

INFORMATION NOTICE 2010/01

Natural Rubber and Latex
REACH, 1907/2006/EC

REACH REGISTRATION REQUIREMENTS Dry Natural Rubber (DNR) and Natural Rubber Latex (NRL)

Natural rubber is a natural occurring polymer

Natural rubber is generated by a polymerization reaction which occurs in nature, more specifically in the e.g. Hevea Brasiliensis, and is obtained as a watery solution by extraction from the bark. From a chemical standpoint natural rubber is a **natural occurring polymer** since it complies with all the conditions listed in Art. 3(5) of the REACH Regulation.

Further details are provided in the ETRMA position paper released in November 2008: [ETRMA Natural Rubber Position Paper](#)

Differences between DNR and NRL

The watery phase of natural rubber contains proteins that originate from the process of natural rubber biosynthesis and are considered as part of the composition of natural rubber.

Once extracted, natural rubber can be coagulated to give Dry Natural Rubber (DNR), or can be worked up towards Natural Rubber Latex (NRL). According to the different process conditions that are undertaken, DNR and NRL shall be considered as two different substances based on their difference in protein content.

Non-isolated intermediates

Regarding the monomers of natural rubber, according to the European Chemical Agency (ECHA, *Frequently Asked Questions about REACH*, Version 3.0.1), "*monomer substance(s) or other substance(s) in the form of monomeric units and chemically bound substance(s) originating from the natural polymer can for practical reasons be treated as "non-isolated intermediates" and do not have to be registered*".

No registration obligations

In conclusion, **no REACH registration is required since both DNR and NRL** fulfil the definition of a natural polymer, and their monomers are considered as non-isolated intermediates.

Substances used to chemically modify DNR or NRL and which are chemically bound within the final polymer, as well as any substance added to improve the performance of the polymer, might need to be registered. Differently, additives necessary to preserve the stability of the polymer are considered to be part of the substance and do not have to be registered.

The ETRMA guidance document released in November 2008 provides specific examples of the most common DNR grades available on the European market and the related REACH obligations: [Guidance Document. Natural Rubber within REACH.](#)

What to do now?

Companies that have pre-registered natural rubber (EC 232-689-0; CAS 9006-04-6) can **de-activate this pre-registration** as there is currently no registration obligation. The pre-registration can be re-activated whenever this would become relevant.

In the absence of registration obligations for both DNR and NRL and according to a recent communication between ECHA and ETRMA, *there is **no reason to split the existing natural rubber SIEF** at the moment. Nevertheless, a splitting of the SIEF could still be accomplished, whenever this would become relevant. The process for doing this is the submission of separate joint registration dossiers for the two substances.*

For further information contact ETRMA:

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Additional references:

- Technical support provided by Apeiron-Team, NV. (<http://www.apeiron-team.eu/>)
- Latex Importers Group (www.rtae.org)

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