

The European voice of the adhesive and sealant industry



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FEICA highlights the importance of a reasonable and workable approach to the extension of registration requirements to polymers

FEICA position paper explains the perspective of the adhesives and sealants industry regarding the registration of polymers

Polymers are currently not included in the registration requirements under Regulation (EU) No. 1907/2006 - Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). However, in terms of Article 138(2) of REACH, a possible further review is foreseen to extend the registration requirements to polymers. If the risk posed by certain polymers can be proven, and practical and cost-efficient ways of selecting polymers requiring registration (PRR) can be established, registration requirements under REACH will be extended to polymers. FEICA recently published the perspective of the adhesives and sealants industry in a Position Paper.

Several relevant parameters need to be considered regarding a proposed registration of polymers. As so many polymers are used in the adhesives and sealants industry (possibly 500 to 1,500 for an individual manufacturer if no grouping of polymers is considered), registration would be very difficult for medium-sized and small businesses. (Annex 1 of FEICA's position paper provides detailed examples of the multiplicity of polymers.)

In addition, adhesives and sealants companies often customise polymers for reasons of technical feasibility and customer requirements as well as regulatory needs. Without such customised polymers, end users would be left with products of higher hazard profile and/or insufficient performance. Customising polymers may result in a huge number of new polymers to be potentially registered while the total production volume of each individual polymer may be comparatively low.

While the total production volume of an individual polymer can be comparatively low, the customised life cycle of a single customised polymer may often be less than three years depending on customer demands, market developments and changes in regulatory requirements.

The profitability of such short-lived polymers in the adhesives and sealants industry is contingent upon production efficiency, and gains in efficiency might well mean that polymers in use have to be modified. Such can be the case, for example, in the flexible-packaging sector, in the wood and furniture industry and in the electronics industry.

FEICA proposes that a viable solution be created, with pragmatic grouping criteria to balance the economic impact on the industry. Exposure needs to be considered while defining polymers requiring registration and exemptions for polymeric precursors should be granted when exposure is controlled within industrial settings.

The FEICA position paper 'Registration of Polymers – Adhesives and Sealants Industry Perspective' is available on the <u>FEICA public website</u>.

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About FEICA

FEICA, the Association of the European Adhesives and Sealants Industry, represents the industry at a European level and works with all relevant stakeholders to create a mutually beneficial economic and legislative environment within which they can operate and prosper.

Our industry provides leading edge technologies that make the manufacture and supply of many everyday products possible; it contributes greatly to the European and global economy, fosters sustainable development, encourages innovation and offers stimulating careers for people with a wide range of skills.

For further information about FEICA, please visit our website www.feica.eu.

FEICA

FEICA, the Association of the European Adhesive & Sealant Industry, is a multinational association representing the European adhesive and sealant industry. With the support of its national associations and several direct and affiliated members, FEICA coordinates, represents and advocates the common interests of our industry throughout Europe. In this regard, FEICA works with all relevant stakeholders to create a mutually beneficial economic and legislative environment.

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