

EU, MDI-CONTAINING CONSUMER PRODUCTS

The most important consequence of the MDI EU Risk Assessment had been the request to limit the risks arising from the use of MDI-containing consumer products due to potential skin and respiratory sensitization of consumers.

As a consequence of this the EU Commission made the proposal to impose legally based marketing and use restrictions on MDI-containing consumer products. After extensive scientific and political discussions on EU level, the EU Marketing and Use Directive (76/769) had been amended (1348/2008/EG) accordingly. Directive 76/769/EC is now part of the REACH Regulation (Title VIII in conjunction with Annex XVII). By Regulation (EC) No. 552/2009, MDI was included in Annex XVII, with the following conditions of restriction being stipulated for MDI in Item 56:

**Methylenediphenyl diisocyanate (MDI),
CAS No: 26447-40-5, Einesc No: 247-714-0**

(1) Shall not be placed on the market after 27 December 2010, as a constituent of preparations in concentrations equal to or greater than 0,1 % by weight for supply to the general public, unless the packaging:

(a) contains protective gloves which comply with the requirements of Council Directive 89/686/EEC of 21 December 1989 on the approximation of the laws of the Member States relating to personal protective equipment (*).

(b) is marked visibly, legibly and indelibly as follows, and without prejudice to other Community legislation concerning the classification, packaging and labelling of dangerous substances and preparations:

— Persons already sensitised to diisocyanates may develop allergic reactions when using this product.

— Persons suffering from asthma, eczema or skin problems should avoid contact, including dermal contact, with this product.

— This product should not be used under conditions of poor ventilation unless a protective mask with an appropriate gas filter (i.e. type A1 according to standard EN 14387) is used.”

(2) By way of derogation, paragraph 1(a) shall not apply to hot melt adhesives.

These legal requirements will make the safe use of MDI containing consumer products even easier: The necessary safety gloves will be readily available and additional safety instructions can help the consumers to adjust the use conditions accordingly.

This Regulation has been in force since 27 December 2010. Products which do not comply with the provisions may no longer be sold to the general public.

WHICH MDI PRODUCTS ARE AFFECTED BY THIS RESTRICTION?

The CAS No: 26447-40-5 stands for „Methylenediphenyl diisocyanate“, which refers to isomers of 2-ring MDI (corresponding CAS No. for 2-ring MDI are 101-68-8, 2536-05-2, 5873-54-1, 26447-40-5). The question if so-called PMDI (CAS No: 9016-87-9) is subject to this restriction too can be answered as follows:

MDI and PMDI could have comparable properties, therefore it is recommended for good industrial hygiene practice to treat PMDI the same as MDI and to apply the rules accordingly.

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