

## Customer Requests – CEPI recommends use of harmonised disclaimers for voluntary declarations in the European pulp and paper industry

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Companies are experiencing, in their daily customer contacts, requests for various declarations, frequently related to non-relevant topics and often totally misplaced. Answering such requests can cause misunderstandings with customers.

In order to help companies give responsible and harmonised answers to their customers CEPI recommends a set of standard disclaimers (**see annex**), to be routinely used depending on the type of request and on the individual discretion of each company. These disclaimers are recommended to be used routinely when signing declarations in reply to those requests, by inserting them in the declaration document. Using the same disclaimers across the pulp and paper industry will reduce the pressure of making unsubstantiated declarations and reduce reputation risks as well as the risk of possible financial claims for individual companies and the sector as a whole.

- i. **These disclaimers are not intended to be used when such declarations of compliance are mandatory (required by law).** These shall be prepared and issued mandatorily, following the forms and ways of releasing them as the legislation requires.
- ii. **These disclaimers are intended to be used for voluntary declarations** regarding statements attesting to the compliance with specific legislation or with qualitative and technical adaptations to non-binding technical standards. For such requests for voluntary declarations, three standard disclaimers are recommended by CEPI:
  - a. **Issuing a declaration on the absence of certain substances**
  - b. **Refusing a declaration of compliance with non-relevant legislation**
  - c. **Issuing a declaration of compliance with non-relevant legislation**

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### Additional information

#### CEPI aisbl - The Confederation of European Paper Industries

The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit organisation regrouping the European pulp and paper industry and championing industry's achievements and the benefits of its products. Through its 18 member countries (17 European Union members plus Norway) CEPI represents some 520 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 950 paper mills. Together they represent 24% of world production.

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## Annex : Disclaimers

1. Requests that may be relevant to our sector, but which are made in a form that is neither in line with legislation nor with scientific common sense. The most frequent case to be considered is a request to declare the “absence” of certain chemicals, whilst the applicable legislation sets a specific limit or no limits are set at all. The voluntary release of such declarations should be accompanied by the following disclaimer:

**With reference to the present declaration, ‘absence’ means that the final product may contain substances that were in the incoming raw materials as traces or impurities and were not intentionally added during the pulp and papermaking process.**

2. Requests related to declarations that are totally irrelevant to our sector<sup>1</sup>. In case the company decides not to release any declarations, the following disclaimer should be used:

**The declaration that has been requested cannot be released, as it concerns<sup>2</sup> [(for example) the restrictions on the content of the chemicals listed in the Directive 2002/95/EC, the so called ‘RoHS directive’, on the use of hazardous substances in electrical and electronic equipment.]**

**This legislation is not applicable to pulp and paper products.**

3. In case the company nevertheless decides to voluntarily release a declaration where the request is related to legislation or standards that are not relevant to pulp and paper, the voluntary release of such declarations should be accompanied by the following disclaimer:

**Where the present declaration refers to legislation or a standard in which this product is not included in the scope, ‘compliance’ means a declaration of intent by the manufacturer, whereas there are no legal means to formally comply due to the limitations set by the scope of the referred legislation or standard. ‘Absence’ means the final product may contain substances that were in incoming raw materials as traces or impurities and were not intentionally added during the pulp and papermaking process.**

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<sup>1</sup> A typical example is the declaration on the compliance with the restrictions on the chemicals listed in Directive 2002/95/EC (RoHS Directive) regarding the use of hazardous substances in electrical and electronic equipment. Naturally, such declarations are mandatory in special cases where the product is used for electronic applications.

<sup>2</sup> Insert the reference and scope of the legislation or standard relevant to the request.