

Subject: Restriction 74 of REACH Regulation concerning diisocyanates containing products

Dear Customer,

we hereby request that you read the content of this document and share it with the relevant functions in the company.

Bullet Building Products Ltd informs its customers about:

- the **obligation**, as from **24 August 2023**, to **have successfully completed a training on the safe use of diisocyanates before using our products** that have a **concentration of diisocyanates**, considered individually and in combination, **greater than 0.1% by weight**, with reference to Paragraph 2, letter (b) of COMMISSION REGULATION (EU) 2020/1149 of 3 August 2020 amending Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards diisocyanates.

These products are **identified** by:

- the wording in **SECTION 15**, subsection 15.1 of the Safety Data Sheet (SDS)

Restrictions relating to the product or contained substances pursuant to Annex XVII to EC Regulation 1907/2006

Contained substances

Point 74 - DIISOCIANATES

- the wording on the label attached to the packaging of the product:

"As from 24 August 2023 adequate training is required before industrial or professional use",

also found in the Safety Data Sheet (SDS) in **SECTION 2**, subsection 2.2

- the **application of Restriction 74 to our products containing diisocyanates** in a **concentration above 0.1% by weight**.

In order to comply with the obligation to **ensure** that **our customers** have **access to training materials** and **access to training courses on the safe use of diisocyanates** in the official languages of the Member States, Bullet Building Products Ltd invites its customers to **consult the training offer** of ISOPA (European trade association for producers of diisocyanates and polyols) and ALIPA (European aliphatic isocyanates producer association) at the following link:

<https://www.safeusediisocyanates.eu/>

Finally, we specify that training materials and courses on the safe use of diisocyanates can be obtained from any body, organization or facility that meets the requirements of Restriction 74 and that may be different from the one mentioned above.

With the publication of COMMISSION REGULATION (EU) 2020/1149 of 3 August 2020 amending Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards to diisocyanates, the European Commission has introduced a new restriction (Restriction 74) concerning the use of diisocyanates.

Indeed, **Restriction 74** stipulates that diisocyanates shall not be placed on the market as substances on their own, as constituents in other substances or in mixtures for industrial and professional use(s) after 24 February 2022, unless:

- (a) the concentration of diisocyanates individually and in a combination is less than 0,1 % by weight, or
- (b) the supplier ensures that:
 - the supplier ensures that the recipient of the substance(s) or mixture(s) is provided with information on the requirements referred to in point (b) of paragraph 1), i.e., *industrial and professional users have successfully completed a training regarding the safe use of diisocyanates before using the substances or mixtures*
 - and the following statement is placed on the packaging, in a manner that is visibly distinct from the rest of the label information: "As from 24 August 2023 adequate training is required before industrial or professional use".

For the purpose of this entry "industrial and professional user(s)" means any worker or self-employed worker handling diisocyanates on their own, as a constituent in other substances or in mixtures for industrial and professional use(s) or supervising these tasks.

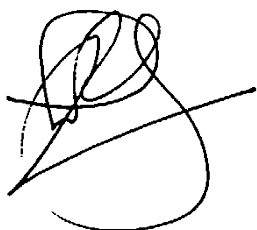
Pursuant to the restriction, it is recalled that the training is addressed to those uses listed in the annex to this communication, and:

- it shall include the instructions for the control of dermal and inhalation exposure to diisocyanates at the workplace without prejudice to any national occupational exposure limit value or other appropriate risk management measures at national level;

- it shall be conducted by an expert on occupational safety and health with competence acquired by relevant vocational training;
- it must be provided in the official languages of the Member States
- it must take into account the specificity of the products, their composition, packaging and design
- it covers at least the training elements indicated in Restriction 74 depending on the intended use and the work activity carried out (see ANNEX 1).

Best regards,

Stuart Riley
Director



ANNEX 1

TRAINING LEVEL	USE
General training	All industrial and professional use(s)
Intermediate level training	<ul style="list-style-type: none"> — handling open mixtures at ambient temperature (including foam tunnels); — spraying in a ventilated booth; — application by roller; — application by brush; — application by dipping and pouring; — mechanical post treatment (e.g. cutting) of not fully cured articles which are not warm anymore; — cleaning and waste; — any other uses with similar exposure through the dermal and/or inhalation route;
Advanced training	<ul style="list-style-type: none"> — handling incompletely cured articles (e.g. freshly cured, still warm); — foundry applications; — maintenance and repair that needs access to equipment; — open handling of warm or hot formulations (> 45 °C); — spraying in open air, with limited or only natural ventilation (includes large industry working halls) and spraying with high energy (e.g. foams, elastomers); — and any other uses with similar exposure through the dermal and/or inhalation route.

Below table of the Bullet Roof range specifies which products require training:

Product	Diisocyanate monomer concentration	Training requirements
BULLET ROOF MONO BROOF SIMILAR TO RAL 7012	<0.1%	NO TRAINING
BULLET ROOF MONO EPOXY PRIMER AC Comp. A GREY	<0.1%	NO TRAINING
BULLET ROOF MONO EPOXY PRIMER AC Comp. B	<0.1%	NO TRAINING
BULLET ROOF DPM PRIMER Comp. A	<0.1%	NO TRAINING
BULLET ROOF DPM PRIMER Comp. B	<0.1%	NO TRAINING
QUICK PRIMER	=>0.1%	TRAINING REQUIRED
BULLET ROOF MONO SINGLE PLY PRIMER	=>0.1%	TRAINING REQUIRED
BULLET ROOF MONO TOP CONV.	=>0.1%	TRAINING REQUIRED