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FEICA feedback to Call for Evidence to Simplification of Administrative Burdens in Environmental Legislation

Introduction

FEICA, the Association of the European Adhesive and Sealant Industry, welcomes the opportunity to provide input to the Environmental Omnibus. Adhesives and sealants are strategic enablers of Europe's sustainability and competitiveness goals, as they are essential to lightweight design, renewable energy technologies, repair and reuse of products, energy-efficient construction, and many other applications central to EU's environmental agenda.

Our sector is characterized by a high proportion of SMEs, which are drivers of innovation but also the most affected by unnecessary administrative burdens. Through this submission, FEICA sets out recommendations to reduce duplication, improve legal clarity, and support proportionate implementation.

We stand ready to engage in constructive dialogue with the Commission to provide technical expertise and ensure that simplification efforts achieve their intended outcome of lowering administrative burden while creating a regulatory environment in which innovative industries like adhesives and sealants can thrive.

FEICA recommendations:

Simplify and streamline reporting obligations

Adhesives and sealants manufacturers face multiple overlapping reporting obligations across EU environmental legislation, including the Waste Framework Directive and its SCIP database, REACH, CLP, and the Packaging and Packaging Waste Regulation.

This duplication creates unnecessary administrative burden without delivering proportional compliance benefits.

For SMEs, which make up the majority of our industry, the challenge is particularly acute. They must devote disproportionate resources to managing multiple IT platforms and reporting the same data in different formats. In practice, members report that the SCIP database has generated significant costs while offering limited added value to recyclers.

FEICA recommends that the Environmental Omnibus should remove redundant reporting requirements, promote interoperable digital reporting systems, and ensure that any new obligations are based on existing frameworks rather than duplicate them. This would reduce

administrative burden, improve data quality, and free up resources for sustainable innovation.

Align definitions of substances with REACH regulation

The use of divergent definitions and sometimes undefined substance categories create confusion and increase compliance burdens for companies. For e.g. terms such as "substances of concern" are defined differently in the Plant Protection Products Regulation (PPPR), the Biocidal Products Regulation (BPR), the Ecodesign for Sustainable Products Regulation (ESPR), the Corporate Sustainability Reporting Directive (CSRD), and the Taxonomy Regulation. New and undefined concepts such as "most harmful substances" introduced in the [Commission's Communication on essential use](#), add further ambiguity.

FEICA recommends that the Environmental Omnibus ensure all substance-related terminology is aligned with the established framework of REACH. The REACH regulation already provides clear, science-based definitions that are understood by regulators, industry, and stakeholders. Reusing these definitions across legislative instruments would guarantee legal clarity, reduce unnecessary administrative burden, and create a level playing field for companies operating in the Single Market.

Avoid duplication and impractical requirements in the Common Data Platform on Chemicals

The proposed Common Data Platform on Chemicals should not duplicate existing obligations under REACH. Companies already submit extensive study data in registration dossiers to ECHA, which is publicly available. Requiring an additional notification of the same studies under Article 22 would create unnecessary double reporting and administrative burden. Just as studies submitted under the General Food Law are exempted, the same exemption should apply to REACH studies.

In addition, the proposed mandate for ECHA to establish and manage a repository of alternatives to substances of concern (Recital 36b and Article 10b), is not workable. Alternatives are highly specific to the use, application, and performance needs of a product, making it impossible to maintain a meaningful, comprehensive repository across such a wide range of substances. This requirement would consume resources without providing reliable or actionable information.

FEICA therefore recommends that the Environmental Omnibus ensure REACH study data is excluded from the Common Data Platform notification system and that the repository of alternatives to substances of concern is deleted. This would prevent duplication, reduce administrative costs, and keep the system focused on measures that genuinely support risk assessment and innovation.

Provide proportionate compliance for SMEs

The adhesives and sealants industry is predominantly composed of SMEs, which face disproportionate administrative and financial burdens compared to larger firms. Implementing new IT systems or complex reporting frameworks absorbs a much higher share of SME budgets and staff time, reducing capacity for research and development.

FEICA recommends that the Environmental Omnibus should include SME-friendly mechanisms, such as simplified reporting templates, phased-in requirements, or thresholds for very small operators. It is also essential that impact assessments explicitly evaluate SME competitiveness before new obligations are introduced. A proportionate approach would safeguard SME participation in the green transition and maintain Europe's industrial diversity.

Improve governance and predictability

Uncoordinated timelines, mid-year application dates, and fragmented national implementation increase compliance costs and legal uncertainty. Adhesives and sealants manufacturers report difficulties caused by misaligned reporting cycles, forced system changes mid-year, and uneven enforcement across Member States.

FEICA recommends that the Environmental Omnibus should align all new obligations with the calendar year, beginning on 1 January, providing adequate transition periods, and publishing guidance well in advance of application dates. Predictable and harmonized implementation across Member States would reduce costs, improve data integrity, and provide businesses with the certainty they need for long-term investment.

Conclusion

FEICA strongly supports the Commission's effort to simplify environmental legislation through the Environmental Omnibus. For our sector, simplification is not just about reducing administrative costs, but about creating the right framework for Europe's innovative industries to thrive. Adhesives and sealants are critical enablers of sustainable products, circularity, and energy efficiency, and must be supported by legislation that is coherent, proportionate, and predictable.

We encourage the Commission to adopt our recommendations to streamline reporting, align definitions, avoid duplication, ensure proportionate rules for SMEs, and improve governance. These measures will reduce unnecessary burden while strengthening the functioning of the Single Market and supporting investment in sustainable innovation.

FEICA and its members are committed to constructive dialogue and stand ready to provide technical expertise to help the Commission achieve these goals.