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FEICA position on Inception Impact Assessment CLP Regulation

FEICA, the Association of the European Adhesive & Sealant Industry, is a multinational association representing the European adhesive and sealant industry. Today's membership stands at 15 National Association Members, 24 Direct Company Members and 19 Affiliate Company Members. The European market for adhesives and sealants is currently worth more than 17 billion euros. 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.

The European Commission opened a public consultation for the Inception Impact assessment for the amendment of the EU legislation on hazard classification, labelling and packaging of chemicals (CLP)¹.

FEICA welcomes the opportunity to participate in the Inception Impact Assessment Revision of the EU legislation on hazard classification, labelling and packaging of chemicals (CLP).

Our industry's capability to formulate products strongly depends on the availability of the raw materials used as ingredients in adhesives and sealants. For that reason, we would like to position ourselves as stakeholders in the CLP amendment process.

In our opinion, international standardisation is key; new hazard classes should go the route of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS) before being added to CLP.

Uniform criteria across regulatory tools are important to create a viable basis for companies, especially Small and Medium-sized Enterprises, and prevent impacts on innovation.

FEICA disagrees with the approach taken by the Commission to consider CLP as the only option to identify EDs without evaluating other potential options under the REACH regulation. REACH has already demonstrated its ability to identify and assess Endocrine Disrupting chemicals. The implementation of ED identification criteria under REACH could be done in the same way as PBTs via an Annex.

The importance of a dialogue with all stakeholders in the supply chain cannot be overestimated. Downstream users of chemicals provide innovative solutions with economic, environmental and societal benefits. Downstream users are best placed to oversee the impact of substance policies and can provide valuable input on the possible consequences.

¹ [Public consultation for the Inception Impact assessment for the amendment of CLP](#)

The administrative burden that will be triggered by the introduction of new hazard classes should not be underestimated.

Thus, FEICA remains available to discuss the potential impacts of the revision of the CLP in the adhesives and sealants industry and participate in any foreseen impact assessment.

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