

Defining a reasonable, safe and efficient system for the notification of polymers

Current regulatory status

Currently, polymers are exempted from registration under EU REACH.

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

The change will be included in the upcoming revision of EU REACH, as per the Chemical Strategy for Sustainability.

Ongoing discussion

Some stakeholders are calling for more information on polymers to be provided by industry.

The Commission is considering requesting industry to notify of certain polymers' information.

This notification requirement would not be limited to polymers requiring registration but most likely to all polymers on the market.

This is an innovation regarding current REACH requirements, according to which, only for registered substances does a need to provide information apply.

The notification of polymers should be limited to a concise dataset.

Data generation will not contribute to further protecting human health or the environment and may be a disproportionate administrative burden for polymer manufacturers and ECHA.



THERE ARE CURRENTLY AROUND 200,000 POLYMERS ON THE EUROPEAN MARKET AS STATED IN THE WOOD/PFA REPORT. FOR EACH OF THOSE POLYMERS, ONE OR MORE PRODUCING/IMPORTING LEGAL ENTITIES WOULD NEED TO BE NOTIFIED.

How much data is too much data?



If notification data is requested, a disproportionate amount of unanalysed, raw data will be received by ECHA.

For such a data collection to be justified, all those notifications will have to be processed and analysed. This exercise will require the allocation of a lot of resources, especially from ECHA.

If notification data would have to be generated - included for polymers not requiring registration (PLCs, non-PRR, polymeric precursors, etc) - would these data then remain unused after submission?

The usefulness of the notification will be very different depending on the relevance of data shared. Data generation will not contribute to further protecting human health or the environment and may be a disproportionate administrative burden for polymer manufacturers and ECHA.

What is FEICA's suggestion?

A notification should be limited to the following data set:

- Identification of the manufacturer/importer
- CAS Number (if available)
- Chemical name
- Tonnage band

This information should be treated as confidential business information by ECHA and not be made publicly available. If information on CAS numbers would be made public, competition could be affected.

IT IS ESSENTIAL THAT THE NOTIFICATION DATA IS LIMITED TO THE DATA SET. ANY ADDITIONAL DATA REQUIREMENTS SHOULD NOT BE PART OF THE NOTIFICATION DATA SET. ANALYTICAL OR TEST DATA SHOULD NOT BE REQUIRED AT THE NOTIFICATION STAGE.

Further information on FEICA positions about the registration of polymers is available at:
<https://www.feica.eu/our-priorities/reach/polymers-requiring-registration>



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