

Facts about Paper Recycling

Press Release 4/2008



Deinkers' soaps stay out of the reach of REACH:

No soap registration needed for paper recycling

The **soaps** produced and used in the deinking process **do not have to be registered** within the REACH process. This has been confirmed to INGEDE by the German Federal Institute for Occupational Safety and Health (BAuA). In a recent statement regarding the revision of Commission Regulation (EC) 987/2008, Claus Haas of BAuA states that *"according to Annex V in accordance with Article 2(7)(b) certain fatty acids with an alkyl chain length between C₆ and C₂₄ obtained from natural sources as well as their sodium, potassium, calcium, and magnesium salts do not have to be registered according to REACH Directive (EC) 1907/2006 if they have not been chemically modified."*

In general, **all chemical substances** exceeding one ton per year used in a production process have to be registered. Several rules and exemptions apply e. g. for non-isolated process intermediates, certain uses and certain substances. Annex IV lists "well-known substances" like oils and a number of fatty acids. Annex V lists substances for which registration would be inappropriate like naturally occurring substances.

INGEDE succeeded in convincing CEPI that the registration of soaps is **not needed** and that there had been contradictions in the REACH annexes. Now the EC has changed the Annexes IV and V. Still the wording in the Annex V left some small uncertainties. INGEDE has asked therefore the German REACH helpdesk for an official statement for its members.

The **full text** of the answer and the English translation are available on the INGEDE website.

Recovered paper also exempt from registration

Recovered Paper and the sorting of "waste" paper also seems to be out of the reach of REACH. Recovered Paper can be defined as cellulose fibre material listed in Annex IV.

At a conference on October 30th in Düsseldorf, Otto Linher of the European Commission, DG Enterprise, towards the *German Association for Secondary Raw Materials and Waste Disposal (bvse)* expressly pointed out that recovered paper does not have to be registered.

Draft guidance on REACH Annex V exemptions

The European Commission has taken the unusual step of publishing a draft guidance document to further explain Annex V of the REACH regulation only a few days after the publication of the

changes in the annex. This guidance can also be downloaded from the INGEDE website.

German Paper Industry Association (VDP) recommends registering sludge and ashes

All residues of the deinking process can be classified as waste. All kinds of waste are exempt from REACH. Biogas produced in the mill is an exemption according to Annex V. If the residues leave the mill as waste rather than as substance, there is no need for registration.

Still it could be of advantage in the long run to pre-register ash and sludge in order to keep all possibilities open. Then no problems will occur in marketing the residues as substances if such a possibility comes up in the future. VDP recently recommended this practice to its members.

INGEDE is an association of leading European paper manufacturers founded in 1989. INGEDE aims at promoting utilisation of recovered graphic paper (newsprint, magazines and office paper) and improving the conditions for an extended use of recovered paper for the production of graphic and hygiene papers.

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This press release can also be found in the internet: www.ingede.com.

More information and links to the relevant documents are available there.