



Brussels, September 2019

Industry calls on the European Commission and Member States to adopt a REACH restriction as the most effective risk management measure for diisocyanates

ISOPA, ALIPA and major downstream associations (hereinafter called industry) **strongly support the principle of a REACH restriction including training obligations for workers** on diisocyanates. Such a restriction would complement existing efforts to protect workers from exposure to diisocyanates under OSH legislation and provide a level playing field for industry across Europe.

The European Chemicals Agency's Risk Assessment Committee (ECHA RAC) concluded in 2017¹ that "[...] the **suggested restriction is the most appropriate EU wide measure** to prevent new cases of respiratory sensitisation from exposure to diisocyanates by implementing harmonised training for the workforce".

A restriction including training obligations would be particularly important to raise awareness among workers of the sensitisation risks from both inhalation and dermal exposure to diisocyanates. As concluded by RAC, *"training measures are needed to raise the awareness for the importance of health protection by means of appropriate RMMs and safe handling practices."* Industry also agrees with RAC that the restriction would help *"harmonise the regulations related to industrial and professional uses of diisocyanates in all Member States"*.

It is important in industry's view that EU regulation follows the scientific recommendations developed by EU agencies and scientific committees. We are therefore calling on the European Commission and Member States of the European Union to **follow the regulatory route recommended by ECHA** and the approach to training as suggested by the dossier submitter BAuA on behalf of Germany. Industry experience, as highlighted in our previous input on the restriction (included here as Annex1) already shows that **training is the most effective Risk Management Measure** to reduce the number of occupational asthma cases from exposure to diisocyanates.

Industry has **invested significantly in developing a set of training materials**, including e-learning which would allow all Member States to provide harmonized and

¹ <https://echa.europa.eu/documents/10162/737bceac-35c3-77fb-ba7a-0e417a81aa4a>

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mutually recognized training across the European Union. In parallel, industry has engaged in ongoing dialogue with the European Commission and Member States to **explain the didactic approach taken to develop the training material and concepts for deployment.**

We remain convinced that, if appropriate solutions and requirements are put in place, a restriction based on harmonized training will be fully monitorable and enforceable. For example, mandatory and efficient record-keeping of workers training could reduce the administrative burden of checks and inspections to be carried out by Member State authorities. We are very much willing to engage in further discussion on how to support enforcement of the proposed restriction and reduce complexity where possible.

Finally, we would note that the Commission's 2018 REACH review² stresses the need to improve the interface between REACH and OSH legislation. Industry sees diisocyanates as a good opportunity to put this objective into practice. RAC has already concluded that a restriction based on training obligations would be the most appropriate Risk Management Measure. We would encourage EU regulators to take this into account when discussing how a restriction could strengthen the effectiveness of existing OSH initiatives on diisocyanates.

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About diisocyanates

Diisocyanates are substances used in the manufacture of polyurethanes. They are employed in a wide range of applications, notably for the production of flexible and rigid polyurethane foam, in some adhesives and sealants, in binders, in coatings, and for the production of polyurethane elastomers. Diisocyanates are processed during the production process of polyurethanes and are no longer present in the cured product.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2018:116:FIN>

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