

BASA Bulletin

INFORMED COMMENT FROM THE BRITISH ADHESIVES & SEALANTS ASSOCIATION



A note from BASA's CEO Lorna Williams

It has been a busy year for BASA, with a full programme of events being run for the first time since 2019. We have been able to run a Business Forum before the March AGM held at the cinch Stadium, Northampton and an Open Industry Forum at Sketchley Grange Hotel, Hinckley in November. Before both in-person events we were able to produce hard copy bulletins for all the delegates to catch up on the work that has been going on. Sports day was well attended by the shooting cohort, and although the number of golfers were a little down on previous year, they still had a great day. All golfers should pencil in the date of next year's Sports Day – June 19th, 2024 – to hopefully avoid a clash with other golf days!

It is a significant challenge for all of us to stay on top of the dual regulatory schemes we now find ourselves exposed to, and we are starting to see more fallout from Brexit in terms of goods being held up by additional customs checks by EU member states. These checks are not being carried out because the UK left the EU, but rather because the EU commission criticised some of the member state customs controls in respect of a lack of EU REACH compliance checks for products being imported into the EU. Sadly, the UK is probably more vulnerable than other countries to this as fewer UK manufacturers have appointed an EU

legal entity to take care of EU REACH obligations. This potentially leaves BASA members exporting to the EU more exposed. We are going to be running some more clinics on how to make sure you have the proper paperwork and declarations to try to help members navigate this complex situation.

In August this year the British government announced that it would delay imposing full post-Brexit import controls on goods from the European Union by a further three months, pushing the start date back to January 2024. Potentially this means that from that date any imports of adhesives and sealants from the EU will need to be able to prove UK REACH and GB CLP compliance. To benefit from the Trade and Cooperation Agreement (TCA) zero tariff, businesses must show the origin of their goods. A product qualifies as 'originating', if it is 'wholly obtained' in the UK and EU or has been substantially transformed in one or both markets. As rules of origin are product-specific and compliance can be onerous, it is hoped that the import controls do not cause unexpected issues next year. Please continue to let us know of any specific problems so that we can look to help.

We continue to work with the other UK Chemical Associations to push for government to rethink the current UKREACH regulation, and the whole issue of UKCA marking

of Construction Products continues to be hugely challenging. We are trying to develop some additional guidance documents in relation to UKCA marking against a European Assessment Document (EAD) and continue to engage with DLUHC to understand what their real intentions are in respect of future UK Construction Products Regulations. Will the current Government actually try to pass new legislation to enforce the intended date to cease recognition of CE marking (30/6/2025) before the general election next year – or will they leave to the next government?

Finally – I hope to see some of you at BASA's annual dinner, being held at the Chester Grosvenor Hotel on Saturday 2nd December. We understand that conditions for business are not easy at present but try to support the Association and buy a couple of tickets to join us at this year's dinner and take advantage of the networking opportunity. It should be a great evening.



Save The Date

41st AGM & Industry Lunch, Thursday 7th March 2024,
Manufacturing Technology Centre (MTC), Coventry

Industrial use deadline for EU and NI market - 01/01/2024

The deadline is fast approaching, read the article from BASA's Regulatory Officer Caroline Raine on how we can help you make these notifications.

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EU Draft Toys Regulation

Read about the EU Draft Toy Safety Regulation and all the proposed changes made in July 2023 by the European Commission.

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Navigating the Scope 3 reporting landscape

Read xtonnes' article about carbon accounting and how it can help your business stay ahead of the curve.

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48th Meeting of ISO TC 59 SC8 “Sealants”

The ISO meeting this year took place on 27th and 28th September in Paris and was attended by representatives from 8 countries. The Secretariat is held by China and Chaired by Mr Ruud De Block from the Netherlands. The work on high movement was closed off with a decision to make no changes to introduce new classes to ISO 11600. The committee also resolved to start a new work item to develop a classification standard for Sanitary Sealants, incorporating ISO 21265:2021 Building and civil engineering sealants — Assessment of the fungal growth on sealant surfaces. It was agreed that a similar process to the development of ISO 11618 “Classification and requirements for pedestrian walkway sealants” would be adopted and Lorna Williams was appointed as convenor for the project. Other work in the next 12 months will be to continue to work on Aesthetic Issues through WG10, where a



draft will be published, some further work on Paint Compatibility, and also WG1 “UV Influence” will be reactivated to revise ISO 11431 in the next 24 months. We have an urgent request for additional UK

participants for ISO TC 59 SC8, particularly to stand as an expert for WG25 Sanitary Sealants. The next meeting is in October 2024 in Japan.

Join us on 2nd December for the BASA Annual Dinner

For this years BASA Annual Dinner we will be returning to the CHESTER GROSVENOR Hotel on Saturday 2nd December 2023.

The event was last held here in November 2019, we are looking forward to seeing BASA Members embrace the Christmas spirit and join us for a night of good food and good company.

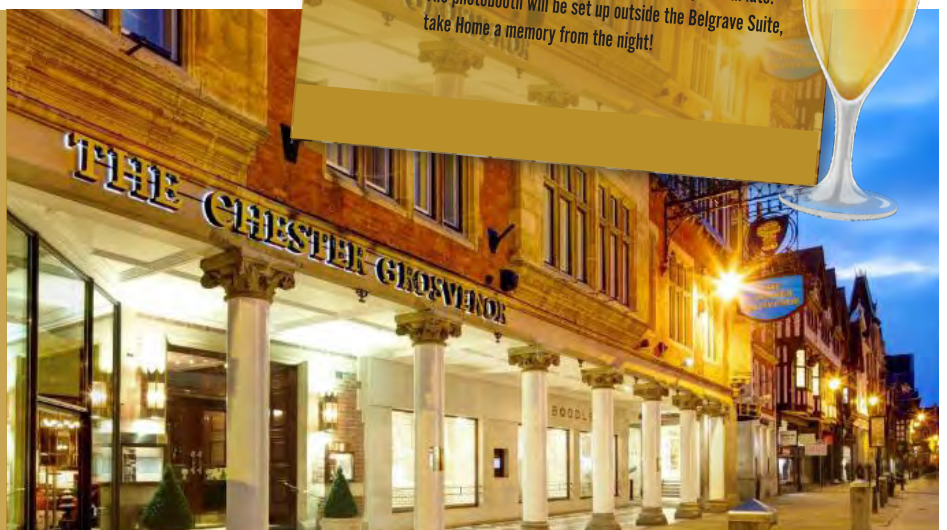
You are all working really hard so this is a chance to let your hair down and have some well deserved entertainment and a night of social networking and festivity.

Want to be a Gold Sponsor of the Chairman's Drinks Reception and support the association?

Sponsorship Package includes;

- Social media promotion
- Publicity in the BASA Bulletin
- A one page advert in the 2024 BASA Members Handbook
- Table for 8 attendees

There are only 3 Gold Sponsorships available for this event.



Booking: www.eventcreate.com/e/basadinner



Jim Palmer,
Technical Officer,
J P Consultancy

Technical Review

This issue of the BASA Bulletin is published to coincide with our first Open Industry Forum for our technical community held face to face since the pandemic. It is hard to realise that it has been more than three years since we last met in this way. In the meantime, technology has come to the rescue of our technical work, even increasing effectiveness and cost efficiency, and broadening our reach and accessibility for the technical staff of our members. All our regular working group and committee meetings are now held virtually, saving staff time and cost.

The popular weekly drop-in clinics, the programme for which is published on the BASA website, are open to all BASA members where current topics are researched and presented, and new issues raised. If you are free one Friday morning at 10 am I advise you to join and see for yourself. However, having said all that, we believe that there is no substitute for in person meetings to build relationships, so this format will continue at least once each year.

The technical work we undertake remains at the heart of the association providing valuable insight on an increasingly broadening list of issues to the membership and providing a route to input to the development of regulatory and standardisation issues both in UK/GB and EU via FEICA.

As predicted our workload has been dramatically increased by the exit from the EU as we now have twice the number of legislative processes to follow. However, our redefined reciprocal relationship with FEICA has eased the burden somewhat, combined with an increase in the technical resources allocated by Council.

The BASA web site is an invaluable source of information for members and is being continuously developed to improve accessibility. An issues map, which links all the up-to-date information on the many key issues, supplements and collates the regular working group postings, which are also notified on a weekly basis to subscribing members.

If you attended the Open Industry Forum on 2nd November, you will have read the latest situation on the hottest issues on the working poster displays, which are summaries of the web pages on the web site. If you weren't able to attend, then you missed a great day! I will comment on just a couple of key topics:

Construction Products Regulation and CE and or UKCA marking:

In Europe following a prolonged consultation the EC has chosen to enhance the CPR to meet their objective of a single market for construction products. Whereas in the UK/GB, where barriers to cross border trade are irrelevant, decisions are to be made by Industry/government about whether to reserve the use of the UKCA mark for safety critical products only as indicated by the building safety bill.

Consequently, rumours abound that recognition of CE marking in UK may continue indefinitely, especially in view of the lack of approved bodies to carry out the necessary test work. Cessation

of the recognition of CE marking in GB continues to a stated government aim but this cannot happen until actual legislation is brought forward. Mutual recognition is the only real answer to avoiding excessive repeat testing. Mutual recognition agreements already exist between EU and other world bodies so why not between EU and UK?

Extended Producer Responsibility:

In UK the plastic packaging tax has driven the change to packaging that contains minimum 30% recycled material to avoid the tax. However, the new Collection of Packaging Reform (CPR) reporting requirements are very complicated, and the implementation has had to be delayed pending further consultation. The intention is for brand owners to fund the collection and recycling cost of local government for household waste and the current classification system defaults packaging to 'household waste' unless other routes can be proven.

Additionally, the divergent approaches around Europe to meet the aims of Extended Producer Responsibility regulation is a potential problem for members supplying into Europe.

As always, I would like to thank my technical colleagues for their commitment and hard work, and I would encourage you all to consider volunteering on the working groups. It is an excellent way to keep up with the latest developments in regulations and standardisation. The time commitment is a matter of personal choice but can be minimal and those who participate fully find it a great contribution to their own personal development. Please do explore the members area of the BASA website to see what appeals.

Save The Date
*BASA Sports Day, Wednesday 19th June 2024,
 Hawkstone Park Hotel & West Midlands Shooting Ground, Shropshire*

Kindly sponsored by

Industrial use deadline – 1st Jan 2024 – for EU and NI market

The Industrial use deadline is looming (1st January 2024). Importers and downstream users of industrial use only mixtures need to comply with the harmonised information requirements outlined in Annex VIII to (EC) No 1272/2008 on classification, labelling and packaging (CLP) of substances and mixtures and submit a poison centre notification via the ECHA harmonised portal to the Member States where they are placing on the market.

(Note - If an industrial use only mixture is on the market and already notified via national submission systems before the 2024 compliance date, it may benefit from the transitional period until 1 January 2025. This means that after this date, all notifications, regardless of the use type, will need to be notified in the harmonised format.)

Northern Ireland requires an Annex VIII harmonised format poison centre notification

Northern Ireland follows the Annex VIII requirements, but not through the ECHA portal. Instead, once the Annex VIII dossier has been created it should be sent to the NPIS.

Because NPIS does not have access to the European Chemicals Agency (ECHA) poison centre notification (PCN), submissions for NI must be provided in the form of a PCN and sent directly to NPIS Birmingham as the appointed body.

In order for submissions to be valid, they must be either:

- produced directly in the ECHA-approved IUCLID desktop/cloud platform and exported as an .i6z dossier
- if produced using a third-party tool, the submission must then be imported into the ECHA PCN, and exported as an .i6z dossier. This exported dossier will be accepted by NPIS as a submission

POISON CENTRES VIRTUAL WORKSHOP

November 13, 2023
9:30 a.m. – 3:30 p.m.

Price: £102 (inc vat)
(discounted rate of £60 for additional attendees from the same company)

What you need to know to make a notification

www.eventcreate.com/e/pcworkshop

Pre-attendance guidance will be provided to booked attendees.

Hosted by
BASA Regulatory Consultant
Caroline Raine
joined by
BASA CEO Lorna Williams

THE WORKSHOP WILL COVER:

- What needs to be notified
- The deadlines
- Information required in the notification
- The differences between consumer, professional and industrial notifications
- Unique Formula Identifier (UFI)
- Mixture in mixtures (MIM)
- pH
- Group Submissions
- Reduced submission
- Updates to submissions
- Notify To Who
- Member State Implementation
- GB And NI implementation
- The use of foreign users

There will also be a practical session on:

- XML format
- UFI Generator
- EU Product Categorisation System (EU PCS)
- ECHA submission portal
- Business and technical rules

These submissions should be made via email to sds.npis@nhs.net

You must also include a UFI in the submission of information and on the label or, in some cases, the packaging of the products that contain a hazardous mixture.

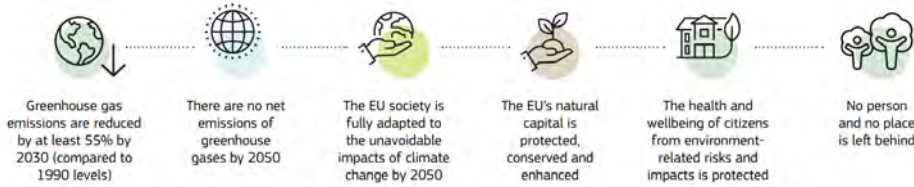
More information on Northern Ireland and Poison centres can be found on the GOV UK website here:

www.gov.uk/guidance/submitting-chemicals-information-to-the-national-poisons-information-service

Need to know how to make these notifications?

BASA is running a Poison Centre workshop in November:

www.eventcreate.com/e/pcworkshop



Synthomer plc receives ISCC PLUS certification

Synthomer plc are pleased to announce they have received International Sustainability and Carbon Certification system (ISCC) PLUS certification. ISCC PLUS certification is an internationally recognised sustainability certification which verifies the traceability of incoming and outgoing sustainable material along the value chain.

Synthomer plc has been certified as a trader with storage which means Synthomer is able to buy, store and trade ISCC certified products.

This is an important milestone for Synthomer as it enables divisions to pursue site specific certification which will put us in a good position to offer ISCC certified sustainable products to customers using the mass balance approach. ISCC certified raw materials such as Butyl Acrylate, Gum Rosin, C5, Styrene, Butadiene, Acrylonitrile are in scope for site specific certification.

The certificate is available on their website here: www.synthomer.com/about-us/certifications/



Are you taxonomy-ready?

The EU taxonomy is a cornerstone of the EU's sustainable finance framework and an important market transparency tool. It helps direct investments to the economic activities most needed for the transition, in line with the European Green Deal objectives.

The taxonomy is a classification system that defines criteria for economic activities that are aligned with a net zero trajectory by 2050 and the broader environmental goals other than climate.

So effectively it is a classification framework that determines whether an economic activity is environmentally sustainable and under EU legislation, "large" EU companies will soon need to report on their taxonomy "alignment" as part of their mandatory sustainability disclosures.

So very simply, this means reporting on the extent to which the activity of their business corresponds to what the EU views as "environmentally sustainable". Unfortunately this will catch a lot of large subsidiaries of US and other international businesses and it is likely to be a complicated exercise for many businesses, and one that they have not had to undergo before.

The Taxonomy Regulation entered into force on 12 July 2020. It establishes the basis for the EU taxonomy by setting out the 4 overarching conditions that an economic activity must meet to qualify as environmentally sustainable.

Under the Taxonomy Regulation, the Commission had to come up with the actual list of environmentally sustainable activities by defining technical screening criteria for each environmental objective through delegated and implementing acts.

EU taxonomy navigator

The Commission created an educational and user-friendly website offering a series of online tools to help users better understand the EU taxonomy in a simple and practical manner, ultimately facilitating its implementation and supporting companies in their reporting obligations.

The EU taxonomy navigator offers four tools that will help you navigate the EU taxonomy:

- 1. EU taxonomy compass:** a visual representation of sectors, activities and criteria included in the EU Taxonomy delegated acts
- 2. EU taxonomy calculator:** a step-by-step guide on reporting obligations
- 3. FAQs repository:** an overview of questions and answers on the EU taxonomy and its delegated acts
- 4. EU taxonomy user guide:** a guidance document on the Taxonomy for non-experts

Find out more about the EU taxonomy navigator by heading to the website:

<https://ec.europa.eu/sustainable-finance-taxonomy/>



The FEICA 2023 European Adhesive & Sealant Conference and EXPO

The FEICA 2023 European Adhesive & Sealant Conference and EXPO took place at the PortAventura Convention Centre in Tarragona, Spain, from 13 to 15 September 2023 and was attended by almost 700 delegates.

This year's event focussed on how to achieve your sustainability goals. Photos of the event are available via the FEICA Conference Media Gallery here: www.feica-conferences.com/the-conference/media-gallery/2023-photo-gallery/.

The presentations for the Members Seminar 'A Business Perspective on Regulatory Challenges' are available for all BASA & FEICA members from the FEICA Extranet

Market changes through Circular Economy by Flor Peña Herron, Chair of the FEICA Sustainable Development Committee, Avery Dennison

- Prepare your portfolio for upcoming substance restrictions by Kim Suetens, Chair of the FEICA Mixture Assessment TTF and Vice

Chair of the Polymers TTF, Soudal

- Status report on FEICA advocacy by Peter Boris Schmitt, Chair of the FEICA European Advocacy Group, Henkel
- Challenges and opportunities for packaging adhesives by Elizabeth Staab, Chair of the FEICA Sustainability & Recycling of Adhesives in Paper & Packaging Applications TTF, H.B. Fuller

The 2024 FEICA Conference & EXPO will be held at Noordwijkerhout in the Netherlands, from 11 to 13 September 2024. Registration will open at the beginning of 2024, so SAVE THE DATE!

You can read more on this year's conference in the forthcoming edition of FEICA CONNECT, out in November.



Launch of the European Adhesives and Sealants Market Report 2023-2028

The market study programme, titled 'The European Adhesives and Sealants Market 2023-2028', was officially launched at the 2023 European Adhesive & Sealant Conference and EXPO in Tarragona.

The European Adhesives and Sealants Market Report 2023-2028 gives detailed forecasts aiming at an accurate picture of the market during this period. The report also provides indispensable insights to help companies better position themselves for success in today's business environment.

Read Smithers article on how the UK adhesives sector continues growth despite headwinds on page 14.



BASA members are eligible for the members rate for the report.

www.feica.eu/information-center/market-reports



Noordwijkerhout, the Netherlands

FEICA European Adhesive & Sealant Conference and EXPO 2024

11-13 September 2024

NH Noordwijk Conference Centre Leeuwenhorst

SAVE THE DATE



International Adhesives & Sealant Day

On the 29th September we celebrated 'International Adhesive & Sealant Day'!

International Adhesive & Sealant Day was globally recognised at the 2022 World Adhesive and Sealant Conference (WAC) to be celebrated each year on 29 September. It is an ideal opportunity to highlight how our industry's products are crucial in a modern world and help create a more sustainable society.

FEICA, the Association of the European Adhesive & Sealant Industry, launched a website on this day at www.internationaladhesiveandsealantday.com.

Kristel Ons, FEICA Secretary General said 'International Adhesives and Sealants day affords an opportune occasion to showcase everything that could not exist without our incredible industry and to celebrate how it enables a more sustainable world. The adhesive and sealant industry is continuously innovating and developing technologies to support a growing world population to live a better life and to use the planet's resources responsibly and efficiently. We hope that everyone will share our enthusiasm to put our amazing global industry in the spotlight today'.

In Europe in particular, the following are some examples how our industry supports the European Commission's Goals:

- Our industry's adoption of digital

technologies that are revolutionising the way businesses operate, setting new standards for efficiency, productivity, and innovation, as well as the importance of assembling electronic devices

"International Adhesives and Sealants day affords an opportune occasion to showcase everything that could not exist without our incredible industry and to celebrate how it enables a more sustainable world."

- Windmills, solar panels, batteries, the insulation of buildings and light-weight vehicles (essential for renewable energy and energy savings)
- Medical and dental care, prostheses and masks (essential for good health and well-being)
- Products used for electrolyzers to produce hydrogen, sustainable



biogas and biomethane, for carbon capture and storage, and for power grids (essential for products relating to the EU strategic Industries)

- Water membranes and filters (essential for clean water and sanitation)
- Reusable packaging (essential for avoiding food waste)

If you missed this press release, you can still check out some of these highlighted at:

www.internationaladhesiveandsealantday.com/innovations.

For further information about FEICA, please visit their website www.feica.eu.

Sep 16 2026

WAC2026 LONDON

WORLD ADHESIVE & SEALANT CONFERENCE

16-18 September 2026
The QEII Centre
London, UK

Hosted by: FEICA Co-organised by: ASC ARAO

EU Draft Toys Regulation

Introduction

In July 2023 the European Commission published the proposed draft EU Toys Regulation, which converts the existing Toy Safety Directive into a new Toy Safety Regulation.

The draft regulation stems from a review of the Toys Directive which was carried out in 2020 where it was identified that there was room to strengthen some of the rules. The new regulation would repeal The Toys Directive 2009/48/EC.

Review of the Toys Directive

The European Commission stated that “The evaluation of the Toy Safety Directive (TSD) (the Evaluation) identified a number of deficiencies in the TSD in ensuring a high level of protection of children from possible risks in toys, and in particular from risks posed by harmful chemicals. The Evaluation also concluded that there remain many non-compliant and unsafe toys on the EU market.”

The intention of the new regulation “should achieve a higher level of protection of children from the most harmful substances and reduce the number of non-compliant and unsafe toys on the EU market.”

The review identified some problems;

- Insufficient protection of children from harmful chemicals
- A high number of toys on the Union market do not comply with the Toy Safety Directive and are unsafe
- New risks in toys, from emerging digital technologies.

Many of the suggested changes and the review are part of the chemical strategy for sustainability (CSS) which called for extending the so-called generic approach towards harmful chemicals (based on generic preventive bans) to ensure that consumers, vulnerable groups and the natural environment are more consistently protected.

In particular, the CSS called for strengthening the Directive with regard to protection from the risks posed by the most harmful chemicals and with regard to possible combination effects of chemicals. The Directive already contains a general prohibition on substances in toys that are carcinogenic, mutagenic or toxic for reproduction (CMRs).

However, it does not refer to other substances of particular concern, such as endocrine disruptors or substances affecting the immune, nervous or respiratory systems.

The review suggested a few key areas for change.

- Policy option 1a – minimum changes to the Directive
- Policy option 1b – Improved protection: generic bans of the most harmful substances with derogations
- Policy option 1c – Maximum protection: generic bans of the most harmful substances without derogations
- Policy option 2a: extending third-party conformity assessment
- Policy option 2b: facilitation of market surveillance through digitalisation
- Policy option 2c: Extending third party conformity assessment and facilitation of market surveillance through digitalisation

And the European Parliament calls on the Commission to revise the Directive to:

- strengthen the protection of children against chemical risks;
- ensure that risks posed by internet-connected toys are addressed by EU law; and
- improve enforcement of the Directive in particular in relation to online sales.

Proposed Draft Regulation

The Regulation applies to products which are for use in play by children under 14 years of age.

Harmful substances

Substances or mixtures classified in any of the following categories is prohibited:

- carcinogenicity, germ cell mutagenicity or reproductive toxicity (CMR) category 1A, 1B or 2;
- endocrine disruption category 1 or 2;
- specific target organ toxicity category 1, either in single exposure or in repeated exposure;
- respiratory sensitisation category 1.

Cosmetic toys, such as play cosmetics for dolls, shall comply with the compositional and labelling requirements laid down in Regulation (EC) No 1223/2009.

The following migration limits, from toys, components of toys or micro-structurally distinct parts of toys, shall not be exceeded:

Element	mg/kg in dry, brittle, powder-like or pilable toy material	mg/kg in liquid or sticky toy material	mg/kg in scraped-off toy material
Aluminium	2250	560	28130
Antimony	45	11.3	560
Arsenic	3,8	0,9	47
Barium	1 500	375	18750
Boron	1 200	300	15 000
Cadmium	1,3	0,3	17
Chromium (III)	37,5	9,4	460
Chromium (VI)	0,02	0,005	0,053
Cobalt	10,5	2,6	130
Copper	622,5	156	7 700
Lead	2,0	0,5	23
Manganese	1 200	300	15 000
Mercury	7,5	1,9	94
Nickel	75	18,8	930
Selenium	37,5	9,4	460
Strontium	4 500	1 125	56 000
Tin	15 000	3 750	180 000
Organic tin	0,9	0,2	12
Zinc	3 750	938	46 000

Nitrosamines and nitrosable substances are prohibited in toys intended for use by children under 36 months or in other toys intended to be placed in the mouth where the migration of those substances is equal to or higher than 0,01 mg/kg for nitrosamines and 0,1 mg/kg for nitrosable substances.

The following limit values, in toys or components of toys or micro-structurally distinct parts of toys, shall not be exceeded:

Substance	CAS No	Limit value and conditions for application
DEHP	115-96-3	5 mg/kg (content limit)
DBP	13674-84-5	5 mg/kg (content limit)
DECEP	13674-87-8	5 mg/kg (content limit)
Formamide	75-12-7	20 µg/m ³ (emission limit) after a maximum of 28 days from the start of the emission testing of foam toy materials containing more than 200 mg/kg (cut-off limit based on content)
1,2-benzisothiazol-3(2H)-one	2634-33-5	5 mg/kg (content limit) in aqueous toy materials, in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005
Reaction mass of: 5-chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-methyl-2H-isothiazal-3-one [EC no. 220-239-6] (3:1)	55965-84-9	1 mg/kg (content limit) in aqueous toy materials
5-Chloro-2-methyl-isothiazolin-3(2H)-one	26372-55-4	0,75 mg/kg (content limit) in aqueous toy materials
2-methylisothiazolin-3(2H)-one	2682-20-4	0,25 mg/kg (content limit) in aqueous toy materials
Phenol	108-95-2	5 mg/kg (migration limit) in polymeric materials in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005. 10 mg/kg (content limit) as a preservative in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005.
Formaldehyde	50-00-0	1,2 mg/l (migration limit) in polymeric toy material 0,062 mg/m ³ (emission limit) in wood toy material 30 mg/kg (content limit) in textile toy material 30 mg/kg (content limit) in leather toy material 30 mg/kg (content limit) in paper toy material 10 mg/kg (content limit) in water-based toy material
Aniline	62-53-3	30 mg/kg (content limit) after reductive cleavage in textile toy material and leather toy material 10 mg/kg (content limit) as free aniline in finger paints 30 mg/kg (content limit)



Toys shall not contain 58 fragrance allergens unless their presence in the toy is technically unavoidable under good manufacturing practice and does not exceed 100 mg/kg. You can see the full list of these 58 fragrance allergens on the Health & Safety Working Group.

The names of 71 fragrance allergens shall be listed on the toy, on an affixed label, on the packaging or in an accompanying leaflet, as well as in the product passport, if those allergens are added to a toy, where they are present in the toy or any component thereof at concentrations exceeding 100 mg/kg. You can also see the full list of these 71 fragrance allergens on the Health & Safety Working Group.

The use of fragrances referred to in entries 41 to 55 in the table in Part A, point 4, and of fragrances referred to in points 1 to 10 in the table in point 1 of this Part shall be allowed in olfactory board games, cosmetic kits and gustative games, under the following conditions:

(a) the fragrances are clearly labelled on the packaging of the toy, and the packaging contains the warning referred to in point 11 of Annex III;

(b) where applicable, the resulting products made by the child in accordance with the manufacturer's instructions comply with Regulation (EC) No 1223/2009; and

(c) where applicable, the fragrances comply with the relevant Union legislation on food.

Such olfactory board games, cosmetic kits and gustative games shall not be used by children under 36 months and shall comply with point 2 of Annex III.

There are some permitted uses for Nickel (carc 2) in toys and toy components made of stainless steel and in toy components which are intended to conduct an electric current.

Product Passport

There is a new requirement for digital product passports, this replaces the existing Declaration of Conformity. All toys, including those sold online, are required to have a Digital Product Passport. The regulations specify the information that must be contained within the passport, *the product passport shall;*

(a) correspond to a specific toy model;

(b) state that compliance of the toy with the requirements set out in this Regulation and, in particular, the essential safety requirements, has been demonstrated;

(c) contain at least the information set out in Part I of Annex VI;

(d) be up to date;

(e) be available in the language or languages required by the Member

State where the toy is made available on the market;

(f) be accessible to consumers or other end-users, market surveillance authorities, customs authorities, notified bodies, the Commission and other economic operators;

(g) be available for a period of 10 years after the toy is placed on the market, also in cases of insolvency, a liquidation or a cessation of activity in the Union of the economic operator that created the product passport;

(h) be accessible through a data carrier;

(i) fulfil the specific and technical requirements laid down pursuant to paragraph 10.

Mental health risks

Article 5 of the regulations has been expanded to include mental health risks.

1. Toys shall only be placed on the market if they comply with the essential safety requirements which include the safety requirement set out in paragraph 2 (the 'general safety requirement') and the safety requirements set out in Annex II (the 'particular safety requirements').

2. Toys shall not present a risk to the safety or health of users or third parties, including the psychological and mental health, well-being and cognitive development of children, when they are used as intended or in a foreseeable way, bearing in mind the behaviour of children. When assessing the risk referred to in the first subparagraph, the ability of the users and, where appropriate, their supervisors shall be taken into account. Where a toy is intended for use by children under 36 months or by another specified age groups, the ability of users in that specific age group shall be taken into account.

3. Toys placed on the market shall comply with the essential safety requirements during their foreseeable period of use.

Batteries in toys

The draft proposed regulation specifies that toys that include batteries should be designed in such a way that the batteries are difficult for children to access. In addition the batteries must comply with other relevant regulations for example The Regulation on the registration, evaluation, authorisation and restriction of chemicals (REACH) and the Batteries Directive.

Labelling changes

In order to help with challenges surrounding translation the review suggested replacing the word 'Warning' by a generic pictogram. The report states that this would lead to simplification for the industry without compromising the protection of children. It would also lead

to savings to the industry when producing the labels but these savings cannot be quantified with precision.



Chemical toys – labels

Without prejudice to the application of the provisions laid down in applicable Union legislation on the classification, packaging and labelling of certain substances or mixtures, the instructions for use of toys containing inherently dangerous substances or mixtures shall bear a warning of the dangerous nature of those substances or mixtures and an indication of the precautions to be taken by the user in order to avoid hazards associated with them. These precautions shall be specified concisely and shall relate to the type of toy. The first aid to be given in the event of serious accidents resulting from the use of the relevant type of toy shall also be mentioned. It shall also be stated that the toy is to be kept out of reach of children under a certain age, which shall be specified by the manufacturer.

In addition to the instructions referred to in the first subparagraph, chemical toys shall bear the following warning on their packaging:

'Not suitable for children under ...2 years. For use under adult supervision'.

Timings

A transition period of 30 months has been proposed. It would apply 30 months after the date of entry into force of this Regulation. This would apply to all new toys.

Draft Regulation Consultation

The draft legislation went through an eight-week feedback period which closed on 31st October 2023, details can be found here:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13164-Protecting-children-from-unsafe-toys-and-strengthening-the-Single-Market-revision-of-the-Toy-Safety-Directive_en

The new regulation will be evaluated after 5 years.

Conclusions

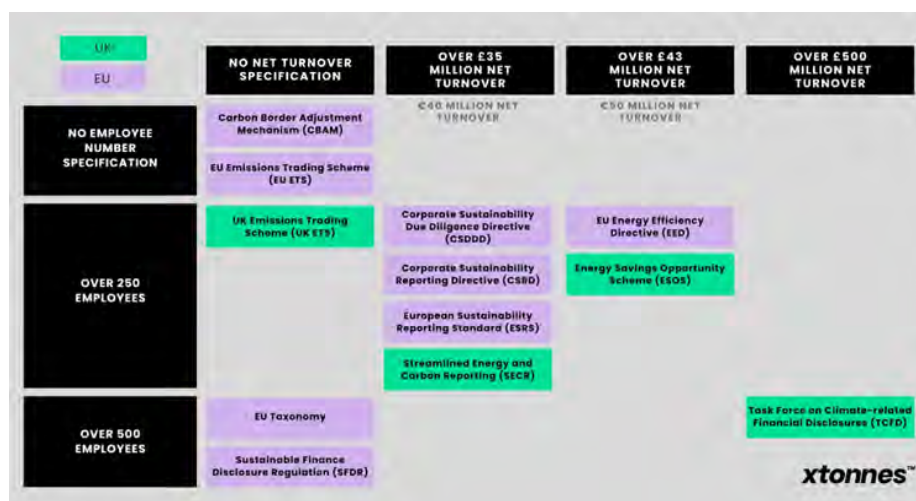
If you place toys onto the market, carefully review the proposed regulation and then start to prepare for the regulation by reviewing your product portfolio and the chemicals you use.

Navigating the Scope 3 reporting landscape

Over the past few years, there has been a notable surge in interest regarding [Scope 3](#) reporting by companies.

In fact, there was a [28% increase](#) in Scope 3 categories disclosed to CDP in 2022, as compared to 2019. And the overwhelming majority (92%) of emissions disclosed by European companies in 2022 were Scope 3, with the use of sold products (57%) and purchased goods and services (17%) cited as companies' key hotspots.

For those not yet familiar with Scope 3, these are emissions that originate from activities both upstream and downstream, involving suppliers, customers and other activities. As opposed to Scope 1 and Scope 2 emissions, where companies have more direct influence in assessing and reducing emissions, Scope 3 emissions present a unique challenge as they often require collaboration and data sharing with various entities or stakeholders in the value chain.



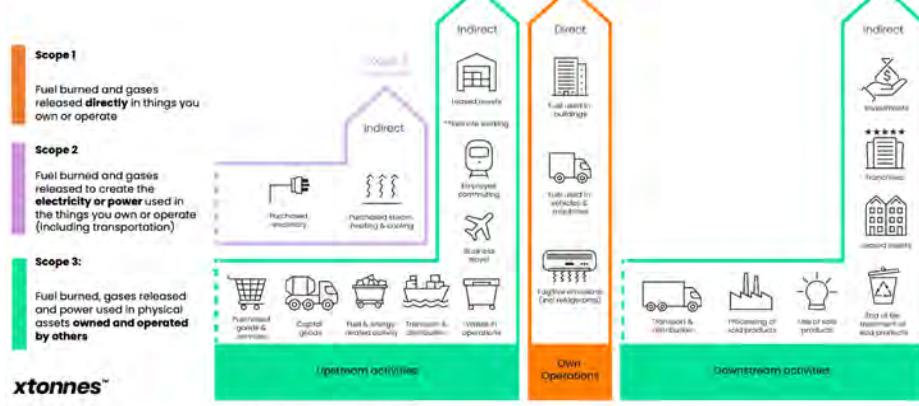
In turn, this means that companies are seeking more granular and specific Scope 3 data to effectively monitor their progress. However, a significant challenge in setting robust Scope 3 targets lies in accessing high quality information from supply chains.

To address this obstacle, [carbon accounting tools](#) are emerging to facilitate the collection and monitoring of emissions data across the value chain. In fact, the global carbon accounting software market size is projected to grow from [\\$15.31 billion](#) in 2023 to [\\$64.39 billion](#) by 2030.

The reason behind this boom is the fact that automating carbon accounting makes tasks like data collection, emissions tracking and analysis a lot more streamlined. Additionally, it enhances transparency, auditability and traceability for carbon reporting. Not to mention that the transformational insights offered by these tools often leads to cost savings too, as the greatest sources of emissions are typically also sources of financial inefficiency.

Companies respond by setting value chain-wide targets

As companies are taking proactive measures to enhance transparency and due diligence by establishing value chain-wide carbon accounting practices, many international corporates are using Scope 3 reporting to engage with their supply chain. This means that, increasingly, companies are asking their suppliers to provide sustainability information, including carbon emissions.



As organisations are increasingly recognising the significance of Scope 3 emissions in their overall carbon footprint, noteworthy trends are emerging in climate-related commitments and [carbon accounting](#).

Let's delve into some of these key trends shaping the Scope 3 landscape:

Scope 3 scrutiny is increasing

It's no secret that the urgency to address emissions is ramping up. As part of the quest for a more sustainable future, regulations are increasingly coming into force that require organisations to disclose their carbon footprints, with some enforcing the reporting of Scope 3 emissions.

Take the [Corporate Sustainability Reporting Directive \(CSRD\)](#) as an example. This regulation will require all large enterprises that carry out business in the EU, including those based outside of the EU, to disclose their carbon footprint starting in 2024, covering Scope 3 emissions too.

Rise in adoption of carbon accounting tools

The proportion of global emissions covered by companies with a target including Scope 3 has [more than doubled since 2019](#). This indicates a growing trend in corporations preparing for regulatory requirements and recognising the importance of addressing their indirect emissions.

For example, beginning in 2024, Amazon is updating its Supply Chain Standards to require suppliers to share their carbon emissions data and set carbon goals. This is in parallel with Amazon's decarbonisation target to reach net zero by 2040, requiring it to reduce its carbon footprint across the entire business, including its vast global supply chain.

Another example of retailers bolstering their Scope 3 is the recent collective initiative by eight of the UK's biggest supermarkets, representing approximately 80% of the UK market, alongside WRAP and WWF. As a group, they will develop a consistent framework for the measurement and reporting of the retailer's Scope 3 emissions.

Scope 3 reporting is here to stay

It is apparent that Scope 3 reporting is not a passing trend. Instead, it's gaining momentum and recognition for the pivotal role it plays in avoiding the worst effects of climate change.

As more and more companies find themselves under mounting pressure, not only from impending legislation but also from investors and key stakeholders, the announcement and implementation of Scope 3 commitments will rise in parallel.

By staying at the forefront of carbon reporting trends, businesses that fall within these companies' value chains can not only be prepared for what information they may have to disclose, but also position themselves as leaders in sustainability and boost their own long-term resilience.

For more information carbon accounting and how it can help your business stay ahead of the curve, reach out to xtonnes.

www.xtonnes.com/contact

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Apollo celebrates 5 years of zero reportable safety incidents

"We celebrate this amazing achievement due to our employee's determination and due diligence. Thank you to all our employees for making safety a priority every single day!"

We encourage employees to continue to report all near misses to catch potential accidents before they happen and ensure we continue this trend."

CONGRATULATIONS!

We are proud to celebrate that we have achieved
5 years without a reportable incident!

We celebrate this amazing achievement due to your determination and due diligence.

Thank you to all our employees for making safety a priority every single day.



ECONOMIC UPDATE OCTOBER 2023

I hope most of you have enjoyed a holiday. I see it as a time for reflection and the opportunity to rise above pressing, day to day, challenges. My three weeks in Pembrokeshire has given me the time and energy to reflect on the current state of the UK, and elsewhere.

The most commonly used word in the media is crisis. Crisis is defined as a time of intense difficulty or danger. Parts of the Ukraine, central Africa, Western Canada, Florida, Libya, Morocco and Hawaii have all experienced weather-related crises over the past six weeks. But is there an economic crisis?

There is no economic crisis; a more appropriate word would be malaise. There is a general feeling of unease although it is hard to pinpoint its cause. The UK and Germany, in particular, are experiencing tolerable underperformance. Tolerable underperformance is best described as low or no real growth, with full employment.

The latest revisions to UK GDP show that, since 2021, UK economic performance has been in line with the rest of Europe; not worse, as originally thought. But we should note that the revisions do not mean the man in the street is better off. Wholesalers and food retailers made much greater profits than originally estimated. China's underperformance is causing the same problem in Germany. Germany however, still has a trade surplus of 4% of GDP which compares favourably to the UK's 3.3% deficit.

The politics reflect tolerable underperformance. There are shifts left or right of centre across a range of countries. Ignoring the USA, these shifts are unlikely to result in major changes in economic management. The UK is experiencing petty wrangling and a clash of cultures between young taxpayers and the old comfortably wealthy. There are growing numbers of the latter.

Stagflation, a period of rising prices with little or no real growth, is tolerable for the majority, particularly if pensions and the minimum wage keep pace with inflation. If next year brings a coalition or a Labour Government, faces will change; hopefully there will be more energy and competence. However, don't expect any major shifts in economic policy.

Money Supply Growth in Major Advanced Economies



NOTE: The chart plots M2 in the Euro Area, U.S., Japan and Canada and M4 in the U.K.
SOURCES: National Central Banks; Haver Analytics
Globalization Institute
Federal Reserve Bank of Dallas

Inflation is falling across the globe due to the collapse in annual money supply growth rate from 14% to 1%.

Inflation has reduced the purchasing power of existing money by at least 10%. Populations have less real spending power so real demand has fallen back from the end of the lockdown peaks. Supply and demand in a wide range of goods and services is beginning to balance out.

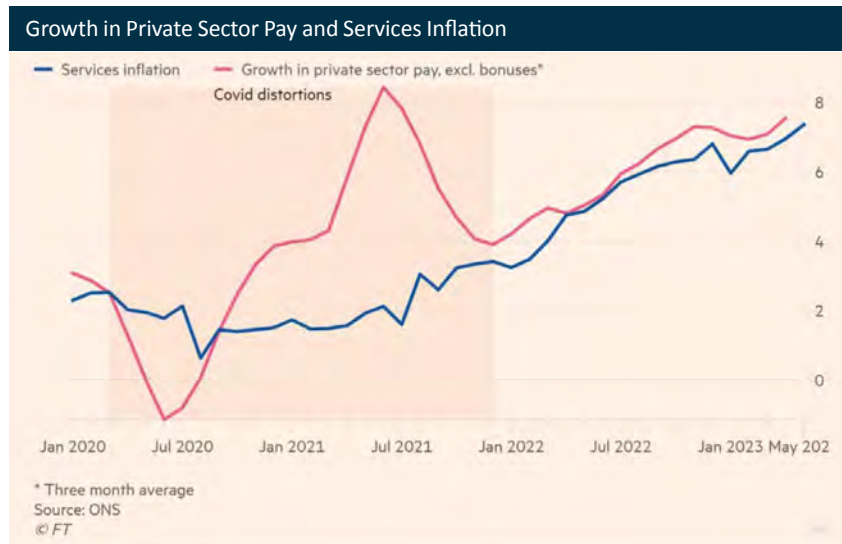
The current danger is overkill due to a rigid inflation target of 2%. The USA sensibly has a flexible inflation target; they now take an average over a number of years. It means that even if inflation is above 2%, the USA will reduce interest rates if growth stagnates. The UK has a target range of 1-3% but no averaging over time.

Unfortunately, the UK Government has politicised the setting of interest rates by the the Bank of England. It firstly blamed gas prices; now it blames the Bank for our inflation rate. The cause is actually generous furlough and business support during covid, financed by new money from the Bank as requested by the Cabinet.

There is NO case at all to raise rates from the current level. There is a case to move to a more flexible target for inflation, but the PM has made the inflation target one of his five measures of leadership performance, even though it is completely out of his control! In fact, of his five targets, the only one within his control is stopping the boats. If the Bank of England raise rates further, we should expect a mild recession in an election year. So there is no need to raise interest rates beyond the current 5% unless wage awards still run in excess of 5%. However, regular pay in the first part of this year was up 7.2%. UK productivity is currently estimated at 1.3%. So arithmetically, we are looking at core inflation running at 5-6%. Therefore the 2% inflation rate target is unrealistic.

Inflation will only fall to 2% in countries which enjoy productivity growth. In this, the USA leads. And most other countries lag. (see chart). As I have said in previous updates, unless productivity can be increased through automation, inflation control requires higher unemployment for all skill sets - a recession.

This chart explains. The growth in private sector pay is running at 7% excluding bonuses. The UK services' inflation rate is slightly lower. If productivity was growing at say 2% inflation rate for services would be 5%.



An important component of the surge in inflation was the rise in import prices as global energy and food costs soared with the outbreak of war in Ukraine. At one point last autumn, that price surge damaged our terms of trade and subtracted about 1.5 per cent from our national income. The terms of trade is the difference between import prices and export prices. If export prices are rising by more than import prices; the terms of trade are improving; conversely, if import prices are rising by more than export prices: the terms are deteriorating.

However, the surge, which drove consumer price inflation to annual rates above 10 per cent, has now fully reversed. Indeed, the terms of trade are now slightly better than they were at the beginning of 2022.

Consequently, the rate of price increases is falling fast; consumer prices in the month of June rose at an annual rate below 2 per cent, and in July the CPI index fell by 0.4 per cent, due to a decline in energy prices.

The UK suffered an unavoidable loss of real income as import prices rose. If workers attempted to maintain their previous levels of real income, the result would be a wage spiral. This happened in the 1970s when the terms of trade deteriorated significantly due to a quadrupling in the price of oil.

Given the terms of trade recovery and no growth in money supply, there will not be a wage price spiral. Real wages are down 4.5 per cent since the beginning of 2022, having failed to keep pace with inflation. But companies have done well. The latest revisions to GDP are the largest we have seen. £44Bn added, due to actual profits being higher than estimated in the food retail and wholesale sector, plus more accurate data on health sector output. As the NHS provides 88% of UK health care output, it is clearly performing well. 85% of NHS output is now measured on an output basis, when formerly it was on an input basis. (i.e. how much was spent, rather than what was produced).



You can read the rest of Roger Martin-Fagg's Economic Update under the Business Steering Committee (BSC) WG.

UK adhesives sector continues growth despite headwinds

The UK adhesives and sealants industry is plotting a future path to recovery. New exclusive data from market research specialist Smithers indicates that in 2023 it is still the third largest market in Europe, with demand reaching a projected 421,700 tonnes, with a value of £1.30 billion (€1.50 billion).

Published in FEICA's European Adhesives and Sealants Market 2023-2028 [<https://www.feica.eu/information-center/market-reports>] these data show adhesives account for £978.0 million or 75.4% of the market by value, and sealants £425 million 24.6%.

The industry outlook is still negatively impacted by broader economic factors. There was a slump in sales during the Covid pandemic, as many core end-use industries slowed or ground to a halt. This was only slightly ameliorated by increased demand from certain priority sectors, such as medical PPE and e-commerce packaging. Hopes of a swift recovery have been dashed by macroeconomic factors, including spiralling inflation, extra costs associated with Brexit, weak domestic consumer confidence, and soaring energy input prices caused by the war in Ukraine. In 2023, the UK is only G7 country where the economy remains smaller in 2023 than it was before the pandemic.

Growth outlook

Smithers analysis tracks a route for the sector to return to positive growth in the near future, capitalising on evolving market opportunities and new technology demands. Still with many issues unresolved this recovery will be slow, and fragile. Consumption volumes are forecast to increase at a +0.5% compound annual growth rate for 2023-2028, reaching 476,600 tonnes in its final year. Value will increase slightly faster, with a +1.0% CAGR forecast for value, with sealants slightly outperforming adhesives.

In 2023, polymer dispersions and emulsions remain the most widely used adhesives in the UK. Smithers data show these represent 44.9% of contemporary national demand, by volume; and 29.7% by value. By tonnage hot melts are the second most widely used adhesive type, 18.2% market share; ahead of reactive (polymerising) adhesives, 15.9%. The latter have the best growth outlook through to 2028; and there will also be appreciable gains in the market share of adhesives made with natural polymers, such as starch, dextrin, casein, and latex.

Consumer segments

Paper and board applications – packaging, bookbinding, tissue manufacture, etc – continue to be largest user of adhesives in the UK.

Packaging has benefitted from the local popularity of e-commerce shopping over the past three years, with the country enjoying one of the highest rates of online delivery sales in Europe. This sector can reward innovations, such as the development of adhesive tabs to enable easy opening and resealing, for returns, in the same container. Returns are most common in apparel segments. Long dependent on polyethylene mailers, many brands are now investigating a transition to waterproof paper envelopes and mailer formats.

Increasingly brands are calling for greater sustainability in home-delivery formats. This is placing a premium on adhesives formulated from natural ingredients, with several commercial suppliers now boasting 80% bio-based content in hot-melt grades.

At the same time recyclability at end-of-life is increasingly of concern, and for adhesives that do not compromise recyclability of corrugated or other paper stocks when disposed of. A similar impetus in flexible plastic packaging has prompted interest in optimised water-based blends that can debond efficiently during processing in a material recovery facility.

In October 2023, the UK joined the wider European trend in enforcing a ban on certain single-use plastic foodservice containers. This has stimulated sales of alternative paperboard clamshells, cups, and trays, including those built with compostable hot-melt formulations.

In hygiene, wipes, and feminine hygiene goods, performance remains the most important consideration, although the sector is still looking for more sustainable solutions, including those that enable a transition to more fibre-based components or reduce the volume of adhesive consumed.

Consumer and DIY adhesive sales also performed well across the Covid pandemic. Home improvement remained one of the few pastimes possible during strict lockdown conditions, and the widespread transition to home working saw many families add a home office or extension. This peak is now tailing off and consumer/DIY products will have the slowest growth rate across the next five years.

Industrial segments

The surge in natural gas prices that occurred following Russia's invasion of Ukraine in 2022, has affected many industries that use adhesives. This has served to delay UK industrial recovery from Covid-19.

From a technical perspective, it has stimulated further interest in formulations with lower curing temperature, while some end-users are also investing in technology that enables more precise deposition, like hot-melt stitching, that can cut the overall volumes of adhesives required.

In transportation, uncertainty post-Brexit has raised questions over the future of automotive manufacture in the UK, exacerbated by global supply chain issues. Significant government support has convinced several major car builders to locate new electric vehicle (EV) factories in the UK. With EVs weight is at a premium for all components to improve travelling range. This is reinforcing the trend to use more adhesives in place of other heavier bonding technology in a car's chassis. Another potentially lucrative segment will be the development of high-performance adhesives and sealants for electric vehicle batteries.

Similar issues have affected many assembly industries. UK manufacturing output saw a major drop, down -5.2% in 2020, followed by a surge in production across 2021, +15.1%. This trajectory has not been sustained however, with another fall of -4.5% seen in 2022.

Construction has also largely recovered, but has a flat outlook, with the wider macro-economic picture meaning there is little public- or private-sector investment planned for the immediate future.

Comprehensive data on the contemporary and future market outlook for the UK and all major countries in the wider European region is available to purchase now.

'European Adhesives and Sealants Market Report 2023-2028' from FEICA available here:

www.feica.eu/information-center/market-reports

BASA members receive the members rate on the FEICA report.



SMITHERS

UK REACH implications for downstream companies

Due to the highly interconnected nature of chemicals supply chains, the UK decision to leave the EU continues to have important implications for businesses. While imports into the EU and Northern Ireland need to be EU REACH compliant, chemicals manufactured and imported into Great Britain (GB) are subject to separate UK law. Registration, authorisation, SVHC communication and restrictions remain key provisions under UK REACH. Although similar in structure, EU and UK REACH are implemented independently from each other, bringing significant challenges to businesses operating in both markets. In this short article, we provide an outline of some key points BASA members may need to consider when dealing with UK REACH.

Transitional arrangements

When the UK was part of the EU, companies that were using or distributing chemicals (on their own or in mixtures) in GB from EU registered sources were classed as downstream users or distributors under EU REACH. Since the entry into force of UK REACH, their role may have changed into REACH importer under UK REACH. This means that a registration may be required for chemicals imported at 1 tonne or more in Great Britain, unless the registration responsibility is taken over by a GB-only representative appointed by the chemical manufacturer or formulator based outside GB.

A downstream user import notification (DUIN) scheme was put in place by the UK authorities to help companies adapt to the change and continue to import until a full registration is required in due course. More recently, the registration deadlines for substances benefitting from the transitional arrangements have been extended by 3 years to give time to government officials to explore an alternative model of registration to address concerns around the cost and complexity of duplicating registrations for the UK market.

The new registration deadlines are now set for 27 October 2026, 27 October 2028 and 27 October 2030, depending on the hazard profile of the substance and the tonnage band.

As the market for chemical products is not static, many of our subscribers regularly enquire about the regulatory implications of making changes to existing supply chains or what actions should be taken if, for example, a company intends to start

importing specific chemicals or products for the first time. In the first case, it is important to note that UK REACH allows for a change of supplier in relation to the downstream user notifications, provided the new supplier is also covered by an EU REACH registration.

In the second scenario, if GB companies manufacture or import substances on their own or in mixtures for the first time after the end of the Brexit transition period and they establish that they have registration obligation, then a UK registration is required prior to the manufacture or import of the substance into GB reaching 1 tonne per year. In this case, a downstream user notification (DUIN) does not apply.

For substances that were previously registered under EU REACH, companies may however be able to defer the submission of the full registration such that data sharing with other registrants can take place. Instructions for the dossier submission are provided by the HSE to potential registrants at the Inquiry stage.

Inquiry dossier

The first step of any new REACH registration is to submit an Article 26 Inquiry dossier. The same process applies both in the EU and in GB. An Inquiry dossier must identify the potential registrant, their substance and the information they require on the intrinsic properties of the substance to complete their registration dossier. Detailed analytical information must be included to prove the substance's identity.

With respect to polymers, it is their monomers and any other reagent used at more than 2% w/w in synthesis that need registration if imported at over 1 tonne equivalent. In many cases, importers of polymers have been unable to obtain samples of the appropriate monomers and reagents to allow confirmatory analysis prior to registration. Because of this, some applicants relied on purchased samples of these monomer substances to put through analysis to satisfy REACH validation rules.

After information checks with the HSE helpdesk, it has been suggested that it may prove more useful to provide analytical evidence that the imported material is a true polymer and to confirm that the monomers/reagents used are as expected through a correct understanding of the polymer. Checks for impurities

(contaminants) are also important.

This is a more pragmatic way to start the registration process for monomers and reagents as it avoids having to buy the (sometimes very hazardous) substances from laboratory suppliers. If companies need to import polymers, REACHReady can advise on the best approach for analysis.

Beyond registration

As the UK regime works independently from EU REACH, some degree of divergence is inevitable and already happening. Whilst the candidate list, authorisation and restriction lists have been carried over at the end of the transition period, and the same legal obligations apply in GB as in the EU, the regulatory processes that lead to substances being added to these regulatory lists have been adapted to a GB-only context.

Although no new substances have been subject to further regulatory controls in GB to date, we advise companies to closely monitor ongoing activities around UK authorities' priorities, which are still informed by EU developments, as detailed in the UK Agency's Annual Work Programme and communicated via the HSE REACH bulletins.

REACHReady's regular technical alerts available to our Gold Subscribers can also help companies keeping track of public consultations, calls for evidence and upcoming changes on specific substances both in the EU and in the UK.



For all your UK and EU REACH, CLP and BPR needs



A wholly-owned subsidiary of the Chemical Industries Association, REACHReady offers a confidential, cost-effective service providing you with information and guidance on what you need to do to comply with UK and EU REACH, CLP and the Biocidal Products Regulation.

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