

PRESS RELEASE

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BIR Autumn Round-Table Sessions Düsseldorf, 30-31 October 2008

International Environment Council: **REACH and its implications for the recycling industry**

Olivier François of Galloo Group is taking up the chairmanship of BIR's International Environment Council (IEC) at a highly promising moment in time for the recycling industry, he confirmed to delegates in Düsseldorf. The new EU Waste Framework Directive "gives us the possibility to have a view on end-of-waste status (for recyclables) after 30 years of effort", he declared. "If end-of-waste status is available in the medium term, it will mean we are selling substances."

The IEC meeting was subsequently devoted almost entirely to the EU's regulation on the Registration, Evaluation and Authorisation of Chemicals (REACH), the aim of which is to make persons placing chemicals on the market responsible for understanding and managing the risks associated with their use. Mr François underlined the importance to recyclers of pre-registering their substances with the European Chemicals Agency (ECHA) by December 1 2008. "We have to be on the safe side," he explained. "This will give us two years to prepare for the future."

Chemical substances on their own, in preparations and those which are intentionally released from articles must be registered with the ECHA. The regulation applies to substances manufactured in, or imported to, the EU in annual quantities of 1 tonne or more per company, unless the regulation indicates otherwise.

The European Commission has recently reiterated the need to pre-register recovered substances that have ceased to be waste under the EU's REACH regulation by the start of next month. Companies who pre-register their substances can benefit from the extended registration deadlines noted by Mr François.

REACH provides relief for recyclers by exempting from registration recovered substances that have been registered before. But since there is no certainty that registrations would have already been completed by December 1 this year, final recovery installations are being advised to pre-register their manufactured substances in order to cover their activities until registration of those substances has taken place.

Pre-registration is a simple, free-of-charge procedure and requires provision of only limited data such as contact details, name of substance and tonnage band, it was stressed in Düsseldorf by guest speaker Kees Wielenga of Netherlands-based FFact Management Consultants. And he urged recyclers not to wait until the final available day before pre-registering because website access could be slow.

Dr Otto Linher, Head of Sector at Unit G.1 REACH within the European Commission's DG Enterprise and Industry, used his own guest speech and a subsequent question-and-answer session to tackle some of the complex issues surrounding this regulation. In terms of specific materials, he noted that pure metals such as iron are substances under REACH even if containing impurities, whereas alloys will normally be regarded as preparations.

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