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Position Paper on the Circular Economy Act

Introduction

FEICA, the Association of the European Adhesive & Sealant Industry, welcomes the European Commission's Circular Economy Act as a landmark initiative to accelerate Europe's shift to a truly circular model. Adhesives and sealants are essential enablers of circularity and the R-strategies throughout a product's life:

- at the design stage adhesives and sealants provide the necessary design freedom needed to rethink long standing products and innovate solutions allowing to avoid unnecessary material use or allow for reuse;
- also, they are crucial for reduction of material and energy use, allowing to build lighter, more resource-efficient structures without sacrificing strength;
- during the use-stage they create durable yet reversible bonds that extend service lives by facilitating repair and maintenance;
- and at end-of-life they support clean disassembly and high-quality recovery of components and materials, including those with recycled content.

While FEICA fully supports the Act's objectives, we wish to draw attention to sector-specific challenges and set out targeted policy recommendations to ensure that the CE Act creates a conducive regulatory framework that fosters innovation and competitiveness in the A&S industry to deliver maximum environmental benefits.

FEICA key asks from the Circular Economy Act

Technology neutral framework: A true circular economy retains resources in the value chain for as long as possible. FEICA therefore calls on the Circular Economy Act to adopt a technology-neutral, life-cycle approach that evaluates technologies by their functional performance rather than by specific substances or processes.

A bias against certain bonding technologies would risk penalising innovation just when the EU industries need new chemistries to support more complex product assemblies. By avoiding prescriptive bans and allowing the market to select the most effective solutions, the Act will foster research, development and uptake of advanced adhesive systems across multiple value chains. By following a life cycle approach, the Act will avoid biased treatment of bonding solutions and encourage continued research into circular, high-performance chemistries. This approach will safeguard innovative adhesive technologies from pre-emptive restrictions, ensuring that recycling, repair and reuse remain at the core of circularity.

Support for advanced materials: A&S industry support the strategic sectors of the EU such as healthcare, digital technologies, transport, defence and energy. We enable innovation of highly technology-driven, competitive and fast-paced products like electronics, electric vehicles, medical

devices and solar panels. Our industry constantly pushes for innovation, with an annual expenditure of over 500 million euros on research and development.

To ensure that innovation thrives further, FEICA asks that the CE Act create enabling conditions for research and development in advanced materials like adhesive and sealants. Support mechanisms, including public-private partnerships and dedicated funding streams, should be explicitly referenced in the Act to accelerate breakthroughs in low-impact solutions that improve the overall life cycle of products.

Increased investment in debonding infrastructure: Debonding-on-demand enables the non-destructive of bonded components, facilitating the reuse of product parts across various applications including end-of-life vehicles. This process involves a controlled reduction in adhesive strength triggered by physical/mechanical and/or chemical stimuli. We are developing a range of debonding technologies tailored to these triggers, allowing for precise and efficient disassembly when needed. By means of debonding on demand, our technologies offer innovative approaches to drive circularity across all industries, providing scalable methods to recover materials and components.

FEICA highlights the urgent need for further investment in debonding and separation infrastructure. The Act should include dedicated funding mechanisms—through Horizon Europe, the Clean Industrial Deal or other EU programmes—for pilot and demonstration projects that scale efficient methods of separation of components bonded by adhesives and sealants. Enhanced debonding capacity will increase the yield and quality of secondary raw materials, lower recycling costs and reinforce the competitiveness and resilience of European value chains.

Harmonised framework: To ensure continuous availability of feedstocks, regulatory certainty and foster innovation, it is imperative that the rules on mass balance are clearly recognised. In a competitive global economy, European harmonised and aligned rules are essential to provide the European adhesives and sealants industry with the clarity it needs to plan investments, scale sustainable solutions, and contribute meaningfully to circularity objectives. Mass Balance is a prerequisite for any policy discussion on bio based and recycled content targets. In this context FEICA strongly advocates to allow for feedstock neutrality as long as it is fossil free rather than creating narrow, separate targets.

FEICA also urges the Commission to create enabling conditions for industry by harmonising regulatory obligations across Extended Producer Responsibility schemes, digital product passports and eco design requirements. A single, coherent set of criteria across product categories will reduce administrative burdens on A&S manufacturers. This will free resources for investment in next-generation bonding technologies rather than complex administrative work. A harmonised framework will support innovation and competitiveness across the adhesives and sealants sector.

Conclusion

The A & S sector in Europe comprises over 95 member companies and national associations and contributes around €15 billion to the Union's economy. It supports high-quality employment in SMEs and large industrial groups, underlining its strategic importance to the Single Market. Adhesives and sealants are not mere inputs but essential enablers of circularity. They help minimise resource use, extend product lifetimes and close material loops across value chains.

FEICA's requests—adoption of a technology-neutral approach, harmonisation of regulatory measures, investment in debonding infrastructure and support for affordable innovation—will ensure that the Circular Economy Act delivers a truly circular, competitive and sustainable European

economy. FEICA looks forward to detailed dialogue with the Commission in further development of EU's legislative framework around circular economy.

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