

Information note

Isocyanates in the Coatings Industry

This note provides information on the REACH Restriction on di-isocyanates as relevant to the coatings manufacturing and using industries.

REACH Restriction

The EU REACH Restriction for diisocyanates¹ was adopted before the end of the EU Exit transition period and so will apply in both the EU and UK. Accordingly, a new UK REACH regulation² entered into force on 30 September 2021. This makes some changes to the EU diisocyanates restriction, mainly to make it operable in a GB-only situation.

Labelling and packaging requirements as of 24 February 2022

Unless the concentration of diisocyanates individually and in combination is less than 0,1 % by weight, either as a substance or in a mixture, the following statement:

“As from 24 August 2023 adequate training is required before industrial or professional use”
must be added and “visibly distinct from the rest of the label” to products (see Annex XVII 2(b)¹).

Manufacturers with long supply chains will need to ensure their labelling and packaging complies with the law as of 24 February 2022 so may need to take action now.

Training requirements as of 24 August 2023

The Restriction requires employers or the self-employed to ensure that industrial or professional users have successfully completed training on the safe use of diisocyanates prior to the use of the substance or mixture. There is no requirement for an accreditation or certification scheme to be put in place for the training. Training will need to be adequate, appropriate to the use of the substance (which includes any specific circumstances as to where it is used i.e. in GB) and in line with the restriction. (The training requirements are set out in paragraphs 4 and 5 of Annex XVII¹ of the restriction).

Suppliers must ensure that training relevant to the particular products they are supplying is available, but suppliers do not need to deliver or pay for the training themselves. The legal duty remains on employers to ensure that all users have successfully completed the required training before using the substance.

Any record that shows the user has successfully completed the required training before using the substance will help demonstrate compliance. However, providing information, instruction and training should be reviewed and updated whenever significant changes are made to the type of work carried out or to the work methods used.

The information contained in this publication is believed at the time of publication to be true and accurate. It is based on general principles and is intended for general guidance and information only. Its applicability to individual circumstances must be considered, having full regard to the specific prevailing conditions. All recommendations contained in this publication are made without guarantee. All liability for loss or damage however arising from use of the information provided in this guidance (whether directly or indirectly) is hereby excluded to the fullest extent permitted by law.

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¹ REACH Annex XVII, entry 74

² The REACH etc. (Amendment) Regulations 2021 (SI904:2021).