





Editorial



By Sophie De Ridder,
FEICA Communication
Officer / Regulatory
Affairs Assistant

Dear Readers,

First of all, I would like to wish you all
a  **Happy New Year 2010!** 

2009 was a challenging year for our
Industry.

The FEICA Secretariat has
contributed to a lot of
improvements: the design and
implementation of a new Website
and Extranet, the organisation of a
successful and profitable
Conference in Budapest, the
enlargement of the FEICA
Membership by adding 5 new
direct members (Forbo, HB Fuller,
Tremco illbruck, COIM, Selena), the
reinforcement of our collaboration
with the National Associations, the
launch of 5 new Working Groups of
Task Forces (Sustainability TTF,
Construction TWG, OCF TWG, OCF
TTF, EBB), the representation of our

Industry and the protection of the
interests of our members in EU
regulatory issues.

2010 will focus on Sustainability.
With the new Working Group led by
Dana Mosora from The Dow
Chemical Company, we would like
to promote the advantages of
adhesives and sealants in
comparison with other bonding
technologies. Examples will be
published on the FEICA website.

I hope you will enjoy reading the
articles and surfing our website. The
next issue will appear in April.

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Sponsorship opportunity

Join us as a sponsor for the

MIGRESIVES Closing Conference 2010!

Gain great exposure for your company's name and
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supporting the MIGRESIVES Project.

Interested? Please contact Marion Krämer:

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EB Words - Who is Ramon Bacardit, FEICA's Vice-President ?



Ramon Bacardit holds the role of FEICA's Vice-President since September 2009. It is a great honour for him:

Ramon Bacardit qualified as a chemist with a PhD degree from Barcelona University and has developed his professional career at Henkel, starting in Barcelona in 1981.

From 1998 to 2002, he and his family moved to Mexico where he became the managing director of Henkel in Mexico and Henkel's representative in other Latin-

American countries. Since 2002, Ramon Bacardit has been working in Dusseldorf, in Henkel's head office, as head of

the Research department in the adhesives business.

In a nutshell, Ramon Bacardit has spent 28 years at Henkel in various departments, roles and countries, always closely involved in the adhesives business.

In 1996 and 1997, Ramon Bacardit was the Chairman of ASEFCA, the Spanish association.

He is a extremely interested in the adhesives business!

As new Vice-President he is pleased to contribute to the further

development of FEICA, making the best possible use of his experience in the business, and also in an international environment.

Ramon Bacardit would like to contribute to improving FEICA's financial situation, increasing the number of members, and motivating the best persons from the member companies to collaborate with FEICA in the various fields where managerial and expert knowledge are required.

He will always be open to suggestions, comments, recommendations etc. from the FEICA members.

Regulatory News - Commission Regulation amending REACH Annex II



By Jana Cohrs, FEICA Regulatory Affairs Manager

In the past we have reported on the discussion amongst Industry, Member States and the Commission about the problem of the last 4 digits in the registration number.

Annex II of the REACH regulation describes that in chapter 3 of the safety data sheet, the registration number must be indicated. The guidance document on registration describes that the registration number contains 4 parts, the fourth part giving the index of a member in a joint submission.

This has created great concern regarding confidentiality as well as workability. However, Annex II has now been revised and the Commission has sent the new version to the European Parliament for examination.

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If the revised version of Annex II comes into force it would resolve the above problem as it states that the last 4 digits of the registration number which identify the registrant

may be omitted in the safety data sheets of a mixture, as long as the manufacturer of the mixture provides the full registration number upon request for enforcement purposes or, if he has not received it, forwards the request to the

supplier within 7 days upon request.

The document is available on <http://www.feicaextranet.eu> in the REACH section.

Regulatory News: One Component Foam (OCF) Technical Working Group



*By Mr. Luc Thys,
Marketing Director,
Soudal N.V.*

In February 2009, the "OCF" Technical Working Group was launched to support this particular construction material. In-situ construction foams are produced by a number of European manufacturers, most of which have become direct members of FEICA and participate actively in the OCF technical working group as well as in the OCF technical task force.

The TWG OCF aims to defend the interests of the OCF industry, to address any issues specifically related to it and to increase value of this product which is sometimes perceived as a commodity.

In reality, it features a unique combination of properties that make it an excellent material for insulating and fixing windows or doorframes, for instance. Its special combination of adhesion, mechanical strength, expansion during cure and fast curing make it a very reliable solution, which is widely adopted in many countries. Taking into account the growing importance of energy-saving in construction, it becomes clear why OCF has become a universal solution. However, a set of objective standards has never been developed for these products, partly due to the complexity of their properties.

During the past 11 months, experts in the OCF Technical Task Force have focused on developing testing

methods to objectively assess OCF properties. Subsequently, minimum performance levels will be developed for a number of applications. A first series of testing methods is planned to be published in the first half of 2010. But the elaboration of a complete set of testing methods, suitable for identifying product performance in all respects, should not be expected before 2011.

The adoption of common practices in testing and evaluating foams is a clear goal that all Technical Working Group members share. It will render product data sheets and performance claims much more transparent between products from all Feica members. Ultimately, it should serve as an industry standard

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to establish product requirements and will enable OCF manufacturers to substantiate product features that they claim.

Regulatory News: The FACET Project



By Peter Oldring (Valspar GB Corporation Limited), Bernard Ghyoot (FEICA Secretariat) and Laurence Castle (CSL)

The FACET project (**F**lavours, **A**dditives and **f**ood **C**ontact material **E**xposure **T**ask) is a large project with a total cost in excess of €8M, an EU contribution of €6M, and a pan-European membership of partners and stakeholders. It started in late 2008 and will run for 4 years. FACET will provide a common tool for estimating the exposure of European consumers to packaging migrants. The FACET software and the encrypted databases will be free of charge and will be used as a risk management tool by the EU Commission and industry. Indeed,

the EU Commission (DG-Sanco, Dr Annette Schaefer) was a strong supporter of the project and sits on the FACET advisory board.

There are twenty partners in FACET including Industry, represented by the FIG (FACET Industry Group). FEICA is one of the twelve European trade associations that comprise the FIG. The associations cover plastics, paper/board, metals, adhesives and inks. The initial tasks for each of the associations are to:

1. Compile a list of substances used in their sector.
2. Compile a list of the food packaging materials containing those substances and their concentrations.
3. Compile a list of foodstuffs that are packaged in each of these materials.
4. Provide either migration data for each application OR provide

conditions of packaging use that will allow migration levels to be calculated by modelling.

The software partner will then use stochastic modelling (random number generation statistics) to derive an estimate of exposure, using food consumption surveys first from eight EU countries (which are data-rich) and then with extrapolation to all 27 Member States.

Regarding progress made so far in the first 15 months: food categories have been agreed for all packaging sectors, and a list of materials and material combinations which are used has been agreed; these can then be linked to market share data.

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The FACET project works on the MIGRESIVES project which FEICA has been involved in.

The MIGRESIVES project is just finishing and the closing conference organised by FEICA will be in April 2010. The MIGRESIVES project should provide some of the information and tools needed for FACET, in particular:

- classification of adhesives according to chemistry and uses
- test strategies based on physico-chemical behaviour of adhesives
- modelling migration from adhesives.

But MIGRESIVES was targeted at industry and specifically SME's, to provide European adhesives manufacturing and converting industries with tools for in-house quality assurance and food packaging control systems. The output of MIGRESIVES is not, however, usable as a risk management tool for industry in general or by the EU Commission. This is because the information on formulation details is confidential to the user and the user also has no information on the other uses of the same substances by others - not only other adhesives manufacturers but also other packaging sectors.

It is vital that members of FEICA work with their customers and suppliers to compile lists 1-4 above. If this information cannot be provided, the default assumption will have to be made that all substances are present in every adhesive used for food contact materials, with the results of unrealistic overestimates of exposure and unnecessarily strict risk management measures being adopted.

Regulatory News: REACH/CLP Q&A



By Wolfgang Urhahn,
ChemADVISOR



Q: What is CLP?

A: CLP stands for Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures. The CLP Regulation amends and repeals Directives 67/548/EEC and 1999/45/EC, and amends REACH Regulation

(EC) No 1907/2006. The CLP Regulation implements the 2nd edition of the United Nations Globally Harmonised System of classification and labelling of chemicals (GHS) into EU legislation. The CLP Regulation came into force on 20 January 2009 and will replace the Dangerous Substances Directive 67/548/EEC (DSD) and the Dangerous Preparations Directive 1999/45/EC (DPD) in a step by step process during a transitional period.

Q: What does C&L Notification mean?

A: C&L Notification means submission of a notification to the Classification & Labelling Inventory at ECHA and requires substance classifications according to the new CLP criteria of Regulation (EC) No 1272/2008.

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Q: Which substances are subject to C&L Notification?

A: C&L Notification applies to two groups of substances: 1. substances which are subject to Registration under REACH and applies to substances with regard to tonnage; 2. substances which fall under the general scope of the CLP that meet the criteria for classification as hazardous without regard to tonnage.

Q: When should companies notify substances to ECHA?

A: Substances placed on the market on or after December 1, 2010 must be notified within 30 days after being placed on the EU market. Substances currently on the EU market must be notified by all manufacturers, importers, or groups of manufacturers or importers by December 1, 2010, means the first notification deadline will be January 3, 2011.

Q: What does a C&L Notification include?

A: Information to be included in Notification, according to CLP article 40(1) is: Identity of the notifier, Identity of the substance or substances, Classification of the substance or substances, Explanation to account for endpoints which are not assigned to the substance in the classification, Specific concentration limits or m-factors if applicable complete with a justification, and Label elements (Hazard pictograms, Signal words, Hazard statements).

Q: How can companies submit C&L Notifications to ECHA?

A: C&L Notifications shall be submitted electronically via REACH-IT. Currently REACH-IT does not offer this functionality. ECHA is currently working on the C&L Notification tool for REACH-IT. But, industry can already submit its C&L Notification using IUCLID 5.1, which is not fully in line with the new CLP. New

notification submission tools will be available in February 2010 when IUCLID 5.2 is released.

Q: Where can companies find further information on CLP and C&L Notification?

A: ECHA provides further information regarding the CLP Regulation and C&L Notification on the Agency's CLP website.

References

ECHA CLP website:

http://www.echa.europa.eu/clp_en.asp

REACH-IT:

http://www.echa.europa.eu/reachit_en.asp

ECHA Harmonized classification:

http://www.echa.europa.eu/clp/harmonised_classification_en.asp

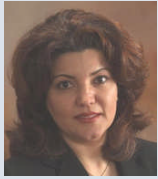
CLP Regulation:

http://www.echa.europa.eu/legislation/classification_legislation_en.asp





Industry News - Turkey Establishes an Inventory



By Patricia Manteghi,
ChemADVISOR



The "Turkish Regulation on Inventory and Control of Chemicals" was published on December 26, 2008. It entered into force on January 1, 2009 and is administered through the Turkish Ministry of Environment and Forestry. The regulation was most recently amended on November 10, 2009. This latest amendment extended the due dates for submission to 2010 and added polymers to the exemptions for submission.

This law is influenced mainly by REACH Regulation (EC) 1907/2006 which requires that substances manufactured in the EU or imported into the EU in quantities greater than 1 ton per annum be notified.

The primary purpose of this Regulation is to protect human health and the environment from negative effects of chemicals for substances either manufactured in or imported into Turkey. This Regulation establishes a protective chemical inventory and control system, and includes administrative

requirements, technical procedures and guidelines.

The scope of this regulation is:

- a) To collect, present and make information available on substances;
- b) To develop possible risk control policies to protect human health and the environment.

This regulation does not cover:

- a) The substances as long as they are not going through any process as the transits of these substances are subject to custom's inspection;
- b) Substances produced or imported for use for military purposes.

The Regulation requires that manufactures and/or importers of substances present on their own or in preparations in quantities greater than 1 ton per annum submit information to the Ministry of Environment and Forestry.

For substances manufactured and / or imported in quantities of 1000 tons or more per annum individually or within preparations, the three

years average of the imported/ manufactured amount, from the date of enforcement of this regulation (December 26, 2008) should be submitted to the Ministry of Environment and Forestry no later than June 30, 2010.

From December 26, 2008 on, for a substance manufactured, for the first time, in the amount of 1000 tons or more, individually or in preparations, from the date the substance is manufactured/ imported for the first time, within a year, manufacturers/importers have to report the Ministry of the Environment and Forestry within two months, after a year from that date.

Data requirements differ depending on the tonnage bands.

The information requirements for substances manufactured and/or imported either individually or in preparations, in the amount of 1000 tons per annum and over are more substantial and are, as follows:

- a) Substance name, EC number and CAS number;
- b) Amount of the substance, manufactured, or imported;
- c) Classification, according to Table 2 of this Regulation.

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- The classification must include the, hazard class, hazard symbol, risk phrases and safety phrases classification;
- d) Information on substances uses area;
- e) Data on physico-chemical properties of the substance;
- f) Data on the behavior of the substance in environmental media;
- g) Data related to substance's ecotoxicity;
- h) Data related to substance's acute and sub-acute toxicity;
- i) Data on substance's carcinogenic, mutagenic, and/or toxic effects on the reproductive system;
- j) Other related information;

Manufacturers and importers, have to conduct necessary research in order to obtain all the existing information, for items (e) to (j), and forward the result to the Ministry. The manufacturers and importers are not obligated to do testing on animals for the non-existing information. The complete list of substances imported or manufactured, in excess of 1000 tons per annum, on their own or in preparations, will be published in an

inclusive list by the Ministry. For substances manufactured and/or imported in quantities of 1 ton but not exceeding 1000 tons per annum, individually or within preparations, from the date the regulation enters into force December 26, 2008, up to three preceding years, the three years average of the imported/ manufactured amount, should be submitted to the Ministry till June 30, 2010.

From December 26, 2008 on, for a substance manufactured, for the first time, in the amount of 1 ton but not exceeding 1000 tons or more per annum, individually or in preparations, from the date the substance is manufactured/ imported for the first time, within a year, manufacturers/importers have to report the Ministry of the Environment and Forestry within two months, after a year from that date.

The information requirements for substances manufactured and/or imported either individually or in preparations, in amount of 1 ton per annum and over but not to exceed 1000 tons are as follows:

- a) Substance name, EC number and CAS number;
- b) Amount of the substance manufactured, or imported;
- c) Hazardous substances and

preparations classification, according to Table 2 of this Regulation. The classification must include the hazard class, hazard symbol, risk phrases and safety phrases classification;

d) Information on substances uses area.

The Ministry may require additional data (according to Table 2) from manufacturers and importers to satisfy the data requirements, i.e., physico-chemical, toxicology and eco-toxicology properties.

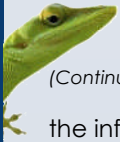
In case one substance is manufactured/ imported by more than one manufacturer/importer, any additional required information can be submitted through one assigned representative, base on their mutual agreement.

Additionally, other importers/ manufacturers have to provide data (from 1.1 to 1.19 of Table 2 of Turkish Chemical Regulation) and provide the name of the manufacturer/importer representing them.

In order to submit the required data under low and high volumes requirements, importers/ manufacturers have to use a special program package within the Ministries' website and submit

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the information electronically.

The following data should be submitted to the Ministry within one month in the case of an update:

- a) Change in use;
- b) Change in the substances' characteristics, (physico-chemical, toxicological and ecotoxicological properties);
- c) Revision to its classification, labeling and packaging;
- d) In case of obtaining new information regarding modification of substance's serious risk to human and the environment.

Furthermore, the importer/manufacturer has to report related information regarding manufactured or imported volume to the Ministry, in case of modification to the volume, every three years.

In case the manufacturer/importer needs to keep the information confidential, he can request the Ministry in writing, not to provide these information to a third party.

Confidentiality claims are not permitted for the following matters:

- a) Substance name;
- b) Data on physico-chemical properties of the substance;
- c) Data among substance's

environmental media's, movement and behavior;

- d) Data on substance's carcinogenic, mutagenic, and/or toxic effects on the reproductive system;
- e) Substance specification and emergency response methods, and information on necessary measurements;
- f) Testing done on animals and necessary data to prevent repetition;
- g) In case of the release of hazardous substance into the environment, determine the subjected hazardous substance, and prevent direct exposure to humans by analytical methods.

Acceptance of the application for confidentiality is subject to the Ministry's written approval.

In order for importers/ manufacturers, to provide the required information based on low and high volumes, the Ministry established a priority list for substances or substance groups which require specific attention due to their potential effects on human health and the environment.

To prepare a priority list the following matters are taking into consideration:

- a) The substance's effects on humans and the environment;
- b) The substance's exposure to humans and the environment;
- c) Insufficient data regarding to substance's effect on human and the environment;
- d) Under Turkey's international contracts and within ongoing work of international organizations;
- e) Other National Regulations on hazardous substances;
- f) Special consideration is given to substances with chronic effects, especially carcinogenic and/or mutagenic effects and toxic effects on reproduction and/or to promote these effects, or to evoke suspicion.

The Ministry performs risk assessments for substances on the priority list. The substances listed in the priority list will undergo a risk assessment under which the notifier may be required to provide further information.

This Regulation contains a list of substances that are exempted from the requirements established for low and high volumes.

- 1. Also exempted from requirements set forth in this regulation, are substances that

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are found in their natural state in nature, and did not undergo any change chemically; such as minerals, jewels, jewel extracts, cement slag, natural gas, fluid petroleum gas, condensate natural gas, processed gases and their components, raw petroleum, coal and coke.

2. Basic chemical substances, whose hazards and risks are known: Hydrogen, Oxygen, Nobel gases (Argon, Helium, Neon, Xenon, and Nitrogen)
3. Polymers

and its amendment Nr.27402, on November 10, 2009.

<http://rega.basbakanlik.gov.tr/main.aspx?home=http://rega.basbakanlik.gov.tr/eskiler/2008/12/20081226m1.htm&main=http://rega.basbakanlik.gov.tr/eskiler/2008/12/20081226m1.htm>

References

Regulation on Inventory and Control of Chemicals
Published through, Turkish Gazette Nr.27092, on December 26, 2008,

<http://rega.basbakanlik.gov.tr/main.aspx?home=http://rega.basbakanlik.gov.tr/eskiler/2009/11/20091110.htm&main=http://rega.basbakanlik.gov.tr/eskiler/2009/11/20091110.htm>

New Publication

The Final Oekopol report on the revision and possible extension of the Directive 2004/42/EC (so called Decopaint Directive) has been

published (available on the <http://www.feicaextranet.eu>).

FEICA Secretariat News - Announcements

FEICA Conference 2010

For more information, visit

<http://www.feica-conferences.com/invitation/welcome/>



Migresives Closing Conference

For more information, visit

<http://www.migresivesclosingconference2010.eu/home/>



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