisocyanates.eu/