



Sinn-Fleisbach, 17th october 2022

Restriction of diisocyanates under REACH

What is or will be important for industrial and commercial users?

Dear Business Partners,

we hereby inform you about your future obligations in the processing of PU adhesives, according to the restriction entry No. 74 for the use and marketing of diisocyanates according to REACH Regulation (EC) NR. 1907/2006.

Why that?

Diisocyanates are suspected of causing skin and respiratory sensitization. This is to be prevented/minimized by the announced commitments in the future.

What obligations arise from this?

From August 2023, appropriate safety training will be required for all processors of PU products. Our PU adhesive series **FENOPUR®** also contains diisocyanates, so it is also affected. Commercial and industrial processing users must therefore be trained accordingly in order to learn how to use and handle such products safely. A documented proof (certificate) of successful participation in such a training course is then mandatory.

Who needs to be trained?

All commercial and industrial processing companies of PU adhesives.
Private users are not affected by this.

What does this mean for packaging?

Since 24th February 2022, a corresponding training notice (EUH204) must be applied to the product label. This obligation is subject to the distributor according to the label.

What future obligations will result from this?

By August 24th, 2023, users of PU adhesives must be demonstrably trained.

Where can I find out more?

Further information on possible training offers can be found e.g. here:
www.fsk-vsv.de/reach/schulungsinhalte-reach-diisocyanate/

On BAuA website, the corresponding training documents state:

“Developing the training concept and training materials is the sole responsibility of the producers' associations.“



On the following training platform you will find so-called "Self-E-Learning" courses. Several languages are already possible:

<https://safeusediisocyanates.eu/>

After the training via this "e-learning" you will receive a corresponding training certificate, which is then valid for five years.

Further information on the BAuA website:

<https://www.baua.de/EN/Topics/Work-design/Hazardous-substances/REACH-assessment-unit/Diisocyanates.html>

Further information on the restriction of diisocyanates under REACH and a FAQ can be found here (only available in german):

https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Publikationen/DE/REACH/BAuA/Fachbeitraege/Kompakt_REACH_Beschr%C3%A4nkung_von_Diisocyanaten.html

Who is responsible for the training / proof of training?

According to legislation, the implementation of employee training is the responsibility of the respective employer. The costs incurred for the training are generally to be borne by the employer.

Sincerely,

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Disclaimer: We provide you with this information on a voluntary basis. They do not guarantee completeness. In principle, everyone who places hazardous substances on the market is responsible for compliance with legal regulations. For reasons of better readability, the generic masculine noun is used in general in the text. These formulations include females and males alike; everyone is of course addressed equally.