Łukasiewicz Industrial Chemistry Institute

BZ/ 36 /2025

Warsaw, 1st September 2025

Recykl Organizacja Odzysku S.A. 6, Fabryczna Str.

22-100 Chełm, Poland

Applies to: REACH Declaration of Conformity

We would like to kindly inform that after reviewing the provided documentation, we declare that the rubber mixtures produced by **Recyki Organizacja Odzysku S.A.**, including SBR GREEN GRAN and GREEN POWDER from the recovery and recycling of rubber tyres, are exempt from the obligation to register substances according to Regulation 1907/2006 (REACH) under Article 2(7)(d). Substances contained in rubber mixtures are considered substances recovered within the European Union. On the basis of the identification tests carried out using spectral techniques, it can be concluded that the composition of the mixtures is the same as the substances registered in the EU at the production stage. In addition, the tests carried out have shown that the rubber compounds do not contain Polycyclic Aromatic Hydrocarbons (PAHs) above a concentration of 0.1 weight % that would affect the classification of the mixtures as hazardous.

Screening analysis of the granules was also carried out, which showed that it does not contain substances of very high concern (SVHCs) above 0,1 weight % listed on the candidate list as of 25 June 2025 (study report No B/119/2025).

Company **Recykl Organizacja Odzysku S.A.** closely follows any changes in the legislation on chemicals, in particular those concerning the supplied products, so that they are placed on the market in accordance with the applicable legislation.

Kierownik Oziału Bezpieczeństwą Chemicznego

mar inż. Paulina Porębska-Sęktas

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