

# Résumé



European Resin Manufacturers Association Newsletter

SPRING 2013

## General Assembly Chairman's Message

Welcome to the ECS edition of Resume. Whether or not you are familiar with ERMA I would be grateful if you take a few minutes to look at this edition if you work within the polymer or resins industry. My statement in this issue deals mainly with the potential registration of polymers under REACH.

ECHA are now indeed actively considering polymer registration under REACH, as signposted during the initial phase of the REACH chemical legislation. To those of you exhibiting polymers and related products at this exhibition, but not involved in the details of European legislation, this development appears to raise important questions: There are thousands of polymers being exhibited at this exhibition; do they all need to be registered? How would reactive polymers and polymer dispersions or solutions be dealt with? How are resins categorised within the proposed scheme? Will it inhibit my company from launching new polymers? What is my company doing about it? In talking to many companies over the past year it is evident that even medium to large size resin producers are unaware of the ongoing developments.

These open questions are being hotly debated right now within ERMA and we are actively involved in the process as well. Currently there is a danger that polymer and resin definitions will be regarded too simplistically within the REACH framework and that this will result in unhelpful and restrictive legislation. The more complex category of resins is in danger of being caught up in this process.

ERMA is the independent voice of the resins industry. We are affiliated to CEFIC and are present on the CEFIC RTP (Resins Technical Platform) a group set up due to the above concerns within the organisation. Whilst playing an active role here, we maintain our independence. We also communicate important details directly to our members very efficiently and in a format which can be easily digested. This of course includes members who are not affiliated to CEFIC or other contributory organisations.

I would be grateful if you could circulate this issue to any colleagues within your organisation who are concerned with the impact of legislation on your business. No final decision regarding polymers has been taken so you would be welcome to work with us to influence the outcome to your benefit!

**David Graham ; Chairman Erma General Assembly**



## ERMA'S OBJECTIVES

- To develop a strong body of members throughout Europe, acting as the recognised 'Voice of Resins in Europe'
- To promote the interests of the European resins industry as determined by its membership.
- To provide the services required by its members
- To fund and administer its operations accordingly



### **Message from the ERMA Technical Chair: Dr. Houshang Kheradmand**

Chemicals have an important role in developing the modern world and improving the quality of life for mankind. However the awareness of Health, Safety & Environmental issues is essential for managing a sustainable chemical business.

*ERMA is committed to:*

- *Defending the interests of its members at the EU and National level*
- *Evaluating and commenting on chemical regulation trends (WW, EU and National) for European resin producers,*
- *Discussing and sharing information with the members.*

### **Did you Know?**

- *SMEs represent more than 95% of all chemical enterprises in the EU (~20,000 SMEs).*
- *The REACH Directive (1907/2006/EC) comprises 700 pages of text for the Regulation itself and over 1000 pages of technical guidance.*
- *REACH requires information from industry (testing, risk assessment of chemicals and tracability).*
- *Only about 9,000 (= 8%) of chemicals are sufficiently investigated with respect to human health and the natural environment.*

*continued ...*

- 31 May 2013 is the deadline for industry to register all phase-in substances manufactured or imported in the EU at or above 100 tonnes a year.
- 3052 is the number of 'new' phase-in substances to be registered for 2013.
- SVHCs (Substances of Very High Concern) need Authorisation.
- 138 is the current number of SVHCs on the Candidate List: (last updated: 19/12/2012)
- The identification of a substance as a Substance of Very High Concern and its inclusion in the Candidate List is the first step of the authorisation procedure.
- New regulations (European and National) have been adopted or proposed for nanotechnology, and ingredients present in the form of nanomaterials (uses, limitation, traceability & declaration).
- In Europe the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals is the CLP Regulations (Classification, Labeling and Packaging) of Substances and Mixtures.
- For substances the CLP classification is already mandatory as of December 1<sup>st</sup>, 2010 and for mixtures from June 1<sup>st</sup>, 2015.
- Products containing skin and respiratory sensitizers substances could be classified (2<sup>nd</sup> ATP).
- Toxication with chemicals & Eutrophication (nitrogen) are the key Environmental Water Problems.
- GPP (Green Public Procurement) as with the Ecolabel, is a voluntary claim.
- Conformity with EU Ecolabel's standard is verified by an independent organization (third party) following ISO 17011.
- The EU Ecolabel criterion for paints and varnishes is under revision.
- The European Commission is currently undertaking a comprehensive review of EU air policy,
- ETV (Environmental Technology Verification) is a new tool to help innovative environmental technologies reach the market
- Construction, decoration and furnishing products sold in France need to be labelled with an emissions classification on the basis of VOC emissions tests, (from Jan 1st, 2012 for all new products & Sept 1st, 2013 for products sold in the EU market "before Jan 1st, 2012").
- As of July 2013, manufacturers, importers, and distributors in France of substances intentionally manufactured in nano size, and in volumes of more than 100 grams per year, will be required to submit an annual declaration to the authority (non-compliance= penalties).

And more & more.....

**Joining ERMA is not only a membership, but an opportunity to know more about the issues**

## New Sub-categories for skin and respiratory sensitizers according to 2<sup>nd</sup> ATP CLP

– Maria van Liere, BASF

According to the new rules, they shall be classified either as category 1A (strong sensitizers) or 1B (other sensitizers) when there is enough information available. When the data is not sufficient for sub-categorization in accordance with the criteria these substances shall be classified as category 1 sensitizers. There is no difference in the labeling for the different categories with regard to pictogram, signal word or H-phrases. However, for mixtures which contain a strong sensitizer there is a lower classification and labeling limit (e.g. for solids and liquids 0.1% for Cat 1A substances versus 1% for Cat 1B and Cat 1 substances). In addition, the concentration limits in a mixture for elicitation (used for the application of the special labeling requirements to protect already sensitized individuals) is one tenth of the concentration limit for classification, i.e. 0.01% for Cat 1A and 0.1% for Cat 1B and Cat 1 substances (see table 2).

Component classified as	Warning on label	Labeling as sensitizer
Skin or Respiratory sensitizer Cat 1	Concentration 0,1 %	Concentration 1,0 %
Skin or Respiratory sensitizer Cat 1 A	Concentration 0,01%	Concentration 0,1%
Skin or Respiratory sensitizer Cat 1 B	Concentration 0,1 %	Concentration 1,0 %

Table 1.

In addition to this, the threshold for some biocides has been lowered as well. See table 2 for some examples.

Component classified as	As of 31.05.1999 § B.9 <sup>1)</sup> from 1999/45/EG	As of 01-06-2015 <sup>1</sup>
BIT	-	≥ 50 ppm
CIT/MIT	-	≥ 1,5 ppm
MIT	≥ 1.000 ppm	≥ 100 ppm

Table 2.

<sup>1</sup> Amendment (EC) 286/2011 of the Regulation (EG) 1272/2008.

These new rules have to be applied for substances from December 1<sup>st</sup>, 2012 and for mixtures from June 1<sup>st</sup>, 2015 at the latest.

# Classification and Labeling of Preparations and impacts on Downstream Users – Maria van Liere, BASF

For many decades we have used chemicals all over the world. However, it is also recognized that chemicals may pose risks that should be indicated throughout the supply chain. Many countries have developed systems for providing information on hazardous properties and control measures of chemicals aimed at ensuring their safe production, transport, use and disposal. Unfortunately those systems do not show the same hazard information. Additionally, these systems are currently not compatible with each other and often require multiple labels and Safety Data Sheets for the same product.

To align all these different systems into one system the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) has come into place. The GHS provides a basis for harmonization of rules and regulations on chemicals. In Europe this GHS has been adopted into the Regulation on the Classification, Labeling and Packaging of Substances and Mixtures (CLP)

The Regulation replaces over time two previous pieces of legislation, the Dangerous Substances Directive (DSD) and the Dangerous Preparations Directive (DPD). There is a transition period until 2015.

For substances the CLP classification is already mandatory as of December 1<sup>st</sup>, 2010.

For mixtures the CLP classification will become mandatory as of June 1<sup>st</sup>, 2015.



The CLP Regulation will introduce some changes compared to the former European DPD/DSD.

1. Risk and safety phrases will be replaced by Hazard and Precautionary statements.
2. Hazard symbols will change. The orange symbols will be replaced by red framed diamonds.



3. Europe has introduced additional EUH-statements to fill the gap between the former DSD/DPD and GHS. These EUH-statements are only obligatory within the EU.
4. The GHS classification criteria for hazardous products results in a more severe classification scheme compared to the former DSD/DPD.

Example of more strict classification criteria for Oral Acute toxicity.

EU DP	T <sup>+</sup> - R28	T - R25	Xn - R22				
LD <sub>50</sub>	≤ 5	5 - 25	25 - 50	50 - 200	200 - 300	300 - 2000	2000 - 5000
GHS	Cat 1	Category 2	Category 3	Category 4	Category 5		

This may impact the classification criteria of currently used raw materials.

Below is an example of the classification criteria of ammonia when used in a mixture.

Classification of mixture	EU DPD	GHS/CLP
<b>Non-hazardous</b>	Concentration ammonia < 5%	Concentration ammonia < 1%
<b>Irritant</b>	Concentration ammonia 5 – 10%	Concentration ammonia 1 – 5%
<b>Corrosive</b>	Concentration ammonia > 10%	Concentration ammonia > 5%
<b>Environmental hazard</b>	Concentration ammonia > 0,25%	Concentration ammonia > 0,25%

**Scott Bader SA, Amiens Plant obtained the OHSAS 8001 certification in addition of the renewal of the ISO 9001 and ISO 14001 from AFNOR, France.**

The Operations and Quality Assurance team of Scott Bader SA recently underwent an ISO and OHSAS certification review audit conducted by the AFNOR Certification Bureau for the Amiens production site, which makes both specialty chemicals and unsaturated polyester resins and gelcoats.

Following the auditors inspection, the Amiens production site was awarded its renewal certification for ISO 9001 2000, ISO 14001 2004 and got OHSAS 18001 2007 for the first time and can use the AFAQ logo. The auditors congratulated the SBSA management team on the "solid, well established management systems that are in place" which are to the high standards demanded of the auditors for them to be able to award these certificates to production sites.

Mr Jean-Marc Bain, Group HSE & Operations Director for Scott Bader Europe comments "I am delighted that our AFAQ certifications are renewed. The Operations team in Amiens does its very best to always maintain or exceed the high ISO and OHSAS standards expected from AFNOR, as is the case for all our production sites across the Scott Bader Group".

More information about The Scott Bader Group of companies worldwide and the range of products and services is available on line at [www.scottbader.com](http://www.scottbader.com).

**Hexion Specialty Chemicals showcases bio-based Powder Coating Resins at exhibition to UN conference on climate change**

COLUMBUS, Ohio – (December 17, 2008) – Hexion Specialty Chemicals, Inc., the world's leading producer of thermoset resins, announced that it contributed to this year's United Nations conference on Climate Change in Poznan, Poland with a presentation on its innovative and eco-friendly bio-based powder coating resins. The 14th "Conference of the Parties to Climate Convention" (COP14), held from December 1st to 12th, focused on possible technical solutions to reduce CO2 emissions. During the annual Conference of the Parties to Climate Convention, delegates from more than 190 governments, NGOs, and international institutions met to discuss and establish rules of implementation of the UN Earth Summit treaty from 1992 and its principal update, the Kyoto Protocol. As this treaty mainly focuses on the global reduction of greenhouse gas emissions, Hexion presented on how their award-winning product improves air quality. The company's bio-based powder coating technology has recently been selected by R&D Magazine as one of the 100 most technologically significant products introduced in 2008.

Hexion Specialty Chemicals is focused on developing new products that reduce emissions. As one of Hexion's newest environmentally suitable products, the advantages of the bio-based powder coating resins' include: improved sustainability by using renewable resource feedstocks such as soybeans and corn, lower CO2 emission by reducing application temperature, cost effectiveness, usability for heat

sensitive substrates and an improved appearance on finished products. These qualities make Hexion's bio-based powder coating resins not only an interesting product to environment-conscious customers but also to the members of the European Parliament and the representatives of the Italian State attending the conference.

Powder coating resins do not contain any solvents and thus do not generate VOC emissions. Powder Coatings are commonly used in a wide range of application areas such as aluminium window frames, household appliances and automotive and other transport equipment. With the new Bio-powder coating Hexion has made a big step towards the future giving its contribution to protect the environment. "We are very happy to be able to offer this bio-based option to our customers, who set a high value on eco-friendly products and also are looking for a coating solution with high performance and energy savings characteristics" said Hexion's Product Marketing Manager for powder coating resins, Donato Di Lorenzo. "But of course, we were very pleased to be able to present our product to the global public during the conference in Poznan. Hopefully we'll be able to contribute at least a little bit to a change of thinking when it comes to the eco-friendliness of products."

Additional information is available at [www.hexion.com](http://www.hexion.com).

Résumé is the newsletter of the European Resin Manufacturers Association (ERMA).

For more information about ERMA contact the secretary on: Tel: +44 (0)20 8487 0859 or Fax: +44 (0)20 8487 0801.

Published by and on behalf of ERMA,

14 Castle Mews, High Street, Hampton, Middlesex TW12 2NP, UK. Email: [info@erma.org.uk](mailto:info@erma.org.uk)

Visit ERMA's Website: [www.erma.org.uk](http://www.erma.org.uk)