



General Assembly

Milan

May 15th 2025 – 8:30/12:30

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Utipulp

Agenda of the meeting

Introduction (Chairman)

- Welcome
- Legal guidelines for attending UTIPULP meetings
- Approval of the minutes of the last meeting (Barcelona, September 12th, 2024)

Market analysis

- Consequences of the tariffs applied by the US (if any) (PA Lacour, All)
- Synthesis of the questionnaire pertaining to pulp supply (PA Lacour)
- Report from the National Associations delegates (All)
- UTIPULP statistics

General Trade Rules/Position of EPIS

Special Subject Dossiers

- EPIS request on the standardization of sustainability questionnaires (Chair, PA Lacour)
- UTIPULP request on the standardization of the technical sheets for pulp
- Extended Producer Responsibility on bales wires

EUDR Developments

- Status of the file
- Next steps

Association Topics/Excom Composition

- Accounts 2024
- Budget 2025
- Excom Composition

Any other business

Close out (Chairman)

- Date & location of the next meeting
- Close

Introduction

Welcome

New delegates

- **Dieter DONY** (GLATFELTER)
- **Christophe SCHLINKMANN** (WEPA)

Guests

- **Teresa GARGIULO** (ASSOCARTA)
- **Massimo RAMUNNI** (ASSOCARTA)
- **Alexandre VIGNON** (SAPPI)

Introduction

Legal guidelines for attending UTIPULP meeting

- The chairman recalls the main requirements of the guidelines. Guidelines are available at any time during the meeting

Approval of the minutes of the last meeting

- Barcelona, September 12th, 2024

Market Analysis (US tariffs)

US Tariffs

- **On 3 April:** USA applies tariffs of 20% on all imports from **Canada and Mexico**, except for goods covered by the regional trade agreement. Pulp is mentioned in this trade agreement. At the present time, there are consequently no tariffs between the USA and Canada on pulp.
- **On 5 April:** the US applies tariffs of 10% on all imports from **all trading countries**.
- **On 9 April:** USA decides to apply “reciprocal tariffs” on all imports from **all trading countries (including EU, Brazil etc.)**. Different rates are considered, but the rate is 20% for pulp and paper from the EU countries.

Market Analysis (US tariffs)

US Tariffs

- **On 9 April:** USA decides a 90-day pause on the “reciprocal tariffs”.
- Consequently, **at the present time:**
 - Pulp and paper products imported by the USA from the EU have a tariff of 10%.
 - At the end of the 90-day (9 July), the tariff will become 20%.
- **On 12 May,** top U.S. officials said that America and China will both substantially cut reciprocal tariffs targeting each other. The announcement goes some way toward deescalating U.S. tariff war. The U.S. will cut tariffs on Chinese imports from 145 percent to 30 percent, while the Chinese side will drop measures from 125 percent to 10 percent.

Market Analysis (US tariffs)

EU Retaliation

- **On 14 April:** the European Commission unveiled a set of “rebalancing measures” via regulation 2025/778. This regulation plans to implement a 25% tariff on **mechanical pulp** (no other pulp grades are mentioned) as of 16 May.
- **On 14 April:** the European Commission unveiled a regulation (2025/786) suspending until the **14 July** the duties on US goods.
- **On 8 May,** the European Commission upped the pressure in the trade conflict by proposing a list of US goods (worth nearly €95 billion of trade) for potential retaliatory measures. No tariff is mentioned yet. The list is put to **consultation until 10 June. This list is additional to the one set on 14 April.**

Market Analysis (US tariffs)

EU Retaliation

This **draft list of US goods includes many pulp grades:**

- thermo-mechanical wood pulp, not chemically treated (47010010)
- dissolving pulp (47020000)
- **unbleached coniferous** chemical wood pulp, soda or **sulphate** (excl. dissolving grades) (47031100)
- **unbleached non-coniferous chemical** wood pulp, soda or **sulphate** (excl. dissolving grades) (47031900)
- semi-bleached or **bleached coniferous** chemical wood pulp, soda or **sulphate** (excl. dissolving grades) (47032100)

NB:

- sulphite pulp is excluded (CN 4704)
- fluff pulp is included: under CN code 47032100 (It is estimated that 75-95% of US imports consist of fluff pulp)
- Pulps of fibres derived from recovered (waste and scrap) paper or paperboard or of other fibrous cellulosic material (CN 4706) are excluded

Market Analysis (US tariffs)

Impacts of US tariffs already noted

- Most of the respondents observe no impact.
- But 40% of respondents indicate that the recent U.S. announcement on tariffs has already had an impact on the pulp market.
- Regarding the noted impacts:
 - Some report that orders from the U.S. have been cancelled, leading to a reduced need for pulp in Europe.
 - Some companies adopt a cautious approach and hesitate to commit to new shipments.

Market Analysis (US tariffs)

What future impacts?

- Many respondents anticipate a positive effect on pulp supply in Europe.
- More volumes, particularly Nordic softwood pulp, will remain on the European market.
- Despite these views, a minority of respondents believe the tariffs may not lead to major changes.

Market Analysis (US tariffs)

Need for a retaliation on imported pulps from the US?

- Possibility of fluff pulp supply disruptions.
- When asked whether they would agree with the EU applying tariffs to other pulp grades (such as chemical pulp or CTMP) in the future, 53% of respondents would agree, while 47% would not.

Market analysis (Outcome of the survey)

- The UTIPULP Secretariat sent an on-line questionnaire to all the delegates (representing companies and national associations).

UTIPULP market questionnaire

Dear Member,

In preparation of our next meeting, on Thursday May 15 in Milan, please find below a short questionnaire.

isabelle.copacel@gmail.com [Changer de compte](#)

Non partagé

Name

Votre réponse

Regarding your pulp supply, has the situation improved or worsen since the last meeting (September 2024)?

☐ strong improvement

☐ slight improvement

☐ steady

☐ slight deterioration

☐ strong deterioration

In H2 2025, according to you forecasts, will the pulp supply improve or worsen?

☐ strong improvement

☐ slight improvement

☐ steady

☐ slight deterioration

☐ strong deterioration

Please specify the reasons of your forecast.

Votre réponse

What key changes will influence pulp consumption in your country during the 12 coming months (new paper mills/capacities, closures...)?

Votre réponse

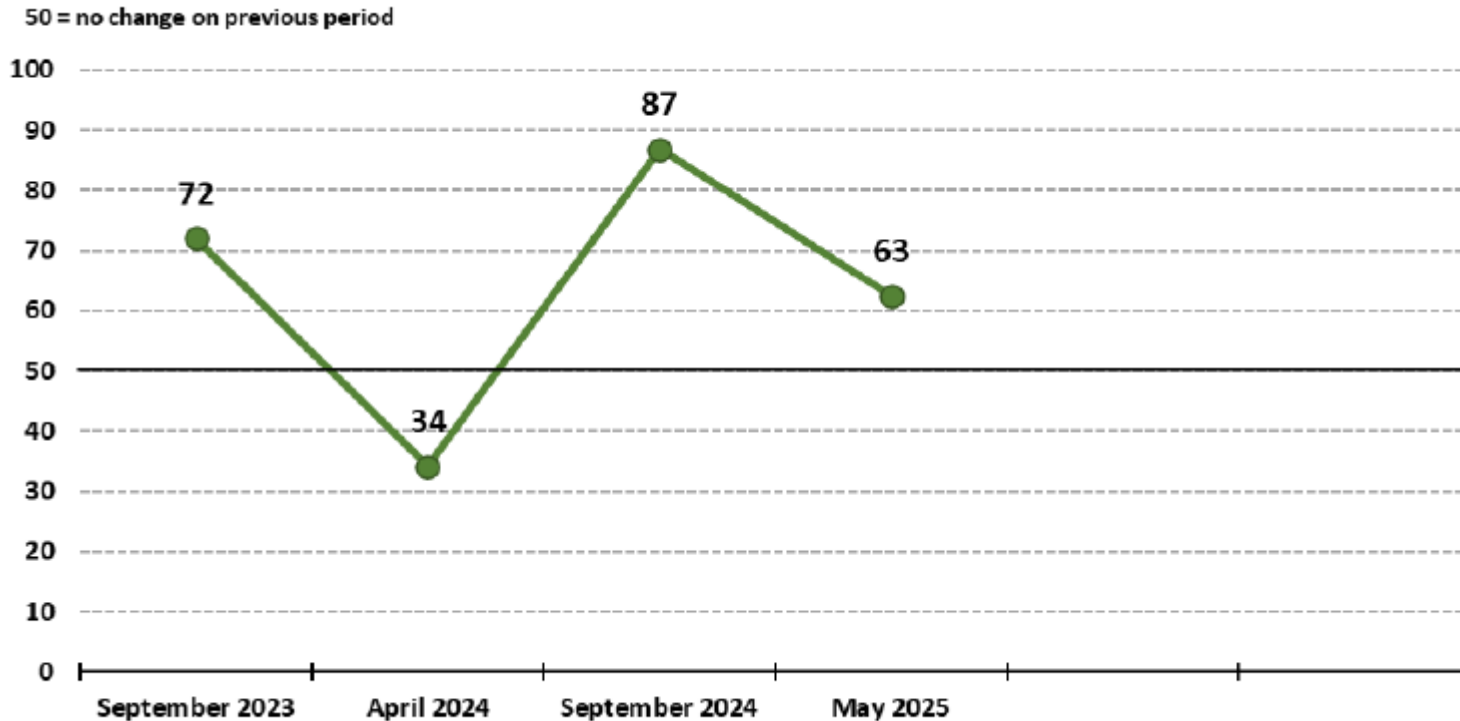
Market analysis (Outcome of the survey)

Index Calculation

- The value of each index is calculated using the following formula: **INDEX VALUE = 1 x (% “strong improvement”) + 0.75 x (% “slight improvement”) + 0.50 x (% “steady”) + 0.25 x(% “slight deterioration”) + 0.0 x (% “strong deterioration”)**
- The resulting index values are therefore bounded between 0 (all companies respond strong deterioration) and 100 (all companies respond strong improvement), with a theoretical no-change mark at 50 (all companies respond “steady” or equal proportions respond up as do for down).
- Index values above 50.0 indicate improvement and below 50.0 report deterioration.
- The index will be reported on a curve that will give a long-term vision.

Market analysis (Outcome of the survey)

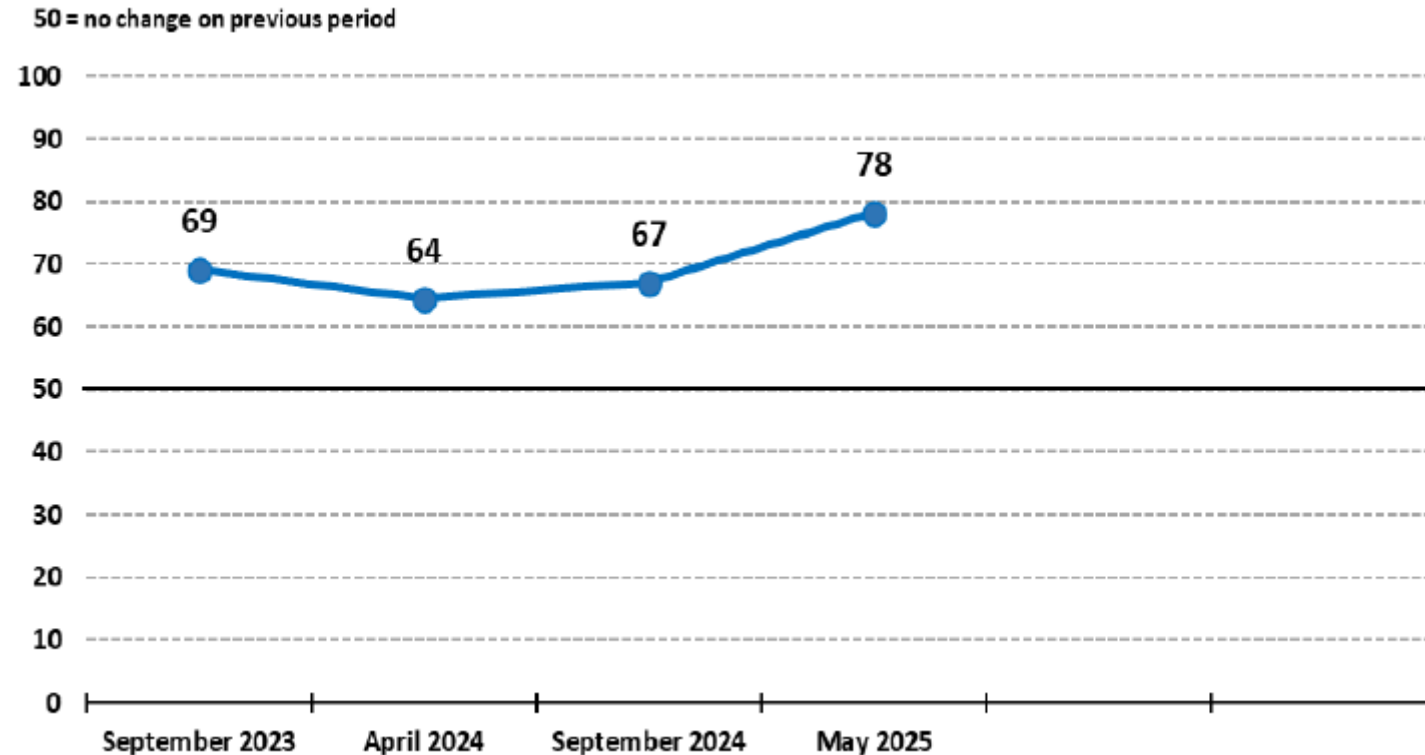
UTIPULP market index (past period)



- 17 answers have been received.
- Compared to April 2024, respondents have experienced a slight improvement of the pulp supply conditions.

Market analysis (Outcome of the survey)

UTIPULP market index (forecast)



- Respondents anticipate an improvement the pulp supply conditions (the index is above 50). Answers are a little more optimistic compared to April 2024, but with no real difference.

Market analysis (Outcome of the survey)

Synthesis of the questionnaire pertaining to pulp supply

- Most of the respondents report an oversupply of pulp and a low consumption.
- Regarding the pulp supply:
 - Production capacity of pulp has been steadily increasing over recent years.
 - Multiple maintenance shutdowns in South America are ending.
 - Sharp decline in Chinese demand.
 - Nonetheless, as pulp costs remain extremely high for Nordic suppliers.
- Regarding the pulp demand:
 - Weakening demand across all major regions.
 - Strong drop in Chinese demand.
 - Uncertainty around potential US tariff developments.

Market analysis (Outcome of the survey)

TOUR DE TABLE

General Trade Rules/Position of EPIS

- During the UTIPULP General Assembly that took place on 13 September, the Secretary General of EPIS, Ana Maija Wessman (accompanied by Kirsi Seppäläinen from Stora Enso), announced that this association had decided unilaterally to repeal the GTR.
- UTIPULP and market pulp buyers expressed dissatisfaction on this decision during the meeting, and in the following weeks.
- On 1 October, Ana Maija Wessman contacted UTIPULP to have a discussion on the GTR.

General Trade Rules/Position of EPIS

- After an internal meeting within the EXCOM, an on-line meeting that was organized on 31 October between EPIS and UTIPULP about the GTR
- During, this meeting, EPIS explained the following as regards the GTR:
 - On the one-hand, companies selling and buying pulp still have the possibility, if they wish so, to refer to the General Trade Rules (as a whole or partly), according to their individual commercial policy.
 - On the other hand, EPIS has explained that, for legal reasons, and more specifically for **compliance with the antitrust legislation**, they will not continue discussing the content of this document in the framework of the association.
- This change in the position of EPIS has been circulated to members on 6 November 2024.
- **In reality, based on preliminary discussions with a lawyer, it seems perfectly allowed that EPIS and UTIPULP update the GTR (if so desired).**



Special Subject Dossiers

UTIPULP request on the standardization of the technical sheets for pulp

- Following a survey carried out in November 2024, UTIPULP Secretariat gather the “top 8 parameters” to be included in in all the Technical Data Sheets (TDS).
- UTIPULP has sent this list of parameters in November to EPIS, with the request that:
 - for one given parameter, **the units of all the TDS are the same** (there are sometimes some variations between g and kg for instance),
 - **standards for measurements are also the same.**
- EPIS will only consider this request during the meeting taking place on 15 May.

Special Subject Dossiers

UTIPULP request on the standardization of the technical sheets for pulp

- | | |
|--------------------------|---------------------------|
| 1. Brightness | 10. Fibre width |
| 2. Tensile Index | 11. Opacity |
| 3. Tear index | 12. Viscosity |
| 4. Dirt | 13. Ash content |
| 5. Fibre length | 14. Coarseness |
| 6. Drainability/freeness | 15. Specific conductivity |
| 7. Bulk | 16. Acetone extract |
| 8. pH | 17. Grammage |
| 9. Air resistance | 18. AOX contain |

Special Subject Dossiers

EPIS request on the sustainability questionnaire

- EPIS has asked UTIPULP that pulp buyers use as much as possible a “standardized questionnaire”.
- This draft questionnaire (prepared by UPM) has been sent to the UTIPULP members for comments.
- 4 answers have been received (1 national association, 3 companies).
- **General comments**
 - The report is very detailed and the initiative is very good.
 - It provides detailed information and the possible costs.
 - The „visual design“ should be improved to be more user friendly and more attractive.
 - Some data are nonetheless missing. They are listed below in the related folders of the Exel file.

Special Subject Dossiers

EPIS request on the sustainability questionnaire

- **Wood sourcing**
 - The Wood Sourcing Statement should ask for the EUDR Compliance Statement.
 - It should be mentioned how the supplier will provide the numbers related to the DDS.
- **Environmental data**
 - Directly list the emissions to be reported in air and waste water.
 - There should be indication on the bleaching process.
 - For the EU Ecolabel, the supplier should mention if he updates the data on eupulps.net.
- **Sampling**
 - The Blue Angel requires information on dust emissions (the value, the method and frequency are requested).

Special Subject Dossiers

EPIS request on the sustainability questionnaire

- **Energy and fuels data**
 - The blue Angel asks for the measurement period of the energy consumption values
 - Is also required the waste landfilled
- **Carbon footprint**
 - This folder is acceptable in its current form.
 - It would be beneficial to include another method besides the CEPI 10 Toes (ISO 14067 or an LCA method like ISO 14044/40).

Confidential

- The following data could fall under this folder: Harvest method (e.g. clear cut, Harvest cycle: x years, yield: m³/ha) ; Fertilizer use (chemical requirements per kg/Adt).

Special Subject Dossiers

Extended producer responsibility on bales wires

- In September 2022, the EPIS Director General intervened during the UTIPULP General Assembly to alert on the future obligations pertaining to the bales wires.
- The bales wires are indeed considered as “packaging” according to the Directive 2018/852 of the European Parliament and of the Council of 30 May 2018 (amending Directive 94/62/EC) on packaging and packaging waste
- According to Article 7 (2) of the Directive of 2018 *“Member States shall ensure that, **by 31 December of 2024, extended producer responsibility (EPR) schemes are established for all packaging** in accordance with Articles 8 and 8a of Directive 2008/98/EC.”*
- The implementation of the EPR schemes varies from one country to another.
- EPIS was worried about some potential cost and/or reporting that would apply to bales wires.
- If UTIPULP members are informed about specific requirement established by this Directive, we would be interested by information sharing.

EU Deforestation Regulation (EUDR)

1. What's new from regulatory point of view?
2. What's new from technical point of view ?
3. Focus on few technical points
4. Next steps

EU Deforestation Regulation (EUDR)

From regulatory point of view - what's new ?

- **of 19 December 2024 amending Regulation EU 2023/115 as provisions relating to the date of application**
 - Postpones the application date of EUDR by one year (30 December 2025 vs 30 December 2024).
 - Postpones the publication of the implementing act relative to the classification of countries (low or high risk) by six months (30 June 2025 vs 30 December 2024).
- **Commission Implementing Regulation of 4 December 2024 on the functioning of the information system**
 - Establishes the operating rules of the information system, including rules on the protection of personal data and the exchange of data with other IT systems.
- **Project currently under consultation - Commission Implementing Regulation on the country benchmarking**
 - Leaked information on Monday
 - EU countries, US, China: low risk
 - Brazil, Indonesia: standard risk
 - Russia: high risk

EU Deforestation Regulation (EUDR)

From technical point of view - what's new ?

- **Technical questions relative to EUDR implementation**
 - The European Commission published the **4th version of FAQ** (173 questions) and the **2nd version of the technical guidance** in April.
 - These texts provide clarifications and simplifications relative to the EUDR implementation. However, the lack of legal force of these documents, combined with contradictions with certain provisions of the EUDR, increases legal insecurity for companies.
- **Information system**
 - In December, the European Commission launched two websites:
 - **LIVE**, the official website for entering due diligence declarations.
 - **ACCEPTANCE**, a mirror training website. This platform enables users to practice the functionalities and features of the system.
 - The European Commission organizes training sessions on how to use the platform for entering due diligence declarations (LIVE site). Training videos are also available [here](#).

EU Deforestation Regulation (EUDR)

Focus on a few technical points

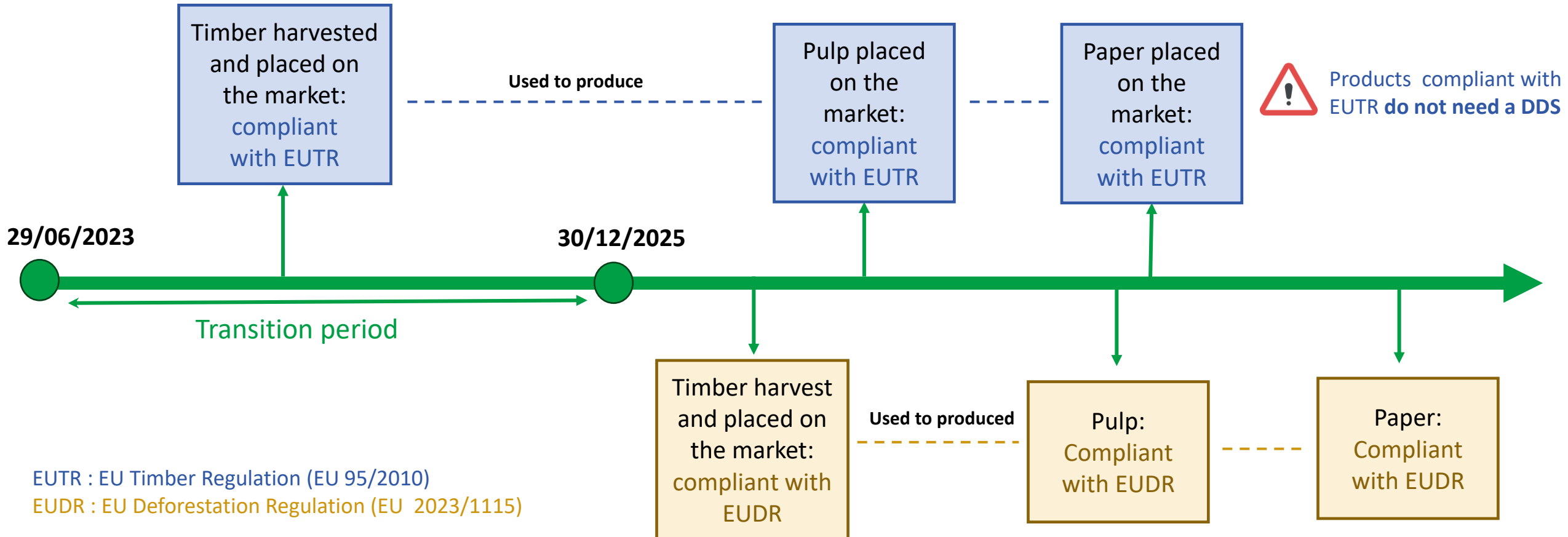
- What are the obligations of non –SME downstream operators? (FAQ 3.4)
 - **Key obligations:**
 1. Downstream non-SME operators **ascertain** that due diligence was exercised upstream **by collecting the reference numbers and verification numbers of DDS** submitted upstream and **verifying the validity of refence numbers**;
 2. **Submit a DDS** and refer to previous DDS.
 - **Possible further steps:**

As non-SME operators retain legal responsibility in the event of breach in the regulation, they could check the chain of submitted DDS as well as the information provided in previous DDS, use the country benchmarking, results of audits of suppliers, ...
 - **They do not have to collect information required by article 9.**
 - **Problem of legal security: huge gap between the EUDR and the FAQ!**

EU Deforestation Regulation (EUDR)

Focus on a few technical points

- Timeline (special rules – transition period - art 37.3 + guidance p8)



EU Deforestation Regulation (EUDR)

What are the next steps?

Considering a scale of 0 to 10, do you consider that your market pulp suppliers are ready to fulfil the requirement of the EUDR (0 = not ready at all, 10 = absolutely ready)



- Answers are rather heterogeneous and rank from “5” (2 times) to “8” (5 times).
- While not all suppliers are fully ready yet, the general expectation is that they will be within the coming months. Some noted that smaller European suppliers appear less prepared, and while progress is being made, it is viewed by some as too slow.

EU Deforestation Regulation (EUDR)

What are the next steps?

Should UTIPULP take a position so that the pulp suppliers “go live” with the EUDR in advance to the official date (e.g : 1 September)?

- Most of the respondents support UTIPULP taking a position to encourage pulp suppliers to begin EUDR implementation ahead of the official deadline, viewing it as a useful way to test the Information System and better prepare paper producers.
- Some also suggest that UTIPULP could offer guidance on unclear aspects of the regulation.
- However, a minority either opposes early implementation or prefers to delay or eliminate the regulation altogether.

EU Deforestation Regulation (EUDR)

What are the next steps?

Lobbying effort is still needed

- A large majority of respondents express strong support for increased lobbying efforts to simplify the EUDR, with many emphasizing the need for a more realistic and progressive implementation.
- A few also advocate for the complete elimination of the regulation, citing excessive bureaucracy.
- Only a small minority express doubts about the effectiveness of such efforts.

Association Topics/Accounts 2024

UTIPULP - 2024 BUDGET / 2024 ACCOUNTS				
DEBIT	2024 BUDGET	2024 ACCOUNTS	DIFFERENCE <i>Euros</i>	DIFFERENCE %
MEETING EXPENSES	10 000,00	7 385,18	-2 614,82	-26,15%
- Meeting room, accomodation, travels	6 500,00	7 385,18	885,18	13,62%
- Invitation of an expert	0,00	0,00	0,00	0,00%
- extra costs for the Barcelona seminar	3 500,00	0,00	-3 500,00	-100,00%
SECRETARIAT	20 700,00	18 482,65	-2 217,35	-10,71%
Salaries	18 000,00	15 866,88	-2 133,12	-11,85%
Stationery	100,00	15,77	-84,23	-84,23%
Accounting	2 600,00	2 600,00	0,00	0,00%
LEGAL ADVICE	0,00	0,00	0,00	-
WEB SITE	0,00	0,00	0,00	0,00%
external web designer	0,00	0,00	0,00	0,00%
salaries	0,00	0,00	0,00	0,00%
TRANSACTION EXPENSES	100,00	0,00	-100,00	-100,00%
TOTAL	30 800,00	25 867,83	-4 932,17	-16,01%
CREDIT	2024 BUDGET	2024 ACCOUNTS	DIFFERENCE <i>Euros</i>	DIFFERENCE %
CONTRIBUTIONS	27 600,00	27 599,00	-1,00	0,00%
INTEREST	700,00	714,20	14,20	2,03%
TOTAL	28 300,00	28 313,20	13,20	0,05%
RESULT	-2 500,00	2 445,37	4 945,37	

- Approval of the delegates of the executed account for 2024?

Association Topics/Budget 2025

UTIPULP - 2025 BUDGET / 2024 BUDGET

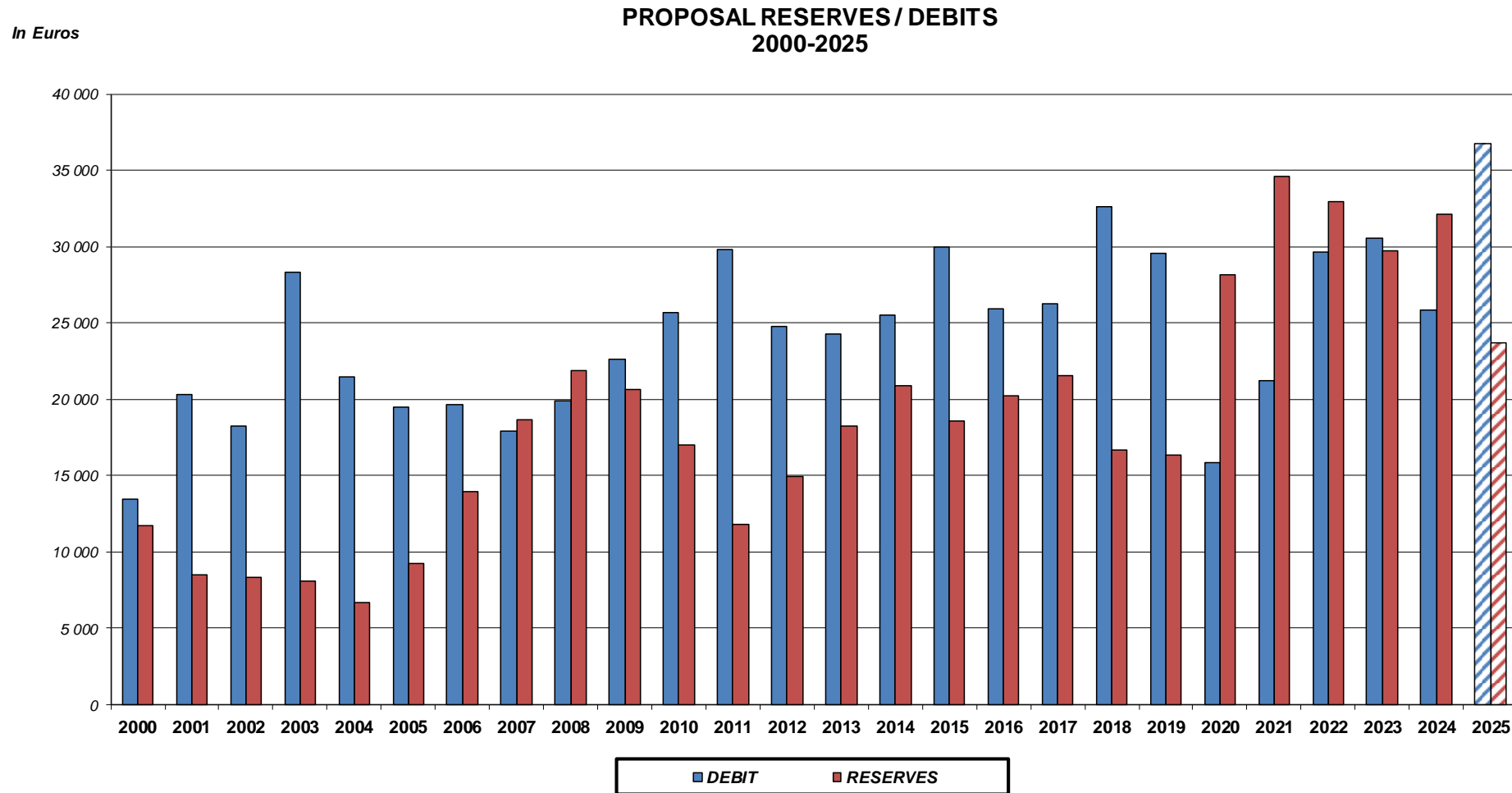
DEBIT	2024 BUDGET	2025 BUDGET	DIFFERENCE <i>Euros</i>	DIFFERENCE %
MEETING EXPENSES	10 000,00	14 000,00	4 000,00	40,00%
- Meeting room , accomodation, travels	6 500,00	14 000,00	7 500,00	115,38%
- Invitation of an expert	0,00	0,00	0,00	0,00%
- extra costs for the Barcelona seminar	3 500,00	0,00	-3 500,00	-100,00%
SECRETARIAT	20 700,00	20 700,00	0,00	0,00%
Salaries	18 000,00	18 000,00	0,00	0,00%
Stationery	100,00	100,00	0,00	0,00%
Accounting	2 600,00	2 600,00	0,00	0,00%
LEGAL ADVICE	0,00	2 000,00	2 000,00	-
WEB SITE	0,00	0,00	0,00	0,00%
external web designer	0,00	0,00	0,00	0,00%
salaries	0,00	0,00	0,00	0,00%
TRANSACTION EXPENSES	100,00	100,00	0,00	0,00%
TOTAL	30 800,00	36 800,00	6 000,00	19,48%

- Proposal of the 2025 budget.
- Proposal to keep the contributions of the members for 2025 at the same level

CREDIT	2024 BUDGET	2025 BUDGET	DIFFERENCE <i>Euros</i>	DIFFERENCE %
CONTRIBUTIONS	27 600,00	27 600,00	0,00	0,00%
INTEREST	700,00	700,00	0,00	0,00%
TOTAL	28 300,00	28 300,00	0,00	0,00%
RESULT	-2 500,00	-8 500,00	-6 000,00	

Association Topics

Budget and contribution from the members for 2025



Association Topics/Excom composition

Excom composition

- | | | |
|-------------------------|-----------|----------------|
| • Mustapha ZAOUG | President | (COPACEL) |
| • Peter DONNABAUER | Member | (AUSTROPAPIER) |
| • Alberto GIOVANNELLI | Member | (ASSOCARTA) |
| • Norman SNEL | Member | (VNP) |
| • Proposed new Member : | Jacek LOS | (SPP/Poland) |

Any Other Business

Requests/questions from delegates ?

Close out

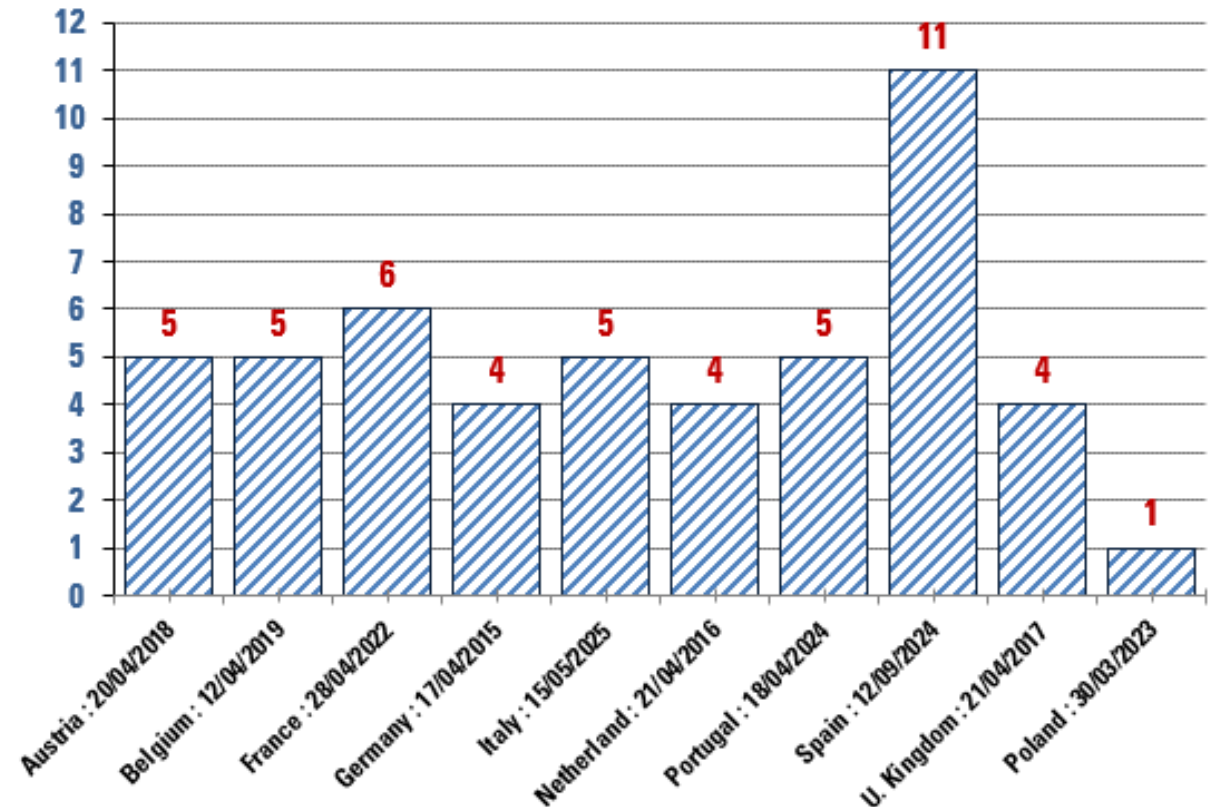
Date & location

BARCELONA

- The Excom will be organized on 17th September (14:30/15:15).
- The UTIPULP General Assembly will take place on 18th September (8:30/13:00).

Spring 2026

- 15th April (Excom and social program) and GA on 16th April



Close

Utipulp

Thank you



Utipulp

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