

# BASA Bulletin

INFORMED COMMENT FROM THE BRITISH ADHESIVES & SEALANTS ASSOCIATION

## Dealing with Brexit

We are now starting to see more information being published and a more active post-EU campaign being run in the press and Manufacturers are being asked to start preparing for the 1st January 2021. This is not as straightforward as it seems due to the need to publish the UK Statutory Instruments to take on all of the current legislation handled by the EU.



The added complication is that because there is currently no deal on things like free trade or mutual recognition with the EU, it means that all of the guidance assumes no deal. Thus, BASA needs to advise members that whilst what we are advising is legally correct in terms of current legislation, then if we believe that a deal will be done by 31st December 2020, this may mitigate against some of the more onerous procedures and costs.

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### Save the date 13th October 2020! BASA Virtual Open Industry Forum

See the back page of this issue (page 8) for details about our VIRTUAL Open Industry Forum and to **send in your questions!**

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## BASA remain full FEICA members

From 1st January 2020 business as usual

One of the great benefits for all BASA Members is the option to sign up for the FEICA Extranet. As an employee of a BASA Member Company you have FEICA National Association Membership and access to the Extranet Members only area and also an option to sign up for the automatic email notifications. This is going to be important over the coming months as we head towards the 31st December end of the EU exit implementation period. Whilst we aim to give you as much information as possible, it is still going to be useful to compare this with an EU view of the processes and procedures needed to continue business with our closest neighbours.

Talking about information, it is probably also a good time to tell you about the various changes to the FEICA Offices that have occurred over the last few months. We probably ought to have mentioned in the last BASA e-Bulletin, that on 6 May 2020, it was announced that FEICA had appointed a new Secretary General following Philip Bruce's retirement. FEICA President, Roland Albers, wished a fond farewell to Philip on his retirement after his four-and-a-half-year term as Secretary General. He went on to say that the FEICA Executive Board unanimously appointed Kristel Ons as the incoming Secretary General of the Association with effect from 15 June 2020.



Kristel Ons with NAM competition winner Jana Kohn at FEICA 2019

# Obituary for Peter Curtis



It is with great sadness that we report the passing of Peter Curtis, ITAC Technical Manager on 30th July 2020 following a brief illness.

Peter joined Itac in 2016 after almost forty years specialising in polymer coatings technology, and the use of Epoxy and Urethane Chemistry following his graduation from the University of Bradford in 1977. He filled the role of Technical Manager, providing Itac with an exemplary knowledge and skills base which could be used to advise customers on a range of issues including formulation help, R&D, quality control, calibration of equipment, testing under ISO 9001, production, specification, and sales. Itac has been privileged to have benefited from Peter's knowledge and wisdom which will be very difficult to replace.

Peter will be missed for more than his technical expertise,

however. The spirit and passion he brought to his role was also exemplary and filtered through to those he took under his wing. He brought humour like no other into the workplace and was never one for mincing his words when it mattered! On the other hand, Peter was always available to lend an ear to anyone who needed support, whether this be in work, or in their personal lives.

Peter was a proud Yorkshire man and was often found with a huge mug of Yorkshire tea. He enjoyed cooking and would often prepare extra portions of stew or soup for staff to enjoy. Due to his Welsh heritage, Peter was a big fan of Welsh Rugby Union and, unknown to some, he was an accomplished church organist. He also enjoyed in-season shooting, cryptic crosswords, vegetable gardening and fish keeping.

Managing Director, Steve Farnworth comments: "Peter was

*a larger than life character that always had time for a joke or an anecdote. He was incredibly supportive of members of his team who he actively helped and encouraged to develop, using his immense knowledge and experience of the coatings industry. Peter will be greatly missed by all of us at ITAC and thoughts go out to his family at this difficult time".*





# MEMBER STORY: Adhesives Manufacturer Utilises Spare Production Capacity to Make Hand Sanitiser

**Itac's New Hand Sanitiser Product, Sanitac, will Boost the Supply Chain to Support the Covid-19 Crisis Response.**



**Bolton, Greater Manchester, UK:**

Itac Adhesives Limited today announced they have used their expertise and factory facilities to manufacture and supply a new hand sanitiser product. This comes at a time when our 5-a-Day essentials become 6-a-Day, to include the sufficient use of hand sanitiser in safeguarding our health against the Coronavirus. Itac plans to supply direct to local cleaning companies, cleaning product distributors, retailers, and other businesses, who will help to ensure workers and customers have all means necessary to safeguard themselves as the Covid-19 restrictions are eased.

Itac also plan to provide chosen local charities with some free hand sanitiser, to help them carry on the amazing work they do, whilst having every opportunity to keep their hands clean.

Don't forget to  
**sanitac**  
your hands!

01204 573736  
sales@sanitac-hand-sanitiser.co.uk

**SPECIAL OFFER**

**\*Exclusive 10% discount for all BASA members!**

Please login to the members area of the BASA website under General Content > Company Networking Promotion Area to receive the discount code.

\*Discount not available in conjunction with any other offer. Expires 30th Sept 2020.

Of the new hand sanitiser launch, Itac's Managing Director, Steve Farnworth commented, *"As things return to normal, we're seeing a new normal! One of the pervading pieces of advice which remains today since the start of the pandemic is to regularly wash our hands with soap and water or hand sanitiser. This will be the new norm before anything else for months, maybe even years! As people return to work and go about their everyday lives, we want to help ensure there are sufficient supplies of hand sanitiser in the local business community, to help minimise the risks of more people falling ill to, or spreading this dreadful disease."*

Features and benefits of Sanitac

include:

- World Health Organisation approved clear colourless liquid formulation including 75% alcohol and made to EN 1500 standards.
- 12-month shelf life from date of manufacture.
- Available in 150ml, 500ml, 1 litre and 5 litre bottles. Also 200 litre drums and 1,000 litre IBC's for bulk orders.
- Can be transferred to small volume liquid spray application containers for ease of use.

Sanitac is available now. More information on Sanitac can be found at [www.sanitac-hand-sanitiser.co.uk](http://www.sanitac-hand-sanitiser.co.uk), by contacting: [sales@sanitac-hand-sanitiser.co.uk](mailto:sales@sanitac-hand-sanitiser.co.uk) or by calling 01204 573736.

About Itac: Itac Adhesives Ltd are a specialist manufacturer of technical adhesives and coatings. They have continued to support their customer base who have remained operational during the Covid-19 Lockdown period, including those supplying the food and medical sectors.

**iTS** - intelligent technical solutions from



adhesives

# FEICA's comments on the Wood/PFA report regarding Polymers Requiring Registration

## Background

### Current regulatory status for polymers

Polymers are currently exempted from registration under Regulation (EC) No. 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). However, Article 138(2) of REACH foresees a possible further review of REACH to extend the registration requirements to polymers. If the risk posed by certain polymers can be proven and practical and cost-efficient ways of selecting polymers requiring registration (PRR) can be established, registration requirements under REACH will be extended to polymers.

### Wood/PFA report

To establish sound technical scientific criteria to identify PRR, the European Commission appointed the consultant firm Wood & PFA to prepare a study. As a result of this exercise, the report 'Scientific and Technical Support for the Development of Criteria to Identify and Group Polymers for Registration / Evaluation under REACH and their Impact Assessment' was published on 6 July 2020. The Wood/PFA report 'Scientific and Technical Support for the Development of Criteria to Identify and Group Polymers for Registration / Evaluation under REACH and their Impact Assessment' is available for download at:

<https://circabc.europa.eu/ui/group/a0b483a2-4c05-4058-addf-2a4de71b9a98/library/66d00cb2-aa0d-47f9-a4d3-42a12798d098/details>

FEICA welcomes the publication of the Wood/PFA report and would like to express its gratitude to the European Commission for the opportunity to provide comments. After a detailed analysis of the report, we have prepared a list of issues which we believe require additional consideration before any final decision is made. While fully supporting the comments on the Wood/PFA report submitted by Cefic and DUCC, FEICA invites the Commission to

**Understanding the impact of polymers' registration on competitiveness and innovation is critical**

Many FEICA companies manufacture or customise polymers, which results in new polymers that are currently exempt from REACH registration requirements (monomers have been registered). We would like to emphasise that these 'downstream customisations' are essential to meet end-user demands and to fulfil technical requirements (those of the user and those laid down by the regulations). The need to register such 'customised polymers' will completely shift the position of adhesives and sealants formulators from being mere downstream users to manufacturers of polymers.

FEICA and its members are concerned that, unless a suitable grouping approach is adopted, the cost of registering polymers might be excessive for the adhesives and sealants sector. This will have an impact on the capabilities of the industry to develop innovative new materials based on unique polymers. Some SMEs will not be able to bear the costs of registration and useful polymers, particularly with regards to sustainability/recyclability, might be completely withdrawn from the market.

FEICA believes that the cost/benefit ratio in the case of registration could become significantly worse than estimated in the Wood/PFA Report. For example, adhesives and sealants formulators might need to use external testing facilities to carry out required tests and might need to commission external consultants for example to write Exposure Scenarios. Enhancing competitiveness and innovation is one of the purposes of the REACH Regulation and, as such, should be considered by the legislator.

Adhesives and sealants are an essential component of many innovative products. In a fast-changing world that needs to adapt to a growing population and challenges such as climate change, adhesives and sealants are enablers for many sustainable solutions such as fixing insulation panels to houses, improving thermal efficiency of windows, enabling use of renewable materials in products and others. More about sustainability of adhesives and sealants can be found on the FEICA website: <https://www.feica.eu/our-priorities/sustainable-development>

## How could the risk to innovation and competitiveness be overcome?

### Exemptions

While being committed to human health and environmental protection, FEICA considers that certain exemptions from registration requirements should be foreseen in cases where no adverse effects can be expected. In particular, FEICA would like to invite the legislator to consider exemptions for polymer precursors and polymers from which monomers or ingredients cannot be separated. We have noticed that precursor registrations are not specifically mentioned in the report. In practice, polymers may be used as polymeric precursors.

In the case of industrial uses with no or minimal exposure, where precursors subsequently cure on application, such transient species should not be considered within the Exposure Scenario. Registration of such functional polymers should be re-considered.

Regarding polymers from which monomers or other ingredients cannot be separated without affecting the stability of the product, we think that the Wood/PFA proposal would lead to the registration of the polymer together with the ingredient. This would imply a duplication of efforts and costs as these ingredients will have been already registered under the current REACH requirements. Exemptions in such cases must be taken into consideration because the toxicological and eco-toxicological effects of polymers are generally lower than those of the corresponding monomers/ingredients.

### Reduced registration requirements

One key function of any risk assessment is to ascertain the risks associated with the reasonably anticipated uses of a chemical. Consequently, any inclusion of uses as a parameter in the criteria should be based on real scenarios.

Reduced requirements for polymers with low exposure hazard should be considered.

We think that risk/exposure-based criteria should be used to apply reduced registration requirements. We are not in favour of using risk-based criteria as a potential PRR criterion.

Furthermore, some polymers are already regulated under other pieces of EU legislation. For example, some polymers used within adhesives for food

packaging applications have already been evaluated under EU food contact regulations.

FEICA asks that polymers already evaluated according to existing legislation are subject to reduced data requirements, while also considering exposure.

### Avoiding legal uncertainty: addressing the safety net concept

The Wood/PFA report suggests that polymers suspected of presenting an equivalent hazard to a polymer requiring registration should also be considered as PRRs, even if they do not meet any of the established PRR criteria.

According to our understanding, this concept is not clearly defined and is in contradiction to Art. 138(2) of REACH, which requires a clear report on polymer risks and the need for their registration. The ambiguity of this concept could lead to polymers of low concern (harmless for human health and the environment) having the need to be registered.

FEICA thinks that the safety net concept as defined in the Wood/PFA report must be reconsidered.

### Key messages on the registration of polymers

#### FEICA recommendation for a grouping approach

FEICA believes that more details should be provided on how the grouping approaches presented in the Wood/PFA report would work in practice.

We cannot envision how, in all cases, a polymer could belong only to one group, as suggested in the Wood/PFA report. In practice, grouping overlaps will occur due to the wide range of polymer characteristics.

From the management point of view, a broad grouping approach would result in large consortia, with all the related logistical difficulties. On the other hand, a very narrow grouping might result in a financial burden for registration not bearable for SMEs, where individual polymers might have a short life cycle of less than three years due to the dynamic nature of the end market. Grouping for adhesives and sealants needs to be flexible enough to allow customisation of polymers.

FEICA supports a wide range or family approach for grouping instead of registration requirements for single polymers. In addition, we think that the regulation should include the possibility to opt out from a group.



## Requirements for the registration of polymers should be harmonised globally

The Wood/PFA report provides criteria for the identification of Polymers of Low Concern (PLC) based in schemes used in other jurisdictions, for example Australia or Canada. However, the report removes some of the exemptions applicable in other jurisdictions. FEICA would like to emphasise that, when possible, PLC criteria should be clear and harmonised globally to avoid distortions in competitiveness on the global market.

Global harmonisation is important to the European single market, which in turns allows the adhesives and sealants industry to provide citizens with safe solutions while maintaining competitiveness.

## Conclusion

The members of FEICA support the efforts of the Commission to develop a comprehensive regulatory framework for the registration of polymers under the REACH Regulation that will help to protect human health and the environment, without losing the competitiveness and innovativeness of the European industry.

We reiterate our commitment to assist in the development of such effective and cost-efficient regulation.

Registration of polymers should be foreseen only when a risk to human health and the environment has been proven. FEICA suggests the development of risk-based mechanisms to assess exposure of both human beings and the environment.

Due to the unique requirements of the adhesives and sealants industry, polymers used in these applications could be subject to high registration costs. This would have a significant impact on competitiveness and innovation.

Criteria to define PRR should be clear, scientifically sound and globally harmonised. Exemptions and reduced registration requirements, in applicable cases, should be considered by the legislator.

FEICA and its members have shared their comments to the Wood/PFA with the European Commission.

## FEICA publishes Position Paper on biodegradability and compostability of packaging adhesives

On August 12, 2020 FEICA posted their Position Paper on biodegradability and compostability of packaging adhesives. The paper is available on the BASA website under the Packaging adhesives WG area by clicking [here](#) (you must log on to the members area to access the document).



One of the focus areas of the 2015 EU Action Plan for the Circular Economy is plastics. Following the growing awareness of the packaging supply chain, the types of plastic packaging marketed as 'biodegradable' or '(home) compostable' has increased significantly and adhesives producing companies receive more and more customer requests regarding the biodegradability and compostability of their products.

The adhesives industry is committed to positively contributing to the transition towards a circular economy and is making considerable efforts to work with its supply chain to better understand and mitigate the possible impact of adhesives on recycling of plastics packaging.



## MEMBER STORY: BeardowAdams, Inc. sees almost 40% growth rate in fiscal 2019/2020

Global adhesive manufacturer Beardow Adams' US business has seen its most successful year to date, reporting almost 40% growth in the 2019/2020 financial year. This follows a growth rate of 20% the prior year.



BeardowAdams, Inc. – part of the Beardow Adams Group – saw a 5% increase in new customers which included several global consumer packaged goods companies in the most recent fiscal year which led to an increase in sales.

The company has since invested in two new sales personnel: Rob Harmening, Director of Sales, and Jimmy Linn, Regional Sales Manager.

Speaking of why he joined Beardow Adams, Rob Harmening said, *"I was impressed with Beardow Adams' track record of solving the most difficult problems for customers. They are an innovative and global organization, who is willing to invest and take a long-term view of things. Their speed of response and flexibility is what customers seek in a trusted resource that develops the right solution. The recent success of Beardow Adams, Inc. is the direct result of these principles."*

Established in 2012 by Beardow Adams founders Bob Adams and Nick Beardow, BeardowAdams, Inc. is located in Charlotte, North Carolina. The company's primary sales focus in the US is hot-melt adhesives to serve the packaging, labelling, product assembly and woodworking markets. Bob Adams stated, *"With our continued growth program in the US, our adhesives plant in Charlotte has grown from two production lines to four state-of-the-art lines capable of producing 66,000,000lbs to guaranteed specifications each year."*

Looking ahead, Eric Coveney, Head of Marketing at Beardow Adams, said: *"Our aim is to increase BeardowAdams, Inc.'s growth further through thought leadership, solving difficult customer problems and by focusing on our strengths, whilst keeping customer intimacy at heart."*

Global adhesive company Beardow Adams has grown from a single adhesive plant in the UK to six in five countries with the network to manufacture and supply speciality adhesives all over the world.

## MEMBER STORY: Chemique Adhesives publish Technical Paper

Polyurethane based adhesives can be formulated to give a wide range of properties that enable them to adhere to many substrates. There are many advantages to using them as well as a few limitations which must also be considered.



The objective of this technical paper is to provide a background to 1-part (1K) and 2-part (2K) polyurethane adhesive systems. This will include some basic chemistry and advantages and limitations of both systems. The issues that most often arise with polyurethane adhesives are usually due to one of the following reasons:

- Using an adhesive with a pot life that is too short for the conditions, such that the substrates are not assembled and under pressure within the pot life.
- Insufficient adhesive applied to substrate so there is not enough coverage to give a complete bond. If one of the substrates is porous this must be taken into account, as should the uniformity of the surface.
- For 1K systems if water misting is required, there is not enough water misting to allow the reaction to fully take place. This is suggested to be 7-10% of the adhesive applied.
- Not enough pressure within the press. Total surface area of substrate needs to be considered, such that the pressure is approximately 10psi.

You can view the full 1-PART AND 2-PART POLYURETHANE ADHESIVES Technical Paper on the BASA website or directly on Chemique's website here:

<https://www.chemiqueadhesives.com/en/the-latest/news-press/chemique-adhesives-technical-paper>

# FEICA Benefits for BASA Members continued

Kristel has been with FEICA for over ten years, previously as its Communications and Events Director, responsible for the organisation of the annual FEICA Conference & EXPO, internal and external communication, and was instrumental in the roll-out of FEICA's strategy. She served as Deputy to Philip Bruce for the last four years and has been very involved in all Secretary General duties since the beginning of 2020 to ensure a smooth transition to the new role.

As a result of these changes, and also the departure of Davina Gomez, on 28th May FEICA saw some new faces and roles (pictured on left).



**Isabelle Alenus**  
Communication Officer  
FEICA a.i.s.b.l.  
Communications



**Vicky Chatzivasileiou**  
Communication Officer  
FEICA a.i.s.b.l.  
Communications



**Jana Cohrs**  
Executive Director Regulatory Affairs  
FEICA a.i.s.b.l.  
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**Paula Diaz Rodriguez**  
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**Yanielle Garcia**  
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Office Manager



**Kristel Ons**  
Secretary General  
FEICA a.i.s.b.l.  
Secretary General



**Dimitrios Soutzoukis**  
Regulatory Affairs Manager  
FEICA a.i.s.b.l.  
Regulatory Affairs

## Dealing with Brexit continued

We are currently looking at UK REACH and UK CE Marking of adhesives and Sealants and intend to start producing sets of 'Scenario' documents to help BASA Members understand the current situation and the recommended actions to comply with legislation as it exists.

With UK REACH we will take a slightly different position as we have been informed that the government intends to extend the deadlines for submitting data under UK REACH transitional provisions subject to scrutiny by parliament and the devolved administrations. The updated guidance on the gov.uk website includes these extension dates rather than those currently provided in UK REACH legislation, and it is to those new extension dates that we will base our scenarios. We are very pleased to see one of the strong suggestions from BASA, through ACA that the UK follow the same tonnage band principals as the original EU REACH has been accepted and is contained in the new guidance (subject to legislative approval).

We will keep a close eye on this topic as we are getting lots of new information every week – so please continue to check the BASA website as we are constantly updating the information.

## BASA Virtual Open Industry Forum 13th October 2020

The title of the Autumn OIF is 'Dealing with Brexit' – and we are keen to ask members to send in their questions ahead of the date so that we can make sure we have speakers who can cover your areas of interest on the day.

To that end we have the following initial scenarios in development that we are working through to spark your thoughts.

All of these scenarios relate to what happens from 1st January 2021:

1. GB Manufacturers of EU CE marked construction product – not classified as hazardous under CLP  
Selling to GB, Selling to NI, Selling to EU
2. GB Manufacturers of EU CE marked construction product – classified as hazardous under CLP  
Selling to GB, Selling to NI, Selling to EU
3. EU Manufacturer of EU CE marked construction products – not classified as hazardous under CLP  
Selling to the UK, Selling to NI
4. EU Manufacturer of EU CE marked construction products – classified as hazardous under CLP  
Selling to the UK, Selling to NI
5. GB Downstream user of current EU REACH registered chemical registered to EU registrant
6. GB Downstream user of current EU REACH registered chemical registered to UK registrant
7. GB Downstream user of UK REACH registered chemical

### URGENT

Please have a think about areas which are causing you concern, or have questions on – please send this to us by the end of September to allow us to cover your topics.

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 keep members updated on all news throughout the year. Thank you to members for your company stories and please continue to send us your news which we will share accross all our media platforms.



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