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FEICA comments after sixth CASG polymers meeting

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

During the sixth CARACAL Subgroup polymers meeting held on the 15 December 2021, the planned impact assessment for the registration of polymers to be commissioned by the European Commission was discussed. FEICA submitted to CIRCABC a [paper](#) on the impact of the proposed changes to the molecular weight criteria for the polymers of low concern (PLC) definition and the impact of an exemption for polymeric precursors linked to strictly controlled conditions.

FEICA would like to thank the Commission for the opportunity to submit follow-up comments.

Impact assessment

FEICA would support the continuation of the discussion about an exemption for polymeric precursors not linked to strictly controlled conditions as well as the molecular weight criteria within the polymers of low concern (PLC) definition.

The planned impact assessment should be comprehensive and consider the potential impacts on all the actors within the supply chain.

FEICA would like to make a request to the European Commission that the planned impact assessment for the registration of polymers compare the different scenarios discussed within the CASG polymers meetings regarding polymeric precursors and molecular weight.

In particular, the following scenarios should be taken into account:

1. Molecular weight:
 - a. Polymers with $1,000 < MW_n \leq 10,000$ 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
 - b. Polymers with $MW_n > 1,000$ 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
2. Polymeric precursors
 - a. Exemption linked to strictly controlled conditions

- b. Exemption linked to adequately controlled conditions based on the applicable occupational health and safety requirements (i.e. driven by the classification of the ingredients).

FEICA remains at the disposal of the Commission in case additional estimates would be useful for the process.

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