



Brussels, 15 November 2021

## FEICA's comments after 5<sup>th</sup> CASG 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

The fifth CARACAL Subgroup polymers meeting was held on the 20 October 2021. In this paper we present our immediate comments. Furthermore, FEICA is in the process of obtaining, as proposed during the last CASG meeting, additional figures from members on the impact of certain measures and will submit them before the 6<sup>th</sup> CASG meeting.

### Polyester's degradation

Polyesters do not have relevant toxicological properties. This, in our opinion, provides justification for the polyesters exemption. FEICA is preparing a paper on the degradation of polyesters that will be submitted before the 6<sup>th</sup> CASG meeting.

Other jurisdictions like Australia, Canada and United States, among others, have similar exemptions for polyesters.

### 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 PLC 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 PLC 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 would be 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 PLC in other jurisdictions and in the EU as a PRR.

During the 5<sup>th</sup> CASG meeting, the Commission requested information on the possible number of polymers impacted by the proposed change. FEICA is collecting figures from its members and will submit an estimated range of affected polymers before the 6<sup>th</sup> CASG meeting.

### 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 the members of the FEICA PRR taskforce to provide an estimation of the percentage of polymers that would be exempted under the polymeric precursors exemption if SCC would or not apply.

We are also collecting data to estimate the percentage of the number of polymeric precursors versus total polymers across the adhesives and sealants industry and will submit any information collected before the 6<sup>th</sup> CASG meeting.

### Grouping

Flexibility to group polymers is important to reduce the number of registrations. At FEICA, we believe that two possibilities should be offered to polymers registrants.

Chemical grouping, as proposed by ECHA, should be the starting point. However, the three-tiered approach proposed by ECETOC should be allowed if enough data would be available to justify it.

### Notification

FEICA favours a registration process that would include a simple [notification of polymers](#) limited to a basic dataset, and a pre-registration of PRRs after a reasonable transitional period. Further comments will be submitted before the 6<sup>th</sup> CASG meeting.

## Contact

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FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

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