

Polymers under the REACH Regulation: Considerations for the Adhesive and Sealant Industry

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Executive Summary

- Simplified and pragmatic solutions are essential to keep short-lived, customised polymers commercially viable. Adhesives and sealants manufacturers, currently downstream users under REACH, may become polymer registrants.
- Introducing information requirements for polymers under REACH poses significant challenges for the European adhesive and sealant industry, crucial to many sectors. A rigid approach could stifle innovation, increase costs, and strain regulatory frameworks, potentially harming competitiveness without notably improving safety or environmental protection.

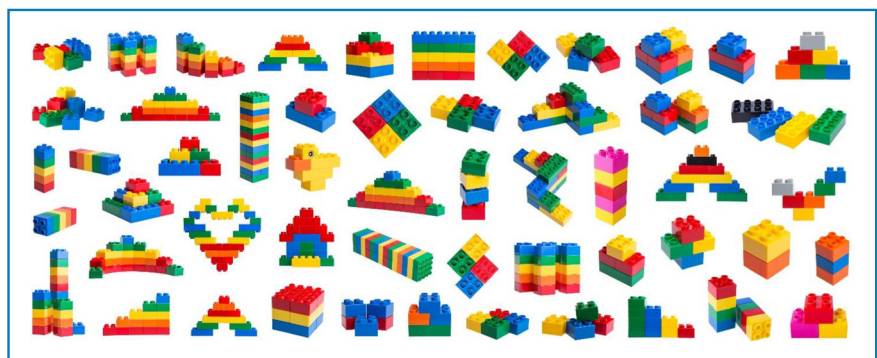
FEICA, representing the European adhesive and sealant industry, opposes a blanket information requirement for all polymers under REACH. Instead, we advocate for a **risk-based**, pragmatic regulatory approach to **safeguard innovation, competitiveness and sustainability while ensuring human health and environmental safety**.

1 Introduction

Polymers are crucial in the adhesive and sealant industry, with a vast number of customised polymers produced using a limited number of raw materials. These raw materials develop an infinite number of polymer precursors, each almost exclusively sourced from a single supplier.

Polymers often have short life cycles, typically less than three years, due to changing customer demands, market developments, and regulatory requirements.

The European Commission aims to regulate polymers under the REACH revision, introducing registration and notification requirements.



Many customised polymers are produced with just a few building blocks

2 Current regulatory framework

Under existing EU regulations, polymers are subject to several layers of regulation that ensure safety without the burdens of registration. These include:

- Classification, Labelling and Packaging (CLP) Regulation: Ensures that polymers are classified based on their hazardous properties
- REACH restrictions: Polymers can be subject to restrictions and authorisations under the current REACH text
- Specific directives: Such as the Single-Use Plastics Directive and the REACH Restriction on Synthetic Polymer Microparticles, which address environmental concerns specific to certain applications of polymers

3 Challenges of polymer registration

Introducing additional requirement for polymers under REACH would present numerous challenges:

- **Volume:** Around 30,000 polymers are placed on the European market by A&S manufacturers.
- **Economic Burden:** Compliance costs could escalate, particularly for SMEs.
- **Complexity and Diversity:** Polymers vary greatly, making standard testing methods inadequate.
- **Innovation Stifling:** The rapid innovation cycle of polymers could be hindered by slow regulatory approval.
- **Short Life Cycles:** Customised polymers often have life cycles of less than three years.
- **No Proportionate Benefits:** Registration will not significantly improve health or environmental protection.

4 Conclusion

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. Efforts should continue to focus on polymers of known risks, applying proportionality and ensuring that European competitiveness is not compromised.

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.

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