



Downstream Users of Chemicals Co-ordination group

26 OCTOBER 2022

# IMPACT OF POLYMER REGISTRATION ON DOWNSTREAM USER FORMULATORS – **SMEs**

## **POLYESTERS & POLYMERIC PRECURSORS**

Over the course of 2020-2022 the Commission has been working to “make a proposal to extend the duty of registration under REACH to certain **polymers of concern**”.<sup>1</sup> As part of the CARACAL-subgroup on polymers DUCC has worked to contribute constructively and collaboratively to this discussion.

At the 45<sup>th</sup> CARACAL meeting in July 2022 the [Commission outlined the options to be considered in their impact assessment](#) for polymer registration. Subsequently, DUCC published a quantification of the [impact of the different policy options for registration of polymers for DUCC members](#) in September. In this first paper DUCC members highlight the importance of polymers for downstream user formulators and point out key impacts for the different proposals.

DUCC now publishes this second paper to focus on the “**polymeric precursors and polyesters**” proposals and their impact **on SMEs**. The two options in question can be described as follows:

- Polyesters:
  1. Polyesters built from a list of ECHA-approved monomers are exempt from registration
  2. No exemption
- Polymeric Precursors:
  1. Polymeric precursors will be exempt from registration if handled under Adequately Controlled Conditions
  2. Polymeric precursors will be exempt from registration if handled under Strictly Controlled Conditions

The effect on downstream users also has impact to downstream customers using DUCC member products. So, in this document we also share examples of the cascading final applications that will be affected.

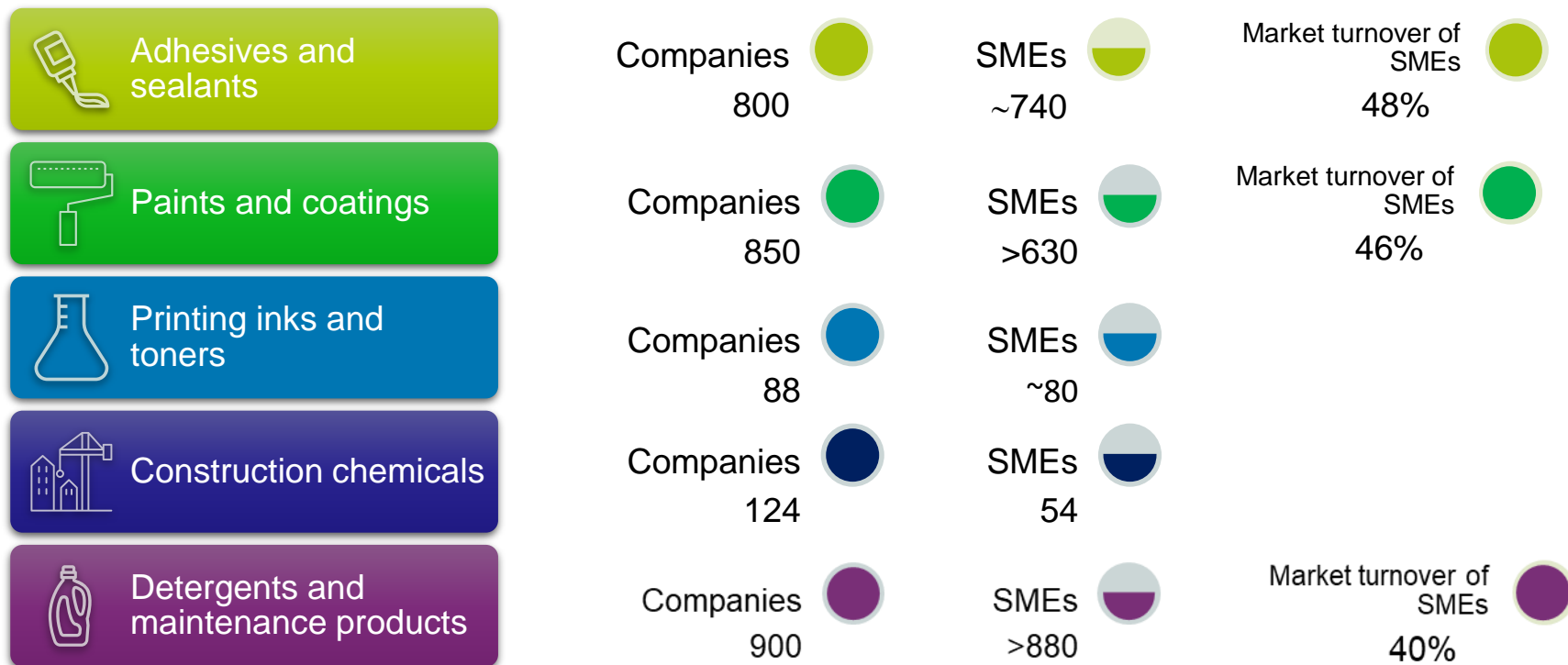
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<sup>1</sup> Chemicals Strategy for Sustainability Towards a Toxic-Free Environment  
<https://ec.europa.eu/environment/pdf/chemicals/2020/10/Strategy.pdf>



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**% of SMEs in the membership of DUCG sectors impacted by the POLYMERIC PRECURSORS AND POLYESTERS proposals**



The proposals being made for **Polyesters** and **polymeric precursors** proposal alone will impact SMEs in different sectors. This will include impacts to both formulators but also end-use applications. Some examples are below:

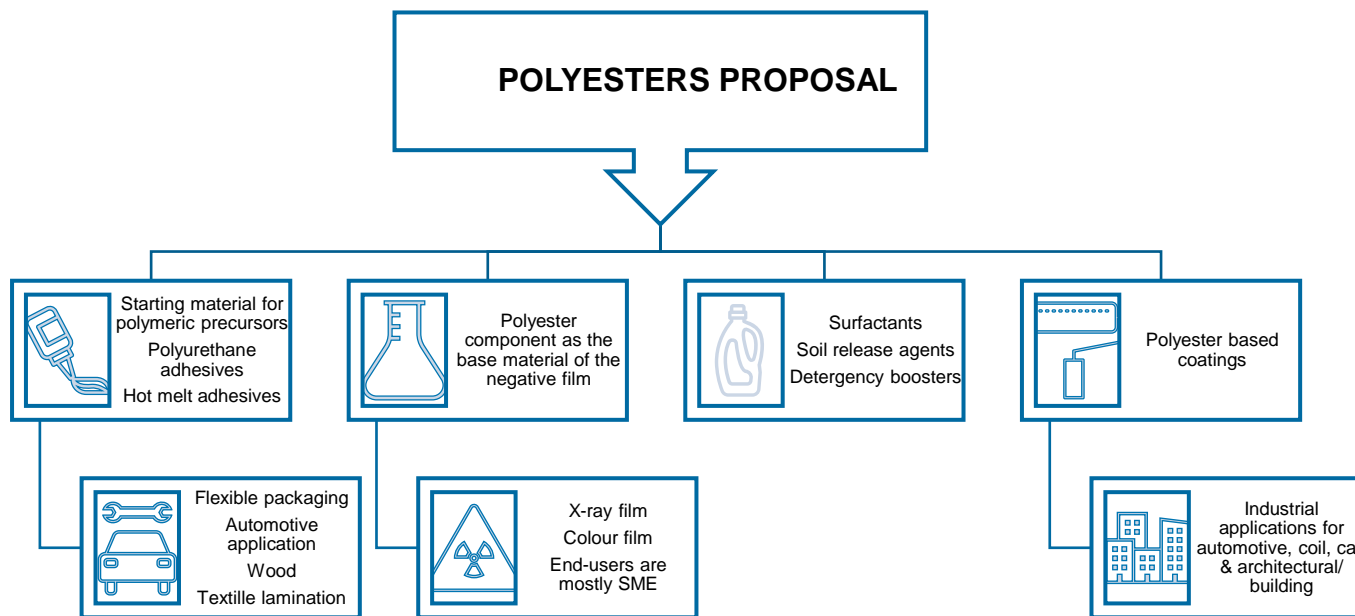
## IMPACTS ON



**Downstream Users**



**End Users**



**DUCG supports that Polyesters built from a list of ECHA-approved monomers are exempt from registration**



**DUCC**



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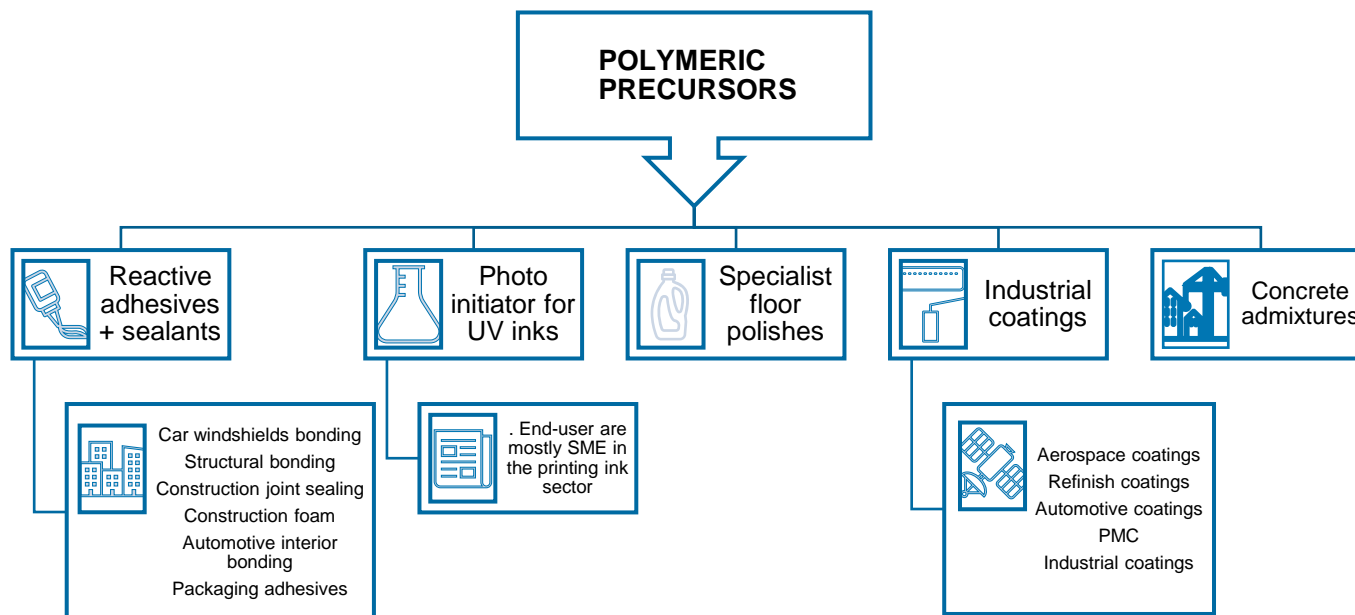
## IMPACTS ON



**Downstream Users**



**End Users**



**DUCC supports that Polymeric precursors will be exempt from registration if handled under Adequately Controlled Conditions**