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## Achieving defossilisation through a technology-neutral approach

- **FEICA welcomes Commission's initiative on Biotech Act II to enhance EU's industrial competitiveness and unlock innovation.**
- **Adhesives are primarily intermediate products, serving as functional components in the manufacturing of a wide range of downstream products.**
- **The EU should recognise and enable a technology neutral regulatory framework, that does not predetermine which defossilisation pathways should be pursued.**
- **The EU regulatory framework should enable the use of (bio)mass balance approaches within Biotech Act II, with definitions that cover both bio-based and bio-mass derived feedstocks.**

Across the EU, industry is shifting towards **defossilisation** and a circular economy, with the chemical sector playing a crucial role in that transformation. For downstream sectors such as adhesives and sealants, this transition depends on access to renewable carbon sources, including recycled materials, biomass, and CO<sub>2</sub>-based feedstocks, as well as new technical processes needed for a functioning circular economy, such as chemical recycling and Carbon Capture and Utilisation (CCU), that are not yet available at scale.

The Biotech Act II is a significant step to accelerate the uptake of sustainable and bio-based solutions across EU industry. In shaping these measures, however, it is essential to account for the **specific role that adhesives and sealants play in the EU industrial value chain.**

### Adhesives are intermediate products

Adhesives **cannot be considered as end products** alone, whether for consumers or professional use. As intermediate products, they serve as functional components in the manufacturing of a wide range of downstream products. Their applications span strategic sectors, including automotive, packaging, defence, construction, digital technologies, healthcare, furniture, and textiles. A limited share is placed on the market as stand-alone products for consumer or professional end use. Their formulation and performance requirements are largely determined by the technical, safety and regulatory specifications of the final products into which they are integrated, many of which are already governed by sector-specific EU legislation.

### Supportive policy framework, with a technology-neutral approach

A balanced policy framework would actively support uptake of innovative products. Should market-driven measures on bio-based content be pursued for adhesives, they should be grounded in **flexibility and technological neutrality**. Thus, an enabling framework for all sustainable crops is necessary (e.g. Renewable Energy Directive). Bio-based feedstocks represent one of several

pathways to sustainability and circularity, alongside recycled, biomass and CO<sub>2</sub>-derived inputs. The technical maturity of these pathways, the availability of sustainable feedstocks, and the regulatory constraints applicable to downstream products vary significantly across application areas and should be assessed at sector-level.

Creating early technological lock-in by setting requirements for single defossilisation pathways, for instance by setting specific targets on a certain technology compared to others available, risk locking the market into a narrow set of technologies, restricting innovation and preventing the scale-up of economically viable renewable carbon solutions, ultimately slowing down defossilization.

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 and technology-neutral definitions** across EU legislation that recognise all renewable carbon sources—recycled, biomass and CO<sub>2</sub> based—as eligible options to meet feedstock sustainability targets across relevant sustainability legislation.
- **Recognition of (bio)mass balance approaches** within Biotech Act II, with definitions that cover both bio-based and bio-mass derived feedstocks.
- **A coherent EU legislative framework** combining demand side instruments and financial measures that, on the one side, accelerate commercialization, foster innovation, and ensure competitiveness of European industries, and on the other side, support both CapEx and OpEx low-carbon and sustainable investments across value chains and compensate for the higher costs of early-stage technologies.
- **Ensuring consistency with existing legislation**, including -indicatively- PPWR, ESPR, REACH, and CLP, to avoid layering additional or conflicting regulatory requirements.
- **Evidence-based integration of Critical Chemicals Alliance recommendations**, ensuring full coherence with existing legislative frameworks and avoiding additional regulatory layering.

Therefore, in order to establish a balanced framework, Biotech Act II should consider the specificities of the adhesives sector, where 85% of companies are SMEs, the need for a robust, market-specific analysis of feedstock availability and policy options, and full coherence with existing EU legislation.

A technology-neutral approach on market-driven measures for bio-based content will accelerate Europe's transition to a circular, climate-neutral chemical sector, while safeguarding competitiveness and supporting innovation throughout the value chain in Europe.

## 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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