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FEICA Statement - Achieving defossilisation through a technology-neutral approach

The chemical industry is undergoing a profound transformation as it advances toward **defossilisation** and a fully circular economy. For downstream sectors such as adhesives and sealants, this transition depends on access to a broad range of renewable carbon sources—recycled materials, biomass, and CO₂-based feedstocks—as well as new technical processes needed for a functioning circular economy and that are not yet developed to scale.

As the EU defines sustainability targets through legislation such as the Packaging and Packaging Waste Regulation (PPWR), the End of Life Vehicles Regulation (ELVR), the Ecodesign for Sustainable Products Regulation (ESPR), and the Construction Products Regulation (CPR), in line with the objectives of the EU Green Deal pushing the EU towards defossilisation, it is essential that these **policies remain and promote a technology-neutral approach**. Premature assumptions from policymakers about which defossilisation solutions are to be preferred risk locking the market into a narrow set of technologies. This approach risks hindering the transition by making premature and biased assumptions about future circular economy processes, restricting technological developments—for example by favouring “closed-loop only” concepts—and preventing the scale-up of economically viable renewable carbon solutions.

Today, renewable carbon solutions face higher raw material costs, significant investment needs, and extensive process adaptation—factors that can result in price premiums of up to 100% compared to fossil-based alternative, thus limiting market uptake and competitiveness, and resulting in true market entry barriers for these solutions.

A **technology-neutral regulatory framework** is therefore indispensable to ensure Europe's industrial competitiveness. Without supportive, coherent, and predictable legislation, R&D and investments risk shifting to regions where frameworks allow more flexibility to innovate.

To unlock innovation and support the commercialisation of defossilised materials, FEICA calls for:

- **Clear, unbiased and technology-neutral definitions** across EU legislation that recognise all renewable carbon sources—recycled, biogenic and CO₂-based—as eligible options to meet feedstock sustainability targets across relevant sustainability legislation.
- **A coherent EU legislative framework combining** demand-side instruments and financial measures that, on the one side, accelerate commercialization, foster innovation, and ensure competitiveness, and on the other side, compensate for the higher costs of early-stage technologies.

Such an approach will accelerate Europe's transition to a circular, climate-neutral chemical sector, while safeguarding competitiveness and supporting innovation throughout the value chain.

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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