

# CELLULOSE ETHERS SECTOR GROUP

## News on polymers in REACH

The European Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation, commonly referred to as REACH, places an obligation on European manufacturers and importers of substances to register the substances in order to continue production in or import into the European market.

Cellulose ethers are polymers derived by chemical modification of the natural polymer cellulose that is obtained from renewable botanical sources and are exempt from REACH registration (see our position paper available in different languages on [www.celluloseethers.eu](http://www.celluloseethers.eu)).

The recent FAQ in the last version of *Frequently Asked Questions on REACH by Industry* - November 2008 - Version 2.3, published on 6 November 2008 on the ECHA website ([http://echa.europa.eu/reach/faq\\_en.asp](http://echa.europa.eu/reach/faq_en.asp)), supports our position as described hereafter. This FAQ has been agreed by the Competent Authorities of the Member States (REACH CA) in October 2008.

*6.3.10 Are there registration obligations for manufacturers and importers of natural polymers that have not been chemically modified? 4 (NEW)*

*Natural polymers are understood as polymers which are the result of a polymerisation process that has taken place in nature, independently of the extraction process with which they have been extracted (i.e. they may or may not fulfil the criteria set out in Article 3(39) of the REACH Regulation). Following Article 2(9) of the REACH Regulation, any polymer meeting the criteria of Article 3(5) of the REACH Regulation does not have to be registered. According to Article 6(3) of the REACH Regulation any manufacturer or importer of a polymer shall submit a registration for the monomer substance(s) or any other substance(s) that meet the criteria mentioned in the respective article. However, monomer substance(s) or other substance(s) in the form of monomeric units and chemically bound substance(s) in natural polymers can, for practical reasons, be treated as "non-isolated intermediates" and do not have to be registered.*

*6.3.11 Are there registration obligations for manufacturers and importers of natural polymers that have been chemically modified? 5 (NEW)*

*Natural polymers are understood as polymers which are the result of a polymerisation process that has taken place in nature, independently of the extraction process with which they have been extracted (i.e. they may or may not fulfill the criteria set out in Article 3(39) of the REACH Regulation). Following Article 2(9) of the REACH Regulation, any polymer meeting the criteria of Article 3(5) of the REACH Regulation does not have to be registered. This includes natural polymers which are chemically modified (e.g. post-treatment of natural polymers). Monomer substance(s) or other substance(s) in the form of monomeric units and chemically bound substance(s) originating from the natural polymer can for practical reasons be treated as "non-isolated intermediates" and do not have to be registered. The substances used to chemically modify the natural polymer and which are chemically bound within the final polymer need to be registered according to the REACH requirements.*

For and on behalf of the European Cellulose Ethers Manufacturers Association,  
November 2008

For more information please contact your cellulose ethers supplier. You may also find more information on the sector group and its members on our webpage: [www.celluloseethers.eu](http://www.celluloseethers.eu) For convenience, the REACH FAQ can be directly downloaded from [here](#).

