

REACH statement

September, 2022

In the REACH Regulation, a recovered material is considered a substance which has ceased to be waste and REACH requirements apply.

For recovered substances, Article 2(7)(d) provides exemption from REACH registration requirements if the same substance has already been registered at the manufacturing stage and information on the registered substance is available.

Rubber recyclers are therefore exempted from the obligation to register the monomer(s) and any chemically bound substance(s), provided that they have been registered and data is available.

Rubber Resources checked the registration of all polymer-derived monomers, constituents present in quantities over 20% and any other substance which still plays an intended role in the recycled rubber. We concluded that all the necessary information is available.

Based on these two findings, Rubber Resources fulfils the conditions described in Article 2(7)(d) and is thus exempted from REACH registration requirements.

This covers all our recycled products which are therefore REACH compliant. This includes all grades of butyl reclaim (RBR), natural rubber reclaim (RNR), truck tire reclaim (RTT) and curing bladder reclaim (RCR).

According to Article 2(7)(d), Rubber Resources is not required to register the recovered substances, neither to make an exposure scenario for the downstream uses nor to notify the use of the recovered substances, even if the use of the recycled rubber is not mentioned in the SDS of the substance at the manufacturing stage.

Rubber Resources will supply the necessary information by providing an SDS. For recycled materials, an SDS may be compiled using generic information and does not require notification of a registration number or an exposure scenario.

Rubber Resources is aware of the notification obligations for substances included on the Candidate List as described in Article 33 and will inform customers where necessary.

Rubber Resources is determined to be REACH compliant at all times. If new obligations for the recycling industry are introduced in the future, we will respond accordingly.

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