

# Rubber Industry Exposure Scenario General Rubber Goods (GRG)

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## COVER LETTER

### Introduction

In accordance with EC Regulation 1907/2006 Registration, Evaluation, and Authorisation of Chemicals (REACH) Article 37(2), a downstream user (DU) has the right to make a use known in writing to the manufacturer, importer, downstream user or distributor who supplies him with a substance on its own or in a preparation with the aim of making this an identified use. In making the use known, sufficient **information shall be provided to prepare an exposure scenario**, or if appropriate a use and exposure category, for that downstream use in the registrants chemical safety assessment.

On behalf of ETRMA member companies as downstream users (DU) of chemicals, and as a supplement to the Use Descriptor communication of 5/11/09, this document provides generic exposure scenarios (GES), and **sector specific information for registrants to perform chemical safety assessments** for substances used within the rubber manufacturing industry. The **formulation/industrial use** of subject chemicals during the rubber manufacturing process are identified in this document.

### Rubber Industry Exposure Scenario

The information provided is assembled based on the CEFIC template for dialog between DU and suppliers created as part of the REACH Guidance on ES development and supply chain communication. The ETRMA document is designed to facilitate specific exposure scenario (SES) development, however, an emphasis has been placed the information required for a **Tier 1 analysis** to develop broad ES inclusive of all facilities.

The ETRMA GES document consists of:

- **Excel workbook “ETRMA GES Template – GRG”**, containing the following sheets:
  - Link to the Use Descriptor communication for the rubber industry
  - Schematic of GRG Manufacturing Process (Formulation and Industrial Use)
  - **GES Data, including: production phases, activities, operational conditions, risk management measures, and a cross-reference to TGD Substance Class usage and**

**concentrations.**

- Risk Management Measure reference sheets
- Environmental emission factors
- Transformation products: non-exhaustive list of publicly available information and reports regarding transformation product substances that are potentially generated as a result of the use of certain substances the rubber industry. It is expected that these transformation products, and any others of knowledge by the registrant, are assessed for applicability in the risk assessment process.

For obtaining substance-specific information, please address your request by email to Lorenzo Zullo ([technical@etrma.org](mailto:technical@etrma.org)), according to the following instructions:

- Subject of the email: “GRG ES: info on [specify CAS and/or EINECS number]
- In addition to the specific request, the body of the email shall contain the following information:
  - Name/company and contact details of the person requesting information (registrant)
  - Name of the substance intended to be registered
  - CAS and/or EINECS number of the substance intended to be registered
  - Contact details of the lead registrant (if applicable) in order to provide updated information when available)
  - Sector: GRG and/or Tyre?

### Next steps following Tier 1 assessment

This collection of data and documentation should be considered as a starting point for exposure and risk assessment work. It is expected to be subject to future modifications and refinement, as further details are still being researched.

It is further expected that registrants of a substances calculating risk characterisation ratios > 1, thus not demonstrating “Safe Use”, as a result of the above data shall contact ETRMA as soon as possible for further discussion on data/information refinement options.

### Contact person at ETRMA:

- Lorenzo Zullo, +32 2 218 49 40, [technical@etrma.org](mailto:technical@etrma.org)

### **Disclaimer**

*The information contained in document is intended for guidance only whilst the information is provided in utmost good faith and has been based on the best information currently available, is to be relied upon at the user 's own risk. No representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.*