



The European voice of the **adhesive and sealant industry**

# Polymeric precursors exemption

# The polymeric precursors exemption


**Currently**, polymers are **exempted** from registration under **REACH**

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European Commission is working to **extend registration requirements** for polymers.

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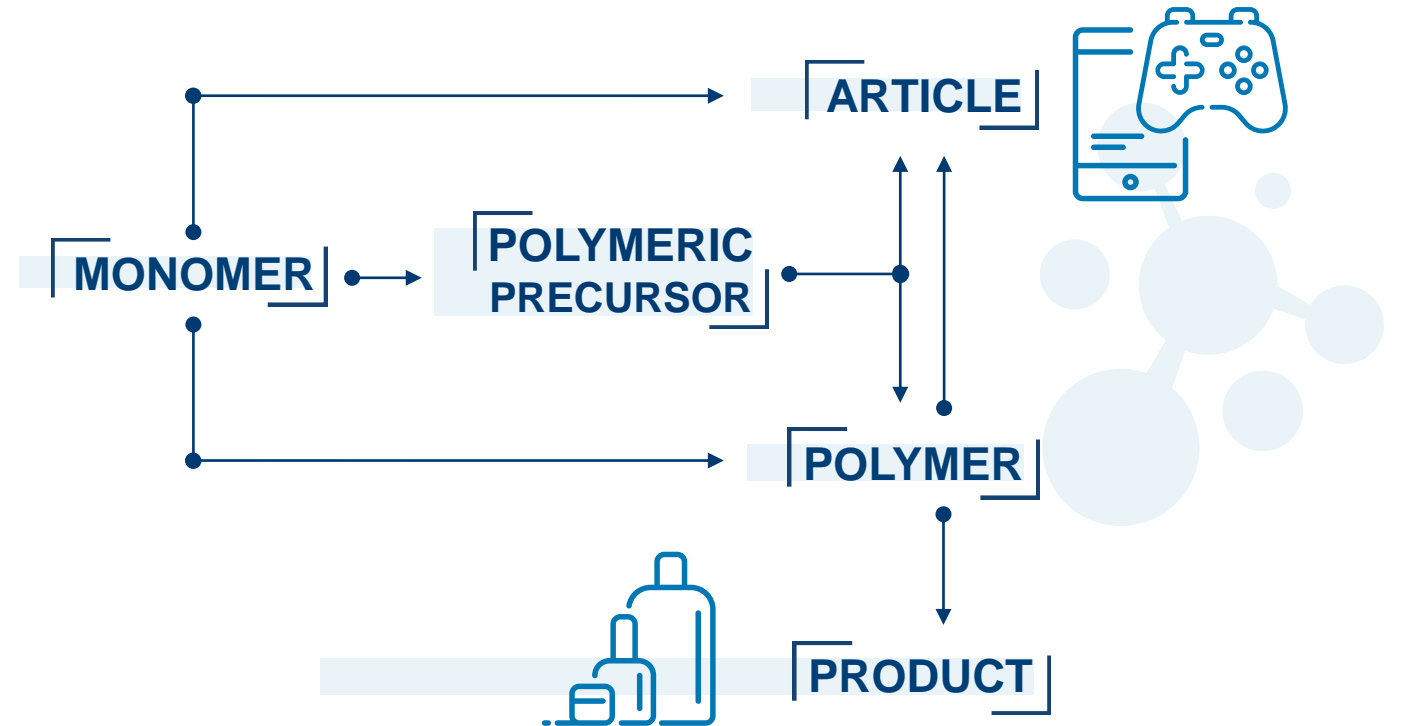
**EXCEPTION:**  
European Commission proposed exemption for polymeric precursors **handled** like **intermediates** under REACH.



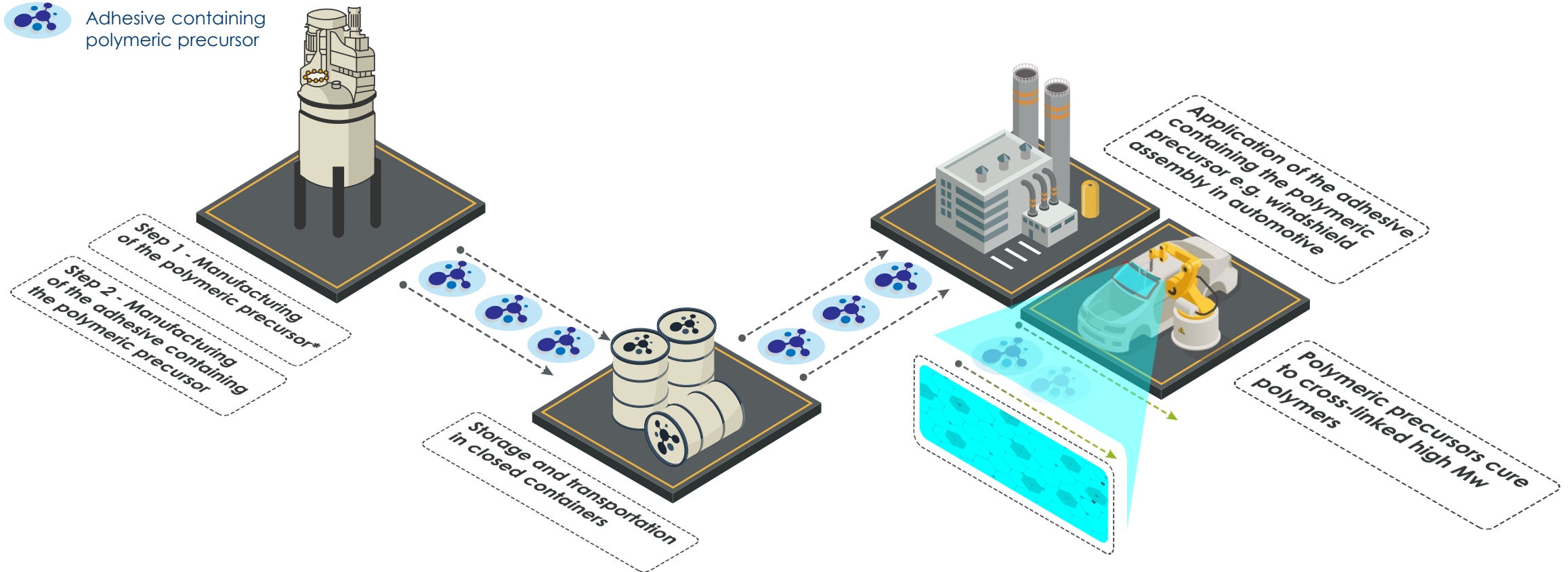
# What is a polymeric precursor?

- **Category of polymers** used to produce **other** polymers or articles
- Designed to be **used up**, disappearing after curing
- **Short lifetime**
- Complexity of a polymer increases with each step from monomer to article
- Polymeric precursors have **low vapor pressure**

*A polymeric precursor is intended to further react into other polymers or article.*



# How the risk is contained?



**Adequately controlled conditions** are ensured by **environmental, health and safety measures at all steps** •-----> **risk is controlled**

\*Polymeric precursors as building blocks possible as well

# How the risk is controlled?

## Polymeric Precursor

**CURES and DISAPPEARS,  
NOT PRESENT IN ARTICLE**

**NO CONSUMER and ENVIRONMENTAL CONCERNS**



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## Waste of Polymeric Precursor is HANDLED

**according to applicable local regulations**

**NO ENVIRONMENTAL CONCERNS**



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# How is the risk controlled?

## Adequately controlled conditions for safe handling

- Adequately controlled conditions will be defined to ensure safe use
- Industry will propose criteria and agree on a definition of adequately controlled conditions
- Precursors presenting more than one use might have to be registered if not adequately controlled

# Advantages of the polymeric precursors

**IN SMALL  
VOLUMES**

**CUSTOMISED  
(tailor-made)**



- Reduce hazard profile of a product, responding to changing regulatory requirements, supporting the EU Green Deal
- New combinations including recycled and bio-based materials
- Improving efficiency in production (faster line speed in assembly operations)
- Improve durability and lifespan of articles
- New design of assembled parts, (lightweight design to improve recyclability)
- Help customers to stay competitive and respond to changing market requirements

# Exposure to polymeric precursors can be adequately controlled?

- The physical properties of polymers are of lower OSH concerns than those for monomers (low volatility, lower bioavailability, ...).
- There are less possible exposure routes due to those physical properties
- These possible exposure routes can be easily controlled
- Polymeric precursors are based on already registered monomers, while intermediates are not
- Polymeric precursors are part of mixtures, already classified under CLP and safety measures are already in place in industrial settings



# How are polymeric precursors used?

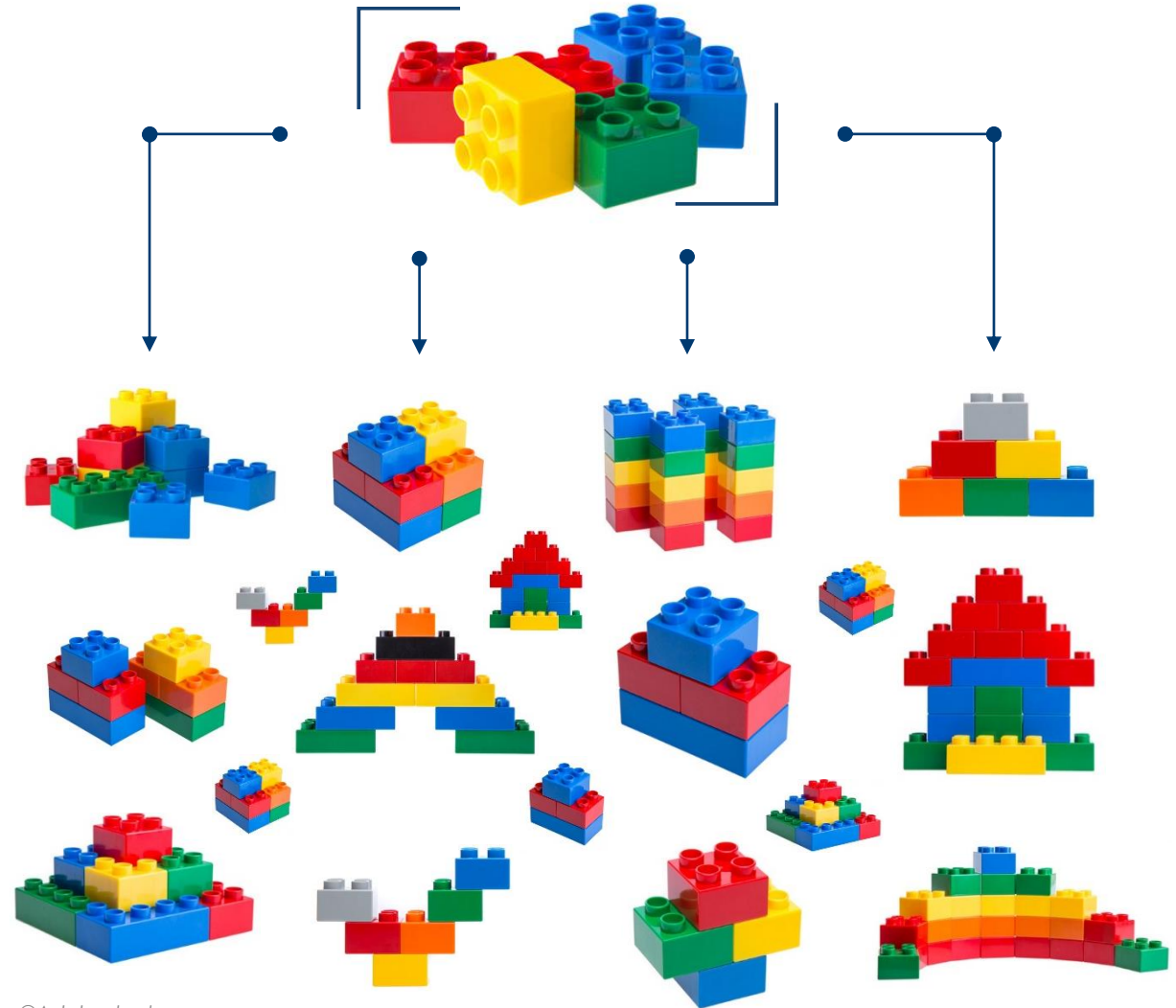
A **LIMITED** number of  
**RAW MATERIALS**  
are used to develop

**INFINITE NUMBERS OF  
POLYMER PRECURSORS**



**EACH** individual  
**POLYMERIC PRECURSOR**  
is almost exclusively

**FROM ONE SUPPLIER**



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# How are polymeric precursors used?

## For example:

- Graphic arts
- Wood & furniture industry
- Textile lamination
- Rigid and flexible packaging for food
- Electronics manufacturing
- White goods manufacturing
- Industrial applications (e.g. wind turbines)
- Automotive (e.g. windshield)
- Other specific examples are available at [FEICA website](#)

**Once fully cured, precursors are not present in final articles.**



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# Conclusion

- FEICA proposes that polymeric precursors handled under adequately controlled conditions are exempted from registration
- Polymeric precursors handled under adequately controlled conditions do not cause risks to human health or the environment

# MORE INFORMATION

Interested in FEICA positions on the upcoming registration of polymers?

<https://www.feica.eu/our-priorities/reach/polymers-requiring-registration>

## CONTACT FEICA

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