



EUROPEAN COMMISSION  
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL  
Chemicals, Metals, Forest-based & Textile Industries  
ENTR.G.1 – REACH

DIRECTORATE-GENERAL  
ENVIRONMENT  
Directorate D - Water, Chemicals & Cohesion  
ENV.D.1 - Chemicals

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Brussels,  
ENTR/G/1/MAM/mm D(2008) 31286

Dear Madam or Sir,

Further to your remarks on our paper concerning waste and recovered substances, we would like to inform you about the discussion of that paper at the meeting of the REACH Competent Authorities (CA) on 25-26 September.

In particular we want to highlight that the meeting did not call into question the need to **pre-register recovered substances that have ceased to be waste** according to the Waste framework Directive, except in cases where the exemption from registration for recovered substances in Article 2 (7)(d) of REACH can be justified (see Section 3.2 of document CA/24/2008 rev.1). Pre-registration provides legal security that manufacturing, placing on the market and using the substance can continue until the relevant registration deadlines. We would ask to you to continue your efforts to ensure that your members are aware of this.

The Commission services are currently finalising the paper including the comments provided at the CA meeting. The final document will be uploaded on the relevant Commission websites and it will then be handed over to the European Chemical Agency (ECHA) for incorporation into future updates of the relevant guidance documents.

We would like to thank you again for your constructive contribution to the paper.

Yours faithfully,

Graham Willmott  
Head of Unit

Astrid Schomaker  
Head of Unit