



Pirelli Tyre S.p.A.

REACH SURVEY - Guidance

DEFINITIONS:

Substance: means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and impurity deriving from the process used.

In line with the above definition and existing guidance documents, a (mono-constituent) substance is a substance in which one main constituent is present at a concentration of at least 80% (w/w) and which contains up to 20% (w/w) of impurities.

Mixture: means a mixture or solution of two or more substances.

Polymer: means a substance consisting of molecules characterized by the sequence of one or more types of monomer units. Such molecules must be distributed over a range of molecular weights wherein differences in the molecular weight are primarily attributable to differences in the number of monomer units. A polymer comprises the following:

(a) a simple weight majority of molecules containing at least three monomer units which are covalently bound to at least one other monomer unit or other reactant;

(b) less than a simple weight majority of molecules of the same molecular weight.

In the context of this definition a "monomer unit" means the reacted form of a monomer substance in a polymer. Monomer: means a substance which is capable of forming covalent bonds with a sequence of additional like or unlike molecules under the conditions of the relevant polymer-forming reaction used for the particular process.

Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.



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Guidance to compilation:

The questionnaire is structured in five sections:

- company data
- substance
- mixture
- polymer
- article

You should first complete the company data section of the form in all parts, including the names of the Legal Representative and REACH Manager.

Then go to the sections relevant to you. Please note that if you are a supplier of mixtures, you should complete both the section "Substance" and the section "Mixture" of the form.

In detail, four different cases are foreseen:

1) Substance

If you are a substance supplier you should complete this section of the form. The data you fill in are valid for all your production factories of the substance, delivering the same to EU28 countries. The questionnaire first, requires you to declare if you sell us the substance as a "pure substance" (this means less than 20 % of impurities) or as a part of a mixture or both. As an example, it is possible that you sell us a "pure substance" or a substance on a chemical support (mixture) or both.

Please indicate CAS and Eines numbers, if available.

If you are not a EU28 supplier, you have to include data of the Only Representative who acts on behalf of you in Europe.

If the registration process of your substance is already completed, fill in the form by answering questions related to SDS, including the exposure scenarios if needed. You will find a precompiled list including the possible uses in the rubber industry, please click on those you indicated in the registration dossier.

If the registration process is still underway, you will have to update the data as soon as the registration process is completed.

2) Mixture

If you sell us a mixture, you must first complete the "Substance" section of the form, detailing all the substances included in the mixture. You should tick "mixture" if you sell us the substance as part of a mixture, or tick "both", if you sell the pure substance and a mixture including it.

If you sell us a mixture that includes a polymer, you should also complete the "Polymer" section of the form, prior to the "Mixture" one.

It is possible that you sell us a mixture containing substances produced by you and/or by another supplier. In this case too, you should first list them in the "Substance" section.



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Secondly you can fill in mixtures in the "Mixture" section of the questionnaire, combining substances or polymers previously inserted in the data-base.

3) Polymer

Even if polymers are exempted by REACH registration you have to provide us with some information according to two subclasses: i) elastomers or ii) other polymeric material.

- i) Elastomers: you should indicate if it is a dry polymer, or an oil extended polymer. If it is a dry polymer, you should indicate in the questionnaire if you (or your supplier) have registered the monomers. In case of oil extended polymer, you should also provide data regarding the extensor oil.
- ii) If you sell a polymer other than an elastomer, you should indicate if it is part of a mixture or not. In both cases it will be asked if you (or your supplier) registered the monomers. If you stated that the polymer is part of a mixture, you should complete the "Mixture" section of the questionnaire, as above specified.

4) Article

This section of the questionnaire must be completed with data on registration of the raw materials and SVHC content.

If you sell to Pirelli substances/mixtures/polymers/articles that are similar, you can easily use the "copy" function available in the List of your Registration.

Please note that in all cases you will be requested to declare that each material sold to Pirelli does not contain any SVHC (Substance of Very High concern) at a concentration higher than 0.1 % w/w (weight by weight).

The SVHC list is available at the following link:

<http://echa.europa.eu/web/guest/candidate-list-table>

The list is timely up-dated by ECHA, so, should any change concerning products you sell us occur, you are kindly requested to up-date your data and communicate it to the Pirelli Reach Manager at the following mail address Reach.Survey@pirelli.com

Should you require any assistance, please contact Reach.Survey@pirelli.com.