



The European voice of the **adhesive and sealant industry**

FEICA STAKEHOLDER FORUM

Relevance of REACH Simplification
for Adhesive and Sealant User Markets

Brussels - 11 June 2025

Competition EU Law Compliance & Confidentiality

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- DON'T discuss discounts, terms of condition of sales, warranty terms, profits or profit margins, market shares, bids or the intent to bid, rejection or termination of customers, market sales territories
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Proceedings

- FEICA post-event communications require a group picture, and organisations present will be tagged in social posts – In case you prefer not to be included in the picture and/or post, please feel free to inform us
- The presentation slides will be shared with all invitees after the event

Adhesives & Sealants: Enabling the EU's Green and Competitive Future

CIRCULAR ECONOMY

A&S accelerate the transition to the **circular economy** across key consumer and industrial markets.

Enabling Smart Redesign

Reducing Material Use

Unlocking Reuse

Supporting Recycling

Enabling Repair



INNOVATION & STRATEGIC AUTONOMY

The A&S industry **accelerates innovation** in crucial sectors, contributing to the strategic autonomy of the EU.

Enabling Innovations - EVs, electronics, solar panels, medical devices, and defence

Growth of the market forecast to reach € 21.4 billion by 2028

Annual R&D investments of € 500+ million

POWERING SOCIO-ECONOMIC GROWTH

The A&S industry is essential to Europe's **socio-economic development**.

A highly skilled innovative workforce

Enabling innovations that improve quality of life

Contribution of €15 billion to the EU economy

Areas that involve the adhesive and sealant industry



Automotive



- Used to **bond dissimilar materials** (e.g. metal to glass or plastic)
- Enabling **lightweight** construction while ensuring **strength and durability**
- E.g. windscreen bonding or structural reinforcement

Flexible Packaging



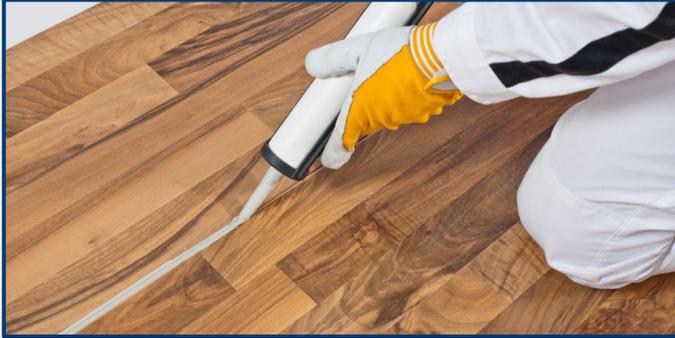
- Used in **food and non-food packaging** (e.g. pet food, tobacco, cosmetics, detergents)
- Enabling the **combination of different materials** while ensuring seal integrity, stability, and product protection

Footwear/Leather Goods



- Used to bond materials such as leather, PU, TPU, and rubber
- Providing **essential technical properties** like thermal resistance and hydrolysis resistance

Construction



- Used to **bond, insulate and seal** in buildings and infrastructure
- Offering **thermal** and **acoustic insulation**, improving **energy efficiency** and **comfort**
- E.g. door and window insulation or floor bonding or sealing against water and air ingress

Electronics



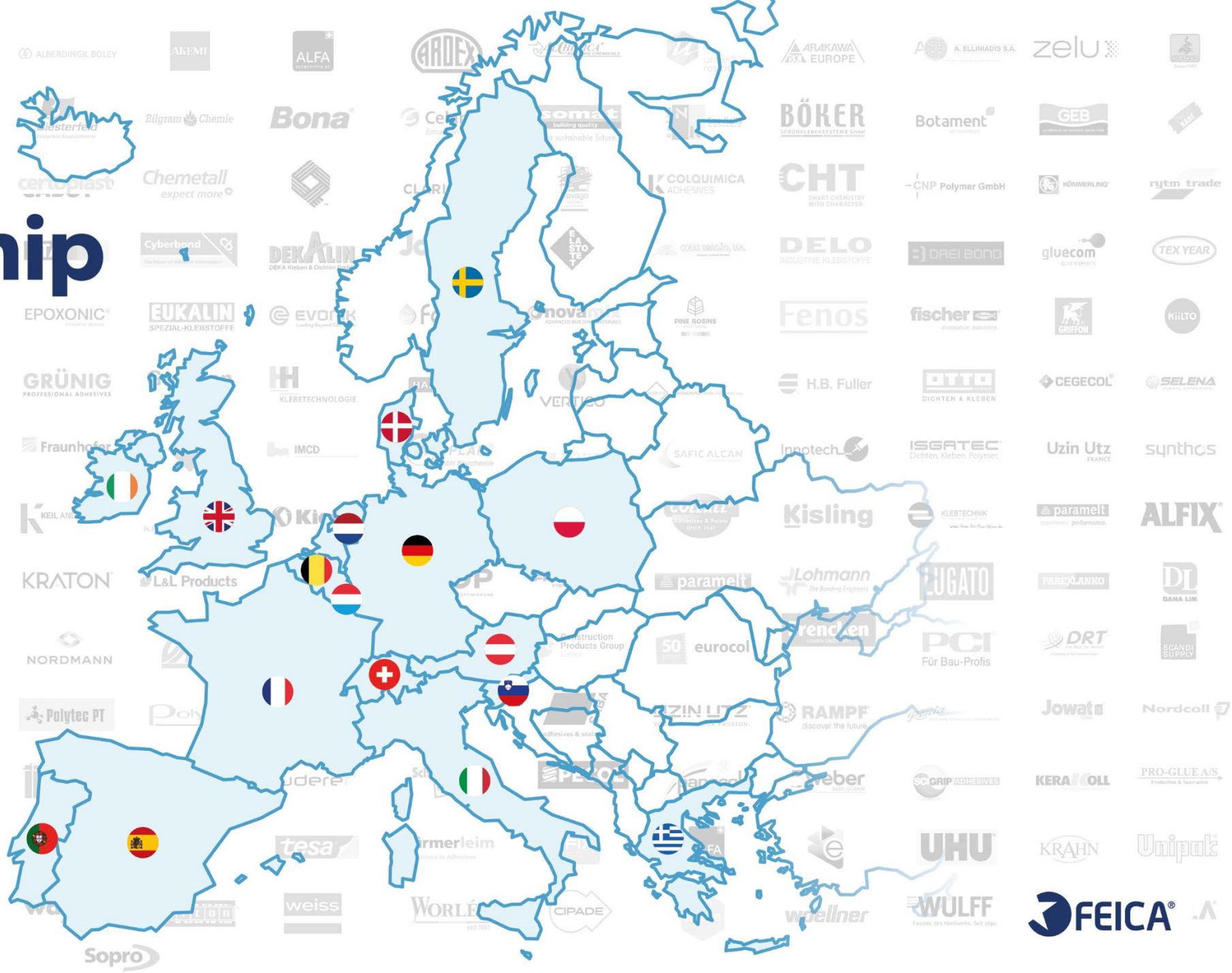
- Used in the **assembly of electronic devices** such as mobile phones, computers, and household appliances
- Providing **resistance to humidity, dust, and temperature**

Aerospace



- A&S used to bond **composite materials, metals, and honeycomb structures** in **aircraft manufacturing**
- **Reducing weight**, maintaining **high strength** and **durability**, contributing to **fuel efficiency** and **structural integrity**
- Provide for **insulation, vibration damping**, and **protection** against extreme temperatures and pressure changes

FEICA Membership





Participant Introductions

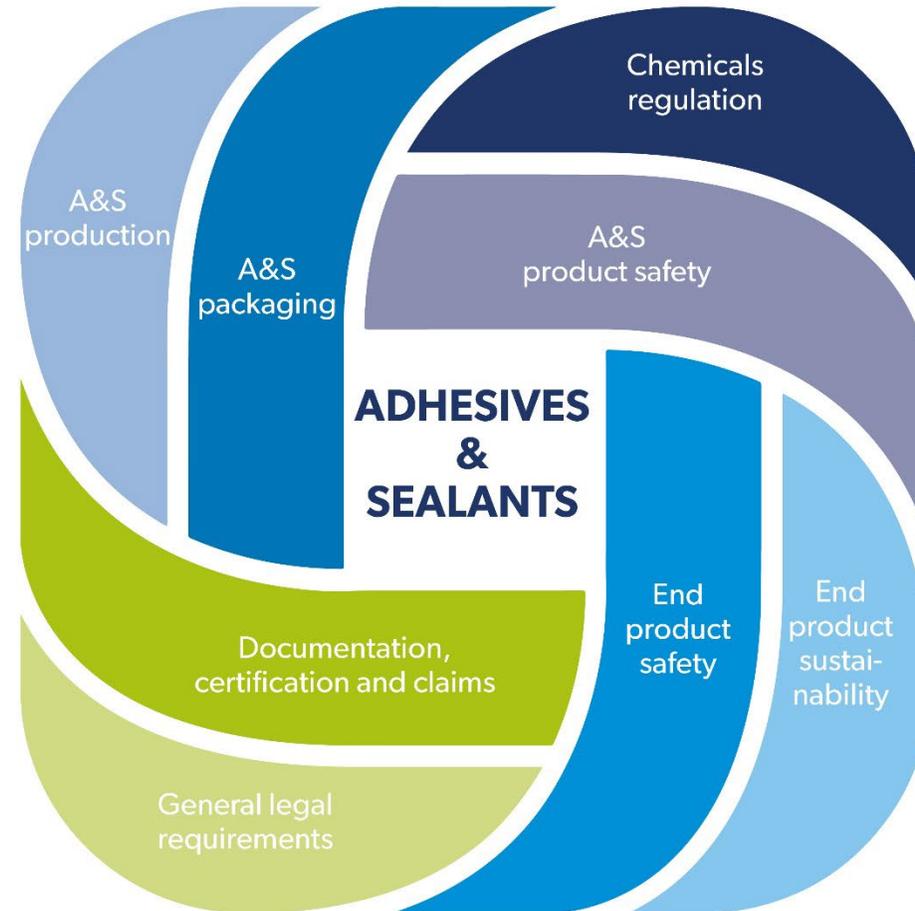
Regulatory Framework Impacting Adhesives and Sealants

- Packaging & Packaging Waste Regulation (PPWR)
- Waste framework directive (WFD)
- Road transport of dangerous goods (ADR)

- Industrial emissions directive (IED)
- Preventing plastic pellet loss regulation (PPLR)*
- Food contact GMP regulation
- Occupational safety and health (OSH)
- Pressure vessels directive; ATEX directive; PPE regulation; Machinery safety regulation

- Classification, labelling and packaging of chemicals (CLP)
- Digital product passports (ESPR, ELVR, ...)
- Product environmental footprint (PEF)*
- Environmental product declarations (EPDs)
- EU Ecolabels / Green public procurement (GPP)
- Substantiating green claims directive (SGCD)*

- Corporate sustainability reporting directive (CSRD)
- Corporate sustainability due diligence directive (CSDDD)
- EU Emissions trading system (ETS)
- EU Taxonomy
- EU Climate law
- Carbon border adjustment mechanism (CBAM)



- Current REACH framework
- Persistent organic pollutants (POP)
- Ozone regulation

- REACH (Isocyanates restriction)
- Occupational safety and health (OSH)
- Biocides regulation

- General product safety regulation (GPSR)
- Food contact framework regulation
- Food contact plastics regulation
- Drinking water directive
- Medical product safety
- Toy Safety Regulation (TSR)
- Cosmetics Products Regulation
- Recycled plastics in food contact regulation
- Restriction of hazardous substances in EEE (RoHS)
- Active & intelligent packaging regulation

- Packaging & Packaging Waste Regulation (PPWR)
- Single-use plastic directive (SUPD)
- Construction products regulation (CPR)
- End-of-life vehicles regulation (ELVR)*
- Waste framework directive (WFD)

* still under development

What is REACH, and why does it matter to you?

REACH = Registration, Evaluation, Authorisation and Restriction of Chemicals

It is the EU's main chemical regulation, designed to:

- Protect human health and the environment
- Maintain competitiveness and innovation

Why it matters to you as a user:

- REACH affects the **availability** of substances and products
- It shapes **product design, innovation, and compliance costs**
- Your sector may need to **reformulate, requalify or adapt** if substances are restricted

2025: REACH Revision still not published

Green Deal is now the ,Clean Industrial Deal‘



2020
-
2024

“The European Green Deal is our new growth strategy. It will help us cut emissions while creating jobs.”
Ursula von der Leyen, President of the European Commission

“We propose a green and inclusive transition to help improve people’s well-being and secure a healthy planet for generations to come.”
Frans Timmermans, Executive Vice-President of the European Commission

Green Deal is now
„The Clean Industrial Deal“

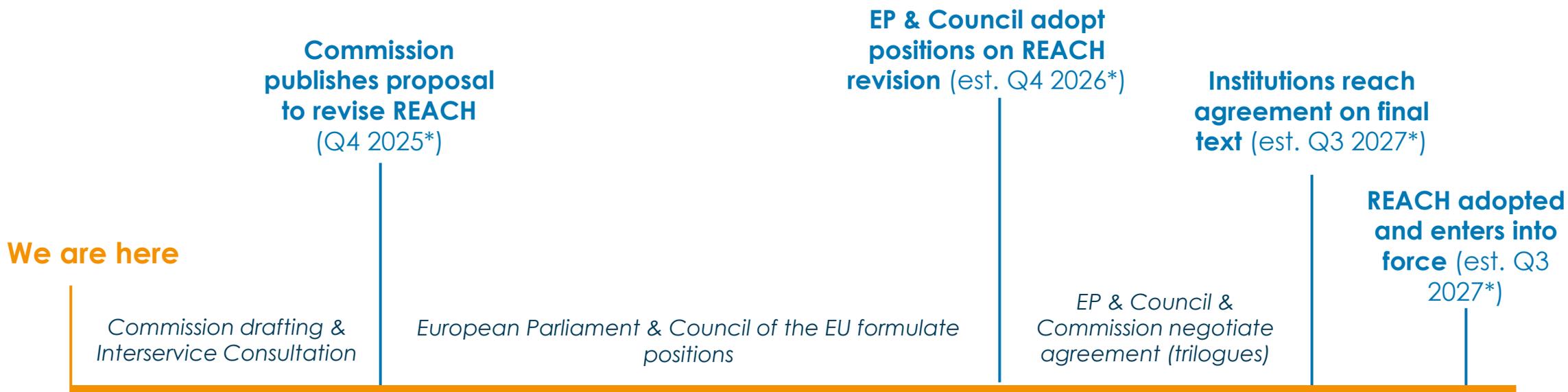
COMPETITIVENESS COMPASS
Feb. 2025
Decarbonisation and competitiveness
Closing the innovation gap
Simplification
Simplification
European Commission
Commission européenne

New EU Commission Objective: achieve Green Deal targets, increase attention to industrial policy, **competitiveness and burden reduction**

Green Deal is now
,The Clean Industrial Deal‘

However, we do not know any details yet

REACH revision: Timeline



- Committee(s) assigned
- Rapporteur(s) and Shadows rapporteurs appointed
- Draft report discussed and adopted by committee(s) and plenary
- Decision to enter into trilogues

- Working Party assigned
- Political agreement in Coreper
- Council adopts general approach

** These dates are based on estimates and are subject to change depending on the length of the negotiations.*

What are the main potential elements of the revision?

Mixture Assessment Factor



- Safety margin applied during risk assessment to reflect combined exposure to multiple substances
- Reduces acceptable exposure levels for individual chemicals

- Many substances cannot be used further in A&S

Extension of the Generic Risk Approach



- Hazard-based restrictions could be expanded
- This is an accelerated way to restrict chemicals or groups of chemicals
- Does not consider real exposure

- Many products won't be available for DIY applications

Polymer Registration Requirements



- Registration could be required for certain polymers
- Creating new obligations in terms of testing, documentation, and compliance

- Special polymers won't be available in the market

Potential impacts on end-users

Reduced availability of adhesives and sealants

- Withdrawal of specialised adhesives and sealants where reformulation is not technically or economically feasible
- High-risk sectors include aerospace, automotive, electronics, and energy, where adhesives must meet extreme performance requirements (e.g. heat resistance, vibration damping, or long-term durability)

Increased costs and disruption

- Reformulating products means requalification: testing, certification, compatibility checks – all requiring time and investment
- Changes in product properties (e.g. viscosity, curing time, flexibility) may disrupt application processes and require equipment adjustments

Potential impacts on end-users

Delays in innovation and product launch

- Innovation cycles are slowed due to longer development and approval times for reformulated products
- Reduced flexibility to adapt quickly to market needs or regulatory changes

Loss of Customisation - Shift to Generic Alternatives

- Tailor-made formulations may disappear from the market because the cost of registering polymers outweighs the benefits or because of the additional safety measures
- Forcing end users to rely on generic, potentially less effective alternatives
This can compromise performance, sustainability, or safety in sensitive applications (e.g. medical devices, EV batteries, repair technologies)

Potential impacts on end-users

Administrative and Communication Burden

- Additional updates in labelling, documentation, and customer communication due to changes in CLP classification
- SMEs especially affected by increased regulatory and administrative workload

Market Uncertainty and Pre-emptive Switching

- Lack of clarity on which substances will be restricted causes premature product changes and stockpiling
- Leads to inefficiencies, confusion across the value chain, and potential supply bottlenecks

FEICA Recommendations on REACH Simplification



No MAF in a simplified REACH



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



No new blanket requirements for polymers



A comprehensive and effective regulatory roadmap



Standardised electronic formats for better data transfer



Proper enforcement to ensure a level playing field

We'd like to hear from you

- **Awareness**
 - Have you or your organisation followed the REACH revision process?
 - Do you feel well-informed about what is coming?
- **Perceived Impacts**
 - Do you expect changes to product availability, performance, or compliance requirements?
 - Have you already experienced disruptions or reformulations?
- **Ongoing Initiatives**
 - Are you already taking action (e.g. product reviews, substitutions, customer communication)?
 - How do these align with FEICA's concerns or recommendations?
- **Support Needs**
 - What kind of support or guidance would help you most?
 - Would continued collaboration (e.g. via this forum) be valuable?

Proposals for collaboration

We invite you to:

- ✓ Share case studies
- ✓ Participate in political dialogues
- ✓ Provide feedback
- ✓ Stay connected

Downstream Users of Chemicals Coordination group (DUCCC) proposal for a shared industry letter

DUCC stakeholder letter

1. Clear regulatory predictability through a **regulatory roadmap**
2. Effective and data-based regulatory decisions – **not extending GRA** and keeping regulatory measures targeted and considering sector-specific needs
3. Combined exposure – **avoiding** simplistic assessments such as **Mixture Allocation Factor (MAF)**
4. Focusing on **polymers with known risks** and no additional blanket registration obligations
5. Strengthening **enforcement** by enhanced cooperation between the EU and Member States, plus ensuring measures are enforceable
6. Improving **supply chain communication** through increased digitalisation
7. Gradual uptake of **non-animal methods** (NAMs) through a planned roadmap



Downstream Users of Chemicals Co-ordination group

The Downstream Users of Chemicals Co-ordination Group (DUCC) position on the REACH revision

May 2025

The REACH revision is a crucial opportunity to uphold its status as the leading chemicals management legislation globally while enhancing European industry competitiveness. It is a chance to maintain high protection standards, reduce administrative burdens, and align with the Competitiveness Compass and the Clean Industrial Deal, through a targeted and effective revision.

Therefore, DUCC proposes the following 7 strategic recommendations for the REACH revision.

1. Clear regulatory predictability

Predictability about upcoming requirements is vital to ensure long-term investment, innovation, and competitiveness in the EU chemicals industry and its downstream users while enabling sustainable transitions. Companies require sufficient time to engage in regulatory procedures, offering the necessary data and expertise for authorities to make science-based decisions.

To achieve this, we call for the development of a **regulatory roadmap** that assigns priorities and clear timelines for regulatory actions on substances. This roadmap enables industry and authorities to plan strategically for necessary tasks and resources, fostering innovation and facilitating the transition to alternatives.

In order to prevent overlapping regulatory demands on any single sector and help SMEs manage compliance, this well-defined roadmap must be followed by EU authorities, Member States and industry. It should encompass all regulatory measures related to chemicals management, not just REACH initiatives, to avoid an overload of simultaneous regulatory requirements.

2. Effective and data-based regulatory decisions

Any regulatory framework should be grounded in science and evidence, incorporating assessments of exposure, risk, and socio-economic considerations. The REACH revision must avoid simplistic assessments – such as extending the Generic Risk Management Approach (GRA) to apply blanket bans to new categories of hazards – and focus on actions when substances pose an unacceptable risk.

Instead, **measures must be targeted, considering sector-specific needs and value chain dynamics**. By implementing the above-mentioned roadmap, regulatory actions would incorporate all necessary information to determine the best legal route, which for example could be Occupational Safety and Health (OSH) measures.

What matters most (substance/use combination/exposure) should prevail when it comes to risk management. A better upfront understanding of the use, exposure, and alternatives of certain substances will allow a well-founded decision as to which regulatory route, if any, should be used.

3. Scientific rigour for the assessment of combined exposure to multiple chemical substances

The introduction of a blanket Mixture Allocation Factor (MAF) in chemical safety assessments needs to be opposed as it risks the **loss of many essential products** that have been safely used for decades. This approach **deviates from a robust, science-**

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