

REACH statement

December 2008

In the REACH Regulation a recovered material is considered as a substance that has ceased to be waste and as to any other substance REACH requirements do apply.

In the Guidance of substance identification it is stated that recovered materials may contain unintended constituents, which may have originally been intentionally added, but which have no function anymore and therefore can be considered as impurities, which do not require separate registration.

Constituents present in quantities above 20% should, however, in general not be considered as impurities but as a separate substance which needs registration. This 20% has to be calculated not on the total weight of the recovered material but on the weight of the substance which they refer to.

Rubber recycling is a form of recovery and therefore recycled rubber might be considered as a substance with impurities, more specific as a polymer with impurities.

According to Article 2(9) polymers are exempted from the registration requirements of REACH. Manufacturers of a polymer must submit a registration for the monomer(s) and any other chemically bound substance(s) that have not already been registered by an actor up the supply chain (Article 6(3)).

For recovered substances Article 2(7)(d) provides the exemption from REACH registration requirements if the same substance already has been registered at manufacturing stage, and information on the registered substance is available. **Therefore rubber recyclers are exempted from the obligation to register the monomer(s) or any chemically bound substance(s) provided that these have been registered and data is available.**

Recyclers should however pre-register their substances, even if they can rely on Article 2(7)(d) as soon as their substances have been registered, because it is not sure that registration has already been done before the end of the pre-registration phase. **Pre-registration is necessary in order to benefit from the extended registration time for phase-in substances.**

Rubber Resources B.V.



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Summarised this means that Rubber Resources has pre-registered all monomer(s) from which the polymers in the recycled rubber are derived, constituents present in quantities more than 20% (related to the polymer) and any other substance which still play an intended role in the final product.

Annex I contains a list of substances that are pre-registered by Rubber Resources. Pre-registration numbers are added. By pre-registration of these substances all our recycled products are covered and therefore Reach compliant. This includes butyl reclaim (RBR), all grades Natural rubber reclaim (RNR) and powders (RNM).


Rubber Resources has not the intention to register the substances mentioned in the list, provided that these will be registered at manufacturing stage and information will be available to us.

Additionally Rubber Resources will supply the necessary information by providing a SDS. For recycled materials a SDS may be compiled by use of generic information.


Some recovery related subjects are still under discussion by the European Commission. **Rubber Resources is determined to be REACH compliant at all times. In case new obligations for the recycling industry occur in the future we will handle accordingly.**

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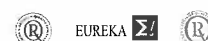


Remy Rousch
Manager R&D

ANNEX I: Substances pre-registered by Rubber Resources

Substance name	CAS #	EINECS #	Pre-registration number
Monomers			
Isoprene	78-79-5	201-143-3	05-2114639261-54-0000
Buta-1,3-diene	106-99-0	203-450-8	05-2114639286-42-0000
Styrene	100-42-5	202-851-5	05-2114306131-71-0000
Isobutylene	115-11-7	204-066-3	05-2114639526-42-0000
Ethylene	74-85-1	200-815-3	05-2114688157-36-0000
Propylene	115-07-1	204-062-1	05-2114639562-46-0000
1,4-hexadiene	592-45-0	209-756-8	05-2114639584-40-0000
Ethylene norbornene	16219-75-3	240-347-7	05-2114639604-46-0000
Dicyclopentadiene	77-73-6	201-052-9	05-2114639623-46-0000
Polymers			
Natural rubber	9006-04-6	232-689-0	05-2114318523-56-0000
Fillers			
Carbon black	1333-86-4	215-609-9	05-2114510577-49-0000
Silica	7631-86-9	231-545-4	05-2114639115-53-0000
Calcium carbonate	471-34-1	207-439-9	05-2114639204-54-0000
Oil			
Residual oils (petroleum), solvent-refined	64742-01-4	265-101-6	05-2114639651-47-0000
Residues (petroleum), vacuum	64741-56-6	265-057-8	05-2114639669-30-0000
Residual oils (petroleum), solvent-dewaxed	64742-62-7	265-166-0	05-2116407615-49-0000
Asphalt, oxidized	64742-93-4	265-196-4	05-2116409851-47-0000
Distillates (petroleum), light naphthenic	64741-52-2	265-053-6	05-2114639708-36-0000
Distillates (petroleum), heavy naphthenic	64741-53-3	265-054-1	05-2114639728-34-0000
Distillates (petroleum), hydrotreated heavy naphthenic	64742-52-5	265-155-0	05-2114639750-47-0000
Distillates (petroleum), hydrotreated light naphthenic	64742-53-6	265-156-6	05-2114639769-28-0000
Distillates (petroleum), hydrotreated middle naphthenic	64742-46-7	265-148-2	05-2114639808-34-0000
Distillates (petroleum), solvent-refined heavy naphthenic	64741-96-4	265-097-6	05-2114639822-44-0000
Distillates (petroleum), light paraffinic	64741-50-0	265-051-5	05-2114644542-51-0000
Distillates (petroleum), heavy paraffinic	64741-51-1	265-052-0	05-2114644614-48-0000
Distillates (petroleum), solvent-dewaxed heavy paraffinic	64742-65-0	265-169-7	05-2114644647-39-0000
Distillates (petroleum), solvent-refined heavy paraffinic	64741-88-4	265-090-8	05-2114644671-48-0000
Distillates (petroleum), solvent-refined light paraffinic	64741-89-5	265-091-3	05-2114644683-43-0000
Distillates (petroleum), hydrotreated heavy paraffinic	64742-54-7	265-157-1	05-2114644694-40-0000
Distillates (petroleum), hydrotreated light paraffinic	64742-55-8	265-158-7	05-2114644705-45-0000
Distillates (petroleum), heavy aromatic	67891-79-6	267-563-4	05-2114644843-43-0000
Distillates (petroleum), light aromatic	67891-80-9	267-565-5	05-2114644871-44-0000
Extracts (petroleum), heavy naphthenic distillate solvent	64742-11-6	265-111-0	05-2114644882-41-0000
Extracts (petroleum), heavy paraffinic distillate solvent	64742-04-7	265-103-7	05-2114644891-42-0000
Extracts (petroleum), solvent-refined heavy paraffinic distillate solvent	68783-04-0	272-180-0	05-2114644905-41-0000
Extracts (petroleum), light paraffinic distillate solvent	64742-05-8	265-104-2	05-2114644924-41-0000
Extracts (petroleum), residual oil solvent	64742-10-5	265-110-5	05-2114644935-38-0000
Extracts (petroleum), vacuum residue solvent	91995-70-9	295-332-8	05-2114644947-33-0000
Other			
Sulphur	7704-34-9	231-722-6	05-2115034738-42-0000

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