

March 2023

# ANNUAL REPORT 2022

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# Foreword

Dear Members of ISOPA,

For the third year in a row, we are pleased to send you the annual report of the Association. This provides a great opportunity to give you a snapshot of the significant developments at ISOPA and in the European chemical universe that occurred in the past year.

It is impossible to comment on 2022 without mentioning the consequences of the war in Ukraine and the massive impact it has had on the entire polyurethane value-chain, from the producers of isocyanates to the end-users. The coming year is expected to be yet again difficult for our sector and will not lack challenges.

In 2022, ISOPA has been engaging on different policy files that will have an impact on the diisocyanates industry. The most prominent one is the Binding Occupational Exposure Values, which will be proposed by the European Commission in 2023. We also expect progress on the Chemicals Strategy for Sustainability and the revision of REACH, which will redefine how chemicals are regulated in the EU.

There are several objectives ISOPA has set for 2023. Priority number one will be to make the safe use of diisocyanates training platform available in all EU languages before summer. All workers need to be trained adequately, and all companies, large or small, must comply with the REACH regulations.

On a more personal note, 2022 also marked the retirement of one of our long-standing experts, Ronald van den Bosch. Always available and knowledgeable on all kinds of topics, Ronald was an invaluable cog in the ISOPA machine. We wish him all the best in his new adventures.

We hope you will enjoy the reading and we look forward to seeing you in a new year that we expect very productive for our Association.



**Christopher Metz**  
President



**Jörg Palmersheim**  
Secretary General

# REACH Restriction



## Training Platform

With the deadline of 24 August 2023 approaching, ISOPA and ALIPA have worked hard in 2022 to improve the training platform on the safe use of diisocyanates.

After the release of the platform in English and German in 2021, trainees can now complete their training in French, Spanish, Italian and Dutch. By the end of 2022, more than 20.000 users have followed the web-based training.

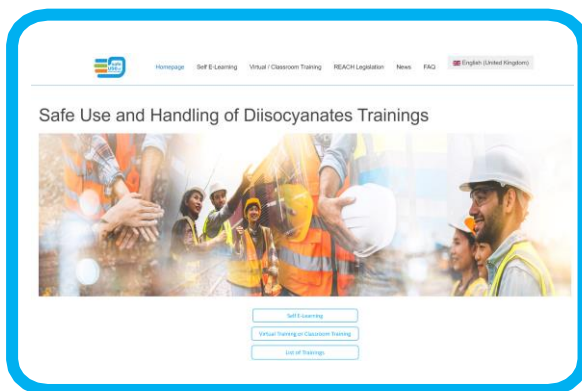
The main goal in 2023 is to ensure that the platform is available in all EU languages before summer to ensure that all employees receive training on time.

In 2022, the team also worked on making the training platform more user-friendly. In order to facilitate this, the website has been completely revamped to help users find training courses and register for them.

Based on feedback from users who have registered and tried the platform, we have developed the option of creating an administrative account. With this feature, companies can register multiple employees to the self-eLearning while receiving a single invoice.

The team is also currently working on improving the option of giving the training as a trainer. We aim to make it easy for internal trainers to organize training within their companies. We are also building a network of external trainers / certified safety experts on diisocyanates that companies can contact to receive the appropriate training within their organizations.

Finally, ISOPA/ALIPA forged partnerships with multiple stakeholders like Berner Group and Secova during 2022. Many more partnerships are expected for next year.



Growing number of registrations for the self-eLearning

# Cohort Study

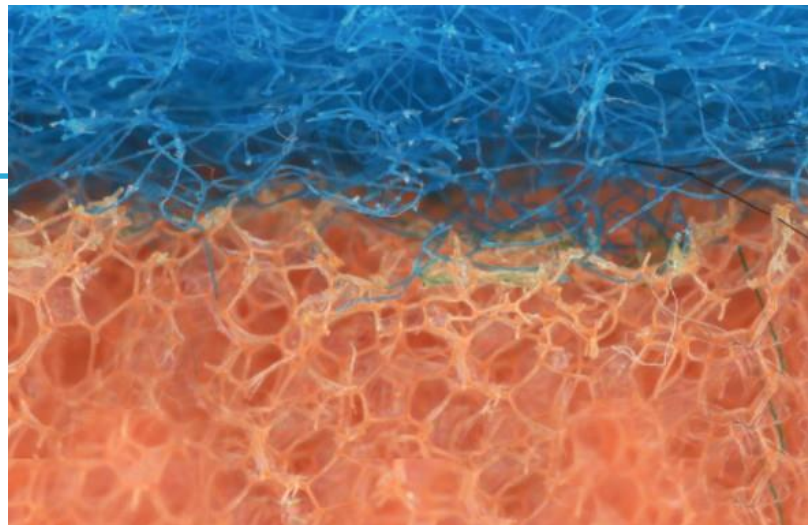
In 2023, the Cohort Study will start for a time span of 5 years. The project is led by the Research Institute for Prevention and Occupational Medicine of the German Social Accident Insurance, Institute of the Ruhr University Bochum (IPA).

This project will be important for our industry as it will provide new evidence on the safety of workers handling diisocyanates by achieving these three objectives;

- to record the number of work-related respiratory and lung diseases caused by diisocyanates,

- to determine the amounts of diisocyanates which are taken up by employees, to describe the relationship between exposure and respiratory and lung diseases,
- to systematically check the effectiveness (i.e., reduction of exposure and diseases) of protective measures which are specified in the REACH restriction proposal

The start of the campaign is expected beginning of March 2023. 21 companies will participate in the study, covering 25 production sites.



# Occupational Exposure Limit for Diisocyanates

ISOPA has been closely monitoring the developments regarding the establishing of a binding occupational exposure limit value (OEL) for diisocyanates.

Adopting an OEL would mean determining a maximum level of exposure to a chemical substance for workers to be considered safe.

The Commission intends to propose an OEL on diisocyanates through the revision of the EU's Chemical Agents Directive.

The Commission is expected to base its proposal on the opinion of the Advisory Committee on Safety and Health at Work, which have agreed on a value of 12  $\mu\text{g NCO /m}^3$  as STEL with a transition period of 20  $\mu\text{g NCO /m}^3$  until the 1st January 2029.

ISOPA considers that it represents the lowest workable solution for the polyurethane value chain to strive towards the zero-diisocyanates induced-asthma goal.

In 2022, the Commission has been reviewing the file to decide if they should follow the recommended values. Once an agreement is reached, the Commission will publish a proposal. This proposal is expected for the first quarter of 2023. The file will then be sent to the European Parliament and the Council for voting.

We have increased our engagement with European authorities in the past months and are still engaging with all decision-makers involved in the process to ensure the best possible outcome for the industry.



# Chemical Regulation Cluster

In 2022, the Chemical Regulation Cluster has met on four occasions to discuss the growing number of legislative topics on diisocyanates and to support the dominant projects at ISOPA: the restriction and the OEL.

Two sets of regulations are of particular interest in 2023: the Chemicals Strategy for Sustainability and the Polymers Requiring Registration. For these issues, two specific taskforces are operating and a summary of their actions is described further in this Report.

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## Global Alignment Task Force

An important task for the Cluster is to ensure that the approach taken by the ISOPA member companies once registering the substances under REACH in the EU is not jeopardized by a controversial approach in other countries.

In 2022, the Cluster monitored closely the situation in Korea, Turkey and the UK. Alongside the alignment on REACH registration, the cluster is monitoring policy developments in other parts of the world, including the setting of an OEL in New-Zealand.

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## Polyol Inhalation Tox

A topic that came on the agenda of the Cluster in 2022 is the toxicology of polyols. The discussions revolved around the "U-shaped tox curve" that can be observed in the results of the polyol inhalation tox study.

Additional data would be required to provide hypotheses and to find explanation for the curve, which in return would help in the debate on the registration of polyols.

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## Other topics

In addition to these issues, the Cluster is focussing on different topics including the category update on MDIs, the NLP Polyols Dossier, the Dossier Improvement Project, PFAS and micro-plastic restrictions.

# Chemicals Strategy for Sustainability

The EU's Chemicals Strategy for Sustainability was launched by the Commission in October 2020. Over the last two years, a programme has been developed which include various actions that will completely revamp how chemicals are regulated in the EU.

The flagship action of the CSS is the revision of REACH. Initially planned for the end of 2022, the revision had to be postponed to 2023.

The revision of the REACH regulation will have an important impact on the diisocyanates industry. For that reason, a dedicated advocacy roundtable has been set up since October 2021 in order to monitor the policy developments. The team brings together advocacy experts from the Member Companies, including members based in Brussels to facilitate our engagement with the authorities.

Under the scope of the CSS, a list of priorities for ISOPA has been set with a focus on:

- Mixture Assessment Factor (MAF)
- The essential use concept
- Generic Risk Assessment and Professional Uses

The roundtable keeps the Board informed on these priorities with a monthly CSS Newsflash.

In 2023, ISOPA will continue monitoring CSS developments and will continue engaging with the EU Institutions on those topics to make the voice of our industry heard.



# Polymers Requiring Registration

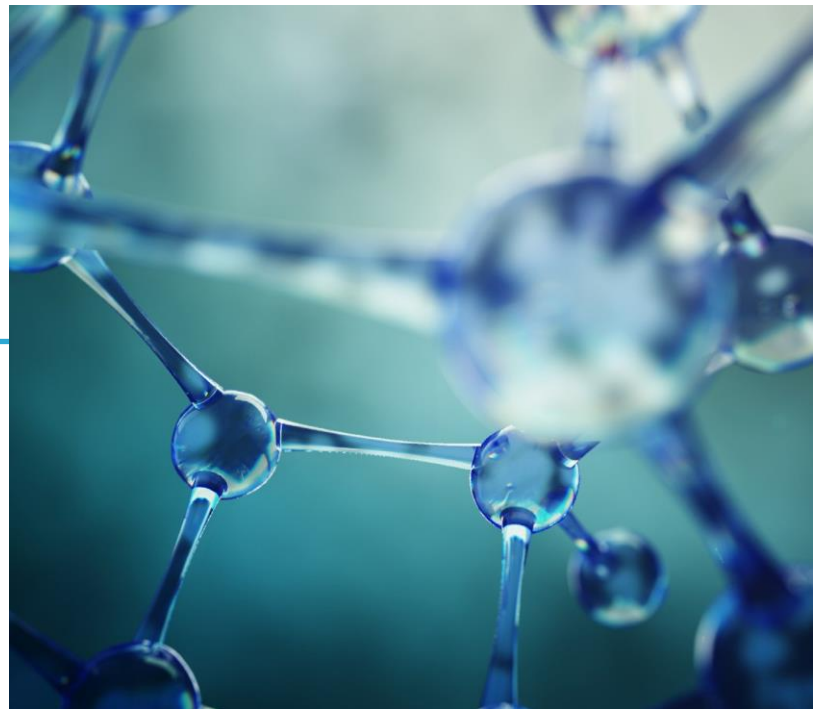
The task force on Polymers Requiring Registration, which was started in 2020, continued working with the main objective of ensuring that the specific chemistry of diisocyanates is being considered when defining those polymers which would require registration.

The task force met 6 times in 2022 and will continue doing so in 2023.

Part and parcel of the PRR task force is to attend the Subgroup Committee for Polymers Requiring Registration under CARACAL, with Martin Klatt and Gitta Egbers representing respectively ALIPA and ISOPA in those committees.

The message being conveyed to the decision-makers is that the majority of our polymers can be identified as polymeric precursors, which are well controlled in the industrial environment and should therefore be excluded from the registration requirements.

As explained in the CSS section of this report, an important decision of 2022 was the delay of the REACH revision. The proposal of the Commission is now expected in the first quarter of 2023 which will follow the ordinary legislative procedure, with the Parliament and the Council.



# Product Stewardship Cluster

The last year was marked by a change of chairmanship for the Product Stewardship Cluster. After years of dedicated service, Ronald van den Bosch has passed the torch to Claire Andeso who is now acting as chairwoman of the Cluster since November 2022.

In light of the REACH restriction and the creation of the Safe Use of Diisocyanates platform, it was agreed that the Walk the Talk programme would not be prolonged. A statement will be issued in August 2023 explaining the decision and the way forward.

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## Logistics

At the end of 2021, ISOPA launched a new digital platform to train drivers for the safe transportation of diisocyanates in Europe.

One year later, based on the feedback of the hauliers, we can proudly say that the new platform is a success. More than 10 000 drivers have now been trained via the ISOPA training programme.

The Carrier Day took place online in October 2022. The event was a success with more than a 100 attendees. The webinar was the opportunity to inform hauliers of the work done by the Logistics Working Group:

- The publication of revised guidelines for Emergency Responses;
- The publication of the results of a survey on the guidelines for the transportation of isocyanates in bulk;
- The creation of a video explaining how to safely unload MDI in bulk.



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## One Step Ahead

Two OSA webinars were scheduled in 2022. The first one took place in March and was held in English. The second was planned in French but had to be cancelled due to low attendance. The Working Group will reflect on how to organize these seminars in the future to guarantee participation and improve the safe transportation of isocyanates in Africa and Middle East.

# Sustainability Cluster

Following the integration of the Circular Economy Task Force, the Sustainability Cluster has met every two months with a focus on the EU Green Deal.

The Cluster is monitoring five aspects related to sustainability and circularity: Substitution, Projects, Legislation, Standardization and Product Stewardship.

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## ESPR

In 2022, the European Commission has made progress on an important regulation regarding sustainability. What was previously known as the Sustainable Product Initiative has been published under the name Eco-design for Sustainable Product Regulation (ESPR).

A public consultation will be launched in the first quarter of 2023. The Cluster is monitoring the latest developments on ESPR and the impact that this legislation can have on products made out of polyurethanes, notably in terms of recycling.

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## MDI & TDI Eco-Profiles

The Cluster has succeeded in getting Ecoinvent to publish the ISOPA datasets with stoichiometric allocations next to LCA dataset with economic allocation.

The Cluster has started a dialogue with Sphera in order to discuss the general situation on the development of Life cycle information as well as the use of data provided by ISOPA.

# Combustibility Cluster

Since the foundation of the Modern Building Alliance, many technical topics are now handled by respective committees of the MBA.

However, the Combustibility Cluster is still active and keeps monitoring different topics that are relevant to ISOPA:

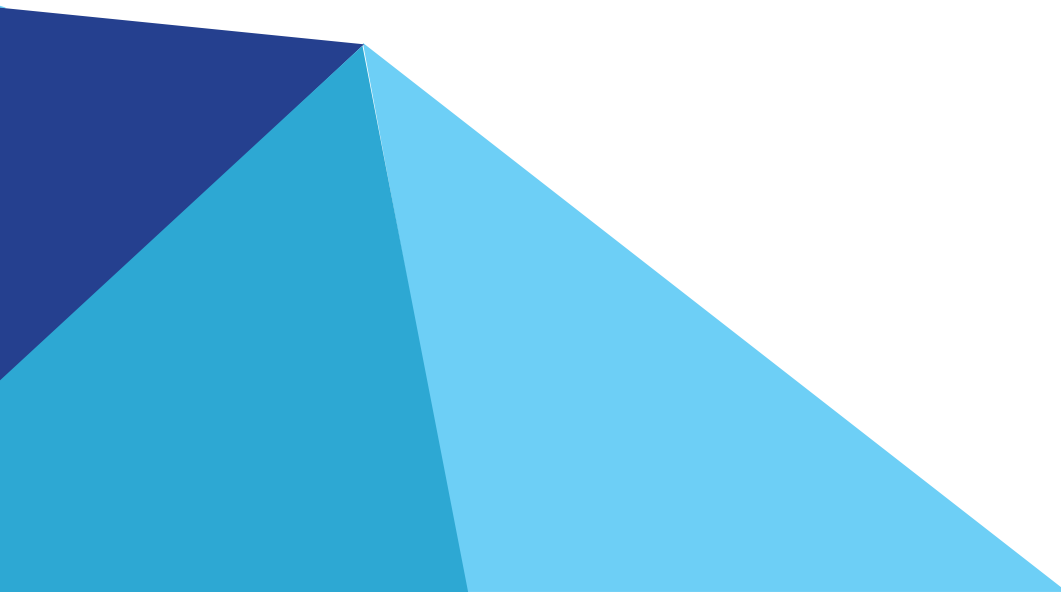
- Keep issue overview of key PU applications & align with Downstream Users;
- Lead on specific smoke tox and environment issues;
- Monitor Flame Retardants;
- Agree on an ISOPA strategy on the topic of standardisation & regulation;
- Crisis communication.

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## Flame Retardants

Flame Retardants are being under increasing scrutiny following the Chemicals Strategy for Sustainability. ISOPA is monitoring the developments of the Chemicals Restriction Roadmap.

A close cooperation with downstream users' associations allows the monitoring of different substances that might be further regulated in the future, including TCPP and Melamine.



# Communications

## New ISOPA Website

The ISOPA website has been relaunched in December 2022. Our goal with this new website is to provide an easier way to learn about the work that our Association is doing. News are being posted on a regular basis and new content has been created, including a new Press Kit that you can download in the documentation section.



### Latest News



## Social Media

In 2022, ISOPA has decided to become more engaged on social media. By posting more content more frequently on LinkedIn and Twitter, our goal is to raise awareness about ISOPA's mission. In particular, our objective is to communicate on the coming REACH restriction and to promote our training platform. For that purpose, testimonials from users are being collected and shared online.



## Media Relations

Over last year, many changes have occurred in the newsrooms of media specialized on polyurethanes. We are pleased to collaborate with new journalists and to provide them with useful and relevant information on the diisocyanates industry. Testament of this excellent relationship is the publication of many of our press releases in flagship outlets such as Urethanes Technology and PU Magazine.

# Experts

The report was created with the tremendous efforts by the member company experts:

## BASF

Christopher Metz; Gitta Egbers; Thomas Merz; Elif Unterberger; Uwe Blumenstein; Steffen Kahrmann; Susanne Demharter; Klaus Wittstock; An Dupon.

## BorsodChem

Tibor Klement; Hella Tothne; Ana Fridelne; Nora Janosik; Andrea Cappella; Gyulane Szabo; Dora Stefanovics.

## Covestro

Christine Mendoza-Frohn; Gudrun Luecke-Brunk; Malik Duhaut; Hans-Georg Pirkl; Lutz Brassat; Tanja Gutschmann; Gesa Dern; Ines Krüger; Monika Leutbecher; Thomas Gross; Lutz Brassat; Yvonne Zielesny; Jose Gavira.

## DOW

Rajesh Balan ; Ronald van den Bosch; Christine Lucas; Petra van Haarlem; Claire Andeso; Paul Cookson.

## Huntsman

Mike Fowles; Erik Vangronsveld; Shpresa Kotaji; Diane Daems; Bart Bossuyt; Liesbeth Melis; Ronald van der Kooij.

## Shell

Wouter Mineur; Els van Eetvelde; Peter Roest; Udeogu Onwusogh.

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