

## FOREWORD

The general rubber goods industry is fundamental and yet mostly unknown to the general public as well as to policy makers.

From aerospace to aeronautic, from the depth of the seas to the depth of the earth, from agriculture to household appliances, rubber products are everywhere and serve all kinds of industries, whose products could not function without the often small technical rubber products.

### The industry is characterised

- by high investments in advanced technologies in order to keep up with evermore demanding downstream sectors. These, combined with the characteristics of rubber, make such products strategic, unique and not replaceable.
- by small and medium enterprises. As their products are niche and essential, these companies - despite their size - are often at the centre of a worldwide trading network.

There is not yet a Single Market for a sensitive part of this industry: no harmonised EU framework for rubber products in contact with food and drinking water, or harmonised test methods. This means that different standards apply in different countries and that the industry and consumers cannot benefit from the EU Single Market.

This particular mix of high technology, research and innovation investments, small-sized companies and intensive trading presents a particular set of challenges to the industry.

By sharing these with you, we want to increase your awareness of an industry that is essential and yet often forgotten. It is our hope that its needs will be taken into account and that further and more intensive dialogue can be developed in the future.

Fazilet Cinaralp, *Secretary-General*

## THE ACTIONS NEEDED

### Red Tape

Both EU and national legislation entail a high level of bureaucratic steps to be accomplished. The weight of such procedures, for SMEs, but also for bigger companies organised in small product units, is such that the opportunities that exist cannot be exploited.

In the EU, SMEs can benefit from support under several EU funding programmes managed at national level and reduced fees for EU administrative compliance. However, applying for such funding is often a daunting experience for smaller companies, which do not have internally the necessary skills and workforce.



### ACTIONS

- Facilitate access to funding for SMEs;
- Give access to better credit conditions;

Social Change and Innovation, COSME, Private Finance for Energy Efficiency, Horizon 2020, SMEs Instrument, InnoFin ... these are just some of the funding instruments that the industry could have access to. However, lack of work force and expertise makes the use of these tools particularly difficult for SMEs.



## The regulatory herculian task



**Chemicals legislations:** keeping up with the evolution of the legislation is challenging, especially for SMEs, who have less capabilities to anticipate, assess the impact and adapt in case of new classification of substances. This translates in

the need for more guidelines and support to comply with REACH, Classification Labelling and Packaging Provisions etc..

In 2004, the chemical sector had to comply with 940 regulatory elements. In 2014, these were 2.219.

**Occupational health & safety:** with the European Institutions looking at a review of the EU Strategic Framework on Health and Safety at Work as well as the constant push inside the industry to keep its workforce healthier for the longest possible period of time, this is and will remain a priority for the industry.

**Energy:** great efforts to gain in energy efficiency are eaten up by growing energy prices. Therefore the competitiveness of the industry is challenged. Energy costs constitute 50% of production costs.

**Small volume chemicals:** niche products that require specific chemicals in very small volumes risk not to find these chemicals available on the market as the costs linked to their registration may outweigh the revenues that their sale can generate.

### Not yet a Single Market

Currently there is no harmonised legislation at EU level for rubber products in contact with food and drinking water.



Non homogenous individual national approval schemes, containing a list of safety requirements and related tests to be applied to the final article, exist in various Member States.

Additionally, some countries (such as France, Germany, Italy, The Netherlands, Spain) have adopted specific positive lists of chemicals that are permitted to be used in rubber food contact applications.



### ACTIONS

- Deliver robust impact assessment and evidence-based policy making, taking into account all interlinked regulations (OHS, REACH, resource efficiency, circular economy etc.) and latest scientific evidence.
- Provide assistance to SMEs to comply with increasingly complex legislations.
- Involve the industry as early as possible in the legislative process and provide sufficient transition period and lead time for implementation.
- Support innovation by better protecting IPR and giving support to access third markets.

**ADCA:** certain chemicals that are added to the mix during the production process disappear in the final product. If the use of such chemicals was to be restricted, it would become impossible for EU producers to supply such products in favour of importers, not subject to the same rules. For this reason, it is advisable to manage such chemicals in terms of occupational exposure.

The content of the positive lists varies from country to country and chemicals could be differentiated by categories related to food, contact time, contact area and/or specific shapes.



### ACTIONS

- Build an EU legislative framework for rubber food contact and drinking water materials to the benefit of consumers and the market.



## Difficulty in attracting workforce with the adequate skills



There is the need for a workforce with skills better suited to the industry. This is due both to continuous technological developments and to the need of replacing a highly experienced and yet aging workforce. For this

reason, the sector is faced with the challenge of attracting the best and the brightest.



### ACTIONS

- Invest in management training and internet technologies and overall competitiveness (Industry 4.0)
- Encourage networking between different research innovation centres.

## ACTIONS TAKEN BY THE INDUSTRY WHICH REQUIRE FURTHER INSTITUTIONAL SUPPORT

Innovation and a proactive approach is the direction chosen by the industry to take up these challenges:

- **...through commitment to health and safety:** by developing new and improved materials, remaining at the forefront of technological innovation.
- **...through investments in Industry 4.0:** including automation, 3d printing, big data, robotisation, simulation process, optical and photonic technology... Energy optimisation can also be helped through these changes.
- **...through the use of secondary raw materials, at the condition of a better alignment between REACH, product and waste legislations.** Furthermore, an enhanced partnership in the value chain will help matching the needs of the specific end-applications with better-suited secondary raw materials.

The **SafeRubber** project involved 12 partners from all over Europe including ETRMA to proactively develop a new, safe, multifunctional accelerator curative molecule which can replace thiourea (ETU) based accelerators. In 2013, the mission was accomplished.

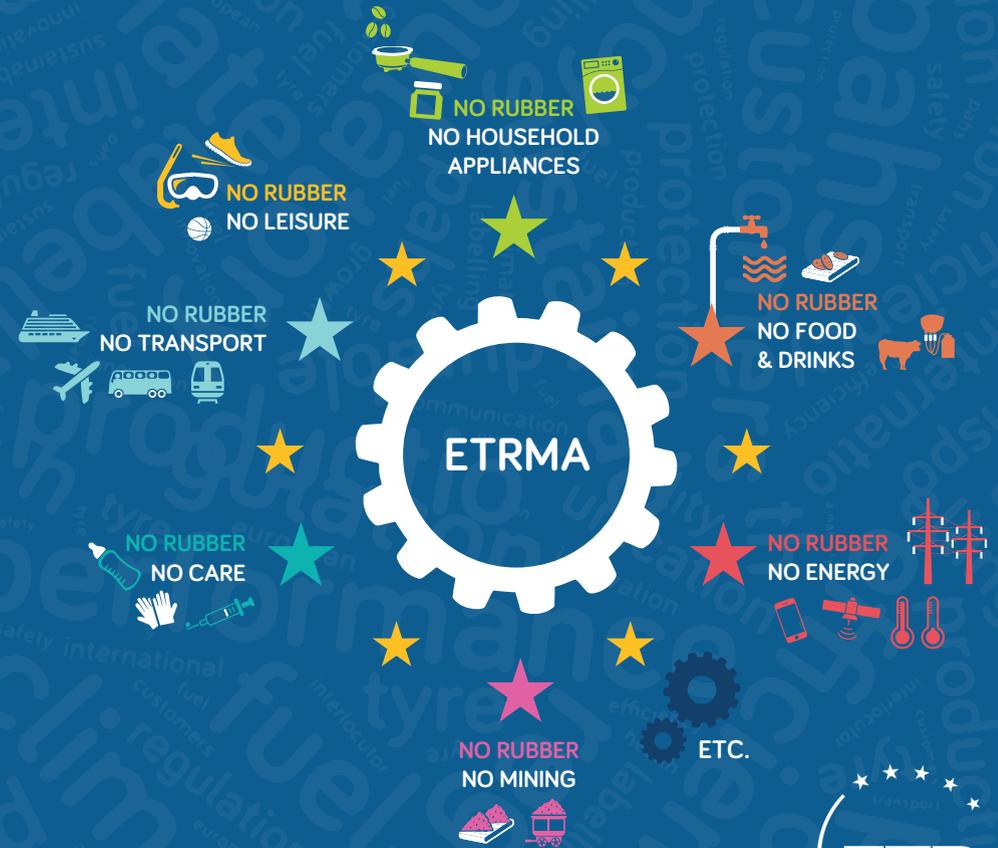
• **...through the establishment of the Automotive Skills Council:** the Council gives the chance to its members to identify the needs of the industry, map possible responses and identify recommendations to policy makers to bridge the skills gap. [www.euautomotiveskillscouncil.eu/](http://www.euautomotiveskillscouncil.eu/)

• **...by investing in innovative education tools:** the industry is not only innovating in terms of production and products, but also looking at new ways (such as MOOCs etc.) to transfer the necessary knowledge to the new generations and keeping the old one up to date.

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Designed by AdGraphics Design Studio (February 2016)

## THE GENERAL RUBBER GOODS INDUSTRY AND ITS CHALLENGES



Rubber is unique,  
strategic and  
not replaceable.



EUROPEAN  
TYRE & RUBBER  
manufacturers'  
association

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