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REACH Revision: Our response to CARACAL-54

President von der Leyen has committed to simplifying EU legislation by reducing bureaucratic burdens to enhance the Union's competitiveness. This includes the promise to "simplify REACH" as part of a new chemicals industry package. Notably, the European Commission has set a target of reducing administrative burdens by 25% for all companies and by 35% for SMEs.

However, the plans presented on 3 April during the 54th meeting of the Competent Authorities for REACH and CLP (CARACAL-54) appear to go in the opposite direction. Rather than reducing complexity, the Commission is reviving outdated proposals and concepts drawn from the Chemicals Strategy for Sustainability (CSS), which was developed half a decade ago in a very different geopolitical and economic context.

A truly simplified REACH is a once-in-a-generation opportunity to strengthen the EU chemicals industry, secure supply chains, and support industrial resilience. This includes the many downstream users of chemicals, such as the adhesives and sealants sector, 85% of which is composed of SMEs.

Above all, a truly simplified REACH must not introduce new burdens on industry. In this one-pager, our sector recalls three red lines that must not be crossed.

Red line 1 – No MAF in a simplified REACH

Introducing a non-scientific, arbitrary Mixture Assessment Factor (MAF) contradicts the very goal of simplification. Existing legislation already addresses combined exposures where relevant. For adhesives and sealants (well covered under REACH) a blanket MAF would trigger unnecessary reassessments, add regulatory burdens, and force critical substances off the market, despite decades of safe use. Combined exposure is a complex issue that cannot be solved by lowering safety thresholds across the board.

Red line 2 – No purely hazard-based restrictions; no extension of the GRA

Simplification must not mean bypassing risk assessment. Extending the Generic Risk Approach (GRA) or applying hazard-based restrictions without considering real-world use and exposure, undermines both science and policy goals. It puts the availability of critical substances at risk and disrupts supply chains, without delivering meaningful safety benefits. REACH should maintain a targeted, risk-based framework, guided by actual exposure and use, with flexible derogations to support science-based and workable substitution.

Red line 3 – No new blanket requirements for polymers

New requirements on polymers under REACH will overburden industry without delivering clear safety gains. The adhesives and sealants sector depends on a broad range of polymers, many of which have well-characterised profiles and long histories of safe use. A one-size-fits-all approach would increase costs, constrain innovation, and place pressure on already limited regulatory resources. Future efforts should instead focus on polymers of known concern, applying proportionality and ensuring that European competitiveness is not compromised.

FEICA publications on the REACH Review are available at:

- [FEICA Position on the REACH Review](#)
- [Annex 1 on EU regulations affecting the adhesives and sealants industry](#)
- [Annex 2 on FEICA's proposal for a regulatory roadmap](#)
- [Annex 3 on FEICA's position on polymers](#)

About us

The adhesive and sealant industry is a cornerstone of the European economy and plays a significant role in achieving the EU's sustainability and economic goals. FEICA represents over 450 adhesive and sealant companies in Europe, manufacturing at some 700 sites. Our industry contributes approximately €20 billion to the European economy annually and employs more than 45,000 people. About 85% of the adhesive and sealant industry is represented by small and medium-sized companies across Europe. Beyond this economic impact, the adhesive and sealant industry is integral to numerous strategic sectors, playing a vital role in key supply chains.

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