

CARTIERE DI TREVI



BORGO TREVI 01/12/2008

TO ALL CUSTOMERS

RE: FULFILMENT BY THE PAPER MILLS OF THE REACH REGULATIONS

Following the expiry of the first fulfilments in compliance with the Reach Regulations we hereby inform customers that with regard to the paper mills that produce industrial paper using pulping paper raw material do not have any specific obligations under the Reach Regulations, since these already utilize a recycled material (pulping paper classified as UNI EN 643) to produce the article (paper); in fact, as we all know, the REACH regulations expressly exclude waste materials within the field of application and it does not make any reference to secondary raw materials (amongst which pulping paper) which does not consist of a waste material. In fact, the EU Commission indicates in its interpretation of European regulations that since the cellulose paste is exempt from registration, also pulping paper is exempt from registration (the Commission however suggests a pre-registration of the recycled materials; the cellulose paste is anyway exempt also from pre-registration). Other components should, instead, be considered if singularly present and for these, the selection Platform must verify that requisites of art. 2.7d of the regulations are met, the Platform must keep a copy of the substance safety form (the document has clarified that a substance safety form compiled by the producer of the substance is sufficient).

We have asked all our suppliers of pulping paper evidence of the occurred evaluation of the need to pre-register.

With regard to chemical products which we use as adjuvants in the production of the same (which however constitute a percentage inferior to the unit on the finished product) stressing that all products supplied to us, in compliance with the REACH regulations, are provided with relative safety form. Updates of the latter have been requested from our suppliers.

With best regards,

Environment and Safety Officer
Dott.sa Daniela Dari