

# BASA Bulletin

INFORMED COMMENT FROM THE BRITISH ADHESIVES & SEALANTS ASSOCIATION

## Enter the 2025 BASA Awards – Celebrate Your Success!

BASA is excited to announce that entries are now open for the 2025 BASA Awards – our annual celebration of excellence, innovation, and impact across the adhesives and sealants industry.

This is your chance to showcase the people, projects, and practices that make your business stand out. Whether you're pushing the boundaries of sustainability, nurturing future talent, or delivering exceptional service – there's a category for you!

### 2025 Award Categories:

- > Community Engagement
- > Best Sustainability Initiative
- > Innovation Award
- > Future Leader
- > Apprentice of the Year
- > Excellence in Training & Development
- > Excellence in Supply & Services
- > Manufacturer of the Year

Winners will be celebrated at the 2025 BASA Awards ceremony taking place on Thursday 6th November 2025 at the East Midlands Conference centre. This is a fantastic opportunity to raise your profile, boost team morale, and share your achievements with the wider industry.

Don't miss out! Entries are open now – so start preparing your submissions and tell us your story. Full details, criteria, and entry forms are available on the BASA website.

Let's celebrate the best in the business – it could be you in the spotlight next year!

**Deadline for entries: 26th June 2025**

**Awards Ceremony: Thursday 6th November 2025 at the East Midlands Conference centre**

**Apply now at: [www.basa.uk.com/basa-awards/](http://www.basa.uk.com/basa-awards/)**



## Through Thick and Thin: A Look Back at the First BASA Bulletins from 1984.

Take a nostalgic look back to 1984, when the very first BASA Bulletin hit desks, covering everything from solvent abuse and sealants standards to superglue surgery and orange crop chaos! Discover how it all began as BASA emerged from a pivotal industry merger.

*Continued on Page 3.*

# Lorna's Leadership Lens



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

## BASA - Supporting Our Sector Through Uncertainty

### Why Trade Associations Matter More Than Ever

In a world increasingly shaped by shifting tariffs, complex chemical regulations, and global instability, the role of trade associations like BASA has never been more vital. For the adhesives and sealants industry, these changes can feel overwhelming, but you're not alone.

### Guidance You Can Trust

BASA supports its members with tailored, practical guidance documents that cut through the complexity. Whether you're navigating post-Brexit regulation, REACH updates, or the impact of international trade shifts, our resources are designed to make compliance clearer and simpler for businesses across the supply chain.

### Advocacy That Makes a Difference

We don't just help you adapt; we work to improve the regulatory environment itself. Through active engagement with regulators and government departments, BASA ensures that the voice of our industry is not just heard, but respected. Our advocacy is strengthened by collaborating with other like-minded associations in the chemical sector, allowing us to push for smarter, proportionate policies that benefit everyone.

### Engagement = Impact

Your involvement as a member is crucial. Those who engage, through our working groups, consultations, and events, get the most value out of their membership. Your insights guide our work, and your feedback shapes our resources. Being part of the conversation helps us help you better.

### Collaboration Across the Value Chain

We also recognise the critical role of raw material suppliers. They're not just upstream providers, they're innovation partners and key voices in our industry's future. BASA continues to welcome and encourage supplier involvement, recognising their contributions to regulatory compliance, product development, and market resilience.

### Together, We're Stronger

In these uncertain times, collective action is essential. BASA is here to guide, support, and represent you, ensuring your business is prepared, protected, and positioned for growth. Let's continue building a better-regulated, more connected future for the adhesives and sealants sector.

Stay engaged. Get involved. And let's shape the future together.

If you'd like to contribute to a working group or need help with a specific regulatory issue, please get in touch with the BASA team.



GOLF & SHOOTING

NETWORKING EVENT



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# Through Thick and Thin: A Look Back at the First BASA Bulletins



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

As we celebrate another year of progress in the adhesives and sealants industry, we're turning the pages back to where it all began- the very first issues of the BASA Bulletin, published in 1984. This was a pivotal moment for the sector, just months after the British Adhesive Manufacturers Association and the Sealant Manufacturers Conference merged in November 1983 to form what we now know as BASA. Issue No.1 hit desks in June 1984, marking the start of a bold new chapter. Back then, members could order extra copies for 8 pence each, a bargain for what was fast becoming essential industry reading!

### What was making headlines?

The first issues covered everything from solvent abuse (a topic revisited in the first seven editions) to the rising potential of adhesives in experimental car construction, where for the first time adhesives were being trialled to replace welds, a revolution in automotive design. On the sealants side, the SWARM initiative (Sealant Workability and Adhesion Rating Method) marked the industry's first steps towards performance classification standards, something now embedded in today's product specs. Meanwhile, the article "Through Thick and Thin" tackled the gritty economics of the time: pricing pressures, the UK's evolving relationship with the European Economic Community, the dominant Deutsche Mark, and comparisons to the controlled economies of the Eastern bloc.

Standardisation was also on the radar. An article titled "Adhesives - European

Standardisation" reported on the Wood Glue Technical Working Party's efforts to get a creep test into CEN adhesive standards, an early sign of the UK's push for more technical rigour. Even in 1984, BASA members were already hearing early rumblings of major legislation. The Classification, Packaging and Labelling of Dangerous Substances Regulations were just being introduced, and the first BASA legislative guide "A Broad Guide to Existing & Prospective Legislation, Regulations, Codes of Practice etc." was released to help members make sense of it all.

### Other standout moments from these early issues in 1984 included:

- \* The start of COSHH discussions (even before the regs formally launched).
- \* A study into superglue for surgical use, a glimpse of future medical innovation.
- \* The unusual link between hotmelt adhesive prices and the failure of orange crops in Florida (a raw material supply shock!)
- \* A brilliant cartoon lampooning H&S rules, suggesting products should be safe even when not used as intended but "in ways reasonably foreseeable."



And of course, no look back would be complete without a nod to the inaugural BASA Glue Pot Golf Trophy, proudly won by Tim Lee of Thiokol Chemicals Ltd, kicking off a tradition still enjoyed by members today at the annual sports day. From technical debates to industry camaraderie, those



early issues set the tone for what BASA has stood for ever since: collaboration, innovation, and keeping members ahead of the curve. We will continue this 'look back' focussing on 1985 in the next BASA Bulletin issue as we digitise and extract interesting facts for your entertainment and reminiscence!

# 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. I’ll be shining a light on the latest developments impacting BASA members, cutting through the complexity to help you stay informed and compliant.

In this Bulletin issue, we’re looking at some key changes and enforcement actions that could affect how you label, promote, and supply your products. First up, changes to the CLP Regulation are tightening the rules on label legibility, including minimum font sizes and clearer requirements for hazard information in advertising. If you’re not already reviewing your product labels and promotional materials, now’s the time. Don’t forget, if you are selling into Northern Ireland then this affects you.

I’ll also highlight the EU’s upcoming enforcement programme for Safety Data Sheets, which puts renewed focus on the accuracy and completeness of SDSs. Even if you’re GB-based, if you export to the EU, this matters.

Finally, I’ll share a brief update on where things stand with UK REACH and the revised fees, including what BASA is doing to represent your interests as the UK shapes its own approach to chemicals regulation.

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

## Changes to CLP label font sizes

| Capacity of the package                              | Dimensions of the label (in millimetres) for the information required by Article 17 | Dimensions of each pictogram (in millimetres) | Minimum font-size (x-height in millimeters) |
|------------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------------|
| Not exceeding 0.5 litres:                            | If possible, at least 52x74                                                         | Not smaller than 10x10                        | 1.2                                         |
| Greater than 0.5 litres but not exceeding 3 litres:  |                                                                                     | If possible, at least 16x16                   | 1.4                                         |
| Greater than 3 litres but not exceeding 50 litres:   | At least 74x105                                                                     | At least 23x23                                | 1.8                                         |
| Greater than 50 litres but not exceeding 500 litres: | At least 105x148                                                                    | At least 32x32                                | 2.0                                         |
| Greater than 500 litres:                             | At least 148x210                                                                    | At least 46x46                                | 2.0                                         |

The CLP Revision (Regulation (EU) 2024/2865) was published on 20th November 2024 and includes new font sizes for CLP labels. This is applicable from the 1st January 2027 in the EU and NI.

The text on the label shall have the following characteristics:

- printed in black on a white background;
- the distance between two lines shall be equal or above 120 % of the font size;
- a single font shall be used that is easily legible and without serifs;

- the letter spacing shall be appropriate for the selected font to be easily legible.

Note: for the labelling of inner packaging where the contents do not exceed 10 ml, the font size may be smaller than indicated in Table 1.3, as long as it remains easily legible, where it is deemed important to place the most critical statement, such as hazard statement or EUH statement, and where the outer packaging meets the requirements of Article 17.

## UK REACH update

### What needs to be done under UK REACH

We are still waiting for the full details on what registration looks like. But for now, this is what must be done to bring a substance into the GB market.

#### Option 1 - Grandfathering



If previously held an EU REACH registration through a GB legal entity the registration could be grandfathered.

This window is now closed, but I am sure HSE would allow if you contacted them.

#### Option 2 - Downstream User Import Notifications (DUINs)



If the substance had been previously imported in the two years prior to Brexit - i.e. 1st Jan 2018 to 31st Dec 2020.

This allows the transitional registration deadlines to be used.

#### Option 3 – NRES



If DUIN is not an option, then must make a registration following the NRES process.

### DUINs – Downstream User Import Notifications

To be eligible to submit a DUIN the substance must have been previously imported in the two years prior to Brexit- ie 1st Jan 2018 to 31st Dec 2020. (Remember that a sample counts, and that the substance could have been imported in a different product...). The DUIN allows you to benefit from the deferred transitional deadlines. If you cannot benefit from a DUIN then a New Registration of an Existing Substance NRES registration must be done.

### NRES - New Registration of an Existing Substance



# New CLP revision – requirements for advertising

**In December REGULATION (EU) 2024/2865 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2024 amending Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures was published. It is referred to as the CLP revision.**

Any advertisement for a mixture classified as hazardous or a mixture containing a classified substance is to mention the types of hazard indicated on the label where such advertisement allows a contract for purchase to be concluded without first having sight of the label. The regulation has been changed to ensure that advertisements for hazardous substances and mixtures contain the most important information in terms of safety and protection of human health and the environment.

Therefore, such advertisements should contain the hazard pictogram, the signal words, the hazard statements and supplemental EUH statements, with derogations for non-visual advertisements. The hazard category should not be provided in the advertisements, as it is reflected by the hazard statement.

In order to ensure proper communication of information on the hazards and safe use of chemicals to consumers and consistency with statements and claims allowed on product labels under this Regulation, it is appropriate to clarify that advertisements for a substance or a mixture classified as hazardous should not contain statements such as 'non-toxic', 'non-harmful', 'non-polluting', 'ecological' or other statements indicating that such substance or mixture is not hazardous or any other statements that are inconsistent with its classification.

Note: This also applies to online sales.

Article 48 of the regulation covers advertisement and states;

1. Any advertisement for a substance classified as hazardous shall indicate, as applicable, the hazard pictograms, signal words, hazard statements and supplemental EUH statements set out in Annex II. Any advertisement for such a substance for sale to the general public shall in addition state: "Always follow the information on the product label."

2. Any advertisement for a mixture classified as hazardous or covered by Article 25(6) shall indicate the hazard pictograms, signal words, hazard statements and supplemental EUH statements set out in Annex II. Any advertisement for such a mixture for sale to the general public shall, in addition, state: "Always follow the information on the product label."
3. Any advertisement for a substance or a mixture classified as hazardous shall not contain statements that are not to appear on the label or packaging of that substance or mixture in accordance with Article 25(4).
4. By way of derogation from paragraphs 1 and 2, the hazard pictograms and signal words may be omitted where the advertisement is non-visual.



## EU REACH update from FEICA®

### Simplified REACH: A unique opportunity to strengthen the EU chemicals industry

The REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) regulation, which came into force in 2007, represents a significant overhaul of the European Union's chemical policy. It aims to ensure a high level of protection for human health and the environment from the risks posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. The REACH regulation has since undergone various amendments to address emerging issues and improve its implementation. The current review process, initiated as part of the EU's Chemicals Strategy for Sustainability, aims to simplify and enhance the regulation further.

FEICA advocates the need for a balanced approach that supports both innovation and safety in the adhesives and sealants industry, whilst fostering industry growth and competitiveness. A truly simplified REACH is a unique opportunity to reduce burdens on the industry, strengthen the EU chemicals industry, secure supply chains, and support industrial resilience.

Visit: [www.feica.eu/our-projects/reach](http://www.feica.eu/our-projects/reach) for links: FEICA position on REACH

Simplification, Annex 1 - Regulatory framework impacting adhesives and sealants, Annex 2- Process for a regulatory roadmap, Annex 3- FEICA position REACH registration of polymers & FEICA response to CARACAL meeting held on 3 April 2025.

FEICA recommendations on the simplification of REACH:

1. **No MAF in a simplified REACH:** Reject the introduction of a non-scientific Mixture Assessment Factor (MAF)
2. **No purely hazard-based restrictions:** Avoid extending the Generic Risk Approach (GRA) without considering real-world use and exposure
3. **No new blanket requirements for polymers:** New requirements on polymers under REACH will overburden industry without delivering clear safety gains
4. **A comprehensive and effective regulatory roadmap:** Recommend a well-defined roadmap to prevent regulatory overload
5. **Standardised electronic formats for better data transfer:** Mandate electronic communication of safety data sheets (SDSs)
6. **Proper enforcement to ensure a level playing field:** Advocate for harmonised enforcement practices across EU Member States

### CLP (Classification, Labelling and Packaging) Regulation

The CLP Regulation (Classification, Labelling and Packaging Regulation (1272/2008)) complements REACH by establishing uniform requirements for the classification, labelling, and packaging of chemical substances and mixtures. Its primary goal is to ensure that the hazards presented by chemicals are clearly communicated to workers and consumers in the European Union, thereby protecting human health and the environment. Regarding the CLP Regulation, FEICA has been proactively collaborating with ECHA on the development of the Guidance on labelling and packaging.

FEICA is Chair of the Downstream Users of Chemicals Co-ordination Group (DUCC), which is a platform of European associations which represent downstream industries. DUCC's main objective is to contribute, with a common voice, to the successful implementation of the requirements of the REACH and CLP Regulations. Kindly note the recent DUCC positions. FEICA contributed significantly to both: [REACH](#) & [CLP](#).

*\*Some of these documents are accessed via the FEICA Extranet, which is available to BASA members as part of your membership fee. Please contact us if you require a log-in.*

## UK REACH fees

On the 1st April 2025 the UK REACH fees were amended.

REACH Fees and Charges (Amendment of Commission Regulation (EC) No 340/2008) Regulations 2025 have been published and are in force from the 1st April 2025 (SI 2025/299).

These Regulations amend the fees payable to the Health and Safety Executive (HSE) with regards to UK REACH registrations.

The legislation can be found in full here:  
<https://www.legislation.gov.uk/uksi/2025/299/contents/made>

The fees for all types of registrations can be viewed in full on the members-only area of the BASA website (info hub):

<https://members.basa.uk.com/MIC/22566931/22566932/#/ResourceDetail/86418/TheLawforUKREACHfeesandch>

Or visit the HSE website here:

<https://www.hse.gov.uk/reach/fees-and-charges-table.htm>

The fees for full registrations are shown below.

Meanwhile, the European Commission has recently announced that they are considering scrapping a REACH administrative charge for companies granted SME status.

This is in a bid to appease industry concerns over its initial plans to increase the fees charged by ECHA for reach registrations by 19.5%.

## Safety Data Sheet Enforcement Program

Caroline Raine summarises the results of the recent **Safety Data Sheet (SDS)** enforcement programme run by the **European Chemicals Agency (ECHA)**.

### Background

ECHA ran an enforcement programme REF-11 on the quality of SDS. The programme ran from January to December 2023 and involved 28 countries, where over 2,500 safety data sheets were checked.

ECHA explained that;

*The primary goal was to check whether the SDS were complete, up-to-date and included all the required information, especially the new information required. Second objective was to check the quality of the information, its consistency and compliance with the legal requirements.*

*Inspectors found that 35% of the inspected SDS did not comply with the legislation – either because the content did not meet the requirements or the safety data sheet was not provided at all.*

*It was also found by inspectors that the flow of SDS in the supply chain works well – suppliers provided the SDS to the recipients when required in 96 % of the cases.*

*Additionally, most of the 2,500 SDS were updated to the new format.*

*Among the new information requirements, the biggest challenge was the lack of information on nanofoms and on endocrine disrupting properties, missing respectively in 67 % and 48 % of the checked SDS where it was required. Another relevant finding was that some of the SDS (16 %) lacked the information required by the authorisation decisions.*

*The Forum project also reported deficiencies in data quality for 27 % of the inspected SDS. Common issues included incorrect information on hazard identification, composition or exposure control. Additionally, 18 % of the checked SDS lacked the required exposure scenarios.*

The enforcement report can be found here: [https://echa.europa.eu/documents/10162/2304648/wg\\_ref11\\_project\\_report\\_en.pdf/](https://echa.europa.eu/documents/10162/2304648/wg_ref11_project_report_en.pdf/)

### Fees for registrations submitted under Article 6, 7 or 11 of UK REACH (full registrations)

Table 1 – Standard Fees

|                                                           | Individual submission          | Joint submission               |
|-----------------------------------------------------------|--------------------------------|--------------------------------|
| <b>Fee for substances in the range of 1 to 10 tonnes</b>  | £2,222<br>[previously £1,518]  | £2,222<br>[previously £1,138]  |
| <b>Fee for substances in the range 10 to 100 tonnes</b>   | £2,222<br>[previously £4,080]  | £2,222<br>[previously £3,061]  |
| <b>Fee for substances in the range 100 to 1000 tonnes</b> | £2,222<br>[previously £10,913] | £2,222<br>[previously £8,185]  |
| <b>Fee for substances above 1000 tonnes</b>               | £2,222<br>[previously £29,419] | £2,222<br>[previously £22,064] |

### Fees for registrations submitted under Article 6, 7 or 11 of UK REACH (full registrations)

Table 2 – Reduced Fees for SMEs

|                                                                                                                                                                                                               | Medium enterprise Individual submission | Medium enterprise Joint submission | Small enterprise Individual submission | Small enterprise Joint submission | Micro enterprise Individual submission | Micro enterprise Joint submission |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------------------------|----------------------------------------|-----------------------------------|----------------------------------------|-----------------------------------|
| <b>Fee for substances in the range of 1 to 10 tonnes</b><br><small>[To note: All SMEs registering in this tonnage band continue to pay the current lowest fee an SME pays within their company size]</small>  | £740<br>[previously £987]               | £740<br>[previously £740]          | £399<br>[previously £532]              | £399<br>[previously £399]         | £57<br>[previously £76]                | £57<br>[previously £57]           |
| <b>Fee for substances in the range 10 to 100 tonnes</b><br><small>[To note: All SMEs registering in this tonnage band continue to pay the current lowest fee an SME pays within their company size]</small>   | £740<br>[previously £2,652]             | £740<br>[previously £1,990]        | £399<br>[previously £1,428]            | £399<br>[previously £1,071]       | £57<br>[previously £204]               | £57<br>[previously £153]          |
| <b>Fee for substances in the range 100 to 1000 tonnes</b><br><small>[To note: All SMEs registering in this tonnage band continue to pay the current lowest fee an SME pays within their company size]</small> | £740<br>[previously £7,094]             | £740<br>[previously £5,320]        | £399<br>[previously £3,819]            | £399<br>[previously £2,865]       | £57<br>[previously £546]               | £57<br>[previously £409]          |
| <b>Fee for substances above 1000 tonnes</b><br><small>[To note: All SMEs registering in this tonnage band continue to pay the current lowest fee an SME pays within their company size]</small>               | £740<br>[previously £19,122]            | £740<br>[previously £14,342]       | £399<br>[previously £10,297]           | £399<br>[previously £7,723]       | £57<br>[previously £1,471]             | £57<br>[previously £1,103]        |

Regulation (EU) 2020/878

REACH Annex II was updated in 2020 through an amendment regulation. Regulation (EU) 2020/878 was published in July 2020 and required all SDS to be updated by the end of December 2022. A number of changes to the SDS format were introduced. Some new subsections were added to the SDS and information on nanoforms, endocrine disrupting properties of substances, SCL/ATE/M-factors, mixtures’ UFI codes are now all required to be provided in the SDS as appropriate. The details on the changes can be found on the BASA website by downloading guidance note GN 117: <https://members.basa.uk.com/MIC/22566931/22566932/#/ResourceDetail/79931/GN117-SafetyDataSheetGuid>

Enforcement Programme

The executive summary of the report from ECHA summaries the outcomes as;

*The project was conducted in 28 MS with a total of 2528 substances/mixtures SDS controlled. 95% (2412) were actively provided with 2095 of the 2412 SDS (87%) found to be in accordance with new Regulation (EU) 2020/878. For 81% of these SDS (1956), the suppliers have procedures for proactively sending updated versions of the SDS to customers from the previous 12 months. Altogether, there were 1006 SDS from Distributors, 664 from Downstream Users, 714 from Manufacturers and 144 from Importers, where 1593 SDS were from Small and Medium Sized Enterprises (SME).*

Looking into the detail in the report some interesting facts and figures are;

- 28 countries participated in the REF-11 enforcement project.
- MS checked 1336 SDS during an on-site inspection and 1192 SDS via desktop inspection.
- Sweden, Spain, Germany and Italy checked the most SDS followed by Belgium and Estonia.
- The highest proportion of SDS checked were from SMEs (63%).
- 95% of suppliers were found to provide an SDS to the recipient of a chemical.
- 87% of the SDS checked were written in accordance with new format as outlined in EU Regulation 2020/878.
- Where information on nanoforms was required, 67% did not have the information in the relevant subsections.
- For ED properties 52% contained the information required in the relevant subsections.
- For ATE, 65% of SDS in which ATE were to be included fulfilled this requirement.
- SCLs were present in 82% of SDS

- M-factors were present in 79%.
- Information on the authorisation, including conditions and monitoring arrangements relevant for downstream users, was provided in 84% of SDS in subsection 15.1, whereas authorisation number required in subsection 2.1 was provided in 32%
- 82% of SDS satisfied the information requirements on subsection 9.1 (physical and chemical properties).

For me this table (taken from the ECHA report) summarises nicely the sections of the SDS that are problematic, namely sections 3, 8, 9 and 1.

| Section of the SDS | Sum of SDS with incorrect information or not plausible | % of SDS with incorrect information or not plausible in SDS with quality issues (513) |
|--------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------|
| 1                  | 157                                                    | 31                                                                                    |
| 2                  | 122                                                    | 24                                                                                    |
| 3                  | 240                                                    | 47                                                                                    |
| 4                  | 27                                                     | 5                                                                                     |
| 5                  | 24                                                     | 5                                                                                     |
| 6                  | 28                                                     | 6                                                                                     |
| 7                  | 23                                                     | 5                                                                                     |
| 8                  | 249                                                    | 49                                                                                    |
| 9                  | 192                                                    | 36                                                                                    |
| 10                 | 21                                                     | 4                                                                                     |
| 11                 | 76                                                     | 15                                                                                    |
| 12                 | 47                                                     | 9                                                                                     |
| 13                 | 22                                                     | 4                                                                                     |
| 14                 | 25                                                     | 5                                                                                     |
| 15                 | 68                                                     | 13                                                                                    |
| 16                 | 43                                                     | 8                                                                                     |

Table 3. Sum of sections of the SDS deemed incorrect or implausible.

**Section 3** lacked ATE, M-factor or SCL, the classification incorrect, for a mixture, subsection 3.1 was filled in instead of subsection 3.2, Not all necessary substances are listed among the ingredients of the mixture.

**Section 8** OEL are included but their legal basis is not correctly provided, OEL missing or wrong (e.g. wrong value or from a different country), lack or insufficient information on PPE, insufficient information on gloves: Type of material, thickness, breakthrough, lack or insufficient information on the type of respirators, lack of information on environmental exposure controls.

**Section 9**, Absence of information requested without any justification, absence of available information, absence of information on the characteristics of particles, lacking necessary information, information inconsistent with the ingredients indicated in the SDS, the subsection 9.2 is missing.

Section 1

**1.1.** Product identifier, wrong product

identifier, UFI missing, UFI indicated in subsection 2.2 and not in subsection 1.1.

**1.2.** Relevant identified uses of the substance or mixture and uses advised against, lacking identified uses for recipients, wrong uses identified, use advised against are not indicated

**1.3.** Details of the supplier of the SDS lacking full address and telephone number of the supplier, lacking email address for a competent person responsible for the SDS

**1.4.** Emergency telephone number, emergency telephone number absent or incorrect, lacking telephone number of official advisory body

ECHA recommendations

ECHA recommends that;

- Those responsible are encouraged to ensure that the latest requirements are applied and in general that the consistency of all the information throughout the document is assured.
- It is recommended that the dutyholders have a procedure to assess that substances and mixtures which are being supplied to them will be supplied together with the latest version of the SDS and that SDS comply with the relevant requirements of article 31 of the REACH Regulation.
- It is strongly recommended that the dutyholders work to improve their understanding of the requirements related to the SDS document. This can be achieved by consulting Q&A, guidance documents and information provided by sector organisations.
- It is recommended that manufacturers, importers and formulators consider the uses of the substance and then extract the relevant information needed for downstream users. For example, they should check whether the required information on authorisation is provided.
- It is also recommended that industry associations pay attention and help raise awareness of the legal duties related to the requirements for the SDS documents included in this project.

Conclusions

It is important to make sure that your Safety Data Sheets are up to date, in the correct format and contain the correct information. Classifications are reviewed and updated on a regular basis so you will need to be monitoring and reviewing your SDS and classifications periodically. If your SDS haven’t been reviewed and updated in a while perhaps now is the time to act before the authorities catch up with you. If in doubt seek advice. A further enforcement programme to check compliance levels is inevitable.

# Jims Technical Takeaways



**Jim Palmer,**  
BASA Technical Officer

This report addresses the rapidly changing regulatory environment and evolving industry priorities, Highlighting the latest initiatives and resources now available on the BASA website for in-depth information on every topic facing our industry.

Our core strength continues to be the dedicated working groups, which serve as the cornerstone of our industry representation. Where regulatory demands in the UK, EU, and globally are continuously shifting, these groups provide critical guidance, detailed position papers, and essential representational activities.

## **Chemical Legislation Working Group (CLWG)**

The CLWG has once again taken a leading role. Their recent publications cover a range of topics, including updated labelling standards introduced with the new CLP revision published last November. Caroline Raine detailed these changes during an April Friday drop-in session, if you missed the session, the recording is available on the BASA InfoHub website. In addition, the CLWG has released comprehensive guidance on achieving joint compliance with both EU and UK REACH regulations, complete with a practical template to assist members. Furthermore, following the HSE's recent announcement of a substance evaluation rolling action plan for UK

REACH through 2026, our updated 'substance watchlist' now incorporates these essential changes.

## **Environment and Sustainability Working Group (ESWG)**

Focusing on our industry's response to emerging sustainability challenges, the ESGW is closely monitoring the development of Extended Producer Responsibility (EPR) regulations in both the UK and Europe. Early analyses indicate that, due to residual contamination, most adhesive and sealant packaging will likely not qualify for the modulated fee reduction. Consequently, under the proposed Recyclability Assessment Methodology (RAM), most, if not all, adhesive and sealant primary packaging is expected to be classified as red and will incur higher fees. To address this challenge, BASA is establishing a packaging task group under the Business Steering Committee to evaluate the potential financial impact on our industry. If you provide adhesives and sealants and your packaging typically ends up in household waste streams, having a representative on this new task group is essential.

## **Construction & Adhesives & Sealants Working Groups**

Both the Construction & Adhesives Working Group (CAWG) and the Sealants Working Group (SWG) are concentrating on standards and product compliance. Their work encompasses the latest requirements introduced by the EU Construction Products Regulation, with additional guidance available from Construction Products Europe, on the website, and the emerging requirements for Digital Product Passports (DPPs). They are also monitoring the UK government's recent Green Paper on construction products, a response to the phase two report of the Grenfell Inquiry.

Additionally, the persistent challenges associated with CE and UKCA marking have prompted multiple trade associations to publicly call for an EU-UK mutual recognition agreement on conformity assessment, a move that could significantly reduce testing costs, and also benefit the UK test industry as it would potentially re-instate

them as EU Notified Bodies. Without this it is difficult to see why a UK test house would spend money to retain its approved body status for construction products.

## **Packaging Adhesives Working Group (PAWG)**

In the absence of specific UK or EU regulations for adhesives used in food contact applications, the PAWG continues to align its activities with those of the FEICA working group. Their latest publications provide guidance, reports, and recommendations designed to support producers, users, packaging converters, and other stakeholders. These documents emphasize the critical role of paper and packaging adhesives in ensuring sustainability, facilitating recycling, and guaranteeing food contact safety.

We are following the proposals from the CEFIC sector group for Food Contact Additives (FCA) in respect of their proposals to the European Commission on how to expand food contacts regulation to other materials than plastics. The most recent presentation on this was at the drop-in clinic on 22nd November 2024. The slides and recordings are available via the BASA Info Hub under Resources > filter by 'Drop in clinic' or you can also search for the date.

As we navigate an era of rapid regulatory and market evolution, BASA's technical working groups remain committed to delivering expert guidance, fostering industry dialogue, and equipping our members.





## CHEMUK 2025 PANEL SESSION

# 'WHAT'S THE FUTURE FOR ADHESIVES AND SEALANTS?'

WEDNESDAY 21st MAY: 10:00 STAGE 3



**PANEL HOST**  
Jim Palmer  
BASA's Technical  
Officer



Sam Hodgson  
Technical Manager  
Hodgson Sealants Limited



Caroline Raine  
Caroline Raine Chemical  
Consultancy Ltd & BASA  
Consultant



Danish Azri  
Sustainability Lead  
CBA



Lorna Williams  
CEO  
BASA



# Tony's Sustainability Snapshot



**Tony Bingham,**  
BASA Sustainability Officer

Last year FEICA reviewed their approach and resources around sustainability and the results of this review are outlined below.

The Sustainable Development Committee, which had been operating for a number of years, had been looking at a number of projects including production of generic EPD's (Environmental Product Declarations) for adhesive and sealant formulation types, the development of Good Practice Stories showing real life examples of where adhesives and sealants contribute to sustainability, publishing industry position papers and following the development of sustainability legislation in the EU, and giving industry input to the relevant legislators.

FEICA had also set up a smaller, high level industry group to lobby directly with the Commission and MEPs in a bid to enable better understanding of the importance our industry can play in achieving their sustainability goals. Resulting from this review, the PAC (Public Affairs Committee) was formed from the two groups above. The importance of promoting our industry and the role we play has also resulted in FEICA working with business management consultants DGA to help with exactly this.

FEICA have also established the RSB (Regulatory and Sustainability Board), formerly the ETB (European Technical Board), again to emphasize the importance of sustainability. Lorna Williams sits on the RSB for BASA, as the vice chair, and I sit on PAC.



## **FEICA Public and Regulatory Affairs high activities for 2025 are:**

- REACH
- Implementation of Packaging and Packaging Waste Regulations
- ELV (End of Life Vehicles Regulation)
- ESPR (Ecodesign for Sustainable Products Regulation)
- EUDPP (European Digital Product Passport)

## **Medium activities are:**

- Construction Products Regulation
- One Component Foams
- EPDs
- EU's review of Food Contact Regulation
- Electronics (Ecodesign)
- Microplastics
- CLP
- Green Claims Directive

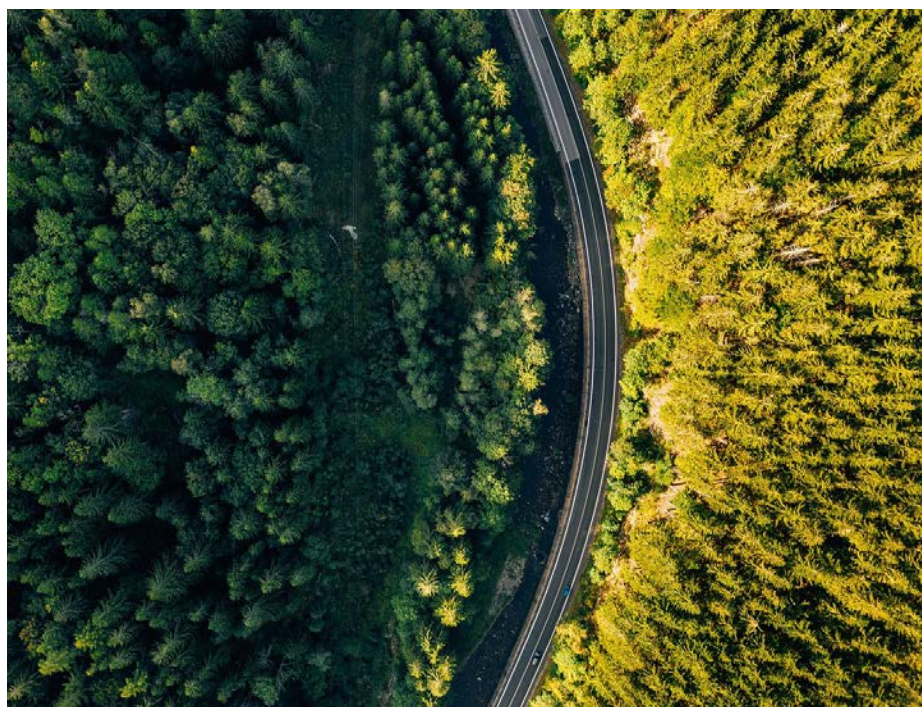
## **Low activities:**

- Mass Balance Approach
- MAF (Mixture Assessment Factor)
- Specific substance Issues in food contact
- Material Declaration Standard
- Plastic pellets

The other group where I represent BASA is SRAPPA (Sustainability and Recyclability of Adhesives in Paper and Packaging Application) where the priority activities have been identified as:

- To develop comprehensive FEICA Reports on adhesives in packaging recycling (labelling adhesives has recently been issued and can be found on the BASA website)
- Encourage company representation on CEN TC 261 (Packaging – responsible, amongst other things, for the elaboration of standards for environmental aspects of packaging and unit loads)
- Closely monitor the activities of RecyClass (a plastics recycling nonprofit, cross industry initiative) and 4evergreen (a paper recycling industry alliance) via individual member company and FEICA membership.

Post Brexit I am sure we all still appreciate the importance of understanding what is going on in mainland Europe as many of us import and export with businesses across the English Channel and Irish Sea. Some of the regulatory thinking and consequent legislation may even be adopted here in GB plc in the future!



# Biocides Post-Brexit: Key Considerations for Adhesive & Sealant Formulators

For BASA members formulating adhesives and sealants, biocides remain a vital part of protecting product integrity and extending shelf life, especially in water-based systems. But since Brexit, the rules around using and sourcing these preservatives have changed significantly, creating new compliance pressures for formulators across the UK.

## Two Regulatory Systems, One Product Range

Since leaving the EU, the UK has implemented its own Biocidal Products Regulation (UK BPR), managed by the Health and Safety Executive (HSE). At the same time, Northern Ireland continues to follow the EU BPR, under the Windsor Framework.

What does that mean in practice? If you're marketing products in both Great Britain and Northern Ireland (or the EU), you may now need dual regulatory coverage even for the same formulation. This affects not only biocidal actives but also treated articles (i.e. your finished products), which must now be compliant under two separate frameworks.

### Preservatives in Focus

Most BASA members aren't placing standalone biocidal products on the market- you're using in-can preservatives or film preservatives as part of a finished formulation.

But you're still impacted by UK BPR requirements:

1. You must ensure the active substance supplier is listed on the UK Article 95 list (separate from the EU one).
2. You need to confirm the active is approved or under review for the relevant product type (e.g., PT6 for in-can preservatives).
3. If you import formulations or raw materials, you may be responsible for compliance yourself if your supplier hasn't addressed UK BPR.

### Data Access & Supply Chain Gaps

A common issue raised by formulators is



access to data. Many upstream suppliers secured EU Letters of Access (LoAs) – but these don't automatically apply in Great Britain. If they haven't arranged UK-specific data access, you might find yourself unable to legally use or sell products with those actives under UK BPR.

We're also seeing cases where preservatives used in long-standing formulations are no longer supported under UK BPR – which can leave formulators scrambling to find alternatives.

### Timelines & Transitional Relief

The UK granted transitional relief by allowing previously approved EU products and actives to stay on the GB market – but only if timely notifications and supporting dossiers were submitted. Many of those deadlines are fast approaching (or already here), so it's critical to check with suppliers or your own regulatory teams about your preservative ingredients.

### A Chance to Influence Future Reform

There is an opportunity here. The UK government has expressed interest in

streamlining the BPR process to better suit national needs, including reducing duplication and supporting innovation.

BASA is actively engaging with policymakers to ensure the voice of formulators is heard, particularly around the practical challenges of sourcing compliant actives.

### What Should You Do Now?

- Audit your formulations for biocidal content.
- Confirm all actives are supported under UK BPR and on the UK Article 95 list.
- Engage with suppliers about UK LoAs and transitional status.
- Flag any at-risk preservatives to BASA so we can represent member concerns.

We'll continue providing updates and guidance as this regulatory landscape evolves. If you have specific concerns about a product or supplier, don't hesitate to reach out.

*Written by Lorna Williams, BASA CEO.*

# MEMBER NEWS

## GROLMAN EMBRACES CIRCULAR INNOVATION TO GROW NEW WITH ITS NEW CORPORATE DESIGN, UNVEILED AT ECS 2025

Neuss, Germany – 25 March 2025 – Grolman, a family-owned global distributor of specialty chemicals, is proud to unveil its new corporate design at the European Coatings Show (ECS) 2025, marking a significant milestone in the company's ongoing transformation. This rebrand is more than just a new visual identity- it reflects Grolman's vision for circular innovation and long- term partnerships.

### A Brand Story Rooted in Transformation

For nearly 170 years, Grolman has embraced change, continuously adapting to shifting market dynamics, technological advancements, and evolving sustainability needs. Since 2017, the company has been on a transformative journey, recognising that the world and the speciality chemicals industry are changing at an unprecedented pace due to climate change, digitalisation, demographics and increasing complexity.

"In this transforming world, the choice seems to be either economic growth or sustainability. This is wrong," says Florian Grolman, Managing Director and CEO of Grolman Group. "Circularity allows the industry to do both- to grow as a business and to save the planet for humanity. 'Grow New', our new brand promise, is our commitment to this balance, driving innovation while creating lasting value. Our brand identity represents this mindset: embracing innovation, driving circular solutions, and helping our partners stay ahead in an ever-changing world."

### A Design That Embodies Progress and Sustainability

The refreshed logo and signet strike a balance between professionalism and energy, ensuring that Grolman remains recognisable while embracing modernity. Key elements of the new corporate design include:

- Dynamic Signet & Wordmark – The "Grow New" signet, derived from the logo, represents forward-thinking transformation.
- New Visual Identity – A distinctive

design concept illustrating circularity through textured, natural elements, symbolising chemicals as the foundation of all materials.

"Our new look is not just a visual refresh - it's a smart way to tell the story we've been building together," explains Florian Grolman. "Every element, from our visuals to our typography, works together to create a unified and compelling narrative. This rebrand is about who we are, what we stand for, and where we're going."

### Official Launch at ECS 2025

ECS 2025 serves as the official global stage for Grolman's brand relaunch. Visitors can experience the new brand identity first- hand at the Grolman exhibition stand, where the company will showcase how its evolved approach supports the coatings and specialty chemicals industry in navigating circular transformation.

In addition to the ECS debut, Grolman is rolling out the new corporate identity across its digital presence, marketing materials, and upcoming global exhibitions.

### A Future Driven by Circular Growth

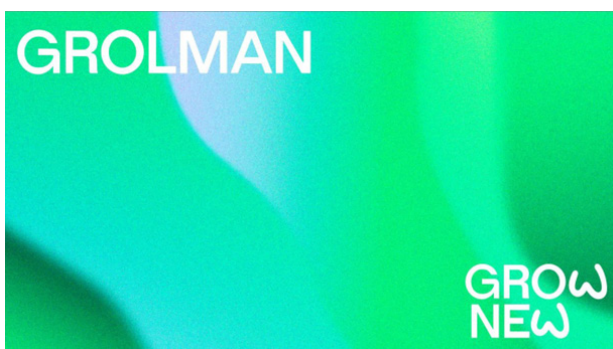
With this transformation, Grolman reinforces its leadership position as:

- The first SME globally in the chemical industry to commit to go Net-Zero by 2050 with SBTi.
- The first distributor to provide CO<sub>2</sub> footprint transparency for every product.
- The first distributor to have trained all staff in circularity.

By embracing circularity as a competitive edge, the company continues to lead the industry towards a more sustainable and innovative future.

### Experience the Future of Grolman

Join us at ECS 2025 to explore Grolman's new identity and discover how we can Grow New together. Visit us at Booth 3A-333 or learn more at Grolman Group.



## Brand refresh connects industry-innovator origins of OAMPS Hazardous Industries to future growth strategy

OAMPS Hazardous Industries, the specialist insurance advisor to the hazardous goods and environmental sectors, has undergone a brand refresh to mark 40 years of consistent commitment to the sector.

The use of 'heritage blue' throughout its website, advertising and social channels is a deliberate nod to OAMPS' origins in the 1980s as an innovator that emerged to deliver fleet risk solutions to the highly specialist hazardous fuels sector when no others were available.

Over the next four decades, the blueprint for developing those bespoke insurance solutions for fuel distributors has been applied and expanded to encompass everything from chemical companies, anaerobic digestion, and adhesives & sealants to environmental contractors, oil/chemical waste & recycling, and LPG distribution and haulage. Today, OAMPS Hazardous Industries can cover every aspect of clients' requirements from manufacture to wholesale, distribution, import/export, storage, haulage, installation and servicing.

### Brand origins

Forty years ago in the early 1980s, following some large explosions in the late 1970s, health and safety concerns surrounding the movement of hazardous fuels had resulted in the whole sector finding itself well outside the appetite of mainstream insurance brokers and insurance companies.

OAMPS Hazardous Industries was founded by petrochemical specialists to change that.

Incorporated as OAMPS UK Limited in 1985, OAMPS Hazardous Industries began life placing high-risk fuel fleet motor business into its own, specially established insurance captive to ensure the wheels could keep turning on a vital sector that underpins so many industries.

### Brand refresh

Building and maintaining close working relationships with leading industry organisations has played a crucial part in OAMPS Hazardous Industries reaching its 40th year and looking ahead to the decades to come, by ensuring its

# MEMBER NEWS

knowledge and industry insight grow in step with the sectors it supports.

Commenting on the brand refresh to recognise four decades in business, **Karl Jones, Account Director at OAMPS Hazardous Industries**, said: "To mark 40 years of unwavering commitment to the industries we support, our return to heritage blue ties together a past, present and future where our core values remain unchanged."



"OAMPS Hazardous Industries was a 'disruptor' before the term even existed. It was created out of real need, to develop viable alternative risk solutions for customers in the downstream fuel market where there were none. And that same approach – blending innovation with integrity and expertise with transparency – powers our business today."

"Four decades of working closely with so many of the UK's hazardous industrial sectors, has also given us the risk understanding needed to support new, emerging and innovative technologies using the same can-do creative outlook."

"Alternative fuel sources, such as HVO and BioLPG, as well as energy production and waste disposal, like anaerobic digestion, are a case in point, and we will continue to work closely with trade associations to help insurance underwriters understand these evolving risks and how they can be effectively managed. We're also a founding member of a working group that aims to highlight the environmental benefits of engaging experienced and independently assessed spill responders to the wider insurance market; encouraging those insurers that are not necessarily familiar with these incidents to focus on optimising outcomes and adherence to best practice."

"As we look to support our clients and their sectors in the transition to a renewable energy- fuelled, low-carbon future, we'll make sure we use our expertise to deliver innovative risk solutions and real value, just as our founders did 40 years ago."

**OAMPS**  
HAZARDOUS INDUSTRIES

## In loving memory of Kieran Patrick Rafferty

If you ever met Kieran Rafferty, chances are you walked away thinking, "So that's what a truly inspiring, fun, and business-savvy leader looks like." That's exactly how we'll always remember him. It was with heavy hearts that the Rakem Group family shared the news of Kieran's passing on Saturday, 8th March. Surrounded by those he loved most; Kieran left us far too soon and leaves behind a space no one else can fill.

Kieran was more than just Rakem's Managing Director and Owner. He was the heart of Rakem. His infectious laugh, boundless kindness, and deep generosity touched everyone lucky enough to know him. He led with humility and humanity, never too busy to lend a hand, crack a joke, or make someone's day just a little brighter.

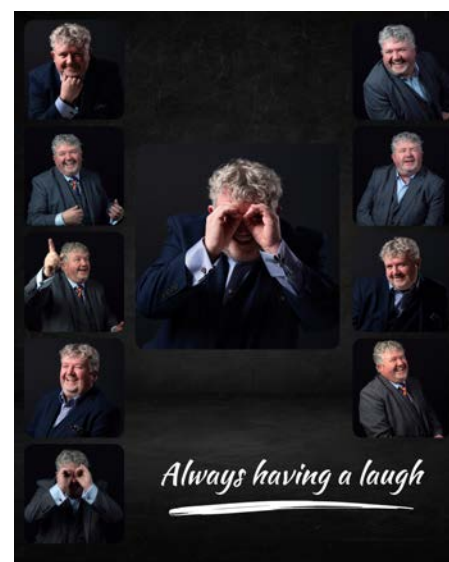
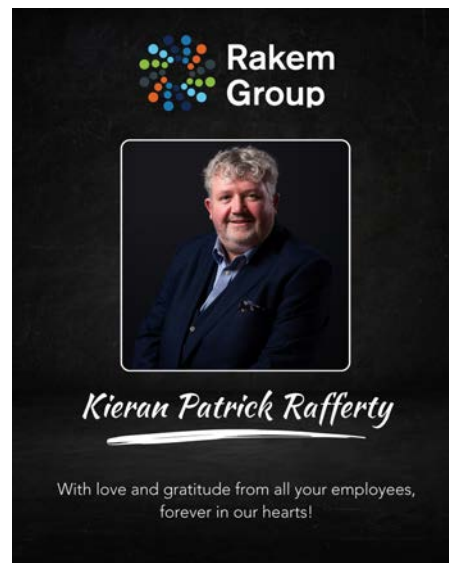
To Kieran, leadership wasn't about titles, it was about people. He made every single team member feel seen, heard, and appreciated. Whether you'd been with the company for a day or a decade, Kieran made sure you knew you mattered. He lived by three simple but powerful values: people, planet, and profit, always in that order. Under his guidance, Rakem became more than a workplace; it became a community, built on Family, Fun, Integrity, Innovation, and Friendliness. These weren't just words on a wall, they were values he lived and breathed every day.

Beyond the business, Kieran's compassion extended into countless acts of charity and philanthropy. His impact reached far beyond the walls of Rakem, touching lives and making a real difference wherever he could.

As we come to terms with this profound loss, we also celebrate the incredible legacy Kieran leaves behind. He taught us how to lead with heart, how to care without compromise, and how to have fun while making a difference.

He will be deeply missed and will be forever in our hearts and forever a part of Rakem.

For those wishing to pay their respects, please visit Kieran's memorial page: <https://kieranrafferty.muchloved.com/>



# Treating Emissions From The Adhesive & Sealant Industry

**DESOTEC** is the largest supplier of mobile activated carbon filtration systems across Europe and US. We offer a closed-loop circular and sustainable solution for both air emissions and wastewater treatment with a filter fleet range matching most process requirements. With a plug and play system, once the filter is spent it is simply swap with a fresh one and the spent carbon reactivated in one of our 4 reactivation furnaces. We are also the first organisation in Europe to produce activated carbon out of Sulfur spent carbon with the recuperation of the Sulfur at our new Production Facility (PF5) now in operation.

DESOTEC UK is based near Manchester and serves the whole of the UK.

## Typical Emissions from the Adhesives & Sealants Industry that can successfully be treated by Activated carbon

- Volatile organic compounds (VOCs) and odours from air emissions produced during the adhesives manufacture and use of solvents (e.g., DCM, acrylates, etc.).
- Halogenated organic compounds (AOX), chemical oxygen demand (COD), and Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in the wastewater generated when cleaning mixers, blenders, dispersers, and other similar equipment.

## Why Choose DESOTEC for your purification needs

- Extensive knowledge and references in the Chemical industry with Mobile solutions to treat air from 5 to 55000 m<sup>3</sup>/h per filter and liquids up to 100 m<sup>3</sup>/h per filter
- Wide range of activated carbon types including renewable based activated carbon and mobile filters to cater for various applications be it small or large
- Minimal cost of ownership- rental model
- State of the art reactivation facility which ensures spent carbon are converted into ready-to-use AC of equivalent quality to the virgin one) > Reduction of CO<sub>2</sub>eq by up to 94%
- Flexible and circular service concept
- Zero waste handling on site

### Case study 1 - Removing VOC for a Glue Global Leader

Application: VOC removal from Glue Adhesive producer Flow rate: 50000 m<sup>3</sup>/h

VOC concentration: 40-400 mgC/Nm<sup>3</sup> Contaminants: Ethyl acetate, isocyanates

**DESOTEC solution:** two lines of Aircon V-XL mobile filters in series.

Results: Successful removal of VOC to ensure clients discharge limit of <40mg/m<sup>3</sup> is achieved.



### Case study 2 - Purifying wastewater of PFAS

Application: PFAS removal from wastewater Flow rate: 20 m<sup>3</sup>/h  
PFAS concentrations: 300 ng/l  
Discharge limit: 100 ng/l.

**DESOTEC solution:** 2 x Mobicon filters in series.

Results: Company became fully compliant with the new lower PFAS limits.



## For Further Information

Our field applications prove that DESOTEC can help companies in the adhesive & sealants industry overcome the emissions sticking point.

To gain further insights on our services, you can reach out to Dr Akmez Nabeerasool or visit our website: [www.desotec.com](http://www.desotec.com)

Contact details:  
[akmez.nabeerasool@desotec.com](mailto:akmez.nabeerasool@desotec.com)  
[desotec.com](http://desotec.com)

# Get ready for InstallerSHOW

**InstallerSHOW - the UK's largest event for installers and specifiers of heat, water, air and energy technology - returns to the NEC, Birmingham on 24-26 June 2025 and you are invited!**

Network with over 800 exhibitors, get hands-on with the latest technology, tools and products, learn from live sessions, and stay updated with industry trends to keep your business ahead of the game.



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# Gallagher Cyber Defence Centre

## Your organisation's cyber threat defence team

A constantly shifting cyber risk landscape demands continuous risk management. To help achieve this, we have created the Gallagher Cyber Defence Centre — an ongoing package of support available as an annual service.

Gallagher Cyber Defence Centre is a collection of tools and services for organisations who want to take a proactive and continuous approach to managing their cyber risk.

It includes access to cyber risk specialists and the latest security technology to help you defend your organisation against cyber incidents. All business sectors have the opportunity to sign up for this service.

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This unique, holistic approach is focused on the cyber and threat intelligence required to continually tackle the cyber problem, enabling you to adapt and evolve as you need to.

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Gallagher has developed this solution to ensure that our clients can have straightforward access to a specialist cyber service that will help them manage what we believe remains a top-tier threat for all organisations.

The following tools and services are included when you become a member of the Gallagher Cyber Defence Centre.

**Vulnerability Scanning:** Our Cyber Defence team will monitor your external boundaries and provide you with updates as to the known vulnerabilities in your technology portfolio. This report will outline where your low-, medium-, and high-risk technology vulnerabilities reside.

**Threat Intelligence Webinars:** Forewarned is forearmed. As a cyber insurance broker, we deal with a huge amount of claims, and from this, we gain extensive intelligence on the latest threats and methods of attack. We can provide real-time updates on where your organisation needs to be focusing its cyber defence efforts.

**Secure Humans:** The biggest contributor to a cyber incident is human vulnerability. Each quarter, we will host a series of cybersecurity training webinars designed for your employees at all levels of understanding. Throughout the year, your staff can be trained by our specialist Cybersecurity team in the role they can play in defending your organisation. Topics will include boundary control, email security and phishing, working from home, data protection, and more.

**Virtual CISO:** Gain access to a Virtual Chief Information Security Officer (CISO), who will provide guidance and support throughout your service. Leverage their expertise to assess your current cybersecurity posture, develop strategies, and address any concerns or questions you may have.

**Gallagher's Cyber Risk Matters Newsletter:** We will send you regular email updates on the latest cyber thinking so that you can stay informed. We are in the age of information, and these key insights can support you in making key changes and adaptations to your security efforts.

**Cyber Essentials:** Through Gallagher, you can take advantage of lower prices on Cyber Essentials and IASME accreditation. Cyber Essentials is the government-backed information security standard that offers 70-plus controls to better secure your network.



**Community Intelligence:** You will be part of a community of security professionals where your contribution counts. You will be invited to monthly discussions about key security concerns and live threats your organisation needs to be aware of. We will be bringing forward thought leadership and solutions for network configuration, technology optimisation, risk management, and risk transfer. As a collective, we are stronger together in the offensive efforts against cybercriminals.

**Other Security Services:** Take advantage of the wider security services the Gallagher Cyber Risk Management practice provides, and receive preferential pricing as a Gallagher Cyber Defence Centre member. Services such as penetration testing, phishing simulations, ISO 27001, incident response planning, maturity assessments, and more are all available to you when you become part of our community.

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We will help you guard your organisation from potential threats, both seen and unseen, through an ‘always on’ approach to cybersecurity.

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To find out more about how the Cyber Defence Centre can support your organisation, [please click here](#) or scan the QR code to watch a short video or email our Cyber Risk Management practice at [CyberRM@ajg.com](mailto:CyberRM@ajg.com).

## What does the Gallagher Cyber Defence Centre membership cost?

We offer various levels of pricing, depending on the size of your organisation. \*All prices are subject to VAT (if applicable) and are charged on an annual basis.

Up to £500k turnover **£250** per annum\*

Up to £1 million turnover **£500** per annum\*

Between £1–£5 million turnover **£750** per annum\*

Between £5–£10 million turnover **£995** per annum\*

Between £10–£25 million turnover

**£1,495** per annum\*

Between £25–£250 million turnover

**£2,500** per annum\*

Over £250 million turnover

**£5,000** per annum\*



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[www.basa.uk.com](https://www.basa.uk.com)



# Progress on Mutual Recognition – A Welcome Step Forward

BASA members will know that I have consistently stressed the importance of securing a Mutual Recognition Agreement (MRA) with the EU, particularly in the two years leading up to the UK's departure from the European Union. This has never been a theoretical concern or an abstract policy point. It's something that directly impacts the day-to-day operations of companies across our sector, those who rely on smooth, predictable access to European markets, and who have built their businesses on shared regulatory frameworks and trusted product certification systems.

For our sector, and indeed for much of UK manufacturing, an MRA on conformity assessment would have provided a simple and effective solution to many of the long-running issues surrounding CE and UKCA marking. It's not just about bureaucracy, it's about avoiding the duplication of costly and time-consuming certification processes, ensuring the continued global competitiveness of UK products, and reducing the regulatory burden that small and medium-sized enterprises in particular often find overwhelming. Without an MRA, many UK firms are forced to either reroute their testing and certification through EU-based bodies or go through a dual conformity process, often at significant expense.

Through my participation in the Construction Leadership Council's Standards and Regulatory Alignment Group, I have continued to raise this issue at every opportunity with government representatives, trade associations, and industry forums. The goal has always been clear: preserve the ability of UK test houses to certify products for both UK and EU markets, avoid duplication, and reduce unnecessary technical barriers to trade. This would help ensure a level playing field for UK-based manufacturers and maintain the strength and reputation of our national testing infrastructure, which has historically been seen as a global benchmark.

Unfortunately, the reality is, of course, frustrating. The UK government alone cannot deliver an MRA. It requires not only willingness on our side, but also the agreement and political will of the EU. And to get there, both sides must recognise that such a deal would bring mutual benefit to businesses on both sides of the Channel. Repeated attempts have been made to raise this through various political and industry channels,

but progress has remained painfully slow, often due to wider political considerations unrelated to the technical merits of such agreements.

However, recent developments offer some renewed optimism. In February 2025, representatives from both UK and EU business organisations met in a specially convened summit aimed at identifying practical ways to reduce technical friction in post-Brexit trade. What stood out was not just the number of stakeholders in attendance, ranging from large multinationals to industry specialists, but the collaborative tone of the discussions. There was a real sense that the political deadlock of the past few years might finally be softening, and that industry voices were being heard more clearly.

It was encouraging to see a spirit of cooperation and pragmatism beginning to emerge. Rather than rehash old arguments or entrench positions, the dialogue focused on practical steps that could be taken to ease the current regulatory divergence. These talks culminated in a significant step forward: on 8th April 2025, a group of EU and UK business signatories jointly issued a policy paper calling for the establishment of an MRA on conformity assessment. This joint statement, now available on the BASA website, outlines a shared commitment to reducing barriers and improving the flow of goods between the UK and EU markets.

This is a welcome move that aligns with what BASA and many others across the UK industry have been advocating for. An MRA would not only reduce costs and delays for manufacturers, but it would also protect the long-term future of UK conformity assessment bodies, many of which have been under significant strain since the divergence of CE and UKCA systems. These bodies play a critical role in ensuring that products are safe, compliant, and market-ready, and their viability is essential to maintaining the integrity of our supply chains and manufacturing standards.

Beyond cost and efficiency, there's also the reputational aspect to consider. UK products have long been seen as meeting high standards of quality and compliance. Maintaining mutual recognition with the EU would help reinforce that perception and give customers, both in Europe and further afield, confidence in our

certification processes. It also opens up more opportunities for collaboration, particularly in the development of new technologies and sustainable materials, where shared standards are key to success.

The potential benefits extend even further. If implemented, an MRA would also ease the burden on importers and distributors, who are currently navigating an increasingly fragmented regulatory environment. It would allow greater consistency in labelling, product information, and documentation requirements, which in turn could simplify logistics, warehousing, and customer communication. The downstream effects would be felt across the value chain, creating a more predictable and efficient environment for everyone involved.

We will, of course, continue to follow this issue closely and engage wherever we can. BASA remains fully committed to keeping members informed, raising our sector's voice in the right forums, and working constructively with partners and policy-makers on both sides of the Channel. The progress made in recent months gives us some hope that meaningful change may be possible, but there is still a long way to go. Achieving a comprehensive MRA will require sustained pressure, smart advocacy, and continued collaboration between industry and government.

In the meantime, we encourage all members to remain engaged. Your insights, experiences, and feedback are invaluable, not just to BASA's work, but to the broader conversation about how we shape a regulatory future that works for our sector. If you have faced challenges with CE/UKCA marking, or if you have examples of how divergent requirements have impacted your business, please share them with us. These real-world stories are powerful tools in making the case for change.

Let's hope this renewed momentum turns into meaningful progress. As ever, we are stronger when we speak together, and BASA will continue to ensure that your voice is heard at the highest levels.

Written by Lorna Williams, BASA CEO.





**10-12 September 2025**

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