

# BASA Bulletin

INFORMED COMMENT FROM THE BRITISH ADHESIVES & SEALANTS ASSOCIATION

## FEICA EPDs - a model for the future!

FEICA's model EPD's have now been running for a number of years and we are starting to see more UK interest in this use in this country.

**GREAT NEWS – the UK's departure from the EU will have no effect on BASA's Association Membership of FEICA**, so you will be able to continue to take advantage of FEICA's core European EPDs for adhesives and sealants.

Full details can be found here: <https://www.feica.eu/our-priorities/edps>

FEICA also has guidelines on how to calculate that your product is covered by a specific core Model EPD. These guidelines, together with a template for a declaration of compliance, are available for FEICA members by clicking on the 'request' link in table in the link above.

The validated Declaration of the core EPD entitles the holder to bear the symbol of the Institut Bauen und Umwelt e.V. It exclusively applies for products produced in Europe and for a period of five years from the date of issue. The core EPD may be used by FEICA members and their members provided it has been proven that the respective product can be represented by this particular EPD.

The "FEICA Model Environmental Product Declarations (Model EPDs)" for the adhesive and sealant industry will lead to significant cost and time savings for companies. Moreover, by expanding the range of products with Model EPDs, it will significantly increase the choice of adhesive and sealant products available to architects and green procurement bodies. It will give SMEs improved access to a market that is otherwise only available to some.

The validity of the FEICA Model EPDs will be extended by one year due to delays relating to COVID-19. The updated ones will be published in mid-2021. We will monitor the UK implementation of any requirements specific for the GB market.



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# BASA OIF BREXIT SPECIAL via TEAMS LIVE EVENT

Due to the effect that the COVID-19 pandemic is having on face to face events, we will be running our Autumn Open Industry Forum as a **Microsoft LIVE TEAMS EVENT on Monday 9th November.**

## **Final programme with confirmed speakers**

- 09:00 Registration and time to send in any questions before the webinar starts via chat function
- 09:30 Introduction by BASA Technical Officer Jim Palmer
- 09:35 BEIS introduction to current Brexit Status – Ryan Diggory, BEIS
- 09:45 UKCA Marking Presentation - Kate Pickering, MHCLG
- 10:10 Q&A UKCA marking
- 10:20 Break
- 10:30 UK CLP and BPR - Leo McDaid, HSE
- 10:50 Q&A UK CLP & BPR
- 11:00 Tariffs and rules of origin – Ryan Diggory, BEIS
- 11:20 Q&A Tariffs and rules of origin
- 11:30 Break
- 11:40 UK REACH - Alun Williams, DEFRA
- 12:10 Q&A UK REACH
- 12:20 EU Poison Centres Update - Caroline Raine, BASA
- 12:30 Final Q&A and wrap up
- 13:00 Webinar ends

Welcome to  
the live event!



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HERE**





# Bondloc UK announces national distribution agreement with MSC packaging

Bondloc UK, a British manufacturer of adhesives and sealants based in Bewdley, Worcestershire, has strengthened their UK distribution network by appointing MSC Industrial Supply as a national channel partner for their premium engineering range of adhesives and sealants.

**Paul Nelson**, sales and marketing director of Bondloc said: *"We are very excited to announce the appointment of MSC as a national distributor of our engineering adhesives and sealants. The growth in demand for our products in the UK engineering market has created the need to bolster our distribution network with a national distributor who has the infrastructure to service the whole of the UK market based on a comprehensive stock holding policy.*

*"MSC is supporting the manufacturing industry by re-framing what customers expect from their suppliers. Alongside next day UK delivery across the full range of our engineering adhesives; we are particularly impressed with their ability to support and improve manufacturing performance by delivering first-class engineering and technical support*

*and cost-saving solutions. Coupled with our extensive bonding experience spanning over 27 years, we look forward to working with MSC to assist UK manufacturing over the coming months and years."*

**Tom Coleing** product manager for MSC said: *"Now, more than ever, our customers face the challenge of trying to reduce the manufacturing costs of their products, whilst ensuring the overall quality is not diminished. Bondloc's comprehensive adhesive range will help customers control costs yet still ensure consistent, high-quality results. Their UK manufacturing setup means they have full quality control and are highly responsive to customer's manufacturing and adhesive challenges. Bondloc's offering aligns with our commitment to our customers to provide 'the right product at the right price at the right time.'"*

MSC has launched the complete range of Bondloc adhesives and sealants on their website [www.mscdirect.co.uk](http://www.mscdirect.co.uk), with a view to a further roll-out of the Bondloc range of structural adhesives later in the year.



APPROVED NATIONAL DISTRIBUTOR

**MSC** | BUILT TO MAKE YOU BETTER

Bondloc:  
[www.bondloc.co.uk](http://www.bondloc.co.uk)

MSC:  
[www.mscdirect.co.uk](http://www.mscdirect.co.uk)

# Vakpak: Extended producer responsibility – navigating the new packaging landscape

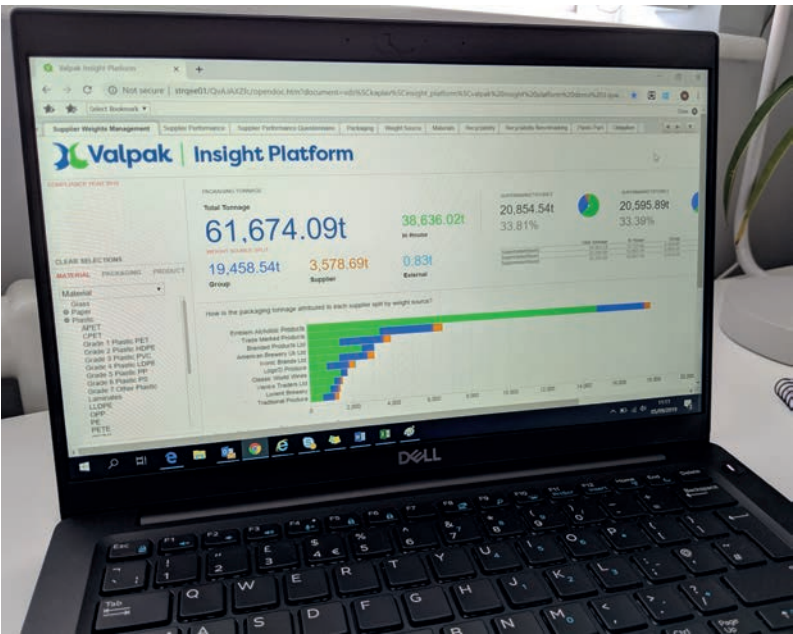
Since 1997, UK material suppliers, manufacturers and retailers have been obligated under the Packaging Waste Regulations. The legislation has successfully helped to take recycling from a standing start to the strong position we find ourselves in today but, in recent years, the focus has changed. Increasingly, we are looking to improve packaging materials and reduce their environmental impact, beyond the recycling of waste materials.

2023 will mark the greatest changes to UK packaging waste legislation since its inception in 1997. The new extended producer responsibility (EPR) regulations will have a huge impact, shifting the significant cost burden of collecting and recycling waste packaging from the taxpayer to the producers of packaging.

For some, EPR is a long overdue upheaval of packaging waste legislation that will hopefully reduce the prevalence of littering, fund nationally consistent waste collections and boost stagnating recycling rates. For others, EPR is seen more as a necessary evil that will see packaging producers finance the post-consumer management of packaging waste in the UK.

## Costs to businesses

The most visible change to the system will be to the



level of costs incurred by obligated businesses. It is estimated that current contributions cover only seven per cent of post-consumer waste management operations in the UK. Under the new rules, producers' compliance costs could rise ten-fold from 2023 and, potentially, higher, if businesses also incur costs under the proposed Deposit Return Schemes and Plastic Packaging Tax. However, the final decision on which areas of the supply chain will shoulder the main burden of costs has yet to be made.

## Preparation of data is key

For those in the packaging supply chain, the preparation of data will be central to mitigating the administrative headaches that EPR could cause.

Even those businesses that escape the rises in compliance costs are likely to see greater reporting requirements, which call for additional staff resources. Where packaging design changes are introduced, all areas of the supply chain will be implicated.

## Valpak can help

As the UK's first and largest scheme for packaging compliance, Valpak recognises the need to help producers



navigate these data challenges.

Our industry-leading E.P.I.C. database already holds data on over 20 million products. To help our members with the more onerous reporting requirements of EPR, we are updating it to handle even greater scales of data. We are also revamping our Data Insights Platform to transform members' packaging data into an easily interpretable, valuable resource that can drive packaging design changes.

### Make sure your voice is heard

Time to become EPR ready is increasingly of the essence. However, with many of the fine details still up for debate, the upcoming public consultation in 2021 is likely to be the final chance to have your say.

Add into the mix the COVID-19 pandemic and its seeming ability to speed up time in 2020, and it is perhaps of no surprise that my enduring message is that efforts to fully embed the polluter-pays principle into the UK's resources and waste sector in 2023 are drawing ever closer. All businesses must prepare accordingly if a success is to be made of this refreshingly ambitious policy initiative.

Valpak has run a series of webinars to prepare BASA members for the arrival of EPR legislation.

To view information from previous Valpak webinars, please contact:  
nicola.valentino@valpak.co.uk  
www.valpak.co.uk



# Croner

HR • Tax • H&S • Reward

📅 NOVEMBER 2020

## Webinar & E-Learning Schedule

Through your association membership, you have free access to any of Croner's Webinar & E-Learning sessions below:

THU  
5

EXCLUSIVE MEMBER-ONLY

### Your Questions Answered: The Biggest Issues UK Businesses Face

Thu, Nov 5, 2020 | 10am start

[Register your place →](#)

MON  
9

### What's New In Employment Law

Mon, Nov 9, 2020 | 2pm start

[Register your place →](#)

MON  
16

### Conflict Management & Mediation

Mon, Nov 16, 2020 | 2pm start

[Register your place →](#)

MON  
23

### Claiming The Job Retention Bonus – What You Need To Know

Mon, Nov 23, 2020 | 2pm start

[Register your place →](#)

MON  
30

### Getting a Grip on Harassment

Mon, Nov 30, 2020 | 2pm start

[Register your place →](#)

**All sessions are FREE through your association membership**

Through your association membership, you have access to free, specialist advice in all of these areas and wider business matters.

**Call 0844 561 8133 to speak to an advisor today.**

# UKCA marking update

## Construction Products Regulation from 1 January 2021

Businesses must prepare for the end of recognition of the CE mark in GB and affix the UK marking using a UK-recognised ‘approved body’ by 1 January 2022. Businesses will be able to use the UK mark from 1 January 2021, but to allow businesses time to adjust, some CE marked goods, that meet EU requirements, may continue to be placed on the UK market.

The government made a statutory instrument which will come into effect on 1 January 2021, however please note, the government proposes to amend this statutory instrument to take into account the effect of the Withdrawal Agreement and Northern Ireland Protocol. Further changes may be made if the UK and EU establish different arrangements under the future trade agreement. Any amended statutory instrument will come into effect on 1 January 2021 replacing the current statutory instrument

### Designated standards

All existing harmonised European standards will become UK ‘designated standards’. This will mean that immediately after the end of the transition period harmonised European standards and UK designated standards will be identical. The government will publish and maintain the list of these designated standards on a UK Database.

## Transitional provision for CE marked products already placed on the UK market

Under the terms of the Withdrawal Agreement, goods lawfully marked with the CE mark and placed on the EU market before the end of the transition period can continue to circulate until they reach their end user, whether they are in the UK or the EU.

### Market surveillance


The UK will have powers to carry out market surveillance and enforcement (Trading Standards in GB and Environmental Health Officers in NI) to ensure that non-compliant products can be removed from the UK market. The government is developing UK databases to support this work.


## Placing construction products on the GB market

Businesses must prepare for the end of recognition of the CE mark in GB and affix the UK marking using a UK-recognised ‘approved body’.


To provide sufficient time for businesses to transition to the new requirements, products can continue to be placed on the UK market without any need for reassessment or re-marking if EU requirements are met (including CE marking). Any third-party conformity assessment must continue to be carried out by an EU-recognised notified body during this time. Businesses must prepare for this provision to end on 1 January 2022


Now







From 1st January 2021 - 31st December 2021





1st January 2022





The UKCA marking can be used from 1 January 2021. However, to allow businesses time to adjust to the new requirements, you will still be able to use the CE marking until 1 January 2022 in most cases.

## Distributors

Distributors in the EU who bring products in from the EU to the GB market will, in most cases, now be classified as 'importers', bringing in products to the GB from a third country. This change in status will bring new obligations such as:

- a requirement for importers to label their products with their name and address
- ensuring that the assessment and verification of constancy of performance (AVCP) requirements has been carried out by the manufacturer
- the product must bear the conformity marking
- ensuring that the manufacturer has complied with their labelling obligations.

Multinational companies who currently transfer product from an EU-27 MS need to be aware of this change.

In some cases, there will be a requirement to apply the new UKCA marking to goods being sold in Great Britain immediately from 1 January 2021. You are encouraged to be ready to use the UKCA marking as soon as possible before this date.

Most adhesives and Sealants are AVCP level 3 (except products for fire that are subject to voluntary CE marking under the EAD) and for the purposes of simplicity this article only covers products subject to mandatory CE marking

## Timelines

### 1st December 2020

If your adhesive or Sealant is covered by a harmonised standard, then it is subject to mandatory CE marking to sell in Europe (EU-28) and will already be CE marked according to EU regulations. There are two possibilities regarding the data on which your DoP and CE marking are based:

1. Your product has a type test report from a UK Notified Body
2. Your product has a type test report from an EU-27 Notified Body

### 31st December 2021

Unless the EU and UK agree to a mutual recognition agreement (MRA), all UK NB currently listed on the Nando database will cease to be recognised as EU NB.

This means that new batches of your adhesive or sealant test reports issued by former UK NB may not be recognised as being legitimately CE marked after 31st December 2020.

Batches of adhesive or sealant currently on the market (ie manufactured and subject to contractual or commercial arrangements to purchase and supply) can continue to be sold.

### 1st January 2021

*Note: any former UK NB will become a UK approved body (AB) from 1st January and will retain the same 4 digit number that they held with the EU on 31st December.*

1. Any batches of adhesive or sealant placed on the market from this date, where the type test data has been carried out by a UK-based conformity assessment body will need to have a UKCA mark
2. Any batches of adhesive or sealant placed on the market from this date, where the type test data has been carried out by a EU-27-based conformity assessment body could continue to be placed on the GB market until 1 January 2022. At this point, the manufacturer would either need to retest with a UK approved body to affix UKCA marking to continue placing the product on the GB market.

**We will have MHCLG who take the lead on the UKCPR giving a presentation and taking your questions at the Virtual OIF to be held via Teams Live Event on 9th November 2020.**



# 2021 changes to ADR

## General Changes

On 1 January 2021, the 'European Agreement concerning the international carriage of dangerous goods by road (ADR)' will become the 'Agreement concerning the international carriage of dangerous goods by road (ADR)'. This is not because of Brexit, but because there are more and more countries outside of Europe becoming signatories to ADR.

There are only four new UN numbers;

- UN0511 - DETONATORS, ELECTRONIC programmable for blasting.
- UN0512 - DETONATORS, ELECTRONIC programmable for blasting.
- UN0513 - DETONATORS, ELECTRONIC programmable for blasting.
- UN3549 - MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS, solid or MEDICAL WASTE, CATEGORY A, AFFECTING ANIMALS only, solid.

## Chapter 1 changes

The information for the new UN numbers has been added into chapter 1, specifically in 1.1.3.6.2 and 1.2.3.6.3.

1.1.3.6.2 - In the first indent, replace "and 0500" by "0500, 0512 and 0513".

The two new UN codes (class 1), covered by the exemption of 1.1.3.6 without 1.10 provision.

1.1.3.6.3 - In the Table, for transport category 0, Class 6.2, replace "UN Nos 2814 and 2900" by "UN Nos 2814, 2900 and 3549".

In 1.1.3.7 b) Exemptions related to the transport of electrical energy storage and generation devices contained in equipment for its operation during transport.

The following extra text has been added. "except for equipment such as data loggers and cargo tracking devices attached to or placed in packages, overpacks, containers or load compartments which are only subject to the requirements in 5.5.4"

Also in Chapter 1 there are new definitions for;

- Dose rate.
- IAEA Regulations for the Safe Transport of Radioactive Material.

And the following definitions have been amended;

- Self accelerating temperature and self accelerating polymerisation temperature.
- Transport Index.

- Tank container/portable tank operator.
- Version numbers for GHS, Un Model regulations and Manual of Tests and Criteria updated.

Radiation level has been deleted.

In 1.4.3.3 The Filler the word maximum has been deleted, it now reads;

(e) He shall, during the filling of the tank, observe the maximum permissible degree of filling or the maximum permissible mass of contents per litre of capacity for the substance being filled;

And in 1.8.5 The unloader is now concerned by the accident report 1.8.5.4.

### 1.10.3.1.2

- A new entry for high risk dangerous goods.
- Add the following new row after 'Class 1, Division 1.5':

Class	Division	Substance or article	Quantity		
			Tank (l) <sup>c</sup>	Bulk (kg) <sup>d</sup>	Packages (kg)
1	1.6	Explosives	a	b	0

## Chapter 2

### 2.1.3.4.3

WASTE.

Used articles, e.g. transformers and condensers, containing a solution or mixture mentioned in 2.1.3.4.2 shall always be classified under the same entry of Class 9, provided:

- (a) They do not contain any additional dangerous components, other than polyhalogenated dibenzodioxins and dibenzofurans of Class 6.1 or components of packing group III of Class 3, 4.1, 4.2, 4.3, 5.1, 6.1 or 8 and
- (b) They do not have the hazard characteristics as indicated in 2.1.3.5.3 (a) to (g) and (i).

### 2.2.62.1.3

The definition of "Medical or clinical wastes" has been amended to read as follows:

"Medical or clinical wastes" are wastes derived from the veterinary treatment of animals, the medical treatment of humans or from bio-research;".

### 2.2.62.1.11.1

Medical or clinical waste containing:

Category A infectious substances shall be assigned to UN No. 2814, UN No. 2900 or UN No. 3549, as appropriate. Solid medical waste containing Category A infectious substances generated from the medical treatment of human or veterinary treatment of animals may be assigned to UN No. 3549. The UN No. 3549 entry shall not be used for waste from



bio-research or liquid waste;

Category B infectious substances shall be assigned to UN No. 3291

Note 1: the proper shipping name for UN 3549 is "MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS, solid".

Or

"MEDICAL WASTE CATEGORY A, AFFECTING ANIMALS only, solid".

## Chapter 3

### 3.1.2.8.1.4

For UN Nos 3077 and 3082 only, the technical name may be name shown in capital letters in column 2 of Table A of Chapter 3.2, provided that this name does not include "N.O.S" and that special provision 274 is not assigned. The name which most appropriately describes the substance or mixture shall be used e.g.

UN 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (PAINT).

UN 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (PERFUMERY PRODUCTS).

Table A has been updated with the new UN numbers;

- UN0511 - DETONATORS, ELECTRONIC programmable for blasting.
- UN0512 - DETONATORS, ELECTRONIC programmable for blasting.
- UN0513 - DETONATORS, ELECTRONIC programmable for blasting.
- UN3549 - MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS, solid or MEDICAL WASTE, CATEGORY A, AFFECTING ANIMALS only, solid.

For UN 3528, 3529, 3530 - Machinery, internal combustion or fuel cell, flammable liquid powered or flammable gas powered. Special provision SP 363 has been amended so that the second indent reads as:

"For carriage that includes passage through restricted tunnels, the transport unit shall display orange-coloured plates according to 5.3.2 and the tunnel restrictions according to 8.6.4 apply."

SP 376 Lithium batteries has also been updated

"NOTE: In assessing a cell or battery as damaged or

defective, an assessment or evaluation shall be performed based on safety criteria from the cell, battery or product manufacturer or by a technical expert with knowledge of the cell's or battery's safety features. An assessment or evaluation may include, but is not limited to, the following criteria:

- (a) Acute hazard, such as gas, fire, or electrolyte leaking;
- (b) The use or misuse of the cell or battery;
- (c) Signs of physical damage, such as deformation to cell or battery casing, or colours on the casing;
- (d) External and internal short circuit protection, such as voltage or isolation measures;
- (e) The condition of the cell or battery safety features; or
- (f) Damage to any internal safety components, such as the battery management system."

The following new special provision has been added:

"390 When a package contains a combination of lithium batteries contained in equipment and lithium batteries packed with equipment, the following requirements apply for the purposes of package marking and documentation:

(a) the package shall be marked "UN 3091" or "UN 3481", as appropriate. If a package contains both lithium ion batteries and lithium metal batteries packed with and contained in equipment, the package shall be marked as required for both battery types. However, button cell batteries installed in equipment (including circuit boards) need not be considered;

(b) the transport document shall indicate "UN 3091 LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT" or "UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT", as appropriate. If a package contains both lithium metal batteries and lithium ion batteries packed with and contained in equipment, then the transport document shall indicate both "UN 3091 LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT" and "UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT."



# 2021 changes to **ADR** continued

## Chapter 4

P801a has been deleted and P801 has been amended. It applies to UN Nos. 2794, 2795 and 3028 and used batteries of UN No. 2800

For Rigid outer packagings, wooden slatted crates or pallets the following text was added;

Batteries shall not leak under normal conditions of carriage or appropriate measures shall be taken to prevent the release of electrolyte from the package (e.g. individually packaging batteries or other equally effective methods).

For Stainless steel or plastics bins may also be used to carry used batteries the following text was added;

Measures shall be taken to ensure that filled bins cannot lose their content.

### 4.1.4.1, P903

"(5) For packagings containing both cells or batteries packed with equipment and contained in equipment:

a) For cells and batteries, packagings that completely enclose the cells or batteries, then placed with equipment in a packaging conforming to the requirements in paragraph (1) of this packing instruction; or

b) Packagings conforming to the requirements in paragraph (1) of this packing instruction, then placed with the equipment in a strong outer packaging constructed of suitable material, and of adequate strength and design in relation to the packaging capacity and its intended use. The outer packaging shall be constructed in such a manner as to prevent accidental operation during carriage and need not meet the requirements of 4.1.1.3.

The equipment shall be secured against movement within the outer packaging.

Devices such as radio frequency identification (RFID) tags, watches and temperature loggers, which are not capable of generating a dangerous evolution of heat, may be carried when intentionally active in strong outer packagings.

Note: For carriage in a transport chain including air carriage, these devices, when active, shall meet defined standards for electromagnetic radiation to ensure that the operation of the devices does not interfere with aircraft systems."

TP19 At the time of construction, the minimum shell thickness determined according to 6.7.3.4 shall be increased by 3 mm as a corrosion allowance. Shell thickness shall be verified ultrasonically at intervals midway between periodic hydraulic tests and shall never be lower than the minimum shell thickness

determined according to 6.7.3.4.

## Chapter 5

### 5.2.1.1

Amended to "The UN number and the letters "UN" shall be at least 12 mm high, except for packages of 30 l capacity or less or of 30 kg maximum net mass and for cylinders of 60 l water capacity or less when they shall be at least 6 mm in height and except for packages of 5 l capacity or less or of 5 kg maximum net mass when they shall be of an appropriate size".

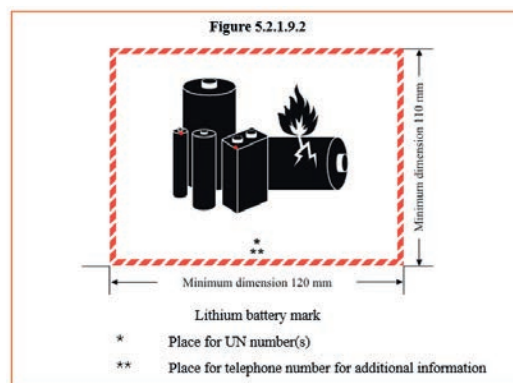
### 5.2.1.7.6

Added the following sentence at the end:

"Any mark on the package made in accordance with the requirements of 5.2.1.7.4 (a) and (b) and 5.2.1.7.5 (c) relating to the package type that does not relate to the UN number and proper shipping name assigned to the consignment shall be removed or covered."

In Figure 5.2.1.9.2

- Replace "120 mm" by "100 mm" and "110 mm" by "100 mm".
- In the last paragraph:
  - First sentence: replace "a rectangle" by "a rectangle or a square".
  - Second sentence: replace "120 mm wide x 110 mm high" by "100 mm wide x 100 mm high".
  - Fifth sentence: delete "/line thickness" and replace "105 mm wide x 74 mm high" by "100 mm wide x 70 mm high".



### 5.4.1.1.1 (k)

Amended to read as follows:

"(k) for carriage that includes passage through tunnels with restrictions for carriage of dangerous goods, the tunnel restriction code given in Column (15) of Table A of Chapter 3.2, in capitals within parenthesis, or the mention '(-)'"

### 5.5.3.4.1

At the beginning of the first sentence, "Packages" has been replaced by "Packages containing dry ice (UN

1845) as a consignment shall be marked "CARBON DIOXIDE, SOLID" or "DRY ICE"; packages".

The following new sub chapter has been added;  
5.5.4  
Dangerous goods contained in equipment in use or intended for use during carriage, attached to or placed in packages, overpacks, containers or load compartments.

- 5.5.4.1  
Dangerous goods (e.g. lithium batteries, fuel cell cartridges) contained in equipment such as data loggers and cargo tracking devices, attached to or placed in packages, overpacks, containers or load compartments are not subject to any provisions of ADR other than the following:
- (a) the equipment shall be in use or intended for use during carriage;
  - (b) the contained dangerous goods (e.g. lithium batteries, fuel cell cartridges) shall meet the applicable construction and test requirements specified in ADR; and
  - (c) the equipment shall be capable of withstanding the shocks and loadings normally encountered during carriage.
- 5.5.4.2  
When such equipment containing dangerous goods is carried as a consignment, the relevant entry of Table A of Chapter 3.2 shall be used and all applicable provisions of ADR shall apply."

**Chapter 6**

6.1.3.1 (e)  
In the text of the note explaining the asterisk, after the clock, the second sentence has been replaced with the following:  
"In such a case and when the clock is placed adjacent to the UN design type mark, the indication of the year in the mark may be waived. However, when the clock is not placed adjacent to the UN design type mark, the two digits of the year in the mark and in the clock shall be identical."

6.1.3.1.4 has been added in, it is confirmation of the practice already applied.  
"6.1.3.14 Where a packaging conforms to one or more than one tested packaging design type, including one or more than one tested IBC or large packaging design type, the packaging may bear more than one mark to indicate the relevant performance test requirements that have been met. Where more than one mark appears on a packaging, the marks shall appear in close proximity to one another and each mark shall appear in its entirety."

**Chapter 7**

7.5.11  
CV36 has been amended to read as follows:  
"If this is not feasible and packages are carried in other closed vehicles or containers, gas exchange between the load compartment and the driver's cab shall be prevented and the cargo doors of the vehicles or containers shall be marked with the following in letters not less than 25 mm high:

**"WARNING  
NO VENTILATION  
OPEN WITH CAUTION."**

**Chapter 8**

8.5, S1 (6)  
In the second paragraph under the list, "substances and articles shall be supervised at all times in order to prevent" has been replaced by "substances and articles, when subject to the provisions in 1.10.3, shall be supervised in accordance with the security plan in 1.10.3.2 at all times to prevent".

8.5, S16  
The second paragraph has been replaced by "In addition, vehicles carrying more than 500 kg of these substances shall, when subject to the provisions in 1.10.3, be supervised in accordance with the security plan in 1.10.3.2 at all times to prevent any malicious act and to alert the driver and competent authorities in the event of loss or fire."

8.5, S21  
The second sentence has been deleted and after the sub-paragraphs, a new paragraph has been added to read: "In addition, these goods shall, when subject to the provisions in 1.10.3, be supervised in accordance with the security plan in 1.10.3.2 at all times to prevent any malicious act and to alert the driver and the competent authorities in the event of loss or fire."

**Chapter 9**

9.1.3.4  
A new paragraph has been added after the first paragraph to read as follows:  
"The vehicle shall not be used for the carriage of dangerous goods after the nominal expiry date until the vehicle has a valid certificate of approval."





# The changing face of healthcare in the UK

Coronavirus has changed every aspect of our lives: how we work, how we shop and how we socialise.

It also appears to be changing how we look after our health. According to a recent national survey\* a growing number of people in the UK are considering taking out private medical insurance, with 27% of those polled saying they have thought about paying privately for healthcare, compared with only 15% before the pandemic struck.

The NHS response to the coronavirus outbreak has been heroic. The skill and dedication of hospital staff have saved many lives. But to enable the health service to meet the unprecedented demand caused by Covid-19, many specialist treatments and routine operations had to be postponed. And concern over lengthening NHS waiting times is the main reason why people are now thinking about taking out private medical insurance.

Of the 1,000 people questioned for the survey, three-quarters said it was long NHS waiting lists that were their main concern, while 67% were worried about the NHS being able to promptly deliver routine care. These concerns seem to be well founded as medical experts agree that the impact of the coronavirus pandemic on NHS services could be with us for some considerable time.

In June this year, health bosses warned it would take four years to restore the NHS services to pre-Covid levels. This will inevitably result in much longer delays for diagnostic tests, while it is feared the number of people waiting for operations could rise from 4.2 million to 10 million by the end of 2020.\*\* Moreover, these depressing forecasts don't take into account the further disruption to NHS services that a second wave of Covid-19 would cause.

Private medical insurance avoids the anxiety of having to wait months for tests and treatment. Outpatient and inpatient care are covered, with patients being able to choose where they are treated from a wide selection of private or NHS hospitals all over the UK. Patients whose care involves being admitted to

hospital overnight or for a longer period, can stay in a private room that has television and wi-fi, with relaxed visiting times for the convenience of family and friends.

Most providers of private health insurance offer a range of medical plans that can be tailored to meet individual and family needs. For a relatively modest financial outlay, more and more people are discovering that they can receive medical care when they need it and avoid the worry that comes from waiting for NHS treatment.

It's not just individuals who are turning to the private sector for their healthcare needs. Affordability and its growing popularity is why a rising number of companies and other organisations are offering private healthcare as a major employment or membership benefit.

Private health insurance cannot prevent you from falling ill. But it does offer the peace of mind that comes from knowing that in the event you do need medical care you will be diagnosed and treated in the quickest possible time. And in these uncertain times that is something that many people seem happy to pay for.

For further information and quotations contact HMCA by telephone on 01423 799949 or visit the exclusive HMCA British Adhesives and Sealants Association website here:  
<https://www.hmca.co.uk/basa>

*HMCA/S PLC (trading as Hospital and Medical Care Association, HMCA and HMCA Members) which is authorised and regulated by the Financial Conduct Authority (FRN:307587). HMCA/s PLC is a company registered in England, company number: 01362094, registered office: Beech Hall, Knaresborough, North Yorkshire, HG5 0EA.*

\* Consumer Intelligence survey

\*\* The Guardian 27 June 2020

[www.theguardian.com/society/2020/jun/27/itll-take-four-years-for-nhs-to-recover-from-covid-19-health-chiefs-warn](https://www.theguardian.com/society/2020/jun/27/itll-take-four-years-for-nhs-to-recover-from-covid-19-health-chiefs-warn)



# BASA Clinic

## Fridays at 10am

Microsoft Team link at [www.basa.uk.com/home/events](http://www.basa.uk.com/home/events)

13th November

CE/CA  
Marking

20th November

REACH & Poison  
Centres

WELCOME

27th November

Tariffs & Rules  
of origin

4th December

CLP & general  
Brexit questions

# Poison Centres update

## Poison centre portal

The poison centre portal has recently been updated to support amended Annex VIII solutions. In particular, derogations for fuels, construction products (standard formulas) and the cross-sector concept of interchangeable components.

ECHA explains that *"Improvements have also been introduced for the latest version of IUCLID and IUCLID Cloud assisting the user to prepare a notification. New features include a navigable and editable table of contents making it easier to explore through the notification data. Additional update reasons have been included such as 'expansion of market area' and a new picklist has been added to include justifications when the pH is not available.*

*The ECHA Submission portal now displays new messages about the status of the notification in the Submission report, and several new validation rules have been included to support the new solutions provided in the legal text, as well as adaptations resulting from the UK's withdrawal from the EU. Pre-prepared standard formula datasets will be made available for use for the construction products cement, gypsum binders, and ready mixed concrete from the poison centre website."*

The second amendment to Annex VIII of CLP has been adopted by the Commission and is expected to be published in November 2020.

## Country updates

Norway has become the 7th country that is now able to accept Annex VIII notifications. Also accepting them are Denmark, Estonia, Germany, Lithuania, Poland and Slovenia. The status of all countries can be found on the ECHA website: [https://poisoncentres.echa.europa.eu/documents/2284544/27487986/msd\\_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009](https://poisoncentres.echa.europa.eu/documents/2284544/27487986/msd_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009)

## Brexit

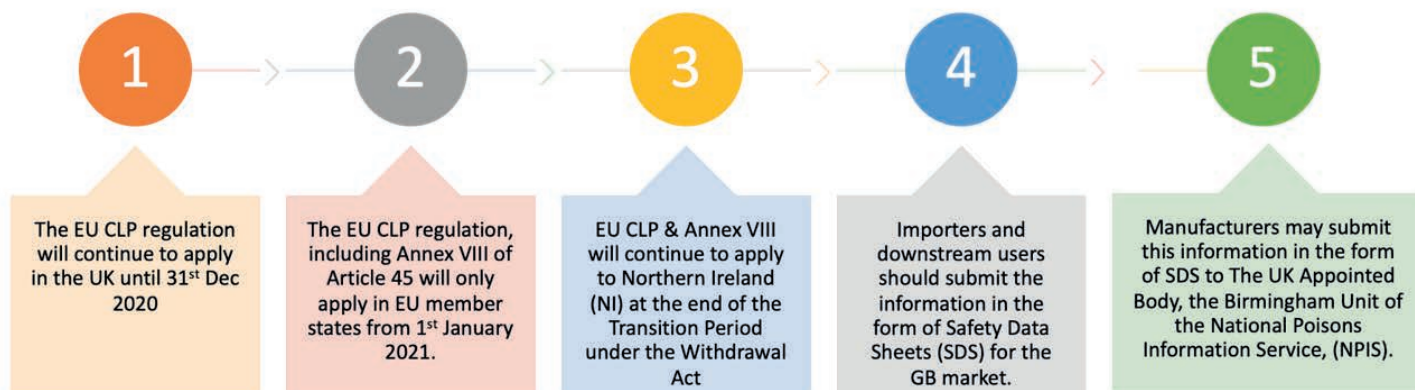
From 1st January 2021 the EU will no longer be an EU member state. This means that you will need to use an EU legal entity to make PC notification, in fact the obligation now lies with the importer, this may mean that your customer has the obligation.

There are several options available to you;

- You let your customer (the importer) do the notifications (share full comp, or the include your SDS and contact information)
- Use an EU legal entity to make the notifications and share your UFI with the customer.
- Use a third party in the EU to make your notifications.

UK based companies will not be able to make notifications via the ECHA harmonised submission portal. Notifications previously made by UK based companies will not be deleted but legally will be 'void'. So you won't have met your legal obligations. Poison centres are not transferable assets, but the substance and mixture data sets can be exported and reimported into the portal.

## UK Implementation



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

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