

The majority of the Member States and stakeholders agreed with the lines taken in the document, in particular the need to pre-register recovered substances once they reach the end-of-waste status. However, the following concerns were raised at the REACH CA meeting on 25 and 26 September 2008:

- Some Member States considered that more examples of waste streams should be developed and included in the revision of the guidance documents.
- Some Member States expressed concerns that the registering obligations may discourage recovery activities. This may conflict with some waste recovery targets.
- Most recovered substances will benefit from exemptions, at the latest once the substance has been registered. However, companies dealing with recovered substance have difficulties to verify whether the substance has been pre-registered or registered. Pragmatic approaches are necessary.
- For some recovered substances, it can be difficult to find an appropriate EINECS number.