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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 [EU List of Authorised Substances: Annex I, Plastics Food Contact Regulation 10/2011/EU, as amended by Regulation 2020/1245/EU, 3 September 2020](#)

0000652-67-5	Isosorbide
0000693-23-2	Dodecanedioic acid
000077-99-6	2,2-Bis(hydroxymethyl)-1-butanol 1,1,1-Trimethylolpropane
000097-65-4	Itaconic acid
000099-96-7	p-Hydroxybenzoic acid
000100-21-0	Terephthalic acid
000102-60-3	N,N,N',N',-Tetrakis(2-hydroxypropyl)ethylenediamine
000105-08-8	1,4-Bis(hydroxymethyl)cyclohexane 1,4-Cyclohexanedimethanol
000107-21-1	Ethyleneglycol
0001076-97-7	1,4-cyclohexanedicarboxylic acid
000108-30-5	Succinic anhydride
000108-31-6	Maleic anhydride
000110-15-6	Succinic acid
000110-63-4	1,4-Butanediol
000110-98-5	Bis(hydroxypropyl) ether Dipropyleneglycol
000111-20-6	Sebacic acid
000111-46-6	Bis(2-hydroxyethyl)ether Diethyleneglycol
000112-27-6	Triethyleneglycol
000112-60-7	Tetraethyleneglycol
000121-91-5	Isophthalic acid
000123-99-9	Azelaic acid
000124-04-9	Adipic acid
000126-30-7	2,2'-Dimethyl-1,3-propanediol Neopentylglycol
0003010-96-6	2,2,4,4-tetramethylcyclobutane 1,3-diol
0003238-40-2	Furan-2,5-dicarboxylic acid
0004457-71-0	3-Methyl-1,5-pentanediol
000502-44-3	Caprolactone
000504-63-2	1,3-Propanediol
000629-11-8	1,6-Hexanediol
001141-38-4	2,6-Naphtalenedicarboxylic acid
008001-79-4	Castor oil
024800-44-0	Tripropyleneglycol
025322-68-3	Polyethyleneglycol
025322-69-4	Polypropyleneglycol
061788-89-4	unsaturated fatty acids dimer (dest.+undest.)
068783-41-5	hydrogenated fatty acids dimer (dest.+undest.)
104-76-7	2-ethyl-1-hexanol
106-14-9	12-hydroxystearic acid
107-88-0	1,3-butanediol
110-17-8	fumaric acid
110-94-1	glutaric acid
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, β 3, β 3, β 9, β 9-tetramethyl- ('SPG')
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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