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Cellulose ethers and their exemption from REACH Registration

The European Regulation (EC) No 1907/2006, REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals), establishes comprehensive requirements for the registration of chemical substances manufactured or imported into the European Union. Under REACH, companies must register substances to continue their production or importation within the European market, unless specific exemptions apply.

Cellulose ethers are a family of polymers obtained through the chemical modification of cellulose, a natural polymer sourced from renewable plant materials. These modifications impart unique properties to cellulose ethers, making them valuable for a wide range of industrial and consumer applications.

Cellulose pulp, the primary raw material for cellulose ethers, is explicitly exempt from registration obligations under Article 2(7)(a) of REACH and is listed in Annex IV, which enumerates substances considered to present minimal risk due to their intrinsic properties. This exemption reflects the extensive knowledge about cellulose pulp and its established safety profile.

Naturally occurring polymers, including unmodified cellulose, fall under the polymer definition in Article 3(5) of REACH. These substances are exempt from registration according to Annex V, paragraph 8, provided they have not been chemically modified and do not meet the criteria for classification as hazardous under the CLP Regulation (Regulation (EC) No 1272/2008).

When cellulose is chemically modified to produce cellulose ethers, the resulting substances still fulfil the definition of a polymer as set out in Article 3(5) of REACH. Consequently, **cellulose ethers are exempt from the requirement to register** under Article 2(9), as long as they are not classified as hazardous according to the CLP Regulation. This exemption is based on the recognition that polymers, due to their high molecular weight and low concern for human health and the environment, generally do not require registration under REACH.

Manufacturers of cellulose ethers within ICA place great importance on the careful selection and thorough assessment of all raw materials and modifying agents used in production. Substances involved in the manufacture of cellulose ethers, such as certain modifying agents, may be subject to registration requirements under REACH, unless they are exempt, for example, by being listed in Annex IV or V, or by being used as intermediates under strictly controlled conditions. ICA members work closely with their suppliers to ensure that all relevant legal requirements are consistently met. This means that users can trust that all applicable regulatory obligations are responsibly observed throughout the entire supply chain.

For users of cellulose ethers produced by ICA members, this approach ensures a high degree of safety and reliability. Manufacturers take care to ensure that their products are not classified as hazardous under the current CLP Regulation, a key prerequisite for the polymer exemption under REACH. Ongoing review and careful documentation help guarantee compliance with all legal requirements. As a result, users can rely on ICA cellulose ethers to be manufactured in accordance with all relevant regulations and to offer a high standard of quality and safety.