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## FEICA comments after 7th CASG polymers meeting

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FEICA, the Association of the European Adhesive & Sealant Industry, is a multinational association representing the European adhesive and sealant industry. Today's membership stands at 16 National Association Members, 24 Direct Company Members and 19 Affiliate Company Members. The European market for adhesives and sealants is currently worth more than 17 billion euros. With the support of its national associations and several direct and affiliated members, FEICA coordinates, represents and advocates the common interests of our industry throughout Europe. In this regard, FEICA works with all relevant stakeholders to create a mutually beneficial economic and legislative environment.

### Background

FEICA would like to thank the Commission for the possibility to participate in and contribute to the seventh CARACAL Subgroup polymers meeting held on the 23 February 2022. FEICA would like to submit follow-up comments about the notification, grouping and naming of polymers. A paper on the degradation of polyesters will be submitted separately.

### Notification of polymers

The document named 'Thought-starter on Information for Notification of polymer status (PLC/PRR/ non-PRR/Precursor) and Identification and Naming of polymers' discussed during the Chemical Safety Advocacy Group (CASG) meeting aims to establish what purpose(s) the notification process should serve and what information should be submitted as part of a notification.

FEICA would like to remind the Commission that the notification of polymers will impact all polymers on the market, including polymers that will not be subject to registration requirements. Therefore, requesting the submission of data such as physicochemical data for those polymers that will not be registered seems unnecessary and disproportionate. This would be equal to asking for a simplified registration of all polymers, with clear consequences for animal testing.

While FEICA appreciates the possibilities contemplated by options A and B in the thought-starter, FEICA would like to ask the Commission to consider an option C, more suitable to achieving the intended purposes. Option C would consist of two steps: a limited notification of all polymers, and a process to define grouping.

Under this option C, companies placing polymers on the market would have to notify them by providing the European Chemicals Agency (ECHA) (confidential business information [CBI] to be guaranteed) with the following pieces of information:

- Substance identity
- Tonnage band
- Conclusion on the PLC/PRR/Precursor/non-PRR status
- Result of assessment on individual PLC/PRR/Precursor/non-PRR criteria
- Number of the average molecular weight of the polymer
- Chemical composition of polymer (incl. Substance ID of the monomers and other reactants, oligomer content, content of unreacted monomers, etc.)

FEICA would like to highlight that purpose 3 listed in the thought-starter and aimed to 'facilitate forming of joint registrations and eventually grouping of PRRs for registration', can in many cases not be fulfilled by means of the notification of polymers if grouping will require details not reflected in the polymer name or due to CBI intellectual property issues.

In addition, only polymers subject to registration need to be grouped. Asking companies placing polymers exempt from registration to submit data relevant to form groups would generate a burden on industry that will not lead to any regulatory benefit. Therefore, an alternative process should be put in place once the notification process is completed.

This alternative process should allow companies to locate each other based on the information shared during the notification step. Companies could then rely on a trustee (i.e. a third party) to create the links and facilitate the creation of groups (join submissions).

In any case, sufficient time should be foreseen for companies to collect data needed for the notification and grouping steps.

## Naming of polymers

Names of polymers should be straightforward and simple to use, also for SMEs. Names should include essential features of the polymer but should not attempt to include all aspects of a polymer in detail (e. g. polymerization type and process information only if relevant for the polymer structure). The polymer's name should not include confidential business information.

A simple name could be used at the notification stage, and a more detailed name for the registration process.

## Grouping of polymers

FEICA supports a grouping approach as proposed by ECETOC and CEFIC. It should be possible, however, to group using the elements considered for Level 1 only if no data required for grouping at higher levels are available. This will help SMEs to group their polymers with need for additional data.

FEICA remains at the disposal of the Commission in case additional information should be needed.

## Contact

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