

Secondary raw materials should be exempt from REACH

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Secondary raw materials, such as ferrous scrap, should not come under the provisions of REACH (Registration and Evaluation of Chemicals), the European Commission's (EC) proposed chemicals legislation, Ross Bartley of the BIR said on Monday.

"Legislators may consider that all things are either 'waste' or 'product', but that does not mean that all things are either 'waste' or REACH," Bartley said in a paper prepared for presentation at the BIR (Bureau of International Recycling) autumn convention in Brussels.

He said that ferrous scrap is essentially a substitute for iron ore, and is neither a waste, nor in the scope of the REACH legislation. It should not be covered by REACH, as it is an intermediate product used to produce another material, and it goes into installations, such as steel works.

It was arguable how much evaluation is required for ferrous scrap, and it is always melted in a furnace at over 1,500 Centigrade.

"Let's not make REACH too big to handle – remove scrap metals from the scope of REACH," Bartley said.