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Interpretation of REACH for Acetate Tow and Filament

1 Acetate tow

Acetate tow is an article , therefore exempted from REACH*

Reference to REACH legislation:

Art.1(2): "This regulation lays down provisions on substances and preparations within the meaning of Art.3."

Art 3(3): "Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition;"

Obligations:

- European manufacturers of tow have "only" the duties of Downstream Users*
- Importers of tow have no obligations under REACH*

* as all ingredients are not intended to be released and are not substances of high concern (>0,1 % - for listing in Annex XIV).

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2 Acetate filament

Acetate filament is an **article**, therefore exempted from REACH** .

Spin finish, coning oil or size are not considered as substances "intended to be released"; the washing of the fabric does not fulfill the criteria of "intended release".

Reference to REACH legislation:

- regarding articles: see under 1.

- regarding substances in articles:

Art. 7 (1): "Any producer or importer of articles shall submit a registration to the Agency for any substance contained in those articles, if both the following conditions are met:

(a) the substance is present in those articles in quantities totaling over one ton per producer or importer per year;

(b) the substance is intended to be released under normal or reasonably foreseeable condition of use."

Obligations

- European manufacturers of filament have "only" the duties of Downstream Users**
- Importers of filament have no obligations under REACH**

** as all ingredients (>0,1%) are not substances of high concern (for listing in Annex XIV).