

Q1: *What transition period do you consider to be appropriate to implement the measures specified in the restriction proposal and why? Please mention potential priorities in terms of application area or geographic regions.*

FEICA members would support a minimum 6 years from the date of the final adoption of the Restriction. The adhesive and sealant industry has a very significant number of users that will likely need to be trained across a large variety of sectors in many different languages. In this context, the industry will need to prioritise sector-specific training requirements and develop pan-European training content where needed, including training for distributors, in a very diverse value chain.

Regarding the foreseen Exemptions, FEICA members expect a high number of adhesive and sealant applications to fulfil the conditions for Exemptions, which will reduce the number of workers needing training. Activities to define exempted applications are likely to take place in the first years after the adoption of the Restriction.

Q2: *What approaches (in addition to those already mentioned in the dossier) would you propose to communicate the requirements of the restriction through the supply chain, to effectively inform all levels of downstream users about their duties (including SMEs and self-employed practitioners)?*

For FEICA members, the SDS is the key method to communicate where an Exemption exists or where training will be required. Therefore, FEICA members are committed to ensuring that the SDS contain all the relevant information.

As part of a communication strategy initiated by FEICA, FEICA plans to continue running education/communication sessions for our members on the actions required for compliance with the Restriction conditions e.g. Seminars at the FEICA Conference.

Q3 *Could you give examples of training methods in the area of occupational health and safety which have proven to be particularly effective? Could you provide information on how the effectiveness of these methods has been assessed?*

Q4: *Do you have any information on a case(s) where respiratory or skin isocyanate-related symptoms were observed with a product containing less than 0.1% diisocyanates? Please provide as detailed case information as possible.*

We currently do not have information to answer Questions 3 & 4.

Q5: *How would the proposed training programme affect your company (we are particularly interested in how this affects SMEs or self-employed persons)?*

Granting of Exemptions will play a significant part in the ability of the diverse adhesive and sealant industry to reduce the total number of people to be trained.

Training in adhesives and sealants will have an effect across the entire supply chain; we anticipate that many SMEs and self-employed persons will require training to use products that are not exempt from the Restriction.

To ensure the most effective implementation, training activities should be integrated with existing training schemes, e.g. during education, technical training, OSH training, etc.