

## REACH (Registration, Evaluation and Authorisation of Chemicals)

*REACH Implementation Issue Group*

### The issue

REACH is a single regulatory system for the Registration, Evaluation and Authorisation and Restrictions of Chemicals, whether new or existing. It came into force on 1 June 2007 and supersedes all existing legislation.

Most of the requirements concern producers, manufacturers and importers, but downstream users also need to fulfil certain obligations. The pulp, paper and tissue industry are amongst others affected by REACH as a downstream user of substances, as an importer and producer of articles, and as a producer/manufacturer of by-products/intermediates. Cellulose pulp is exempted from the obligation to register and recycled pulp will not be affected as it does not contain hazardous substances above the established concentration limit. The Waste Framework Directive is still under revision and will have its influence on recovered paper, following EU law currently considered as waste and as such outside the scope of REACH.

### Impacts on the industry

The price of chemicals is expected to increase by 2-5%. Some chemicals will be withdrawn from the market, requiring process changes. Workloads in the mills will increase by around 1 man-year per mill.

The pulp and paper industry is required to have data readily available proving that the potential presence of a substance of very high concern in an article is below 0.1% (w/w).

By-products such as tall oil, turpentine, tall soap that are marketed or transported between two legal entities need to be registered by 2010. Process "waste", such as ash, sludge, dregs, etc., that is marketed may also need to be registered by 2010 (depending on Member State implementation of the European Waste Directive). In a typical pulp mill/company, approximately four substances will need to be registered. This will cost some €1.6 million per company and involve a lot of manpower, although these costs can be shared between registering companies in consortia.

Under REACH, our industry will have to present information to suppliers on the intended use of the chemical substances they deliver so that the supplier can foresee the appropriate exposure scenario (ES). If a downstream user (DU) does not want to pass on the use of the chemical to the supplier (e.g. confidentiality), the DU will be responsible for the ES.

### CEPI's position

CEPI developed a guidance document for the implementation of the Regulation in the pulp and paper industry, available on the members only section of the CEPI website. CEPI went through the preparatory exercise for joining existing consortia (for non specific pulp and paper industry substances) and the formation of own consortia (for specific pulp and paper industry substances) and this towards registration. Meanwhile, interim co-ordinators and a task force were appointed to for all substances (except one) that could be produced by a mill. These interim co-ordinators and the task force are taking the next steps leading to joining existing consortia and the formation of own consortia. The consortia management and registration itself will most likely be outsourced. It is now up to the legal entities involved - who are taking the lead on this issue - to make an agreement.

CEPI is member of the REACH Alliance and involved in the drafting of the Commission Technical Guidance Documents for the implementation of REACH.

REACH is tied up with the waste directive review, so further communication will be needed to secure the best outcome for our industry. Under the current waste directive, recovered paper is considered as waste and beyond the scope of REACH. Recovered paper might become a product under REACH when the new waste directive is in place in 2008. Our current interpretation is that this will not have a major impact on the use of recovered paper, though, as recovered paper could be imported as waste. CEPI is currently giving input to the Commission services to have recovered paper being accepted as "cellulose pulp, including impurities" which would also make it exempted from registration when falling under REACH (not being waste anymore). The revised Annex IV will maintain to include "cellulose pulp" (exempted from registration).

CEPI's current objective is to successfully introduce the implementation of the REACH Regulation across our industry while addressing the need for information on chemicals used in papermaking.

### Additional information

- ENV/089/07: CEPI-ETS guidance document for implementing REACH in pulp and paper industry
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