EUROPEAN TYRE & RUBBER manufacturers' association

Brussels, 2 November 2008

POSITION PAPER
REACH, 1907/2006/EC

Natural Rubber

The European Tyre and Rubber Manufacturers Association (ETRMA) is fully involved in the implementation phase of the REACH Regulation by supporting with several activities its members and helping them to fulfil the requirements and meet the deadlines laid down in the Regulation.

Following some questions raised by actors in the supply chain of natural rubber, ETRMA considers it necessary to clarify for the sector whether pre-registration and registration obligations of REACH apply to this important raw material.

In this context, ETRMA states that **natural rubber is a naturally occurring polymer** according to the Regulation 1907/2006/EC and the interpretation provided in the guidance on monomers and polymers published by the European Chemicals Agency (ECHA) in March 2008. Therefore, European manufacturers and importers of natural rubber are exempted from any registration provisions under Title II of the Regulation. The following paragraphs elaborate on this definition:

Natural rubber is a polymer

From a chemical standpoint **natural rubber is a polymer** since it complies with all the conditions listed in Art. 3(5) of the REACH Regulation.

In particular:

- Natural rubber is a substance consisting of molecules characterised by the sequence of one or more types of monomer units (called isoprene).
- The molecules of natural rubber are distributed over a range of molecular weights wherein differences in the molecular weight are primarily attributable to differences in the number of monomer units.
- The simple weight majority of molecules contains at least three monomer units which are covalently bound to at least one other monomer unit or other reactant;
- Natural rubber contains less than a simple weight majority of molecules of the same molecular weight.

Natural rubber is a naturally occurring substance

Natural rubber fulfils the definition from article 3(39) as it is not chemically modified.

For clarification, natural rubber is obtained by tapping plants of *hevea brasiliensis*. The extracted liquid contains particles of natural rubber.

This liquid may then be coagulated. The coagulation is a physical process that could involve the use of chemicals, such us acetic and formic acid, to create a specific environment helping the polymers coagulation. The chemicals used for coagulating natural rubber do not chemically modify the natural polymers and they are washed out at the end of the process. Some impurities produced by the tree could remain at trace level in the natural rubber at the end of the process.

Natural rubber does not meet the criteria for classification as dangerous in accordance with Directive 67/548/EEC

In view of the above, ETRMA stresses the fact that Natural rubber is a naturally occurring polymer and as such, no registration obligations apply and therefore no pre-registration is necessary. A specific guidance document has been developed by ETRMA on Natural Rubber treated grades.

For further information contact:

Mrs Fazilet Cinaralp, Secretary General, f.cinaralp@etrma.org
Mr Lorenzo Zullo, Technical Adviser, technical@etrma.org

ETRMA Aisbl
2/12 Avenue des Arts
1210 Brussels, Belgium

Tel +32 2 218 49 40
Fax +32 2 218 61 62
www.etrma.org