

# Issue Brief

## European Union REACH Activities Regarding the Use of Diisocyanates



---

**Contact:** Timothy Feeley  
**Email:** Timothy.Feeley@covestro.com  
**Telephone:** 412-445-0871  
**Date:** September 28, 2020

**Subject:** REACH restriction to ensure safe handling of diisocyanates at the workplace.

---

### Update on recent regulatory activities of European authorities regarding diisocyanates

On August 24, 2020, a restriction on the use of diisocyanates under the Registration, Evaluation, Authorization & Restriction of Chemicals (REACH) entered into force in the European Union. REACH is a regulation of the European Union that addresses the production and use of chemical substances, and their potential impacts on both human health and the environment. This restriction entered into force on August 24th, 2020. The main requirements are:

- The scope of the restriction includes isocyanate products and mixtures containing at least 0.1 % diisocyanates. Most of Covestro's isocyanate products branded DESMODUR are affected.
- Mandatory training for EU employees dealing with diisocyanates is the central element of this restriction for all industrial and professional workers. Training requirements and monitoring can be set out either by national occupational health and safety authorities and/or by industry, giving flexibility to Member States how they want to implement the restriction.
- Transition time for fulfilling the training requirement is 3 years. This means all employees dealing with products in scope have to be trained by August 24, 2023.
- Producers of diisocyanate containing substances and mixtures have to make training materials available in all EU languages and in three levels. Depending on the exposure level at workplaces, workers have to be trained according to
  - General training (basic level),
  - Intermediate training (depending on the application) and
  - Advanced training (some special applications or tasks).
- Additionally, the transition period for the labelling requirement on packages will be 1.5 years after entry into force, meaning that labels on packages will have to be in place by February 24, 2022. The labels shall display the information: "As from 24 August 2023 adequate training is required before industrial or professional use".

Producers of diisocyanates represented in the industry associations ALIPA and ISOPA, and downstream user associations representing the European PU-industry, are already working in the PU Exchange Panel to provide adequate training materials and a suitable infrastructure to distribute these within the required time frame.

Covestro actively contributes to the work of the PU Exchange Panel and fully supports a smooth and efficient implementation throughout the polyurethanes value chains.

The final text of COMMISSION REGULATION (EU) 2020/1149 regarding diisocyanates is available under the following link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1596534449847&uri=CELEX:32020R1149>

# Issue Brief

## European Union REACH Activities Regarding the Use of Diisocyanates



US companies already have similar responsibilities to provide training (e.g., hazard communication/personal protective equipment) to their employees per the Occupational Safety and Health Administration (OSHA) standards.

Product Safety and Regulatory Affairs North America is happy to provide safe use and handling information, including customer visits, as appropriate for your customers. For more information, visit our product stewardship website [Product Safety First](#).

We will come back to you with updated information as it develops. If you have any questions, please contact PSRA in your region. If your customers need further training or education around isocyanates or have questions on this restriction, our PSRA team would be happy to assist them in any way we can.

For more information about Covestro, visit [www.covestro.us](http://www.covestro.us).

### **Forward Looking Statements**

This document may contain forward-looking statements based on current assumptions and forecasts made by Covestro AG. Various known and unknown risks, uncertainties and other factors could lead to material differences between the actual future results, financial situation, development or performance of the company and the estimates given here. These factors include those discussed in public reports of Covestro and Bayer which are available on the Covestro website at [www.covestro.com](http://www.covestro.com) as well as on the Bayer AG website at [www.bayer.com](http://www.bayer.com). Covestro assumes no liability whatsoever to update these forward-looking statements or to conform them to future events or developments.

**September 2020**