



Brussels, 21 June 2021

## FEICA comments on ECHA's Thought Starter on SID polymers

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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.

### Background

FEICA welcomes the opportunity to comment and appreciates the comprehensive and pragmatic Thought Starter on substance identification and joint submission obligations of Polymers Requiring Registration developed by the European Chemicals Agency (ECHA).

In advance of the discussion during the CASG meeting of the 22 June 2021 (Agenda item 4: CASG-Polymers/05/2021), we would like to share some initial comments regarding the paper.

### PRR Substance (1.1)

FEICA supports the proposal to have the name of a 'polymer group' changed from the previous 'Unique PRR' to 'PRR Substance'. We believe that the term 'PRR Substance' is less ambiguous and will provide clarity.

### Homogeneity of Hazard Profile (1.3)

FEICA supports the position that there should be sufficient homogeneity of the hazard profile within a PRR Substance. This will safeguard that the hazard information from the joint registration of one substance covers the hazard for all registrations of the full scope of that substance in a PRR substance.

### PRR Substance Types (1.5)

FEICA favours Option 3 identified in the Thought Starter: in this option all Types of a PRR Substance would be registered jointly as one PRR Substance, while still allowing individual registrations to use the Type as the basis for adaptations according to Annex XI, which would then provide Type-specific adaptations for PRR Substances. Nevertheless, individual adaptations (and information requirements) per Type will require several specific provisions which still need to be discussed and worked out.

Details on Information requirements should be further developed.

FEICA favours the concept described in the Thought Starter for Phase 2 where grouping and joint registration of PRRs will be based on similarity of chemical composition. However, we believe chemical composition grouping criteria should not be based only on CAS numbers, but additional considerations should be taken into account.

We acknowledge that grouping criteria based on chemistry will ensure consistency with existing REACH criteria and facilitate verification. However, opting out of joint registration should be allowed when there are sufficient reasons (for example, for situations when it is not clear if the polymers belong to the same group).

It is proposed in the Thought Starter that 'the grouping of polymers into one PRR Substance is based on the identity of the starting materials contributing to at least 2 %'. There may, however, be situations where different starting materials can result in the same polymeric structure (e.g., use of a dimethyl vs. a diethylester as starting material in a polyester formation). Thus, we suggest that the use of such different starting materials that result in the same polymer should be accounted for.

## Annexes

FEICA will provide feedback on the Annexes after the 4<sup>th</sup> Caracal Subgroup Polymers meeting.

## Contact

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### Publication ref.: POP-EX-K06-036

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