

QUESTIONS & ANSWERS regarding REACH-Evaluation of HDI Trimer

HDI trimer (more precisely: HDI oligomers, isocyanurate type) has been subject to a substance evaluation process in 2014.

The following Q&A aim to provide more detailed information about this process and the outcome of the evaluation.

What is a “substance evaluation” under REACH?

Substance evaluation is a process within REACH to evaluate all available information for a certain substance in order to clarify if there is a risk to human health or the environment. The evaluation is carried out by a Member State, in our case Slovenia.

What are possible consequences of a substance evaluation process?

The Member State can either conclude that the available information is sufficient to evaluate possible risks related to the substance, or that additional information is needed for evaluation. In the latter case the Member State will draft a legally binding decision requesting further information from the registrants of the substance. If the available information is sufficient for evaluation, the Member State may conclude that no further actions are needed, or may recommend additional measures (e.g. set up/modify OEL, modify classification & labelling, initiate restriction or authorization).

What is the “CoRAP”?

CoRAP stands for “Community Rolling Action Plan”. This plan is updated and finally published by ECHA each year in March and indicates substances for evaluation by the Member States in the next three years. It lists substances, responsible Member State, year of evaluation and initial grounds for concern.

Why was HDI trimer chosen for substance evaluation?

Substances are selected and prioritized for evaluation based on hazard information, exposure information and tonnages. Based on these criteria the CoRAP lists for all substances so-called “initial grounds for concern”. For HDI trimer these grounds were: high aggregated tonnage, potential for wide dispersive use from professional uses and suspect to be a “vPvB” (very persistent, very bioaccumulative) substance.

Are other HDI polyisocyanates also subject to the evaluation process?

Only HDI trimer (more precise: HDI oligomer, isocyanurate type) with REACH registration numbers 01-2119485796-17-XXXX has been subject to evaluation. The registration numbers are provided in current safety data sheets. Other HDI polyisocyanates (e.g. HDI biuret), even if the same CAS no. (28182-81-2) or NLP no. (500-060-2) is assigned to them, were not affected (CAS and NLP numbers are not always sufficient to describe the substance identity under REACH). Also the current CoRAP (2016-2018) does not list any further HDI polyisocyanate.

What was the outcome of the substance evaluation of HDI trimer?

ECHA informed in March 2015 that the evaluation of HDI trimer was concluded without a draft decision. This means that the Member State was able to clarify the initial concerns on the basis of the already available information.

The evaluation documents prepared by Slovenia were published late 2015 and state that “the initial concerns were not confirmed and HDI trimer is not considered a PBT or vPvB substance”. Consequently, it is concluded that there is no need for any regulatory follow up action.

Where can I find the official evaluation documents for HDI trimer?

The full evaluation report and a summarizing conclusion document are published on the ECHA website.

Conclusion document: <https://echa.europa.eu/documents/10162/ca1bd0c9-0450-4406-977b-94c94d06dc1c>

Full report: <https://echa.europa.eu/documents/10162/79168e1e-3c60-4cf1-a821-9571fc63019f>