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FEICA impact assessment on the EU PLC definition and the definition of polymeric precursors

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

The fifth CARACAL Subgroup polymers meeting was held on 20 October 2021. FEICA submitted some initial comments¹ after the CASG meeting.

In this paper FEICA would like to share additional figures from members on the impact of certain measures before the 6th CASG meeting.

Molecular weight

In the first proposal for an EU PLC definition, the following point on molecular weight was included:

- polymers with $1000 < MW_n \leq 10\,000$ Da can qualify as PLCs if containing less than 10% oligomer content of $MW < 500$ Da and less than 25% oligomer content of $MW < 1,000$ Da

However, in the latest version shared, the abovementioned statement was replaced with:

- polymers with $MW_n > 1000$ Da can qualify as PLCs if containing less than 2% oligomer content of $MW < 500$ Da and less than 5% oligomer content of $MW < 1,000$ Da

If this change were implemented, a significant number of polymers would no longer be considered as PLCs and therefore would become PRRs, which would lead to the increase in the number of registrations.

In addition, this would also create an inconsistency because the same polymer would be classified as a PLC in other jurisdictions and as a PRR in the EU.

¹ [FEICA comments on ECHA's Thought Starter on SID polymers](#)

We have asked our members and the members of our national associations about the possible number of polymers impacted by the proposed change. As a result, we can share the following estimations:

1. If the first proposal were adopted (polymers with $1000 < MW_n \leq 10\,000$ Da can qualify as PLCs if containing less than 10% oligomer content of $MW < 500$ Da and less than 25% oligomer content of $MW < 1,000$ Da), **around 50% of our polymers would be considered as PLC. Responses from our members were in the range 0% - 100%.**
2. If the second proposal were adopted (polymers with $MW_n > 1000$ Da can qualify as PLCs if containing less than 2% oligomer content of $MW < 500$ Da and less than 5% oligomer content of $MW < 1,000$ Da), **around 20% of our polymers would be considered as PLC. Responses from our members were in the range 5% - 45%.**

Polymeric precursors

The Commission has proposed an exemption for polymeric precursors handled like intermediates under Strictly Controlled Conditions (SCC).

FEICA has collected feedback from its members concluding that **none of the polymeric precursors formulated by adhesives and sealants companies would benefit from an exemption linked to strictly controlled conditions.**

At FEICA, we estimate that we place on the market more than 10,000 polymeric precursors, depending on what the exact definitions would be. This number is the result of the customisation needed to achieve regulatory and customer needs.

A need to register these polymers 'customised downstream' would add a significant burden on companies (especially SMEs) and might also result in some products being withdrawn from the market. The increase of registrations would also increase animal testing.

Precursors are designed to be consumed in the process (either conversion to another polymer or into an article). Polymers are also of lower hazard than substances (lower vapor pressure; much reduced membrane crossing/toxicological availability). In nearly all of the cases, the polymeric precursor is not the risk-driving component in the products. This justifies lowering the requirements from SCC to adequate control.

FEICA would support a more precise position of adequately controlled conditions.

We asked FEICA members and the members of our national associations to provide an estimation of the percentage of polymers that would be exempted under the polymeric precursors exemption if SCC would or would not apply. According to our members, **around 85% of our polymers could benefit from an exemption not linked to SCC. Responses from members were in the range 40% - 100%.**

Please note that depending on their respective product portfolios, the impact of these criteria on our member companies may differ significantly from company to company. We take this into account by providing a range first, giving an indication of the members companies impacted the least and the most by the proposed criteria. Then, we give an average value that reflects the averaged impact of the proposed criteria on all member companies which replied to our questions. This figure is calculated taking the number of companies into account. As the number of polymers produced by each company will differ, the figures reported here can represent trends only. We will be able to supply more accurate figures after our member companies have had more time for a thorough assessment of their product portfolios.

FEICA thanks the Commission for the opportunity to provide this information in advance to the 6th CASG polymers meeting and remains available in case further explanations are needed.

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