

## PU Europe input on the 5 specific questions raised in the ECHA public consultation on the restriction dossier for diisocyanates

Brussels, 31<sup>st</sup> May 2017

### Final Version

#### **Question 1**

*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.*

#### **Answer**

PU Europe holds the view that a minimum of 6 years is needed to allow the sector, mainly the suppliers and importers of diisocyanates with the support of the rigid polyurethane foam manufacturers, to design and establish the structures and training modules required for all work forces in the EU.

Our industry believes that the development of the training modules for Measure Group 3 materials associated with strategies for their roll-outs should be given the highest priority in the transition period.

It is also our understanding that a transition phase at national level for actually implementing the training for all employees, which is time & resource consuming, will be added to this transition period. We would also favour prioritization in that context with the emphasis being put to MG3 and MG2.

#### **Question 2**

*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)?*

#### **Answer**

A constructive dialogue is needed between industries and national authorities. Whenever national associations exist, the best effort should be made to rely on those to develop and implement communication strategies towards the downstream users and SMEs in particular.

At European level, PU Europe will commit to play its part in communicating the requirements of the restriction to its membership (14 national association and 20+ EU based companies) via different communication channels like briefings to members, speeches during conferences/members' meetings, detailed information on our extranet....

#### **Question 3**

*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?*

#### **Answer**

Within our membership, many of our members' companies have developed and trained, i.e. using in-house trainings, their employees for the proper handling of diisocyanates for numerous years.

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In the last few years, PU Europe has developed a training module dedicated to spray foam PU rigid insulation applicators (Measure Group 3). This spray foam stewardship scheme has been supported at national level by several national trade associations with a great success.

With regard to the question proper on training methods, we can report that applying the “train the trainer” principle in companies (supplying MDI or performing a foaming process in a factory) has proven very effective. Concerning the way to give the proposed training duration, we advocate for a flexible approach notably for MG1 and MG2- on how the 4 hours, or 4 +4, are given to the trainees. From a company perspective but also from a target audience one, it is suggested to have trainees following part of the training course, go to the workplace, then finish off their training course and be evaluated. Such approach also allows for the trainer to tune/adapt the training to the trainees and should ideally have an “on the work” training. In addition, our industry calls for “blended learning” method to be allowed above MG1. Indeed, e-learning should also be possible for part of the MG2 and MG3 trainings. Furthermore, considering the advancement of social science and technologies, training methods should not be seen as static, notably since the actual training of the proposed restriction will be performed in the 2020-2030s period.

As a side comment to the training methods, workers falling under MG1 and MG2 should not be prevented from working if their certificates have not yet been granted. This is especially true for new staff, temporary workers or third party intervening at the company premises. A kind of “light” version, or “basics”, of the training should be given at the time of joining of this new worker to ensure basic safe working practice, and after a few days the rest of the training course must be followed by those workers. When a new worker joins the company (or any of the other type of workers above described), it will be very expensive to imagine setting up immediately a training course for him/her. Hence our call to allow e-learning or a more flexible approach for providing modular training within the MG itself.

Furthermore, to get the certificate (passing the exam but also receiving the proof of the evaluation), it should not be mandatory to go to an evaluation centre, and we recommend that the trainer is given the competences to carry out this task.

## **Question 4**

*Do you have an 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.*

## **Answer**

PU Europe has not received any evidence or information suggesting that isocyanate-related symptoms were observed with a product containing less than 0.1% diisocyanates.

## **Question 5**

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

## **Answer**

As stated in our answer to question 4, PU Europe believes that blended learning, a mix of e-learning and “on the work” learning, has a key role to play in reducing the burden of self-employed persons and SMEs in taking a training course. For that reason, MG2 and MG3 should permit this type of learning method.

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