

ISOPA POSITION ON C&L OF TDI PRE-POLYMERS

1. Some TDI pre-polymers (or other modifications), result in rather low molecular weight chemicals, so-called NLPs (No Longer Polymers) that must be registered as substances under REACH. These carry their specific C&L as determined by testing (identical or very similar to unmodified TDI).
2. In many other cases, pre-polymers (or other modifications) will qualify as POLYMER under REACH.
 - 2.1 These higher molecular weight pre-polymers will often contain appreciable amounts of unreacted TDI, so that the full C&L of TDI remains applicable. The hazardous components of such a product must be indicated in the SDS. These will be the unreacted TDI and the modified portion. The modified portion must be identified with its CAS-Nr., if available, and its chemical name and its hazardous properties given, unless proven to be non-hazardous. The following C&L has been found appropriate for the modified portion (in the absence of other testing results):



Xn, Harmful, R36/42/43 according to DSD and



Danger, H319, H334, H317 according to the CLP Regulation.

- 2.2 Should such a pre-polymer contain less than 10 % b.w. unreacted TDI, the irritating properties from the full C&L of TDI would no longer be applicable (according to CLP). In these cases, ISOPA finds it important to test the product (at least) for irritation and label it according to the findings.

NOTE: The a.m. labeling for sensitization will always remain applicable, unless proof to the contrary is existing.