



Brussels, 16 May 2022

FEICA proposal for a list of starting monomers for the polyesters exemption

FEICA welcomes the European Commission's proposal to keep an exemption for polyester polymers made from monomers on the EU list when polymers subject to registration requirements are defined.

While FEICA considers the polyester exemption to be scientifically supported, we acknowledge that the list of starting monomers should be updated to eliminate hazardous monomers.

Polyesters eligible for the polyester exemption should be manufactured from a defined list of registered monomers posing no concern to human health or to the environment – in order to safeguard that the eventual hydrolysis products of eligible polyesters will be non-hazardous.

FEICA experts, in collaboration with **Professor Kricheldorf** (Hamburg University) have drafted a **list of monomers based on the EU List of Authorised Substances: Annex I, Plastics Food Contact Regulation 10/2011/EU**, as amended by Regulation 2020/1245/EU, 3 September 2020¹. Moreover, non-hazardous monomers that are of commercial importance today but were not included in the Plastics Food Contact Regulation have been added for consideration.

In any case, the list should be updated regularly to allow for the removal of monomers classified as hazardous at a later stage and the addition of new non-hazardous monomers (e.g. bio-based monomers).

We would like to propose the following list as a starting point for the Commission and the European Chemicals Agency (ECHA) to develop an EU list of authorised monomers. FEICA experts remain available in case further technical support is needed.

Overview of raw materials for polyesters proposed for exemption from REACH PRR		
Based on the list of authorised monomers and other starting substances in COMMISSION		
REGULATION (EU) No 10/2011 on plastic materials and articles intended to come into contact with		
food		
Methylesters of acids as starting materials for polyesters are also allowed since the degradation		
product is the acid, not the methylester.		
CAS No.	Name	
'4767-03-7	2,2-bis(hydroxymethyl)propionic acid	
	Dimethylolpropionic acid	
000050-21-5	Lactic acid	
000056-81-5	Glycerol	
000057-55-6	1,2-Propanediol	

¹ <u>EU List of Authorised Substances: Annex I, Plastics Food Contact Regulation 10/2011/EU, as amended by Regulation 2020/1245/EU, 3 September 2020</u>

Dodecanedioic acid	0000652-67-5	Isosorbide
1,1,1-Trimethylolpropane	0000693-23-2	Dodecanedioic acid
D00099-96-7 D-Hydroxybenzoic acid D00102-10-0 Terephthalic acid D00102-60-3 N.N.N.N.YTetrakis(2-hydroxypropyl)ethylenediamine D00105-60-8 N.N.N.N.YTetrakis(2-hydroxypropyl)ethylenediamine N.N.N.YTetrakis(2-hydroxypropyl)ethylenediamine N.ACyclohexanediamethanol D00107-21-1 Ethyleneglycol D001076-97-7 N.ACyclohexanedicarboxylic acid D00108-30-5 Succinic anhydride D00108-30-5 Succinic anhydride D00110-15-6 Succinic acid D00110-63-4 N.AButanediol D00110-63-4 N.AButanediol D00110-63-5 Disphyloroxypropyl) ether Dipropyleneglycol D00111-20-6 Sebacic acid D00111-20-6 Sebacic acid D00111-20-6 Disphyloroxypropyl) ether Diethyleneglycol D00111-20-6 Disphyloroxypropyl) ether Diethyleneglycol D00112-27-6 Tiethyleneglycol D00112-91-5 Isophthalic acid D00112-91-5 Isophthalic acid D00124-99- Azelaic acid D00124-04-9 Adipic acid D00124-04-9 Adipic acid D00124-04-9 Adipic acid D00124-04-9 Adipic acid D0003238-40-2 Furan-2,5-dicarboxylic acid D003238-40-2 Furan-2,5-dicarboxylic acid D003238-40-2 Furan-2,5-dicarboxylic acid D003238-40-2 Furan-2,5-dicarboxylic acid D00304-4-3 Caprolactone D00304-4-3 Caprolactone D00304-4-3 Caprolactone D00304-4-3 Caprolactone D00304-4-3 Caprolactone D00304-4-3 Caprolactone D00304-4-3 D0	000077-99-6	
	000097-65-4	Itaconic acid
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0.00105-08-8	000100-21-0	Terephthalic acid
1,4-Cyclohexanedimethanol	000102-60-3	N,N,N',N',-Tetrakis(2-hydroxypropyl)ethylenediamine
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110-94-1 glutaric acid 111-29-5 Pentane-1,5-diol	107-88-0	1,3-butanediol
111-29-5 Pentane-1,5-diol	110-17-8	fumaric acid
	110-94-1	glutaric acid
115-77-5 pentaerythritol	111-29-5	Pentane-1,5-diol
	115-77-5	pentaerythritol

115-84-4	2-buty-2-ethyl-1,3-propanediol
126-58-9	2,2,2',2'-tetrakis(hydroxymethyl)-3,3'-oxydipropan-1-ol Dipentaerythritol
143-07-7	lauric acid
1455-42-1	2,4,8,10-tetraoxaspiro[5,5]undecane-3,9-diethanol,β3,β3,β9,β9-tetramethyl- ('\$PG')
2163-42-0	2-methyl-1,3-propanediol
23235-61-2	2,2'-[oxybis(methylene)]bis[2-ethylpropane-1,3-diol]
2396-61-4	3,3'-oxydipropanol
555-43-1	Glycerol tristearate / glycerol, esters with stearic acid
57-10-3	Palmitic acid
59113-36-9	Oxybispropanediol
67701-08-0	Fatty acids, C16-18 and C18-unsatd.
8001-22-7	soybean oil
8001-78-3	Castor oil, hydrogenated
871-70-5	1,18-octadecanedioic acid
821-38-5	Tetradecanedioic acid

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