



REACH Self-declaration

In the REACH Regulation, a recovered material is considered a substance which has ceased to be waste and therefore 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 Conversion 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 its recycled rubber. We concluded that all the necessary information is available. Based on these two findings, Rubber Conversion fulfils the conditions described in Article 2(7)(d) and is thus exempted from REACH registration requirements. This covers all Rubber Conversion products which are therefore REACH compliant. According to Article 2(7)(d), Rubber Conversion is not required to register the recovered substance, 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 Conversion 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 Conversion 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 Conversion 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.

REACH representative for Rubber Conversion:

Mr Morisco Guido

e-mail: g.morisco@rubberconversion.com

Phone: +39 0442 333 259

RUBBER CONVERSION S.R.L.

Via Per Marco 12/A

38068 Rovereto (TN)

C.F. e P.IVA 02461550226

info@rubberconversion.com

RUBBER CONVERSION SRL

C.F. e P.IVA : 02461550226

Sede Legale: Via Per Marco, 12/C - 38068 Rovereto (TN)

Sede Operativa: Via Sansovino, 3/5 – 37053 Cerea (VR)