FEICA®

Annex 2

Process for a regulatory roadmap

April 2025

FEICA recommends that authorities develop a regulatory roadmap that outlines specific actions on substances and uses on an annual basis, with a focus on simplifying the process and enhancing efficiency.

1. List of substances with potential regulatory needs
2. Identify problematic **substance**/ use **combinations**
3. Define targeted regulatory instruments
4. Fast track for SVHC – develop a robust AoA per substance/use
5. Establish a regulatory roadmap of regulatory actions per year defining substance/use

Targeted regulatory instruments to reduce the burden on authorities

Increased information on uses and exposure will allow regulators to make a strategic risk management decision about which regulatory route is the most effective.

Targeted risk management options can be:

- REACH restrictions
- Harmonised classification (CLH) under CLP
- Occupational Safe and Healthy (OSH) measures like the establishment of Occupational Exposure Limits (OELs)
- Measures established under other regulations such as the Industrial Emissions Directive (IED) or the Water Framework Directive (WFD)
- Under limited circumstances, REACH authorisations

Define a list of substances with potential regulatory needs

Regulators must define a list of substances with potential regulatory needs, allowing for more predictability.

The substances included in this list must adhere to specific, well-defined criteria to ensure manageability by both authorities and industry stakeholders.

The list should encompass registered information on uses. Sectors involving downstream users will be required to review, enrich, and detail information regarding use and exposure. Problematic substance/ use combinations should be identified.

Based on the information on uses available after consulting the downstream users, regulators should identify problematic substance-use combinations requiring regulatory follow-up due to their highest priority.

Automatic prioritisation of CMR Category 1 substances in consumer use: no proof of unacceptable risk required

Industry must submit information on available alternatives (AoA) to support a future substitution plan:

- If suitable alternatives exist, ban the substance/use combination
- If no suitable alternatives exist, have ECHA conduct a safety evaluation
  - If the use is safe, continued use is allowed under the substitution plan until suitable alternatives are available. These cases are periodically reviewed
  - If the use is not safe, ban unless there is an overriding benefit
  - In the case of overriding benefit – use authorisation as the regulatory tool (last resort)

Regulatory roadmap

A well-defined regulatory roadmap outlines which substances (fast track or other substance-use combinations) would be tackled with which Regulatory Tool and in what year.

This roadmap should include all regulatory measures related to hazardous chemicals management, not just REACH initiatives, to ensure that the industry can address these measures effectively and avoid an overload of simultaneous requirements.

A regulatory roadmap might look like the following:

Year to start the regulation action	Substance/use	Choice of regulatory action
2026	Substance A/Use X	REACH Restriction
	Substance B/Use Y	OSH
	Substance B	CLH
	Substance C/Use Y	CPR
	Substance C/Use X	IED
2027	Substance D/Use Z	REACH Restriction
	Substance E/Use Z	SVHC ID
2028	…	

About FEICA

FEICA is the Association of the European Adhesive & Sealant Industry. Adhesives and sealants (A&S) play a crucial role in many of the EU's strategic sectors and are essential enablers of countless everyday products. A&S enhance products' performance, durability and circularity. With the support of its members and national associations, FEICA voices the interests of the industry in Europe, where 85% of adhesive and sealant companies are SMEs. The association provides regulatory guidance, helps members navigate compliance requirements, and promotes sustainable practices. FEICA fosters collaboration with industry stakeholders to address shared challenges and to create a mutually beneficial economic and legislative environment.

Contact:
Paula Diaz
Senior Public & Regulatory Affairs Manager
p.diaz@feica.eu

FEICA is registered in the EU Transparency Register with ID no. 51642763262-89
FEICA - Association of the European Adhesive & Sealant Industry
Rue Belliard 40 box 10, 1040 Brussels, Belgium | Tel: +32 (0)2 896 96 00 | info@feica.eu
www.feica.eu

FEICA© Publication ref.: POP-EX-O04-013-A