

FEICA's suggestions for the simplification of REACH

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Adhesives and sealants are vital in many applications. Despite high energy costs and economic variability, the sector, mainly SMEs, shows resilience and innovation. REACH regulation is crucial for managing chemical components, ensuring health and environmental protection, and fostering industry innovation and competitiveness. A REACH revision should streamline processes while maintaining standards to support growth and safeguards.



No MAF in a simplified REACH

Introducing a non-scientific, arbitrary Mixture Assessment Factor (MAF) contradicts the very goal of simplification. Existing legislation already addresses combined exposures where relevant. For adhesives and sealants (well covered under REACH) a blanket MAF would trigger unnecessary reassessments, add regulatory burdens, and force critical substances off the market, despite decades of safe use. Combined exposure is a complex issue that cannot be solved by lowering safety thresholds across the board.



No purely hazard-based restrictions; no extension of the GRA

Simplification must not mean bypassing risk assessment. Extending the Generic Risk Approach (GRA) or applying hazard-based restrictions without considering real-world use and exposure, undermines both science and policy goals. It puts the availability of critical substances at risk and disrupts supply chains, without delivering meaningful safety benefits. REACH should maintain a targeted, risk-based framework, guided by actual exposure and use, with flexible derogations to support science-based and workable substitution.



No new blanket requirements for polymers

New requirements on polymers under REACH will overburden industry without delivering clear safety gains. The adhesives and sealants sector depends on a broad range of polymers, many of which have well-characterised profiles and long histories of safe use. A one-size-fits-all approach would increase costs, constrain innovation, and place pressure on already limited regulatory resources. Efforts should continue to focus on polymers of known risks, applying proportionality and ensuring that European competitiveness is not compromised⁽¹⁾.

(1) See [Annex 3 on FEICA's position on polymers](#).



A comprehensive and effective regulatory roadmap

Predictability is essential for long-term investment, innovation, and competitiveness in the EU chemicals industry. Companies need time to engage in regulatory procedures, providing data for science-based decisions. Adhesives and sealants companies navigate complex regulations⁽²⁾, including REACH. To prevent overlapping demands and help SMEs manage compliance, we recommend a well-defined regulatory roadmap. This roadmap⁽³⁾ should include all hazardous chemicals management measures, not just REACH, to avoid regulatory overload.

(2) See [Annex 1 on EU regulations affecting the adhesives and sealants industry](#).

(3) See [Annex 2 on FEICA's proposal for a regulatory roadmap](#).



Standardised electronic formats for better data transfer

We support transitioning to digital formats for safe data exchange along the supply chain. Communication of safety data sheets (SDS) by electronic means should be mandated when requested. A standardised electronic format should be pursued to enhance efficiency and accuracy of information transfer. ECHA should work on digitalising supply chain communication. Simplification of supply chain communication rules for CLP non-hazardous mixtures should be considered, allowing the use of SDS to convey CLP Annex II label elements.



Proper enforcement to ensure a level playing field

Improved consistency in enforcement across EU Member States is crucial. We advocate for harmonised enforcement practices and proportionate regulatory measures to ensure fair competition and maintain market integrity, particularly addressing challenges posed by online sales and imports.



[FEICA information and positions on REACH](#)

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.

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