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TO WHOM THIS MAY CONCERN

STATEMENT FROM APAG GLYCEROL PRODUCING COMPANIES

Concerns: COMMISSION REGULATION (EC) No 987/2008 of 8 October 2008, amending Regulation (EC) No 1907/2006 as regards Annex IV and V

The purpose of this statement is to clarify the position of glycerol producers with regard to the updated version of Annex V to REACH (Entry 9, P 29-32)

WORDING OF ANNEX V

The following substances obtained from natural sources, if they are not chemically modified, unless they meet the criteria for classification as dangerous according to Directive 67/548/EEC with the exception of those only classified as flammable [R10], as a skin irritant [R38] or as an eye irritant [R36] or unless they are persistent, bioaccumulative and toxic or very persistent and very bioaccumulative in accordance with the criteria set out in Annex XIII or unless they were identified in accordance with Article 59(1) at least two years previously as substances giving rise to an equivalent level of concern as set out in Article 57(f):

Vegetable fats, vegetable oils, vegetable waxes; animal fats, animal oils, animal waxes; fatty acids from C6 to C24 and their potassium, sodium, calcium and magnesium salts; glycerol.

ECHA GUIDANCE DOCUMENT TO ANNEX V

Furthermore, ECHA guidance document further clarifies that:

Glycerol

Glycerol, which is also commonly called glycerine or propane-1,2,3-triol, forms the backbone of triglycerides bound to a number of fatty acids.

Note: This exemption refers to glycerol which is obtained from natural sources as described above. Glycerol manufactured synthetically needs to be registered. (section 9, p 32)

CONCLUSION

As all substances which are in the closed list of Annex V, entry 9, benefit from the exemption of registration – irrespective of the number of steps required to reach /manufacture those substances - Industry concludes that glycerol, whatever the process that is used to obtain it and providing it is from natural sources, is exempt from registration.

Ch De Cooman
APAG Secretary General
On behalf of APAG Glycerol Producers