

# BASA Bulletin

INFORMED COMMENT FROM THE ADHESIVES & SEALANTS ASSOCIATION FOR THE UK & IRELAND

## BASA Open Industry Forum: Navigating the Future of Regulations and Sustainability

Regulatory change is accelerating — and BASA's Open Industry Forum in Coventry delivered a timely deep dive into what it means for our sector. The event brought together leading voices from across industry, government and enforcement to explore the latest developments shaping adhesives, sealants and construction products.

Key sessions covered CE marking in the UK and EU, flexible plastic packaging challenges, innovation under regulatory pressure, EU vs GB compliance, packaging EPR, chemicals legislative reform, UK REACH and PFAS policy, and security requirements under the Poisons Act.



[Read more on Page 4](#)

*Welcome*



**Sussex Compliance**

We would like to introduce our new BASA member: Sussex Compliance TG.

## Preparing for the Major Energy Cost Changes in 2026



[Read more on Page 5](#)

## Why manufacturers shouldn't be expected to write user risk assessments for chemical products

In industries that work with chemical products, including adhesives, sealants, coatings, and related materials, risk management is essential. But a recurring misconception persists that the manufacturer is responsible for writing a risk assessment for how a customer uses their product.

*Continued on Page 18*

# IN THIS ISSUE

MARCH 2026

## INSIGHT

**3 A welcome from the CEO**

**5 Energy Costs**  
Preparing for major changes in 2026



**10 Working Group**  
What's new in the BASA WG's

**12 Sustainability**  
A view into the future



**18 User Risk Assessments**  
Where responsibility sits



## MEMBERSHIP

**3 Member Benefit**  
Join the weekly drop-in clinic

**4 OIF Recap**  
Navigating the future of regulations and sustainability

**9 Member Benefit**  
REACHReady discount

**14 Publications**  
A Decade of change in BASA bulletins

**20 BASA Showcase**  
Save the date

## NEWS

**6 Industry News**  
UK REACH, transport & poison centres

**8 Industry News**  
UK Gov Environmental Improvement Plan (EIP)

**12 Industry News**  
Dangerous exposure to DCM

**13 Industry News**  
Economic update

**16 Member News**



**2026 MEMBERS HANDBOOK NOW AVAILABLE**



# Lorna's Leadership Lens



**Lorna Williams,**  
CEO of BASA  
secretary@basa.uk.com

As CEO of BASA, I am proud to represent the UK's adhesives and sealants industry, a sector that is fundamental to countless supply chains, from construction and manufacturing to packaging, transport and consumer goods. BASA brings together over 90 member companies, collectively supplying the vast majority of adhesives and sealants used in the UK and Ireland, and serves as a trusted voice for technical excellence, regulatory engagement and industry collaboration.

We are committed to supporting our members through evolving regulatory and market challenges, offering guidance, training and insight to help them remain competitive and compliant. This commitment is reflected in our programme of events, including the first ever BASA Spring Conference & AGM held on 3 March 2026 and our Sports Day on 24 June 2026, which bring

the industry together to learn, network and share best practice.

We're also actively shaping the sector's future at major industry platforms. At ChemUK 2026 taking place at the NEC from 20-21 May, BASA is exhibiting and hosting a panel session (Sticky Business: Exploring Future Opportunities in Adhesives & Sealants). At the Surfex Exhibition taking place at the Coventry Arena from 9-10 June, we're delivering two sessions, From REACH to Reality and Towards Circularity, focused on key regulatory shifts and sustainable pathways for our products. By maintaining a visible presence at these exhibitions, BASA ensures the industry's priorities and expertise are represented at the highest level.

And let's not forget the Open Industry Forum scheduled for 6th October at Grand Station Wolverhampton where we will have speakers on Digital Products Passports (DPPs) and Extended Producer Responsibility (EPR) in the UK and EU.

Finally, preparations for the 2026 BASA Showcase are already underway – with a focus on Innovation, Sustainability and Talent categories. Further details on timelines, entry requirements and how to get involved will be shared in the coming weeks, so watch out for those emails and start planning your entries!

BASA continues to engage constructively with policymakers to ensure that legislative frameworks support innovation, environmental goals and the long-term health of the UK adhesives and sealants industry.

## Why You Should Join Our Weekly Drop ins

In today's fast-moving regulatory environment, staying informed and connected is more important than ever. Our weekly drop-ins give members the chance to discuss key developments, share challenges, and explore topical issues in a collaborative setting.

Each session covers emerging risks, regulatory updates, and changes that may impact our organisations, alongside insights from guest experts including regulators, academics, and industry leaders.

Above all, these meetings support peer-to-peer learning, strengthen relationships across the sector, and help members stay ahead of the curve. We encourage all members to attend.

Kerry Knowles, Group Regulatory Affairs Manager, Tremco CPG UK Limited says:

*"The Drop-In Clinics are a great way to quickly and regularly touch base with the BASA community to get updates on current topics affecting our industry offering an opportunity to ask any questions within a like-minded forum."*

Read the **Consutiv Utilities** article on **page 5** and if you or one of your Finance or Operations colleagues want to know more join the drop-in on March 27th at 10am!

### Weekly Drop-Ins:

Your Friday Fix for Industry Updates & Member Support



10:00 am,  
every Friday  
via Teams

**BASA**  
**GOLF & SHOOTING**  
**NETWORKING EVENT**

**SAVE THE DATE**  
The next BASA Sports Day will be Wednesday 24th June 2026.

# BASA Open Industry Forum: Navigating the Future of Regulations and Sustainability

27 November 2025

The BASA Open Industry Forum brought together industry leaders, experts, and stakeholders to discuss the latest developments in regulations, sustainability, and innovation at the Village Hotel, Coventry. The event was packed with insightful presentations, breakout sessions, and networking opportunities, providing attendees with valuable knowledge and actionable strategies to navigate the evolving landscape of adhesives, sealants, and construction products.

## Key Highlights from the Forum

### Construction Products Regulations: CE Marking in the UK and EU

Lorna Williams from BASA shared updates on the UK Government's decision to indefinitely extend the recognition of CE marking for construction products in Great Britain and to amend legislation to recognise the 2024 EU CPR. This move provides manufacturers with stability and flexibility, allowing products to be certified with either UKCA or CE marking for the British market. However, products placed on the EU market must still meet CE certification requirements.

The alignment of CE and UKCA standards is seen as a positive step toward reducing costs for manufacturers and promoting a greener, circular economy. However, the UK Government continues to revise its regulations, which may lead to divergence in the future, particularly for safety-critical products not covered by harmonized standards.

### Flexible Plastic Packaging and Environmental Challenges

Brian Lodge from BPF highlighted the pressing issues surrounding flexible plastic packaging, including the lack of recycling infrastructure, contamination challenges, and the need for chemical recycling facilities. He emphasized the unintended consequences of material switching driven by regulatory changes, such as increased food waste and product damage.

Despite the challenges, flexible plastic packaging offers significant benefits, including lower environmental impact, superior physical properties, and cost-effectiveness. Industry stakeholders

were encouraged to lobby for reforms, debunk myths about plastics, and push for mandatory labelling to improve recycling rates.

### Innovation Under Pressure: Regulatory Challenges in Consumer Markets

Anthony Thresh from Hodgson Sealants Ltd discussed the delicate balance between innovation, compliance, sustainability, and competitiveness. He highlighted how regulatory uncertainty, public perception, and precautionary measures often slow down formulation development and hinder the adoption of greener technologies.



The session emphasized the need for evidence-based regulation, transparent communication with consumers, and collaboration with policymakers to ensure regulations support innovation rather than stifle it.

### Navigating Divergent Regulatory Landscapes: EU vs GB Compliance

Dr. Sandra Wade from Henkel explored the challenges manufacturers face in complying with both EU and GB CLP regulations post-Brexit. While divergence between the two regulatory frameworks has been limited so far, the potential for future differences remains a concern.

A case study demonstrated the impact of regulatory divergence on product labeling, safety data sheets, and supply chain costs. Dr. Wade emphasized the importance of proactive planning and industry collaboration to address these challenges effectively.

### Packaging EPR and Sustainability for Retailers

Tom Penton from B&Q provided insights into the UK's Extended Producer

Responsibility (EPR) scheme, which covers the entire lifecycle of household packaging materials. He discussed the financial implications of eco-modulation fees based on recyclability and the challenges of meeting EPR takeback criteria.

The session highlighted the importance of sustainable packaging innovation and the need for industry-wide collaboration to address the complexities of EPR reporting and compliance.

### HSE's Chemicals Legislative Reform

Leo McDaid and Andrew Low from the HSE shared updates on the Chemicals Legislative Reform, including proposals to make GB CLP evaluation more agile and predictable, reduce regulatory burdens, and align with international standards.

The session also covered the EU's Chemicals Simplification Package, which aims to simplify hazard communication rules and reduce administrative burdens for chemical suppliers to EU and Northern Ireland markets.

### UK REACH and PFAS Policy Updates

Rebecca Leete from Defra provided an update on UK REACH policy, including the development of an Alternative Transitional Registration model (ATRm) and proposed extensions to registration deadlines. She also discussed the UK's approach to managing risks from PFAS, including consultations on restrictions targeting firefighting foams.

### Control of Explosives Precursors and Poisons

Detective Inspector Melissa Tudor and Police Sergeant Steve O'Donovan from the Homeland Security Group emphasized the importance of collaboration between BASA and the Home Office to safeguard national security. They provided practical guidance on compliance with the Poisons Act and reporting suspicious activity related to regulated and reportable chemicals.

### Looking Ahead

The forum concluded with closing remarks from Jim Palmer. He encouraged feedback on future topics and reminded everyone to mark their calendars for BASA's upcoming events in 2026!

# Preparing for the Major Energy Cost Changes in 2026



**Craig Portsmouth, Senior Procurement Analyst at Consultiv Utilities**

From April 2026, UK businesses will face the most significant shift in energy cost structures since market deregulation — and the impact will be felt regardless of when current fixed contracts end.

The change centres on Transmission Network Use of System (TNUoS) residual charges. These charges, which form part of a business's standing charge rather than its unit rate, are set to almost double in a single year. Unlike consumption-based costs, TNUoS residual charges are applied per meter, per day. That means even businesses that successfully reduce energy usage will still see higher costs.

Why is this happening? Over the next five years, the UK electricity grid requires around £80 billion of investment. New offshore wind in the

North Sea, renewable generation in Scotland, and large-scale solar projects must be connected and reinforced to deliver power to demand centres in the Midlands and South. In short, businesses are contributing directly to the infrastructure required to deliver the UK's net zero future.

For most organisations, these increases will appear quietly but significantly within standing charges — often without a clear explanation.

One of the most effective ways to manage this exposure is through a review of agreed capacity and capacity banding. Residual charges are applied based on a site's connection voltage and agreed capacity, with thresholds set under Ofgem's Targeted Charging Review (TCR) and locked in for the period ahead. Businesses operating near the upper limit of a band could see disproportionately higher increases.

Capacity bandings range from one to four. The higher the band, the higher the fixed charge. Many businesses discover their capacity is either set too high, resulting in unnecessary costs, or too low, triggering unauthorised capacity charges that can be up to three times higher than authorised rates. In both cases, proactive review and adjustment can lead to meaningful long-term savings.



Importantly, these reviews should not wait until renewal. Adjustments made mid-contract can positively influence pricing at renewal and reduce exposure through to 2031.

Beyond energy, organisations can also benefit from reviewing water, waste, telecoms, Climate Change Levy exposure, VAT eligibility, and compliance requirements. The latter range from Display Energy Certificates, Energy Performance Certificates to ESOS and SECR for larger entities.

In a rapidly changing energy landscape, a proactive, consultative approach is no longer optional. Understanding how costs are applied — and acting early — is now essential to maintaining predictable, affordable operating budgets.

# Caroline's Compliance Corner



**Caroline Raine,**  
BASA Regulatory Officer

Welcome to Caroline's Compliance Corner. Your go-to update on the ever-evolving world of chemicals regulation. In this issue, we're diving into four key topics you need to know about:

## > UK REACH Update

The Government has confirmed UK REACH transitional registration deadlines will be extended, with new submission dates running from October 2029 to October 2031. BASA will continue to monitor ATRM developments and keep members updated.

## > Transport Update

The IATA 67th Edition DGR (effective 1 January 2026) introduces stricter rules for power banks, new hybrid vehicle UN entries, updated provisions, and a new appendix outlining expected 2027 changes. The UK has also issued an annual DGSA audit template and updated the DGSA syllabus. Read more on P7.

## > Poison Centre Changes

Several Poison Centre requirements are changing from 1 January 2026, including Belgium's new annual fee model, Switzerland's new mandatory notification system, and Latvia's updated SDS emergency contact details. Read more on P7.

## > The UK Government's Environmental Improvement Plan (EIP)

The EIP sets out a long-term roadmap to improve England's environment through to 2043. It includes commitments on chemicals and pesticides, including UK REACH reform and stronger oversight of hazardous substances. Read more on P8.

Stay tuned, stay compliant, and as always, get in touch if you've got questions or feedback!

# UK REACH Update



The Government has published its response to the consultation on extending the UK REACH transitional registration submission deadlines. This can be [viewed on GOV.uk](#).

Defra held an 8-week consultation (14 Jul – 8 Sep 2025) on proposals to extend the UK REACH transitional registration dossier submission deadlines because the first current deadline (October 2026) is approaching and there is still work to finalise an alternative transitional registration model (ATRM). UK REACH is the UK's main chemical regulation regime for substances placed on the market in GB.

## Options Considered:

Three extension options were consulted on, including maintaining current deadlines ("do nothing") or moving them back by different amounts.

### 1. Baseline – Do Nothing

*Keep the current deadlines unchanged:*

- o 27 October 2026
- o 27 October 2028
- o 27 October 2030

### 2. Option 1 (Government's preferred option)

*Move the first deadline back by 3 years & keep one-year gaps between the phases:*

- o 27 October 2029
- o 27 October 2030
- o 27 October 2031

### 3. Option 2

*Move all deadlines back by 2½ years and retain the current 2-year spacing:*

- o 27 April 2029
- o 27 April 2031
- o 27 April 2033

### 4. Option 3

*Move the first deadline back by 2½ years & use one-year gaps between deadlines:*

- o 27 April 2029
- o 27 April 2030
- o 27 April 2031

Defra's preferred option was to shift the deadlines to 27 October 2029, 27 October 2030 and 27 October 2031 with one-year spacing between bands.

Industry stakeholders largely favoured Option 2, (BASA included), as it provided the longest overall extension and wider spacing between deadlines, giving companies more time to prepare robust dossiers and manage costs.

The government's decision to proceed instead with Option 1 was therefore met with disappointment, as BASA feels it did not go far enough to address ongoing uncertainty and practical challenges around data access and the development of the alternative transitional registration model.

## Responses from Stakeholders:

- 210 responses were received from industry, trade associations, NGOs, and others. Respondents generally supported extending deadlines, rejecting the do nothing option. Many stakeholders valued additional time to prepare and to await ATRM details. Some preferred a longer spacing between deadlines.
- Most respondents did not think the extension would significantly undermine protection for human health and the environment and saw benefits in allowing higher-quality dossiers.

## Government Position:

After considering the views, the UK Government agreed that **Option 1** (new deadlines in 2029–31) is the most proportionate approach. It will provide industry more time to prepare and allow the ATRM to be finalised, while still ensuring important safety data is submitted in an orderly way. Subject to legislative approval (including consent from Scottish and Welsh Ministers), the government intends to proceed with extending the deadlines.

The Government will publish further information on ATRM requirements with sufficient notice to enable registrants to prepare and comply ahead of the new deadlines. The UK Government, with the consent of the Devolved Governments of Scotland and Wales, intends to introduce legislation in 2026 to give effect to these new deadlines.

## UK REACH Transitional Deadlines Have Been Extended

≥1,000 tonnes: Was Oct 2026 → Now Oct 2029 (extended by 3 years)

100–1,000 tonnes: Was Oct 2028 → Now Oct 2030 (extended by 2 years)

1–100 tonnes: Was Oct 2030 → Now Oct 2031 (extended by 1 year)

\* *Tonnage band (per registrant per year)*



## Transport update

Recent changes to transport regulations reflect a wider push toward clearer standards, stronger assurance, and better alignment between international and UK-specific frameworks. Three developments in particular are shaping compliance and training priorities across the sector: the IATA 2026 regulatory updates, the Department for Transport's (DfT) latest approach to the annual DGSA audit report, and the revised DGSA syllabus.

### IATA 2026 regulatory changes

The International Air Transport Association (IATA) have published the significant changes in the 67th edition of the Dangerous Goods Regulations (DGR) (2026). The 67th edition becomes effective on the 1st January 2026. An addendum has also been published. The

document outlining the changes can be downloaded from the [IATA website](#).

### DGSA annual audit template

The UK Department for Transport (DfT) have published a "Carriage of dangerous goods annual audit template".

It is a standardised form provided by the UK that Dangerous Goods Safety Advisers (DGSA) can use to complete their required annual audit of dangerous goods transport activities. The template helps companies demonstrate compliance with regulations by guiding the DGSA through key areas such as the company's arrangements for dangerous goods transport, staff training, and the quantities and types of dangerous goods handled over the year. It's designed to

support organisations in preparing their annual audit report in a consistent and comprehensive way.

View the audit template page on [GOV.UK](#).

### Updated DGSA syllabus

Finally, the UK government has updated the DGSA exam syllabus (last updated 13 January 2026) with more detail on the topics candidates are expected to know. The syllabus is clearly structured across all classes, core knowledge, and mode-specific sections (road, rail, inland waterways), helping organisations map training plans to the exam and to on-the-job competence requirements.

View the 'Dangerous goods safety adviser exam syllabus on [GOV.UK](#).

## Poison centre changes

### Belgium Poison Centre changes – effective 1 January 2026

Belgium has confirmed a major update to its Poison Centre notification (PCN) fee system, effective for notifications submitted from 1 January 2026. The changes apply to all companies submitting mixture notifications via the ECHA portal and represent one of the most significant revisions to Belgium's approach in recent years. Overall, the new system substantially reduces the cost of placing mixtures on the Belgian market, particularly for companies with larger portfolios.

From 2026, Belgium will introduce a new annual payment model. Notifications submitted during a calendar year will be invoiced in the following year by FPS Public Health. Fees will no longer be calculated per product, but instead will be based solely on the total number of mixtures declared annually by the operator, as defined under Article 45(1)(b) and (1)(c) of the CLP Regulation.

Each notification remains subject to a one-off fee. However, where a change to mixture composition triggers a new notification under Annex VIII, an additional fee will apply. Under the new structure, companies declaring between 1 and 5 mixtures will pay no fee, while higher tiers range from €500 up to a maximum of €40,000 for portfolios exceeding 10,000 mixtures. This represents a significant reduction compared to the 2025 system, where notifications cost €200 per product.

### Switzerland – mandatory poison centre notifications from 1 January 2026

Switzerland has introduced a mandatory poison centre notification requirement for hazardous mixtures placed on its market from 1 January 2026, under Article 48 of the Swiss Chemicals Ordinance (ChemO). The system operates in a similar way to the EU PCN regime but is managed nationally.

Manufacturers and importers must submit a notification dossier to the Swiss Register of Products for Chemicals (RPC) using

the national online portal. Submissions must include detailed composition data, product identification information, and a Swiss Unique Formula Identifier (UFI), which must also appear on the product label. The information is made available to Tox Info Suisse to support emergency response. The obligation applies to consumer, professional, and industrial mixtures, with limited exemptions. Switzerland also requires environmental hazard reporting, such as quantity bands, which goes beyond EU PCN requirements. Companies without a Swiss establishment must appoint a local commercial representative.

### Latvia – SDS Section 1.4 update

Latvia has updated the information required in Section 1.4 of the Safety Data Sheet (SDS). SDSs must now include the following national emergency contacts: Valsts ugunsdzēsības un glābšanas dienests – 112 Saindēšanās un zāļu informācijas centrs, Rīga – +371 67042473

# The UK Government's Environmental Improvement Plan

The UK Government's Environmental Improvement Plan (EIP) 2025 is:

- A statutory, cross-government roadmap for improving England's natural environment with actions, commitments and interim targets up to 2043.
- It responds to the legal duty under the Environment Act 2021 to set out how the government will meet long-term environmental targets.
- The plan is structured around 10 goals covering nature, air, water, chemicals and pesticides, waste, resources, climate, hazards, biosecurity, and access to nature.

## Chemicals & Pesticides (Goal 4)

### Goal 4 Focus

The plan includes a dedicated Goal 4: Chemicals and pesticides, recognising chemicals as a major environmental pressure.

### Overall Aim

The government's stated ambition under Goal 4 is to reduce risks from chemicals and pesticides to people and the environment. This is framed in terms of

risk reduction and better management, rather than promising full elimination of all harmful chemicals.

### What the EIP Says About Chemicals

While the EIP doesn't set a large number of new numerical limits for chemicals, it includes high-level commitments to improve regulatory oversight and reduce harm from hazardous substances.

In the monitoring plan annex (which supports the main EIP), actions connected with chemicals and pesticides include:

- Implementing updates to international conventions such as the Stockholm Convention for persistent organic pollutants (POPs).
- Restricting manufacture, import and export of mercury-added products in line with the Minamata Convention.
- Compliance testing and enforcement to identify and manage POPs in waste streams.
- Surveying local authorities on contaminated land to understand chemical pollution challenges better.
- Guidance to pesticide users and

improved compliance regimes under the National Action Plan (NAP) for sustainable pesticide use.

- Potential regulatory changes to reduce reliance on emergency pesticide authorisations for specific active substances.

## Chemicals Regulation & UK REACH Reform

The EIP commits to reforming UK chemicals regulation, particularly UK REACH. The aim is to make regulatory action faster and more efficient while maintaining high protection standards, including improvements in how harmful substances of concern are identified and managed.

The plan includes commitments to:

- Align UK chemical regulation more with EU approaches where beneficial.
- Update lists of hazardous substances (e.g., "Substances of Very High Concern" under UK REACH) that have not been revised since Brexit.

*Caroline Raine, BASA Regulatory Officer*

***"The aim is to make regulatory action faster and more efficient while maintaining high protection standards, including improvements in how harmful substances of concern are identified and managed."***



# Join REACHReady at an Exclusive BASA Rate!

Are you keeping up with UK & EU REACH, CLP and Biocides regulations? BASA is proud to be a partner of the REACHReady programme – your one-stop-shop for expert compliance support.

## Why join?

- Access to a specialist Helpdesk
- Up to 1 hour of FREE consultancy for new subscribers
- 20% off training, seminars, and workshops
- Regular compliance alerts & updates
- Exclusive member resources and guidance

BASA members get 25% off REACHReady Gold Membership!

Let REACHReady help you stay compliant and confident in an ever-evolving regulatory landscape.

Join today by contacting [enquiries@reachready.co.uk](mailto:enquiries@reachready.co.uk) and mention you are a BASA member.



**CHEMUK2026**  
GROUP OF EVENTS

20TH & 21ST MAY 2026 NEC, BIRMINGHAM, UK

**BASA**  
VISIT US ON  
STAND A140  
REGISTER FREE NOW

## Jim's Technical Takeaways



**Jim Palmer,**  
BASA Technical Officer

Another new year brings a special edition of the BASA Bulletin, published in hard copy to mark the first-ever BASA Conference. Since the last edition, BASA's technical team has remained highly active. Below is a summary of the key issues, developments and discussions across each BASA working group, further details of these and other topics of interest are available on the BASA website. I cannot emphasize sufficiently how beneficial involvement in BASA working groups is both for the employer and employee, so as always, I encourage you to get involved.

### **BASA Open Industry Forum**

This annual gathering of BASA's technical community brought together regulators, industry experts and retailers to examine the rapidly evolving regulatory landscape affecting the UK adhesives and sealants sector.

Presentations covered the status of the EU and UK Construction Products Regulations, including the continued acceptance of CE marking, the transition towards UKCA, and the implications for adhesives and sealants as CPR revisions progress. Extended Producer Responsibility (EPR) featured prominently, with speakers highlighting the risk of unintended environmental trade-offs, cost impacts across the supply chain, and the retailer perspective on compliance and data demands.

Innovation challenges were explored, focusing on how regulatory pressure and increased substance scrutiny are affecting formulation development and competitiveness. Several sessions addressed post-Brexit regulatory divergence, including dual EU/GB compliance requirements for CLP and SDS, and the need for clearer alignment.

Updates from HSE and DEFRA outlined developments on UK REACH, biocides policy and the government's approach to "smarter regulation". Enforcement-focused sessions covered explosives and drug precursor controls. The event concluded with reflections on the importance of collaboration in managing regulatory complexity while continuing to support safety, sustainability and innovation. Read the full OIF report on page 4.

# What's New in the BASA Working Groups



### **Sealants Working Group**

The October meeting provided a comprehensive update on sealant standards, regulatory developments and related policy issues across both building and road applications.

Updates from CEN TC 349 highlighted the implications of the new EU Construction Products Regulation, which introduces sustainability and Digital Product Passport requirements. Sealants are currently considered a lower priority, with revisions unlikely before 2030. Alignment issues around CE and UKCA marking were discussed, with standards remaining aligned and CE marking still recognised. Several ISO and CEN overlaps were noted, alongside slow progress on some voluntary EN series and the ongoing need for UK expert engagement.

Significant progress was reported within CEN TC 227 on road sealants, including the publication of multiple new EN test methods and the advancement of several prEN revisions. Discussions focused on the CPR Acquis process, harmonisation versus de-harmonisation of standards, and the establishment of a new coordination group to manage TC 227 inputs.

Substance-related updates included the removal of the EU titanium dioxide classification, upcoming GB biocide renewal deadlines and developments relating to diisocyanate occupational exposure.

Circular economy issues remain a key concern, particularly the cost impacts of Extended Producer Responsibility and forthcoming EU packaging recyclability requirements. The launch of the BASA Product Packaging Life Cycle Task Force underlined the importance of active member engagement across technical, regulatory and sustainability topics.



### Chemicals Legislation Working Group

Key discussions at the October meeting focused on evolving EU and UK chemicals legislation, including the implications of Omnibus VI, ongoing REACH revisions and updates to the CLP Regulation.

Members reviewed proposals for new hazard classes and harmonised classifications, noting potential impacts on product labelling, safety data sheets and downstream user obligations. The group also discussed ongoing advocacy work through industry associations, highlighting challenges associated with alignment between UK REACH and EU REACH, and the need for clear transitional guidance.

Updates were provided on the European Commission's progress towards a "one substance, one assessment" approach, alongside national enforcement trends and data submission requirements. BASA continues to engage with DEFRA and HSE to ensure members' views are represented in future consultations and will support members in preparing for Omnibus VI implementation.

Additional topics included substitution pressures arising from the Chemicals Strategy for Sustainability, microplastics restrictions and effective supply chain communication. The next meeting is scheduled for 24 March 2026.



### Environmental & Sustainability Working Group

Discussions at the October meeting focused on sustainability, environmental regulation and EU and UK policy developments relevant to the adhesives and sealants sector.

Members reviewed updates from FEICA, including Public Affairs Committee activity on Good Practice Stories, the Green Claims Directive, the Advanced Materials Act and reputational challenges facing the industry. These materials are available on the BASA website.

Significant attention was given to carbon net zero initiatives, including an overview of the EU Carbon Border Adjustment Mechanism (CBAM), with supporting resources shared with members. New and forthcoming legislation was also discussed, including EU deforestation-free product requirements and potential UK alignment. Limited UK government activity was noted, alongside possible implications for raw materials such as palm oil.

Recycling reforms were reviewed, including mandatory food waste separation, the delayed implementation of digital waste tracking until April 2026, and consultation on industrial emissions reforms. Members also received updates on Extended Producer Responsibility, including revised base fees and planned fee modulation to incentivise recyclable packaging from 2026/27. Environmental reporting requirements were discussed, highlighting the EU Omnibus Simplification package aimed at reducing administrative burdens on SMEs, as well as developments in eco-design, energy labelling and digital product passports. There were no new developments on the Plastics Tax. The next meeting is scheduled for 24 March 2026.



### Construction & Adhesives Working Group

At the virtual WG meeting in December 2025, current activities were reviewed and priorities agreed for the period ahead. Discussions focused on standards development, international representation and emerging sustainability requirements.

In the absence of a permanent chair, members agreed to rotate chairing responsibilities to ensure continuity, while efforts continue to identify a long-term chair. The group also agreed to prepare a comprehensive map of relevant ISO, CEN and BSI committees to improve visibility of standards activity and representation, alongside publishing updated Terms of Reference on the BASA website.

Progress on standards development remains a key focus. Members will review the draft dismantability standard ISO/DIS 21037, while work continues updating EN test methods for adhesives. The recent publication of BS ISO 5684 and BS EN 18070 was noted as an important addition to the standards landscape.

A shortage of UK experts was highlighted for several committees, notably ISO TC 61 SC 11 WG 5 and CEN TC 193 SC 1 WG 12, particularly in wood adhesives, where increased participation is essential.

Key topics included FEICA's work on Environmental Product Declarations under the revised EU CPR, indoor air quality requirements and dangerous substances, and the implications of Extended Producer Responsibility for adhesive packaging. Members are encouraged to get involved by volunteering for the Product Packaging Task Force, standards committees or the WG chair role.



### Packaging Adhesives Working Group

The WG met in October to review key regulatory developments and priorities affecting the sector.

Adhesives account for less than 1% of packaging weight even in worst-case scenarios, and typically less than 0.1%. HMRC clarified that while packaging adhesive manufacturers are not liable for the Plastics Packaging Tax, packaging converters must include the solid polymer content of adhesives when calculating plastic content. It was also agreed that requiring recycled content within adhesives themselves is technically unfeasible, as it would compromise performance. Members supported the development of a BASA position paper to explain this clearly. BASA continues to work through the Food Packaging Value Chain Alliance to promote a consistent UK-wide approach across devolved administrations. Key challenges include limited Food Standards Agency resources and emerging issues such as BPA and PFAS.

At EU level, FEICA continues to raise concerns regarding new NIAS migration limits under Regulation 2023/351, citing analytical feasibility challenges and potential impacts on adhesive classification. Further discussions covered boric acid authorisation, proposed toxic classifications for resins and rosin esters, and updates from FEICA SRAPPA and FPVCA.

# Tony's Sustainability Snapshot



**Tony Bingham,**  
BASA Sustainability Officer

## SUSTAINABILITY REVIEW – A VIEW INTO THE FUTURE?

Carbon capture and utilisation (CCU) is emerging as a promising pathway for reducing greenhouse gas emissions while creating value-added materials, including the adhesives and sealants industry. By using captured carbon dioxide (CO<sub>2</sub>) as a raw material, adhesive manufacturers can partially replace fossil-based feedstocks and lower the overall carbon footprint of their products.

One key CCU route relevant to adhesives is the conversion of CO<sub>2</sub> into polyols, which are essential building blocks for polyurethane (PU) adhesives. Through catalytic processes, captured CO<sub>2</sub> can be incorporated into polymer chains, producing CO<sub>2</sub>-based polyols with performance comparable to, or in some cases better than, conventional petrochemical polyols. These materials can be used in construction, automotive, packaging, and footwear adhesives, helping manufacturers meet sustainability targets without sacrificing

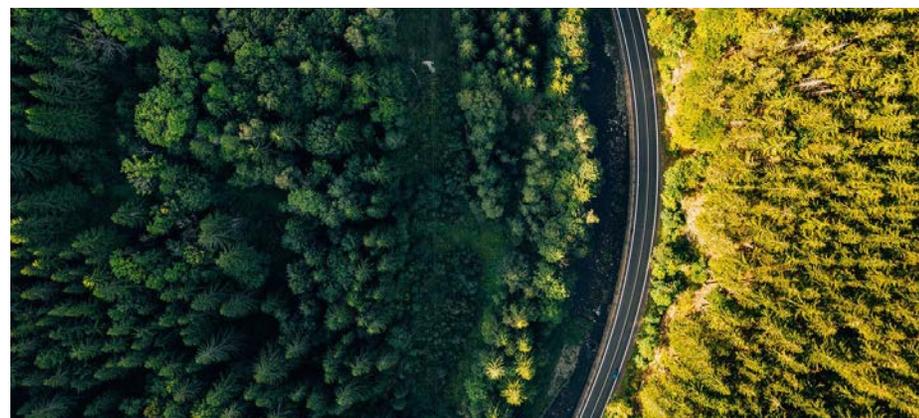
bonding strength, flexibility, or durability.

Another important application lies in epoxy and acrylic adhesive systems. CO<sub>2</sub> can be utilised to produce cyclic carbonates and methanol, which serve as intermediates for epoxy resins and acrylic monomers. Integrating CCU-derived intermediates enables the development of lower-carbon adhesives suitable for high-performance applications such as electronics, coatings, and structural bonding. Additionally, research is ongoing into using mineralised CO<sub>2</sub> as functional fillers, improving adhesive properties while permanently storing carbon.

Another example within the adhesive and sealants sector is with the use of CCU technology to capture industrial CO<sub>2</sub> emissions and, using hydrogen, convert them into methanol, which forms 35% of vinyl acetate monomer – a crucial element to produce polymers used in adhesive formulations.

Beyond material innovation, CCU supports circular economy principles in the adhesives industry. Using captured CO<sub>2</sub> from industrial emissions—such as cement, steel, or chemical plants—creates industrial symbiosis and reduces reliance on virgin fossil resources. When combined with renewable energy and bio-based components, CCU can significantly reduce life-cycle emissions of adhesive products.

However, challenges remain. High costs, energy intensity, and limited availability of captured CO<sub>2</sub> currently restrict large-scale deployment. Standardisation, regulatory support, and customer acceptance are also critical factors. As technologies mature and carbon pricing increases, CCU is expected to play a growing role in enabling the adhesives industry to decarbonise while maintaining high performance and economic competitiveness.



## Maintenance company fined after worker dies from exposure to DCM

We have become aware of a recent case where an HSE investigation found that a housing association maintenance company failed to take appropriate precautions to ensure hazardous substances were not used when safer alternatives were available. The company was fined £400,000 after a worker died while laying a bathroom floor, having inhaled toxic vapours from a flooring adhesive containing dichloromethane (DCM). A hose connected to a pressurised glue canister became damaged, releasing a large amount of adhesive into a poorly ventilated bathroom. The worker lost consciousness and collapsed, with emergency services having to force entry to reach him.

DCM can be used in adhesives in the UK, but its use is strictly restricted to professional and industrial settings due to serious health risks, including potential carcinogenicity and asphyxiation. BASA manufacturers have access to DCM-free formulations that are more suitable for domestic bathroom flooring applications. This case highlights the importance of training, risk assessment, and appropriate respiratory protective equipment when using DCM-based products in enclosed spaces.

The '[HSE Leaflet DCM2](#)' provides clear COSHH essentials guidance and is strongly recommended reading for anyone working with DCM-containing products.



# ECONOMIC UPDATE DECEMBER 2025

Roger Martin-Fagg



In this update I want to talk about some more macroeconomic fundamentals. Fundamentals should drive economic policy. In recent years, unfortunately, the opposite has been the case.

In a mixed market economy, the engine of income generation is, privately-owned, mostly small and medium sized businesses. The Government undertakes four key activities. The first is to provide the necessary infrastructure in which the private sector works. Infrastructure projects are mostly too big, and too risky, for the private sector, and the financial return is too uncertain and distant for bankers and entrepreneurs. The second activity is to provide a legal framework which ensures probity and the fulfilment of contracts. The third activity is to redistribute income from those who are fit, healthy and generating incomes and profit, to those in society who are elderly, sick, or unfortunate, through no fault of their own. The fourth activity is to provide a safe and secure country.

Economic growth is generated by the animal spirits of individuals who, with vision, charisma and competence, create successful businesses.

Economic growth – growth in incomes and profits - is measured by growth in real GDP, and real GDP per person. On this measure the UK is the sixth richest country in the World.



Economic growth does not measure wealth, although rising incomes allow individuals to purchase land, property and equities, thereby increasing their wealth. Income and wealth are two very different things. Income can be freely spent, but wealth is mostly illiquid. The UK taxes wealth lightly; only 2.3% of tax revenues are generated by wealth taxes.

Incomes generated in the UK last year amounted to £2.8 trillion. However, the value of assets – e.g. land and buildings, was estimated at £12.5 trillion.

GDP is the equivalent of the P&L of the country; wealth, the balance sheet of the country.

The UK balance sheet estimated value is £12.5 trillion, compared with £2.7 trillion of Government debt. So, the gearing is 21%. Additionally, there is £2 trillion of household debt, and £3.5 trillion of company debt. All this debt provides a healthy income for UK banks and building societies.

## IS THE AVERAGE BRIT OVERTAXED?

The chart below shows a significant uplift in contributions by the top 40% of earners in the UK. By contrast, in Sweden, Denmark, and most other countries, the system is more steadily progressive.

In the UK, 45% of top earners' salaries goes on tax and social contributions. The average worker pays 29%.

UK top earners contribute more, despite enjoying no increase in their share of national income.

The steep rise in the UK tax take for the top third of earners, gives a clue as to why so many professionals such as GP's, are working 3 days, rather than five days a week. I had hoped Reeves would smooth out the transition to higher income tax.

It's time to switch from income to expenditure taxes. Wealth taxes do not work. They are easy to avoid, and expensive to administer. Reeves should have raised VAT to 22%, but in my opinion stupidly, she has tried to reduce inflation with an electricity subsidy.

*\*This article is taken from Roger Martin-Fagg's December 2025 Economic Update.*

**BASA members can access the full update via the Info Hub under Resources. Simply search "Roger" to find the latest edition. If you do not yet have access to the Info Hub, please contact [enquiries@basa.uk.com](mailto:enquiries@basa.uk.com) to set up your login.**

# Through Thick and Thin –

Those of you who read [Bulletin 108](#) back in May 2025 will hopefully have enjoyed my look back at the first year of the BASA Bulletin in 1984 (and if you missed it, it is available online on the website). I thought that I would give you all a flavour of the 1985–1987 issues before the numbering sequence was recommenced with a new print format in January 1988. This is part of our process to digitise the historical BASA Bulletins, which were available to us only in printed form before 2017.

## Looking Back: A Decade of Change in BASA Bulletins (Issues 4–14, 1985–1987)

Between 1985 and 1987, BASA's Bulletin captured a period of significant transformation, technical, commercial, and even cultural, for both the association and the wider adhesives and sealants industry. Issues 4 to 14 chart not only the evolution of BASA itself but also offer a fascinating snapshot of how the industry responded to regulatory developments, technological growth, and shifting market expectations. Today, these early Bulletins read like a time capsule, showcasing ambition, humour, and the growing professionalism of the association.

## Regulation, Safety, and the Rise of Standards

Regulation was a consistent thread throughout these issues. Issue 4 opened with a review of the proposed COSHH regulations, highlighting early discussions on chemical safety long before today's familiar frameworks were fully established. By Issue 7, attention turned to new hazardous product labelling requirements taking effect on 1 January 1986, a sign of the accelerating regulatory landscape of the mid-80s.

BASA also played a hands-on role in helping define performance criteria for cork tile adhesives, offering early examples of industry guidance and cooperation with regulators and standards bodies.

Meanwhile, Issue 11 reported on BS 5750 certification assessments developed jointly by BASA and BSI, demonstrating how the association was already shaping quality standards long before ISO 9001 became commonplace.

## Technical Development and Industrial Innovation

The mid-80s were a dynamic period for technological progress. Issue 4 shared an article titled "Adhesives Replace Mechanical Fasteners," even referencing the iconic TV programme *Tomorrow's World* to illustrate how widespread public interest in adhesives technology had become.

Other issues showed BASA's technical committees becoming increasingly influential. Issue 8 highlighted their work and discussed the high costs associated with R&D, still a familiar theme today.

FEICA also appeared frequently across the Bulletins. Issue 6 noted the publication of a series of test methods and performance requirements for adhesives used to bond materials in floors, walls, and ceilings, reflecting a period when harmonisation across Europe was beginning to take shape.

And perhaps one of the most charming technical snippets appears in Issue 13: cyanoacrylates being used to reconstruct fossils, proof, if ever needed, that adhesives truly hold history together in more ways than one.

## BASA's Growth, Identity, and Professionalisation

Across these issues, BASA's growth is unmistakable. Issue 6 celebrated the election of Max Kochman as chairman and included a profile on him, notable at a time when the association was building its leadership identity. Issue 5 also introduced the formation of Re-Solv, a new charity focused on reducing solvent abuse through education and research, signalling BASA's social responsibility beyond industry interests.

Issue 8 marked an important milestone: the promotion and availability of official BASA logos for the first time, reflecting a new confidence in branding and outward identity.

Issue 11 revealed the launch of the BASA Yearbook, 192 pages strong and notably £15 a copy (equivalent to around £44 today), a detail charmingly

noted in the document. A professional, comprehensive reference guide like this shows BASA's growing maturity and ambition.

By Issue 14, the tone was unmistakably upbeat, emphasising BASA's increasing scale and the expanding work of its technical committees.



## Finances, Fees, and a Glimpse of 1980s Economics

Economics also played an interesting role in the narrative. In Issue 9, BASA reported an excess of income (around £5,000) being returned to members as credit notes, something that would certainly attract attention if repeated today!

Membership fees and publication costs also fluctuated, with Issue 11 noting that the Bulletin had reached an annual price of £41.40, a figure that feels both modest and bold depending on one's perspective.

## People, Culture, and a Changing Association

Beyond the technical and regulatory content, these issues offer delightful glimpses into BASA's culture at the time.

Sports days, for example, evolved notably. Issue 10 recalls that squash and

## Looking Forward from a Historical Lens

The story of BASA Bulletins from Issues 4 to 14 is, fundamentally, a story of transition. Over just two years:

- BASA grew in visibility and professionalism

As we look back at these early Bulletins, they serve not only as historical documents but as reminders of how far the association, and the entire adhesives and sealants industry, has come. The groundwork laid during this period helped shape the BASA of today: technically robust, engaged with policymakers, and focused on advancing best practice across the sector.

Watch out for my next set of observations on issues from 1988 onwards (starting at Issue 1 again!)

Archive research by:  
**James Williams,**  
BASA's Membership Manager



golf were once both part of the event, while Issue 14 expands this to include badminton as well, perhaps indicating a shift toward more inclusive opportunities for friendly competition.

Some cultural notes serve as reminders of social norms now long outdated. Issue 11 mentioned that FEICA events still assumed partners' activities were "ladies-only" programmes, a telling snapshot of the era's expectations and a marker of how much industry culture has changed since.

- Industry standards and regulations intensified
- Technical committees expanded their influence
- Branding and publications became more sophisticated
- Cultural and social elements of the association continued to evolve

These issues chart the journey of an organisation finding its voice, its identity, and its role in a rapidly changing industrial landscape.

BASA's publications can be viewed/downloaded at:  
[www.basa.uk.com/publications](http://www.basa.uk.com/publications)

## Publications

BASA Bulletin's	BASA Handbooks
BASA Bulletin 110	BASA Handbook 2025
BASA Bulletin 109	BASA Handbook 2024
BASA Bulletin 108	BASA Handbook 2023
BASA Bulletin 107	BASA Handbook 2021
BASA Bulletin 106	BASA Handbook 2020
BASA Bulletin 105	If you would like an earlier PDF of any issue, please email <a href="mailto:enquiries@basa.uk.com">enquiries@basa.uk.com</a>
BASA Bulletin 104	

# MEMBER NEWS

## Meet Hodgson Sealants newest member of the team!

We've installed a brand-new cartridge filling line, boosting our capacity by 40,000 cartridges every week.

It's all part of our ongoing investment to improve efficiency, strengthen OTIF performance, and support the growth of our water-based Fire Acrylic range.

*"Our new, state-of-the-art Turello filling line will help us improve lead times and fulfil more orders, keeping customers at the heart of everything we do."*

- Sales Director Kevin Powell

At Hodgsons, we're proud to be leading the way in sealant manufacturing in the UK, we are always looking for ways to do things better: Extra investment means we can go even further for all our customers!



"Say hello to our new cartridge filling machine"

**Hodgson SEALANTS**

## Grolman Group and Venator Sign Distribution Agreement for Ultramarine and Manganese Violet Pigments in Italy and UK/Ireland

Grolman Group and Venator have signed a distribution agreement covering ultramarine and manganese violet pigments for **Italy and United Kingdom / Ireland**, effective 1 January 2026. Under

the agreement, Grolman Group will distribute Venator's ultramarine blue, violet and pink pigments, as well as its manganese violet pigment portfolio, in these markets.

The partnership brings together Venator's expertise in high-performance inorganic pigments and Grolman Group's strong local presence, technical service and regulatory support in Italy and the UK / Ireland. The pigments are widely used in coatings, plastics and personal care applications, where consistent colour quality, purity and safety are essential.

Manufactured in France using proprietary technologies, the pigments are available as powders, aqueous

dispersions and low-dust grades. The ultramarine range includes tightly specified, treated and acid-resistant options, offering high heat stability, excellent light fastness and easy dispersibility. Selected grades comply with FDA and EN 71/3 requirements.

The manganese violet pigments complement the portfolio with heavy-metal-free inorganic solutions suitable for colour correction and mass coloration, with approvals for use in cosmetics, toys and various food contact applications.

Through this agreement, Grolman Group strengthens its pigment portfolio in Italy and the UK, while Venator expands its market reach through an experienced distribution partner providing local commercial and technical support.



## Organik Kimya Achieves EcoVadis Gold Rating, Ranking in the Top 5% Globally

Organik Kimya is proud to announce that it has been awarded the EcoVadis Gold Rating in the February 2026 sustainability assessment, placing the company among the top 5% of companies assessed globally.

Since joining the EcoVadis assessment in 2014, Organik Kimya has participated every year, using each cycle to further strengthen its sustainability practices. This consistent commitment to improvement and transparency has driven steady progress, culminating in the company's advancement from last year's Silver Rating to the prestigious Gold Rating in 2026—an important milestone reflecting its long-term vision and leadership in sustainable growth.

EcoVadis, one of the world's most trusted sustainability rating platforms, evaluates companies across four key areas: Environment, Labor &

Human Rights, Ethics, and Sustainable Procurement. Achieving Gold status confirms Organik Kimya's strong sustainability management systems and its commitment to transparency, responsible practices, and continuous improvement.

Co-CEO Stefano Kaslowski commented on the achievement:

*"Earning the EcoVadis Gold Rating and being ranked in the top 5% globally is a meaningful recognition of our long-term commitment to responsible growth. Sustainability is not a standalone initiative for Organik Kimya; it is embedded in our business strategy, innovation mindset, and daily decision-making. This achievement belongs to our entire organization and motivates us to keep raising the bar."*

With more than 100 years of experience in the chemical

industry, Organik Kimya continues to integrate sustainability into innovation, operations, and partnerships. The company remains focused on creating long-term value for its customers, employees, and stakeholders while contributing to a more sustainable future.



# MEMBER NEWS

## Power Adhesives expands world's first certified biodegradable range with new grades

Power Adhesives has announced a major expansion of its Tecbond biodegradable hot melt adhesive range, introducing three new grades that strengthen its leadership in sustainable bonding solutions for packaging and beyond.

The new products, Tecbond 902B-PL, 351B-PR, and 355B-PR, join the pioneering Tecbond 214B and 110B-PR, the world's first fully certified biodegradable hot melt adhesives. Together, they create a comprehensive portfolio of adhesives designed to meet the demands of both sustainability and performance.

All Tecbond biodegradable grades comply with EN 13432 and ASTM D6400, ensuring they biodegrade fully under industrial composting conditions without leaving microplastics or harmful residues. The full range of grades has also achieved CHIRA assessment approval, confirming that they are benign within paper recycling streams and have no adverse effects on the pulping or recovery process.

Ross Cunningham, Chief Executive Officer at Power Adhesives, commented: *"This expanded range gives converters and brand owners more flexibility than ever to meet the EU's evolving Packaging and Packaging Waste Regulation (PPWR) requirements.*

*"It also demonstrates that sustainability and performance can coexist – these*

*adhesives are engineered to deliver the same speed, strength, and reliability customers expect from Tecbond."*

Each grade has been formulated for specific applications:

- Tecbond 902B-PL – A bulk pillow adhesive containing 51% bio-based content, offering very high tack and permanent pressure sensitivity, ideal for labelling applications, and bonding paper, board, wood, and plastics.
- Tecbond 351B-PR – A clean-running and odourless low-viscosity bulk adhesive formulated to reduce filter and nozzle blockages and improve process efficiency.
- Tecbond 355B-PR – Designed for coated or laminated packaging, this bulk adhesive provides clean-running, low-temperature performance with a 10-second open time, making it ideal for freezer applications.

All products are suitable for use in high-speed packaging lines and precision manufacturing, offering reliable adhesion to a wide variety of substrates, including fibre-based, plastic, and coated materials.

With further grades currently in development, Power Adhesives continues to push the boundaries of biodegradable technology, helping converters and manufacturers future-proof their operations against tightening global sustainability regulations.

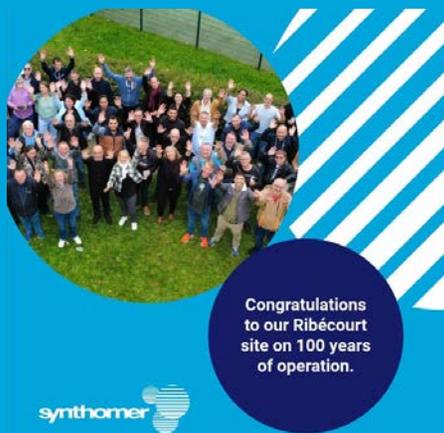


## Ribécourt, France site celebrates 100 years of operation — a century shaped by transformation, resilience, and achievement

From its beginnings as a fortified house during World War I to becoming a major centre of polymer chemistry, Ribécourt has continually evolved to meet the changing needs of society and the industry.

Today, the site is recognised for its expertise in latex powders and for advancing our corporate strategy. By driving improvements in operational excellence and championing diversity, equity, and inclusion – including initiatives to increase female

representation in operations – Ribécourt reinforces our commitment to innovation and to building a more inclusive future.



## Safic-Alcan and Scott Bader expand strategic partnership to the UK and Ireland

Safic-Alcan is pleased to announce the expansion of its strategic partnership with Scott Bader's Functional Polymers division to the United Kingdom and Ireland. This marks a new step in a successful collaboration already established in France, Italy, and Turkey.

Through this extended agreement, Safic-Alcan will distribute Texipol® rheology modifiers and Texicryl® acrylic dispersions to customers across the UK and Ireland, supporting a wide range of applications in paints, coatings, inks, adhesives, construction, textiles, and other industrial specialties.

This strengthened partnership reinforces the shared commitment of both companies to deliver innovative, sustainable, and high-performance solutions to the market.

Marie Elliott, Director for Europe & Africa at Scott Bader, said: *"Our partnership with Safic-Alcan combines high-quality materials with technical expertise and industry knowledge. We are delighted to expand our partnership to offer UK and Irish customers quality products alongside a great experience."*

Jean-Marie Schmuck, Business Unit Director C.A.S.E. and Industrial Specialties at Safic-Alcan, said: *"We are pleased to expand our trusted partnership with Scott Bader into the UK and Ireland. This reflects the strong synergies between our companies and our shared commitment to providing environmentally friendly and technically advanced solutions to our customers."*



# Why manufacturers shouldn't be expected to write user risk assessments for chemical products

In industries that work with chemical products, including adhesives, sealants, coatings, and related materials, risk management is essential. But a recurring misconception persists that the manufacturer is responsible for writing a risk assessment for how a customer uses their product.

In reality, this isn't how the system is designed, nor is it viable in practice. The manufacturer's duty is to identify hazards, communicate them clearly, and specify required precautions. The user's duty is to assess the risks arising from their actual application, workplace, exposure, and controls. Each party has a distinct and complementary role, and confusing the two undermines both safety and accountability.

Below is a clear explanation of why manufacturers can't produce user risk assessments, why users must, and how the regulatory system is structured to work.

## 1. Hazard vs. Risk: Two Different Things

The distinction between hazard and risk lies at the heart of the issue.

- **Hazard** = the intrinsic properties of a substance that could cause harm (e.g. flammability, skin sensitisation, VOC content, corrosivity).
- **Risk** = the actual likelihood of harm in a specific use situation (how the product is applied, quantities used, exposure duration, ventilation, PPE, process temperature, proximity to ignition sources, waste management, etc.).

A manufacturer can know the **hazards**, because they arise from the product's formulation.

A manufacturer **cannot know the risks**, because they depend entirely on how and where the customer uses it.



## 2. Standards Backlog & Industry Concerns

For chemical products in the UK and EU, the manufacturer must:

- classify the hazards according to CLP/GHS,
- create and maintain a compliant Safety Data Sheet (SDS),
- communicate recommended handling precautions and exposure controls,
- ensure label warnings and instructions are correct,
- provide information that helps the user perform their own risk assessment.



This is substantial work — but it does **not** extend to predicting or assessing how thousands of users will deploy the product across hundreds of scenarios.

A manufacturer of a sealant, for example, cannot foresee whether it will be applied:

- on a ventilated construction site,
- in a small workshop with solvent-sensitive equipment,
- in a school refurbishment,
- at elevated temperatures,
- next to a live flame,
- or by inexperienced hobby users.

With so many variables, any attempt to write a user risk assessment would be either dangerously vague or misleadingly specific.

## 3. Why manufacturers cannot be responsible for user risk assessments

### a) Infinite variability in use

Adhesives and sealants alone can be used in:

- industrial assembly lines,
- construction sites,
- maintenance workshops,
- confined spaces,
- outdoor conditions,
- automated dispensing systems,
- DIY applications.

Each setting has different ventilation levels, exposure durations, PPE policies, worker training, fire load, and waste handling.

A single "risk assessment for use" would be meaningless in most of those environments.

### b) The user controls the exposure

Risk is primarily shaped by:

- how the product is handled,
- the equipment used,
- local ventilation,
- storage conditions,
- worker protection measures,
- on-site supervision,
- temperature and scale of use.

Only the employer or site operator has visibility and control over these factors. The manufacturer doesn't — and can't.

### c) Responsibility must lie with the party managing the workplace

UK COSHH regulations, EU worker-protection directives, and common safety practice all place the responsibility for workplace risk assessment squarely on the employer.

This makes sense: the employer controls the safety systems, not the manufacturer. Manufacturers support risk assessment by providing hazard information — they cannot carry out the assessment itself.

### d) Avoiding false reassurance

If manufacturers attempted to create user risk assessments, it could lead to:

- unsafe assumptions by users (“the manufacturer says it’s fine for this scenario”),
- incorrect controls for complex site conditions,
- legal disputes when a generic assessment does not apply in a specific environment.

Safety is strengthened when each party owns the part they can actually influence.

## 4. What manufacturers should provide

Although they cannot write the user’s risk assessment, manufacturers play a critical enabling role:

- A detailed SDS with accurate hazard classification.
- Appropriate precautionary statements, handling guidance, and PPE recommendations.
- Information on physical properties that influence risk (flash point, viscosity, volatility, cure chemistry, etc.).
- Clear instructions for safe storage, transport, and disposal.
- Description of hazardous decomposition products or incompatible materials.
- Technical data that supports safe use (e.g. cure characteristics, ventilation needs, overheating risks).

This information is precisely what a competent user needs to build an accurate risk assessment for their environment.

## 5. Why the user must do their own risk assessment

A user (or employer) is the only party who knows:

- the workplace layout,
- the ventilation system,
- the workers’ health profiles or sensitivities,
- the presence of ignition sources,
- the frequency and duration of tasks,
- other chemicals used on site,
- emergency arrangements,
- the scale and method of application.

All these factors shape the real-world risk. Therefore, only the user can produce a meaningful, legally defensible assessment.

## 6. The System Works When Each Party Does Their Part

- Manufacturers: provide accurate hazard data, clear guidance, and honest communication.
- Users / Employers: assess risks in their specific situation and put the right controls in place.
- Regulators: ensure both sides fulfil their obligations.

This division is intentional, and essential. Trying to shift responsibility for user risk assessments onto manufacturers would produce poorer assessments, blur legal accountability, and weaken workplace safety overall.

*Written by: Lorna Williams, BASA CEO*



BASA  
SHOWCASE  
2026

MORE  
DETAILS  
COMING  
SOON

FRIDAY 20  
NOVEMBER

THE MET HOTEL,  
LEEDS



[WWW.BASA.UK.COM/SHOWCASE](http://WWW.BASA.UK.COM/SHOWCASE)