

J. ALLCOCK & SONS LTD
Incorporating
WELLINGTON RUBBER CO. LTD

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REACH REGULATIONS

RUBBER CRUMB COMPLIANCE.

From the onset of the regulations, we liaised with the UK Competent Authority i.e. the H.S.E. to ascertain our commitment under the new regulations. It was suggested that we pre-register all the ingredients contained in a generic, tyre tread formulation.

The "generic" tag was required because, obviously, the tyre producers were not going to give us access to their carefully guarded, secret formulations.

We pre-registered all the ingredients via the Helsinki portal, and received an immediate response from Helsinki direct – "Surely the materials you have pre-registered are the components of a mixture that will produce an article, and so are not liable for registration". This was the response we expected.

The situation is that the original ingredients, not the mixture, are regulated. Even the polymers (rubbers) are not regulated, but their monomers are. If the basic raw materials are regulated, the mixtures and articles made from them must be.

Our position is that the waste stream material we use, has originated from tyres, or the tyre carcass, made by, either national or multinational companies, whose basic, bought in, raw materials will already have been subject to the REACH regulations, via their suppliers, **before** they are incorporated in the tyre material

Even the small independent re-treaders will use bought in tread compound, or pre-cured tread sections, where the same situation will apply.

Our process recycles the materials by size reduction only. No chemical additions are made. Therefore all our grades of Tyre Tread (TT) crumb and granules etc, are REACH compliant.

(The above statement is aimed at tyre tread materials. Within limits, it will also apply to all types of rubber crumb)

Dated: June 2014.

A J Rushton (Managing Director)

N L Challinor (QR)