

# BASA Bulletin

INFORMED COMMENT FROM THE BRITISH ADHESIVES & SEALANTS ASSOCIATION

## BASA to put together a series of short webinars for members



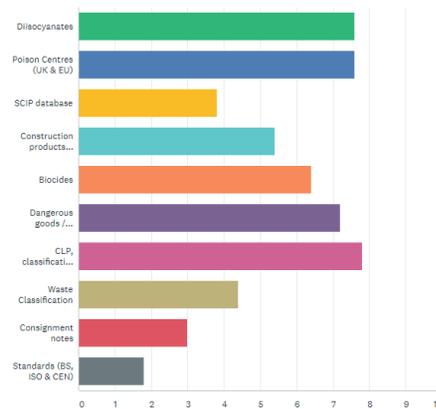
Proposed at a recent Technical Steering Committee meeting, BASA intends to produce a series of informative webinars and podcasts to guide members through a number of topics of interest. Our first webinar will be based on the recent Poison Centres notification webinar where we will be

taking you through the use of the ECHA Portal (date TBC), but we have a list of topics and a survey out for members (you can still take the survey here:

<https://basa.uk.com/News/ArticleDetails?articleId=947>).

These were the 10 topics we asked members to rank in order of importance:

- CLP, classification of substances
- Diisocyanates
- Poison Centres (UK & EU)
- Dangerous goods / transport
- Biocides
- Construction products regulation – EU & UK
- Waste Classification
- SCIP database
- Consignment notes
- Standards (BS, ISO & CEN)



Proposed topics by BASA members:

- UK REACH - access to ECHA data
- How UK REACH differs from EU REACH
- WTO tariffs
- Customs clearance
- Titanium Dioxide

If you gave a topic that is not listed please get in touch and let us know.

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## Open Industry Forum

As a result of the Corona virus, BASA has decided that face to face meetings are unlikely to be held in 2020. This will mean that the Open Industry Forum normally held in October/November each year will not take place.

We are currently looking at the option of holding a Zoom type short online Forum where we can update you all on the webinars available as pre-recorded sessions on the website and also give you all a short review of the key working group and regulatory issues and also the latest Brexit guidance.

The provisional date for this is 13th October 2020

# BASA Member support during COVID-19 crisis

Providing as much support for its members as possible has been BASA's aim during the coronavirus pandemic and we will continue to provide information and guidance and support as member companies come out of lockdown. We will all need to get used to working in a different way and we are here for our Members to support them.

As many of the Members know, the BASA Secretariat has always been managed out of a home office and so we are well used to remote working so have been able to maintain this 'head office' function throughout lockdown, providing advice and member support over the phone and by email. Meanwhile our website has become a vital source of information the latest government guidance and how to access financial support. It has been a source of general information about the crisis, as well as specific information and guidance targeted at the chemicals manufacturing sector.

Our automatic email notification system continues to send out weekly and bi-weekly emails to members, providing a wide source of information and guidance and we are working on out social media activity to ensure that we post key highlights from the website postings on LinkedIn and Twitter. We will monitor the success of this increased activity over the next few months and let you know how successful we are.

BASA's Lorna Williams, Executive Officer and General Secretary said:

**“ During this period, I think our members have come to recognise the real value of having a proactive trade association.**

**It has been a very difficult and worrying time for everyone in the flooring industry – and we're not out of it yet. We have seen our role as providing critical support for our members. This has also led to an increase in membership applications, which is very gratifying.”**

**“It should also be noted that we have managed to keep our regular work on behalf of the industry going as well. For instance we are about to launch a new BASA Technical Guidance Note on the Specification and Application of Screeds and we have also posted on our website two new publications in digital page-turner format – Resin Bound Systems for External Applications and the Guide to Cleaning Resin Floors. We have also kept our regular monthly E-news going, which contains a wealth of information beyond the current crisis, such as our new apprenticeship schemes, member news and details of the latest member benefits.”**

BASA was intending to hold its 37th Annual General Meeting alongside our annual industry lunch and Open Industry Forum in March at the historic SS Great Britain in Bristol, however BASA Council took the decision to cancel the event and the official proceedings of the AGM were carried out by correspondence. Over 60% of the membership participated in the online voting, enabling BASA to continue to function in these difficult times. We intend to hold the 2021 AGM and Industry Lunch on March ?? 2021

**“We are sure that members and the whole industry will understand and support the decision which we have taken,” said Mark Spowage.**

**“There is simply too much uncertainty around the original November date to enable us to proceed. Our principal concern is for the safety of everyone attending the Awards and all those involved in the event in any way, so we feel this is the best option – and we now look forward to seeing everyone next summer, when our Awards can take place with the same quality, style and success that we have enjoyed over many years, with the added bonus of some warmer weather. We hope that all our members, friends and family stay safe and well and we thank you for your continued support.”**

# Polymers under REACH

It is not clear how the UK intend to deal with this topic, but we continue to actively work with FEICA and BASA's Consultant Caroline Raine is looking to start a list of polymers of interest to BASA members to be able to feed in to the work and also to be able to alert members if there is any upcoming legislation that will impact the sector.

## Background

Polymers are intrinsic backbones for the adhesives and sealants sector. The versatility of polymeric materials is due to the fact that the physico-chemical properties of polymers can be tailored by a careful adjustment of the composition and molecular weight distribution of the molecules constituting the polymer. Owing to the potentially extensive number of different polymer substances on the market, and since polymer molecules are generally regarded as representing a low concern due to their high molecular weight, this group of substances is currently exempted from registration and evaluation under REACH.

Polymers may however still be subject to authorisation and restriction.

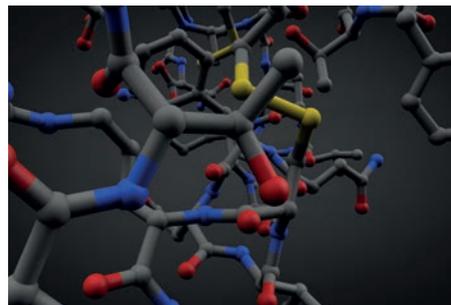
Manufacturers and importers of polymers may still be required to register the monomers or other substances used as building blocks of the polymer, as these molecules are generally recognised as of higher concern than the polymer molecule itself.

Article 138(2) of REACH provides for an ongoing review of the "risks posed" by polymers, with a view to identifying those that display equivalent concern to other substances. This clause has acted as a trigger for a number of studies requested by the European Commission. The first was conducted in 2012 by RPA, which sought to gain an overview of the polymer sector and the hazards and risks associated with it.

In 2014, Bio-Intelligence was commissioned to assess the potential for grouping polymers (to reduce the sheer number to be considered) and criteria to define "polymers of low concern."

This principle had been adopted in other parts of the world, although not with the same sensitivities about specific polymer identity issues. Bio-Intelligence was therefore able to assemble a significant body of information on approaches adopted elsewhere, although this only tangentially addressed the central issue facing REACH.

In the Commission's latest initiative, a further study has been launched to determine the criteria for "polymers of concern." This clearly plays more closely to the agenda identified under Article 138(2) but stresses even more the need for clarity on how polymer substances are identified. It will not be possible to gloss over the identity issue as may have been possible for "polymers of low concern."



Commission ideas:

- Find criteria based on hazard properties and exposure for deciding whether a polymer is of concern or not;
- Look at ways of grouping polymers (or substance ID for polymers); and
- Find the appropriate information requirements for polymers of concern (also in the function of tonnage bands).

## Conclusions

REACH imposes a level of substance specificity on chemicals not seen in other comparable regulations. When applied to polymers, any assessment under Article 138(2) will require very clear guidance on how a substance is identified. While thermoplastics are the dominant form in terms of volume, thermosetting and other reactive polymers are dominant in number. Dealing with the naming of reactive systems will be a key issue, which is likely to require going beyond the existing CAS framework. Industry experience suggests that discussions on polymer identity at substance level may take much longer. The challenges are very different to those posed by the wider plastics discussion, which is focused solely on physical characteristics.



## University of Bolton announces collaboration with **Bondloc UK**

The University of Bolton has 'bonded' with leading adhesives and sealants company Bondloc UK Ltd which will help students to learn the latest in motorsport industry techniques.

The University's National Centre for Motorsport Engineering (NCME) says that the exciting collaboration will:

- Allow future developments applicable to the motorsport industry to be discussed, trialed and tested by University of Bolton students.
- Further enhance the University's manufacturing capabilities by developing and testing assemblies and assembly methods through the supply of projects, product and support.
- Create research streams to develop collaboratively.
- Create industry standard projects for students to enhance their CVs.
- Allow the adhesive and surface treatment industry to be discovered and explored by UoB students.

Mark Busfield, Director of NCME, pioneered the motorsport engineering course at the University of Bolton with a dedicated team of Industry and academic specialists in 2017.

He said: "I am really excited that NCME is collaborating with Bondloc. This will be a great boost to our students' learning in preparation for them to enter an industry which is constantly at the cutting edge of new technological developments."

**Paul Nelson, Sales and Marketing Director of Bondloc**, said: "We are delighted to announce this close working relationship with the pioneering National Centre for Motorsport Engineering at the University of Bolton.

"The courses there are fantastic and equips the students for a career in a very exciting and technically fast-moving industry."

"It is great to know that Bondloc products will help to strengthen that learning process going forward."

## Do you use face masks at work?

During the Covid-19 pandemic testing of sealants and adhesives and other construction materials was limited for the team at 4Ward testing, however, with a forensic scientist on board and microbiological lab capabilities we were able to respond to the governments 'call for medical mask testing'.

4Ward Testing was able to convert laboratory space to the development of equipment and facilities for medical and surgical mask testing to EN 14683:2019 + AC:2019

- Section 5.2.3 Breathability
- Section 5.2.4 Splash Resistance in accordance with ISO 22609:2004
- Section 5.2.5 Microbial cleanliness
- Section 5.2.5 Bacterial Filtration Efficiency

The masks that we are currently testing are manufactured all over the world and being tested by manufacturers and end users alike to check their suitability and certification before being used in hospital, shops, and production lines to name a few . All tests to these specifications will be carried out with traceable calibrated instrumentation. We have also applied for UKAS certification and hope to gain full accreditation by the end of the year.

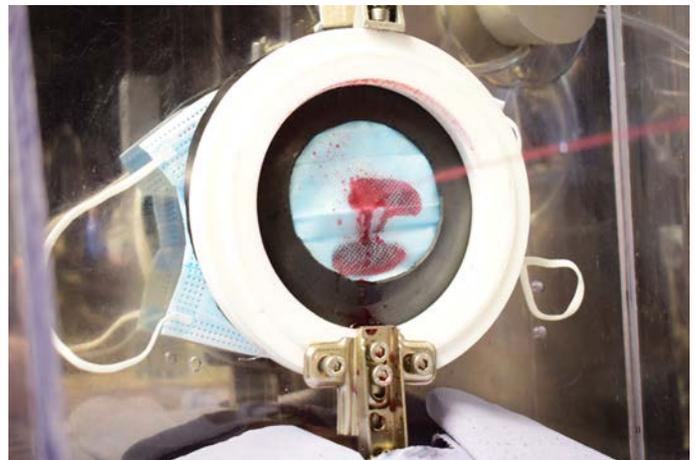


The tests:

Bacterial Filtration Efficiency, to BS EN14683:2019+AC:2019 Section 5.2.5, is a measure of the resistance of a material to bacteria penetration. The results are reported as percent productivity and are related to the fabric's ability to

resist bacterial penetration. The test is used to determine the amount of infective agent that is retained by the face mask.

The Splash Resistance test to EN 14683, in accordance with ISO 22609:2004, enables a fixed volume of synthetic blood to be directed at high velocity at the centre of the mask (32 masks are required for each test of which 29 are required to pass). The evaluation of a pass/fail is dependent on the velocities of the synthetic blood and the penetration that is observed following the test. The velocities correspond to a blood pressure at 80, 120 and 160 mm Hg. Breathability of masks is calculated by the differential pressure reading when a flow rate of air at 8L/min is passed through it; this highlights the ease of breathing through the mask



Microbial cleanliness is a measure of the total bioburden per individual mask and based on the mask weight in total bioburden per gram. 5 masks are washed in a peptone solution before 100 ml of the liquid is drawn through a filter which is placed on agar media for incubation of any colonies which will all a CFU (colony forming unit per gram) to be calculated.

We are delighted with our new venture and development of our capabilities which runs alongside our sealant and adhesive laboratory. All our team are back at work and it is business as usual for us in West Sussex. Should you require any product testing please do not hesitate to get in touch.

# Standards

## Standards and Brexit

BASA and BASA Members are heavily involved in the standardisation process. Our adhesives and sealants have to meet or be tested using global standards, that could be British Standards, European Standards (EN) or International Standards (ISO).

There is increasing uncertainty about the new government commitment to the single standards model and we are already seeing the 'downgrading' of UK status at CEN. Latest information from the US trade negotiations has highlighted the issue of US standards being classed as international standards, and therefore this raises the possibility of degrading the importance of BS/EN, which is a concern where the US standards are at a different performance level. The UK have already been demoted to the next level down as a non-EU member state.

## Standards and COVID-19

ISO 140001, 9001 & 18001 have all moved to remote auditing. Our experience is that the remote process seems to work well, and this is certainly better than postponing the auditing to a later date.

# Dangerous Goods Safety Advisers

## COVID-19: what happens to the DGSA exams?

As a result of the COVID-19 virus a multilateral agreement has been introduced and the UK has signed in. Multilateral Agreement M324 concerning driver training certificates in accordance with 8.2.2.8.2 of ADR and safety adviser certificates in accordance with 1.8.3.7 of ADR.

Multilateral agreement M324 expires on the 1 December 2020 and has been signed by the following countries Luxembourg, Germany, Austria, Norway, France, Ireland, San Marino, Netherlands, Czechia, Switzerland and the UK. The multilateral agreement allows those ADR drivers and DGSAs whose qualifications expire between 1 March 2020 and 1 November 2020 to remain valid until 30 November 2020. So, you will have an extension until 30 November 2020.

By derogation from the provisions of the first paragraph of 8.2.2.8.2 of ADR all driver training certificates the validity of which ends between 1 March 2020 and 1 November 2020 remain valid until 30 November 2020. These certificates shall be renewed for five years if the driver furnishes proof of participation in refresher training in accordance with 8.2.2.5 of ADR and has passed an examination in accordance with 8.2.2.7 of ADR before 1 December 2020. The new period of validity shall begin with the original date of expiry of the document to be renewed.

By derogation from the provisions of 1.8.3.16.1 of ADR all certificates of training as safety adviser for the transport of dangerous goods the validity of which ends between 1 March 2020 and 1 November 2020 remain valid until 30 November 2020. The validity of these certificates shall be extended from the date of their original date of expiry for five years if their holders have passed an examination in accordance with 1.8.3.16.2 of ADR before 1 December 2020.

## DGSA Examination Venue Availability

The Scottish Qualifications Authority (SQA) as the agent for the Department for Transport (DfT) have delayed enrolment for 17 September 2020 examinations until 03 August 2020. More information can be found here. Following the cancellation of DGSA exams on 11 June 2020, we will monitor the situation. Currently, most venues booked for the September DGSA exams are closed and we are not aware of their plans for reopening.

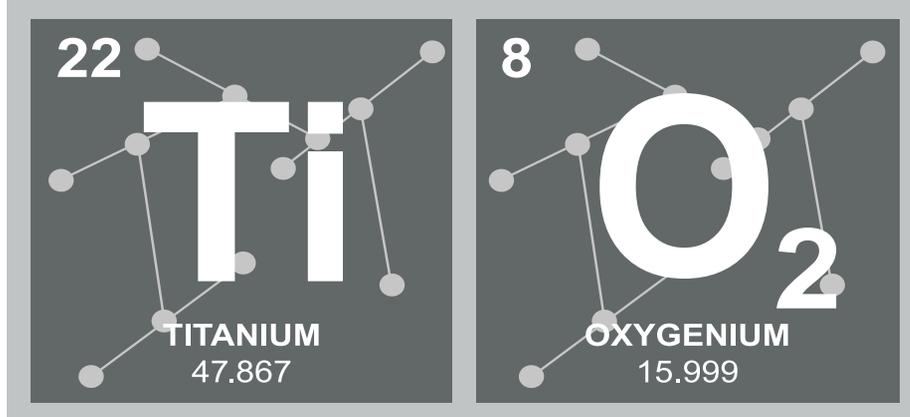


# Poison Centres

We are aware of a request from Greece for a 6-month delay to the 1st January 2021 registration deadline. They are seeking support from the other EU-27 MS, but BASAs contact with H&SA in Ireland indicates that they would not support a delay.

The Irish H&SA state that the harmonised system will reduce their workload and they have confirmed that the set annual retainer fee issued by the National Poison Centre Ireland permits the use of their emergency telephone number in section 1.4 on the products SDS & is not charged per notification. It will still be a requirement for companies to register with the poison centre & pay the annual retainer fees in order to use the poison centres emergency number on the SDS

As the REACH Annex II update means that all SDS will need to be updated by the end of 2022, this would now seem to be a sensible date to work to for all implementation?



## Titanium Dioxide – action to annul harmonised classification as a Cat 2 Carcinogen

On 13 May 2020, Member Companies of the Titanium Dioxide Manufacturers Association (TDMA) as a part of a wider group of titanium dioxide (TiO<sub>2</sub>) producers and users submitted an action in annulment to the General Court of the European Union against the harmonised classification of TiO<sub>2</sub> as a suspected carcinogen (cat 2.) by inhalation under the EU's Classification and Labelling (CLP) Regulation.

The appeal challenges the legality of the classification adopted by the European Commission on 4 October 2019 and requests its annulment.

The appeal demonstrates that there is no reliable, acceptable or available data to suggest that TiO<sub>2</sub> causes cancer. It also shows that the classification was adopted in breach of the Commission's duty of care and several principles of EU law, including the principles of legal certainty, proportionality and the right of interested parties to be heard.

The decision of the General Court is expected to take 2 to 3 years and therefore will be after the classification comes into force on 1 October 2021. In the meantime, TDMA and its members will focus on finding a way to implement the regulation from that date despite the uncertainties of the classification.

Download the statement here: [TDMA- Statement- Legal action against the classification of titanium dioxide](#)

### Hazardous Waste implications

BASA are concerned about how the reclassification or EUH phrases will suddenly create a huge amount of hazardous waste. Under WM2 product is considered more hazardous when dry, so this may be a huge issue when all construction waste which has been painted would be classed as hazardous. It is also not clear what users are you going to do with their 'empty' bags?



# A sustainable future for the Adhesives and Sealants Sector

## Compostability / Biodegradability

BASA are looking at whether to develop some education material or guidance relating to compostability and biodegradable on the BASA website

## Sustainability Issues Map for BASA Members

BASA are currently developing an interactive pdf document to provide details of the current Circular Economy and Sustainability issues affecting our sector. This will be a living document looking at where BASA members can get guidance and useful information and also to tie in with the regulatory and strategic ideas around the topic.

Why not join the BASA Environment and Sustainability Working group to help shape the direction of the work?

# Sustainability of paper and packaging adhesives

There was a FEICA TTF SRAPPA (sustainability and recycling of adhesives in paper and packaging adhesives) WebEx in June and the issue of paper recycling and adhesive re-dispersibility or solubility was discussed as there are currently no national or industry standard test methods. FEICA are looking at options to develop a universally recognised method, but there is a requirement to define what is meant by re-dispersible or soluble.

## Diisocyanates

On 4 February, the REACH Committee voted in favour of the European Commission's proposal for a REACH restriction on diisocyanates. The restriction will introduce mandatory training requirements for workers using diisocyanates. This is in line with the opinion delivered by ECHA's Risk Assessment Committee, which confirmed that mandatory training is "the most appropriate EU-wide measure to address risk in terms of the effectiveness, in reducing the risk, practicality and monitorability" associated with diisocyanates.

We believe that publication of the legislation required is likely to be postponed until September as a clerical error caused delay (25th May

**< 0,1 %**  
OF CUMULATIVE DIISOCYANATES CONCENTRATION:

- users are not affected
- only very few product/use combinations

**< 0,1 %**  
OF CUMULATIVE DIISOCYANATES CONCENTRATION:

**TRAINING REQUIRED**  
Risk for exposure requires specific training of users

- Information on how to get access to the course should be communicated throughout the supply chain
- Operators placing these substances and mixtures on the market must ensure that training courses are available to the recipients of such substances or mixtures
- Training should be provided to industrial and professional users
- A transition period of three years was considered appropriate to allow the concerned workforce to perform the required training in the current draft

to Council and Parliament). It is likely to be formally adopted early September with a 3-year transition period.

It is unclear at this time whether the UK will mirror this, as we are aware that HSE already feel that the risks are adequately controlled. In any case we are active in the FEICA work to develop training, and the

majority of A&S users won't need to go beyond the basic level. We therefore feel that the scope for classroom training is limited. There is also the probability that users will expect that the suppliers will give the training for free.

Keep an eye on the Health and safety page of the BASA website for the latest information.

BASA Bulletin ONLINE is our online only newsletter for the British and Irish Adhesives and Sealants Association, to be circulated to members inbetween our 2 yearly printed bulletins in order to continue to find ways to keep members updated on all news throughout the year. Thank you to members for your company stories and please continue to share your news with us which we will share across all our media platforms.



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