



October 2012

Information of Cumberland Packaging paper producers relating to REACH

REACH has an impact on all producers and importers (into EU) of chemical substances in volumes > 1 ton / year and legal entity. Furthermore REACH has an impact on downstream users of chemicals.

Registration

Cumberland Packaging is mainly affected by REACH as downstream users of chemicals.

Cellulose pulp, which is the main raw material for paper and board, is especially exempted from registration according to Annex IV and Annex V, point 8 "substances occurring in nature, if they are not chemically modified".

The chemicals that we use in our industry are normally not pure substance but preparations. Many of our suppliers are formulators (downstream users) of chemical preparations, without registration obligations. The manufacturer or importer of the "pure" substance has the registration obligation.

We have asked our suppliers whether the substances they supply will be registered. We have received confirmation that our suppliers will ensure timely implementation of REACH. We don't foresee any substantial changes in the quality of our supplied papers due to REACH.

Substances in articles

Paper is an article in terms of REACH, and the chemicals used in the manufacturer are consequently "substances in articles".

As manufacturers of corrugated products, we are impacted by Article 7, "registration and notification of substances in articles".

The demands, in Article 7, which are relevant to us, imply that we need to consider whether our papers contain substances, meeting the criteria in Article 57, and identified in accordance with Article 59 (1), in concentrations above 0.1%, and the total amount of the substance is > 1 tonne / year. If both criteria are met the European Chemicals Agency (ECHA) must be notified.

The substances as defined in Article 57 are:

- Substances classified as Carcinogenic, Mutagenic or toxic to Reproduction (CMR), meeting the criteria for classification in category 1 or 2 in accordance with the directive 67/548/EEC. This directive was recently replaced by the new EU regulation (EC) No 1272/2008 on classification, labelling and packaging of chemical substances and mixtures, the so-called CLP Regulation. According to the new CLP Regulation these substances shall be classified as 1a or 1b.
- Substances which are persistent, very persistent, bio accumulative, very bio accumulative and toxic in accordance with the criteria set out in Annex XIII of REACH (PBT, vPvB substances);
- Substances for which there is scientific evidence of probable serious effects to human health or the environment.



These substances are potential Substances of Very High Concern (SVHC) and the use of them might eventually need authorization from ECHA.

The EU member states will continuously recommend substance to be evaluated and, possibly, included in the SVHC-candidate list. The consequence is that the presence of SVHC in products must continuously be assessed.

The increased demands on paper in food contact and more rigorous environment regulations (e.g. Directive 94/62) in recent years, has put the focus on the use of chemicals. An action to minimise the use of hazardous chemicals has already started.

The in-depth survey carried out in all paper suppliers to Cumberland Packaging, based on the information received from our up-stream chemical suppliers, permits us to state that, to the best of our knowledge, the papers that we manufacture, do not contain, in a concentration above 0.1%, substances on the latest SVHC candidate list (follow the attached link):

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

Cumberland Packaging will follow the development of the SVHC candidate list actively and assess all our products accordingly.

If, in the future, we should discover that chemicals, containing SVHC in concentrations above 0.1%, are used in our mills, we will immediately inform the customers and without delay look for better alternatives.

For more information please contact the undersigned.

Yours sincerely

John Watson
Managing Director