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Adhesives & Sealants are Strategic Intermediate Products

Introduction

Draft policy concepts and initiatives such as the Critical Chemicals Alliance, the Biotech Act II and the Industrial Accelerator Act are triggering discussions on potential demand-side ("market pull") measures for the chemical value chain.

In this context and considering emerging proposals (including biomass-derived content targets for adhesives)¹, FEICA aims to clarify the positioning of adhesives and sealants (A&S) within value chains and products.

FEICA recommendation:

A&s are intermediate products supplying the many strategic industries. FEICA recommends avoiding applying quotas or biomass/low-carbon content targets directly to the adhesives and sealants sector, because:

- They would create disproportionate costs with limited environmental impact.
- Due to the limited volumes they would not effectively support downstream sectors in meeting potential targets set at end-product level.

Background

Adhesives and sealants are **intermediate products**, not end products. They enable the performance, durability and safety of final goods across a wide range of industries.

The sector is predominantly **business-to-business**: only around **9% of volumes (10% of value)** are sold directly to consumers.

In key end-use sectors such as construction, A&S represent **only a very small share of the final product** (typically **less than 5% of the weight of a building**), despite being critical for functionality and performance.

Implications of quotas on the adhesives and sealant industry

- Defining A&S as "end products" for demand-side measures does **not reflect their role** in value chains and does not effectively support the downstream user in reaching their potential targets.
- Given that an innovative A&S industry is essential to enabling the green transition, such measures risk **unintended adverse effects**.

¹ <https://cefic.org/resources/cefic-policy-proposals-to-introduce-biomass-derived-content-targets/>

- Due to their **very limited share in volume and weight**, applying quotas or similar measures directly to A&S would **not generate meaningful market pull** nor significant overall environmental benefits.
- Reformulation (e.g. to increase low-carbon or bio-based content) is **rarely a simple drop-in process**. It requires:
 - significant R&D and innovation efforts; and
 - **lengthy requalification and certification processes**, for example to meet construction standards and ensure safety and performance.
 - The adhesives and sealants industry continuously develops new and sustainable products meeting the growing demand of end markets.

As a result, imposing demand-side obligations at the level of A&S risks **disproportionate costs, delays and limited impact**, compared to their actual leverage in driving systemic decarbonisation.

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About FEICA

FEICA is the Association of the European Adhesive & Sealant Industry. Adhesives and sealants (A&S) play a crucial role in many of the EU's strategic sectors and are essential enablers of countless everyday products. A&S enhance products' performance, durability and circularity. With the support of its members and national associations, FEICA voices the interests of the industry in Europe, where 85% of adhesive and sealant companies are SMEs. The association provides regulatory guidance, helps members navigate compliance requirements, and promotes sustainable practices. FEICA fosters collaboration with industry stakeholders to address shared challenges and to create a mutually beneficial economic and legislative environment.

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

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