



# General Assembly

## Barcelona

18 September 2025 – 8:30/12:30

[paul-antoine.lacour@copacel.fr](mailto:paul-antoine.lacour@copacel.fr)

# Utipulp

# Agenda of the meeting

## Introduction (Chairman)

- Welcome/new delegates
- Legal guidelines for attending UTIPULP meetings
- Approval of the minutes of the last meeting (Milan, May 15<sup>th</sup>, 2025)

## Market analysis

- Update on the tariffs
- Synthesis of the questionnaire pertaining to pulp supply
- Report from the National Associations delegates

## Special Subject Dossiers

- UTIPULP request on the standardization of the technical sheets for pulp
- Legal status GTR

## EUDR Developments

- Status of the file
- Outcome of the questionnaire regarding the “readiness” of the suppliers

## Association Topics/Excom Composition

- Excom composition
- Relations with EUROPULP

## Any Other Business

## Close out (Chairman)

- Date & location of the next meeting
- Close

# Introduction/Welcome

## Last meeting for two delegates

- **Luis Fernando RUIZ ARRUE (Papelera del Oria)**
- **Klaus KRIEG (Koehler Paper)**

## New delegates

- **Guillermo BISTUE (Papelera del Oria)**
- **Teresa GARGIULO (ASSOCARTA)**

## Change in the representation of one Delegate

- **Burkhard KRÜCKE (Koehler Paper)**

## Guest

- **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

- Milan, May 15<sup>th</sup>, 2025

# Market Analysis (US tariffs)

## Status of the file

- On 21 August 2025, the U.S. and the EU issued a Joint Statement agreeing on a “Framework on an Agreement on Reciprocal, Fair, and Balanced Trade.”
- Under this framework, the U.S. will apply the higher of either the MFN (Most Favored Nation) tariff or a 15% tariff (which includes a "reciprocal tariff") on goods from the EU.
- Practically, for pulp and paper products from the EU, the tariff of 15% applied.
- **BUT**, on 6 September, President Trump signed an Executive Order that modified the Joint Statement dated 21 August

# Market Analysis (US tariffs)

## Status of the file

- This Executive Order sets a list of product excluded from tariffs (= tariff “0”). In this list can be found:
  - ✓ 4703.11.00 Unbleached coniferous chemical woodpulp
  - ✓ 4703.21.00 Semibleached or bleached coniferous chemical woodpulp
  - ✓ 4703.29.00 Semibleached or bleached nonconiferous chemical woodpulp
- This list apply to imports from all countries (EU and non-EU).
- The exclusion of these pulp grades will take effect for products entered on or after 8 September 2025.
- But what's next?

# Market Analysis (US tariffs)

## Impacts of US tariffs already noted

- 62 % of respondents (14 answers) indicate that the U.S. announcement on tariffs has already had an impact on the pulp market.
- But most of the respondents emphasize that the overall impact on pulp demand and supply remains indirect and not yet clearly defined.
- Regarding the noted impacts:
  - Some respondents report pre-buying, especially in fluff pulp, amid tariff uncertainty.
  - Others note reduced consumption due to slower economic activity and shifting trade flows.
  - Allocation changes are expected in softwood pulp as trade adjusts between Brazil, Europe, and the U.S.
  - Several underline that inconsistent tariff policies have disrupted supply chains, affecting prices and availability.

# Market Analysis (US tariffs)



## UTIPULP position regarding fluff pulp

- UTIPULP is again a retaliation targeting imports of fluff pulp from the US (no position regarding the other pulp grades).
- Currently, no retaliation applied from the EU.
- In order to secure the fluff pulp supply on the medium/long term, and in case the EU sets retaliations, it is proposed that UTIPULP keeps on advocating « no retaliation » on fluff pulp.
- The message would be conveyed within CEPI (as CEPI is favorable to retaliation on fluff pulp, after a transition period of 6 months).
- Agreement from the delegates ?

# 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

**B I U**  

Dear Member,

In preparation of our next meeting, on Thursday September 18 in Barcelona, please find below a short questionnaire.

Name \*

Réponse courte

Regarding your pulp supply, has the situation improved or worsen since the last meeting (May 2025)?

☐ strong improvement

☐ slight improvement

☐ steady

☐ slight deterioration

☐ strong deterioration

In H1 2026, 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.

Réponse longue

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

Réponse longue

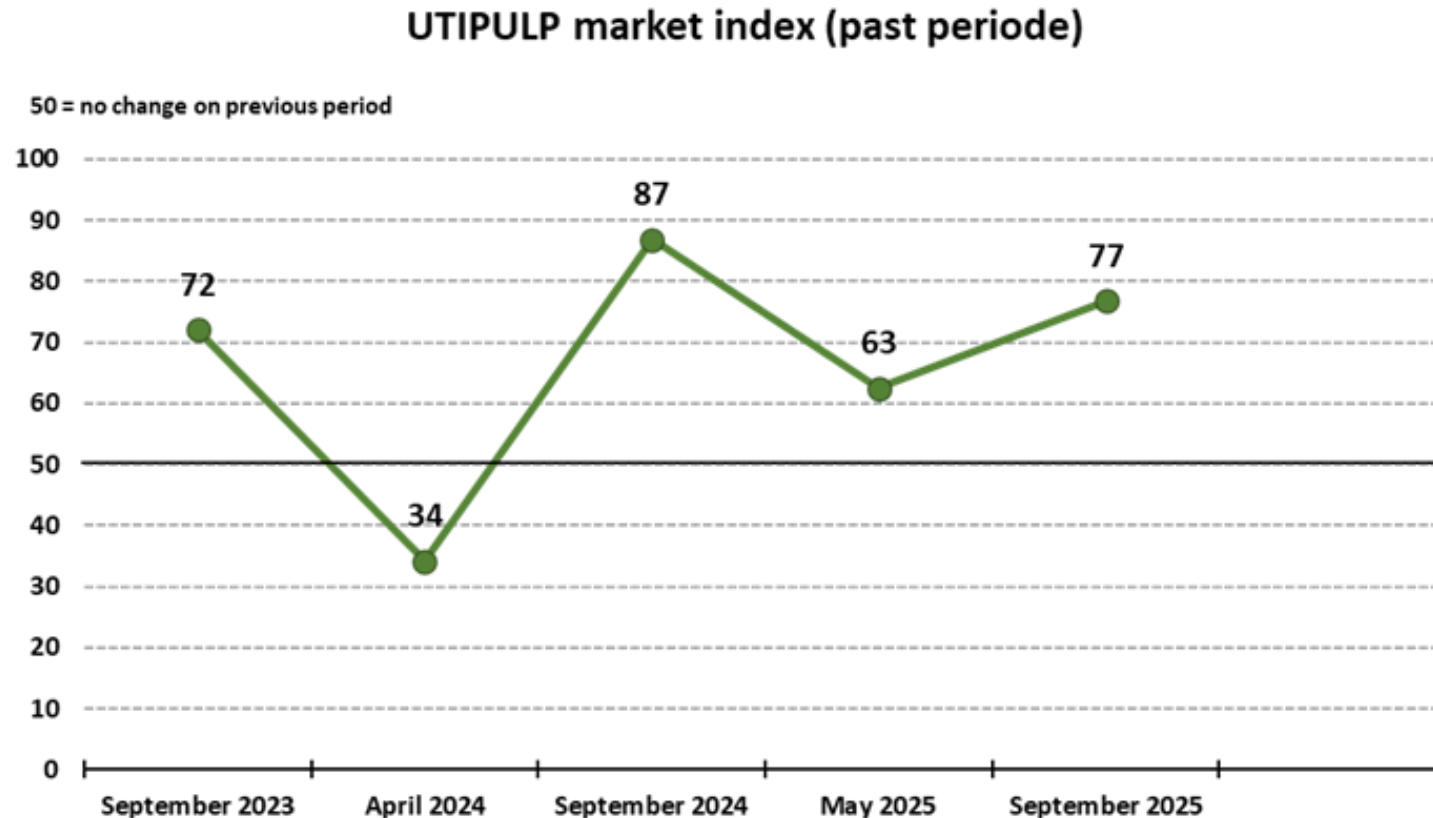
# Market analysis (Outcome of the survey)

## 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 )

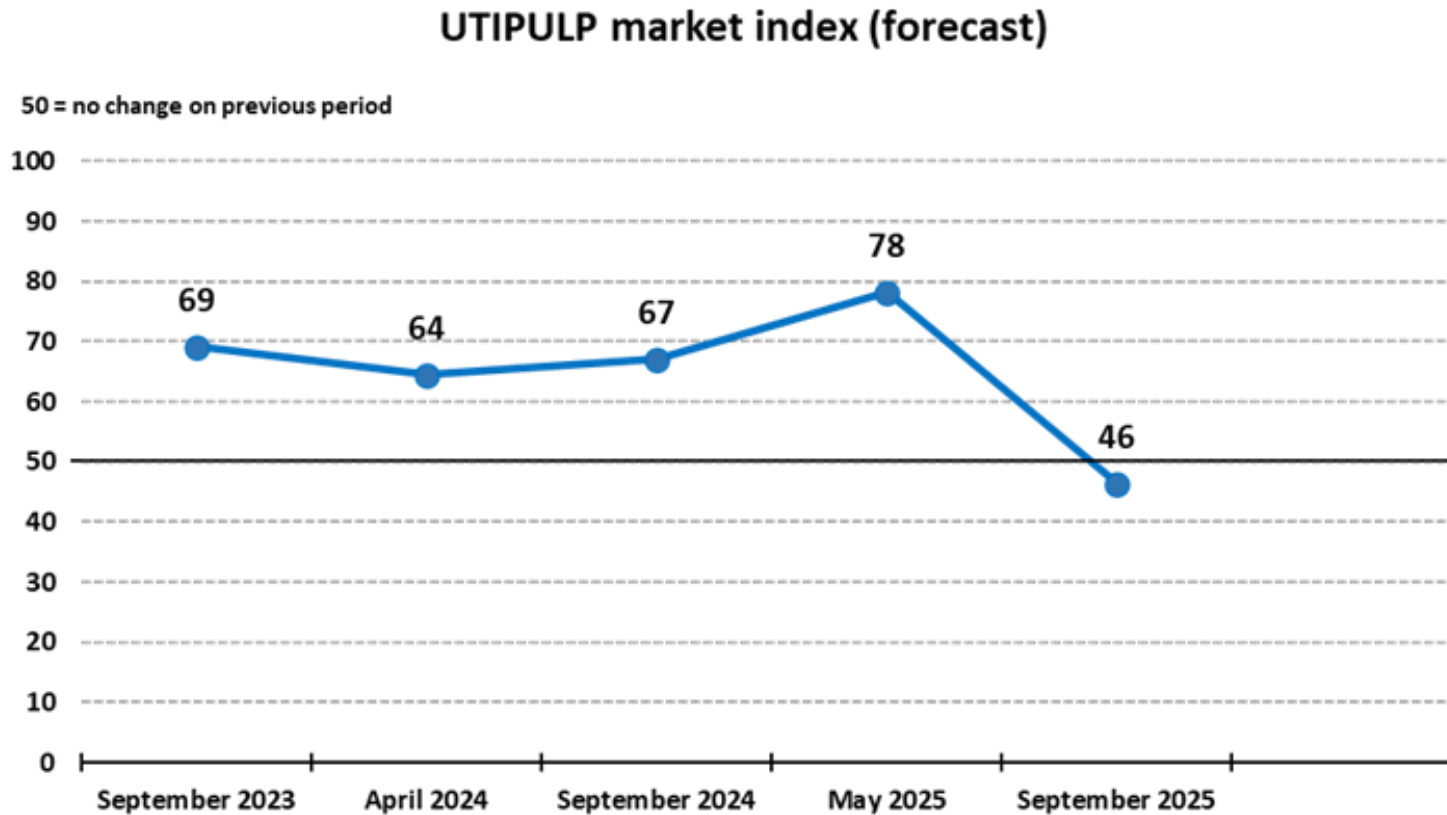
## UTIPULP market index (past period)



- 14 answers have been received.
- Compared to May 2025, respondents report an improvement in pulp supply conditions.

# Market analysis (Outcome of the survey )

## UTIPULP market index (forecast)



- Respondents anticipate a slight deterioration in pulp supply conditions, with the index dropping just below 50.

# Market analysis (Outcome of the survey)

## Synthesis of the questionnaire pertaining to pulp supply

- Most of the respondents report a good pulp availability and a low consumption.
- Regarding the pulp supply:
  - Current availability is ample, but closures of unprofitable mills could tighten supply.
  - European suppliers under pressure from high wood costs and weak exchange rates.
  - Canadian producers face chip availability challenges.
  - No major new softwood capacities expected, limiting future supply growth.
- Regarding the pulp demand:
  - Demand remains weak across all segments, with no clear recovery signals.
  - Modest support could come from regional stimulus and speculative buying.
  - Chinese demand expected to rebound gradually from H1 2026 after price bottoming.
  - EU–US tariff uncertainty adds volatility, with possible upside or downside effects.

# Market analysis

Report from the National Associations delegates



# Standardization of the Technical Data Sheets (TDS)

- During the last meeting (Milan), UTIPULP members agreed that pulp companies should use a common set of TDS, as well as the same standards and units.
- Following this request, EPIS was contacted and answered again that *“TDS are a commercial tool, and as such, companies do them one by one”*.
- EPIS added *“per our lawyer, our meeting cannot discuss them any further”*.
- Conclusion: **it is vain to consider that pulp producers will engage in any kind of standardization of the TDS** (have UTIPULP members noted any change on this issue?)
- This “lack of willingness” means that **there is no reason anymore that pulp buyers engage in the standardization of the sustainability questionnaires.**
- **Is this position confirmed by the General Assembly?** If yes, that will put the “TDS” and “sustainability questionnaire” to an end.

# General Trade Rules (1/3)

- During the Barcelona meeting last year (13 September), the Secretary General of EPIS mentioned that EPIS has unilaterally repealed the GTR.
- A week weeks later, it appeared that this statement was not correct, and that (i) companies still have the possibility to refer to GTR (ii) EPIS will not discuss in the future the content of this document.
- During the meeting in Milan (15 May), UTIPULP delegate decided to have a legal advice on this matter.
- UTIPULP asked a lawyer specialized in competition regulations to provide a legal analysis (see slides hereafter).

# General Trade Rules (2/3)

1. “At the request of UTIPULP, we reviewed the slides “Competition Law & GTR”, prepared by EPIS’ lawyer, and sated September 2024”.
2. “The presentation explains that the exchange of sensitive information between competitors constitutes an anticompetitive agreement. We fully agree with this principle: if competitors exchange such information, the parties must immediately cease all discussions, as this would amount to a collusive arrangement.”
3. “However, we believe that the General Trade Rules constitute a form **of standardization agreement**. On this point, the Guidelines on Horizontal co-operation agreements (2011/C11/01) provide that:

*“Standardisation agreements usually produce significant positive economic effects, for example by promoting economic interpenetration on the internal market and encouraging the development of new and improved products or markets and improved supply conditions. Standards thus normally increase competition and lower output and sales costs, benefiting economies as a whole. Standards may maintain and enhance quality, provide information and ensure interoperability and compatibility (thus increasing value for consumers).” ( § 263)*

# General Trade Rules (3/3)

4. “Regarding the General Trade Rules as currently drafted, we believe they would be valid under competition law insofar as competitors may have access to them, the document is public (easily accessible on the internet) and they have no impact on pricing.”
5. “Therefore, **we believe that the content of this document is not sensitive from a competition law perspective**. It would be possible to refer to these rules in pulp purchase contracts.”
6. “Finally, in the future, **we believe discussions could take place between UTIPULP and EPIS.**”

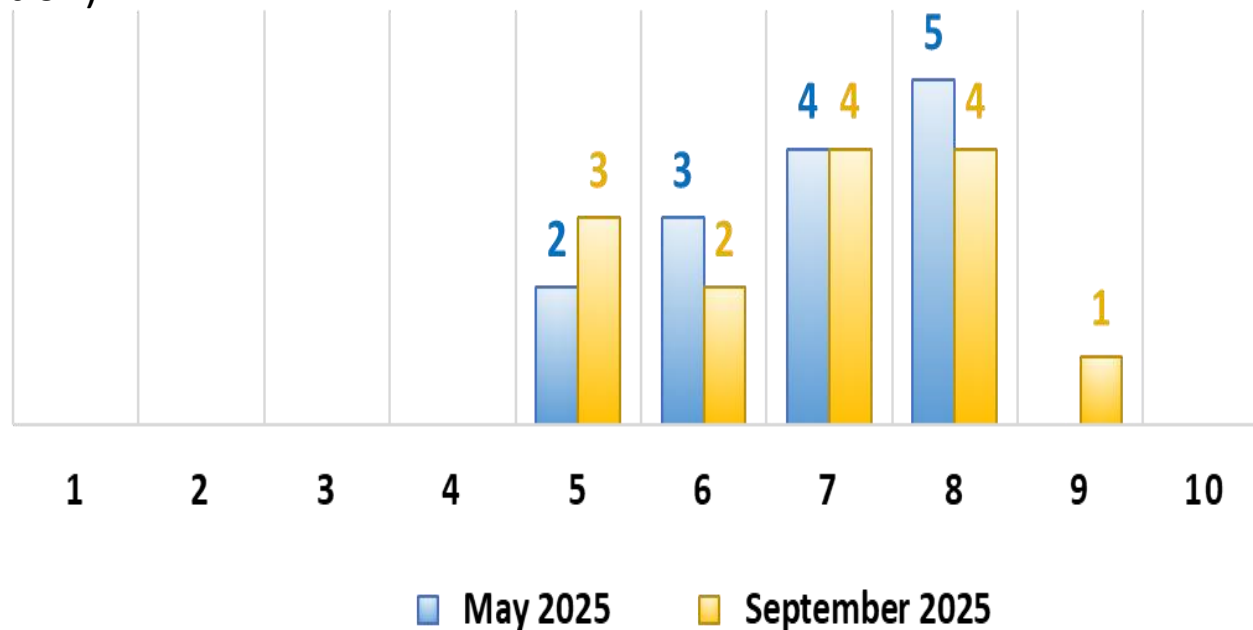
Remark :

- The difficulties to make real progress on several files with EPIS suggest a “change of methode”. **A joint meeting (EPIS + UTIPULP Excom) has to be envisaged.**

# EU Deforestation Regulation (EUDR)

## « Readiness » of the suppliers

- 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 no problem to provide all the requested information)



- Little progress since May.
- Major South American suppliers are generally well prepared to meet EUDR requirements.
- North American and European suppliers still show gaps.
- Data transmission remains rarely tested.

# EU Deforestation Regulation (EUDR)

## EUDR Implementation : latest developments

**Country  
benchmarking**

**EUDR entry  
into application**

15 April

25 May

30 December

- **EU Guidelines (v.2)**
- **FAQ (v.3)**

Possible technical adjustments to TRACES system

# EU Deforestation Regulation (EUDR)

## From regulatory point of view - what's new ?

- **Commission Implementing act on the country benchmarking (22 May 2025)**

### High risk

Belarus, Russia, Myanmar, North Korea

### Low risk (selection)

EUROPE : EU27, Albania, Bosna Herzegovina, Macedonia, Moldova, Ukraine, UK, Norway, Switzerland

AFRICA : South Africa and others

ASIA : China, Japan, Turkey, India, Vietnam

OCEANIA : Australia, New Zealand

NORTH AMERICA : USA, Canada

SOUTH AMERICA : Chile, Uruguay

### Standard risk

Brazil, Indonesia and all countries not mentioned in the other two categories

# EU Deforestation Regulation (EUDR)

## Country benchmarking – implication for operators

|   |  |
|---|--|
| <b><u>Low risk</u></b><br><br>Min. 1% operators checked / yr      | Simplified due diligence: obligation of <b>collection of information</b> only<br>( <b>including geolocation</b> ) ** |
| <b><u>Standard risk</u></b><br><br>Min. 3% operators checked / yr | Obligation of collection of <b>information</b> ,<br><b>risk assessment</b> and <b>mitigation</b>                     |
| <b><u>High risk</u></b><br><br>Min. 9% operators checked / yr     |  |

\*\* Unless: there is a risk of circumvention or of mixing with products of unknown origin or from standard and high-risk countries; or a substantiated concern is raised

# EU Deforestation Regulation (EUDR)

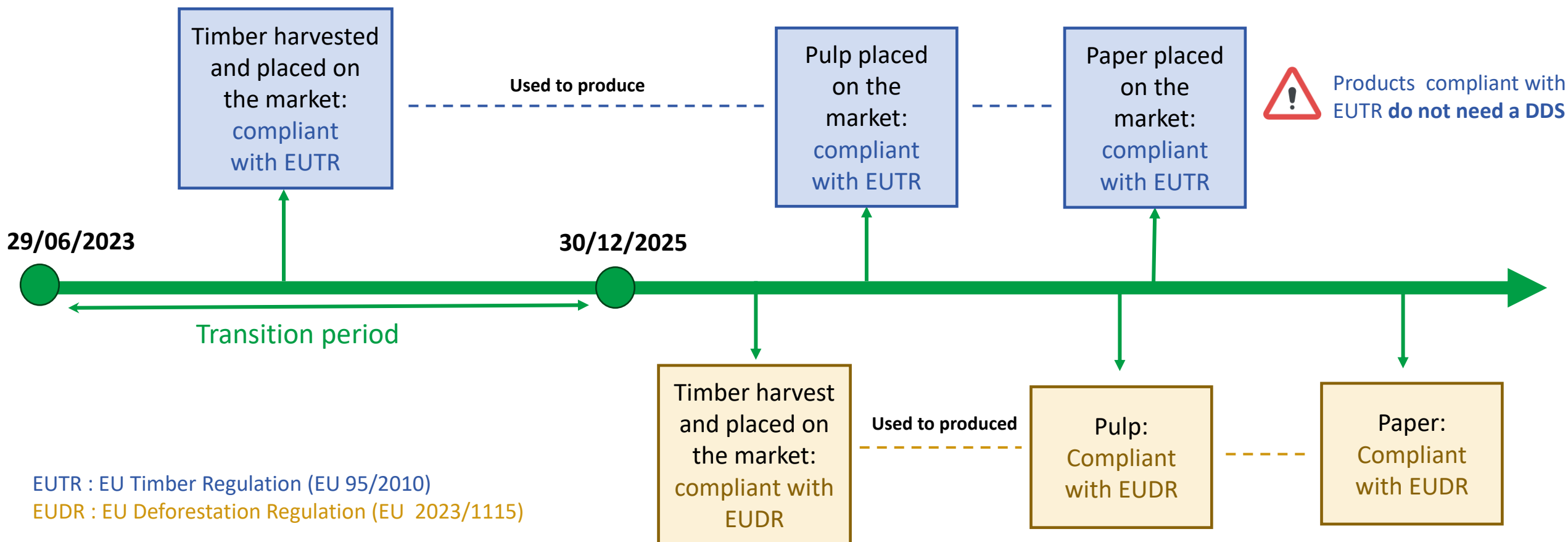
## From technical point of view – as a reminder

- **Technical questions relative to EUDR implementation**
  - The European Commission published the **4<sup>th</sup> version of FAQ** (173 questions) and the **2<sup>nd</sup> version of the technical guidance** in April.
  - These texts provide clarifications and simplifications regarding the EUDR implementation.
  - One of the major simplification concerns the **downstream operators** who can submit their DDS based on the upstream operators DDS. They do not have to collect information required by article 9
  - **Huge gap between the EUDR and the FAQ! The lack of legal force of the FAQ increases legal insecurity for companies.**
- **Information system**
  - **TRACES**, the official website for entering due diligence declarations has been available since December.
  - **ACCEPTANCE**, a mirror training website. This platform enables users to practice the functionalities and features of the system.

# EU Deforestation Regulation (EUDR)

## From technical point of view – as a reminder

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



# EU Deforestation Regulation (EUDR)

## From technical point of view – what's new ?

- **Guidance about the use of “Units of Measure” (12 September 2025)**
  - This document provides guidance on the correct use of Units of Measure (UoM) for DDS submission in the EUDR system.
  - For some HS codes, units are mandatory. This new detail might necessitate an API update.

| HS code |   | Unit                          | Display text          |
|---------|---|-------------------------------|-----------------------|
| 4403    | Wood in the rough, whether or not stripped of bark or sapwood, or roughly squared | Cubic meter                   | MTQ (m <sup>3</sup> ) |
| 4701    | Mechanical wood pulp  | Kilogram of substance 90% dry | KSD (kg 90% sdt)      |
| 4702    | Chemical wood pulp, dissolving grades   |                               |                       |
| 4703    | Chemical wood pulp, soda or sulphate, other than dissolving grades                |                               |                       |
| 4705    | Wood pulp obtained by a combination of mechanical and chemical pulping processes  |                               |                       |

# EU Deforestation Regulation (EUDR)

## From political point of view – what's new ?

- **July 7, 2025: 18 agriculture ministers ask Ursula von der Leyen to include the EU Deforestation Regulation (EUDR) in the Commission's simplification plan.** They call for lighter requirements for farmers and forest operators in areas deemed “insignificant” risk of deforestation, as well as for products already on the EU market.
- **July 8, 2025: 16 organizations from the agri-food, forestry and wood sectors issue a joint statement urging a new legislative procedure to simplify the EUDR. CEPI did not sign this letter.**
- **July 9, 2025: The European Parliament, meeting in plenary session, is calling for the withdrawal of the text listing countries at low or high risk of deforestation.** This vote, which is symbolic in nature, reflects the Parliament's state of mind regarding the implementation of this text.

# EU Deforestation Regulation (EUDR)

From political point of view – what's new ?

- **September 10, 2025:** The European Commission's public consultation on simplifying environmental administrative burdens (July 22 – September 10) receives many contributions calling for simplification of the EUDR. At the same time, numerous citizen contributions, driven by NGOs, oppose any changes to the regulation.
- **The fourth “Environment Omnibus”** is to be unveiled at the beginning of October.

# EU Deforestation Regulation (EUDR)

## What are the next steps?

- **Many stakeholders are calling for a simplification of the regulation.**  
Some seek to secure its legal implementation (by incorporating the changes introduced by the FAQ into the regulation), while others are asking for a real reduction in the administrative burden by limiting obligations to the first operator placing products on the EU market.
- **Will the Environment Omnibus include the EUDR?**  
The Commission is expected to present its Environment Omnibus proposal at the beginning of October.  
If so, this will likely result in a “stop the clock” and therefore a new postponement of the implementation date.  
In the meantime, it is necessary to continue preparing for its implementation.

# Association Topics/Excom composition

## Excom composition

|                       |           |                |
|-----------------------|-----------|----------------|
| • Mustapha ZAOUG      | President | (COPACEL)      |
| • Peter DONNABAUER    | Member    | (AUSTROPAPIER) |
| • Alberto GIOVANNELLI | Member    | (ASSOCARTA)    |
| • Norman SNEL         | Member    | (VNP)          |
| • Jacez LOS           | Member    | (SPP)          |

# Association Topics

## Relations with EUROPULP

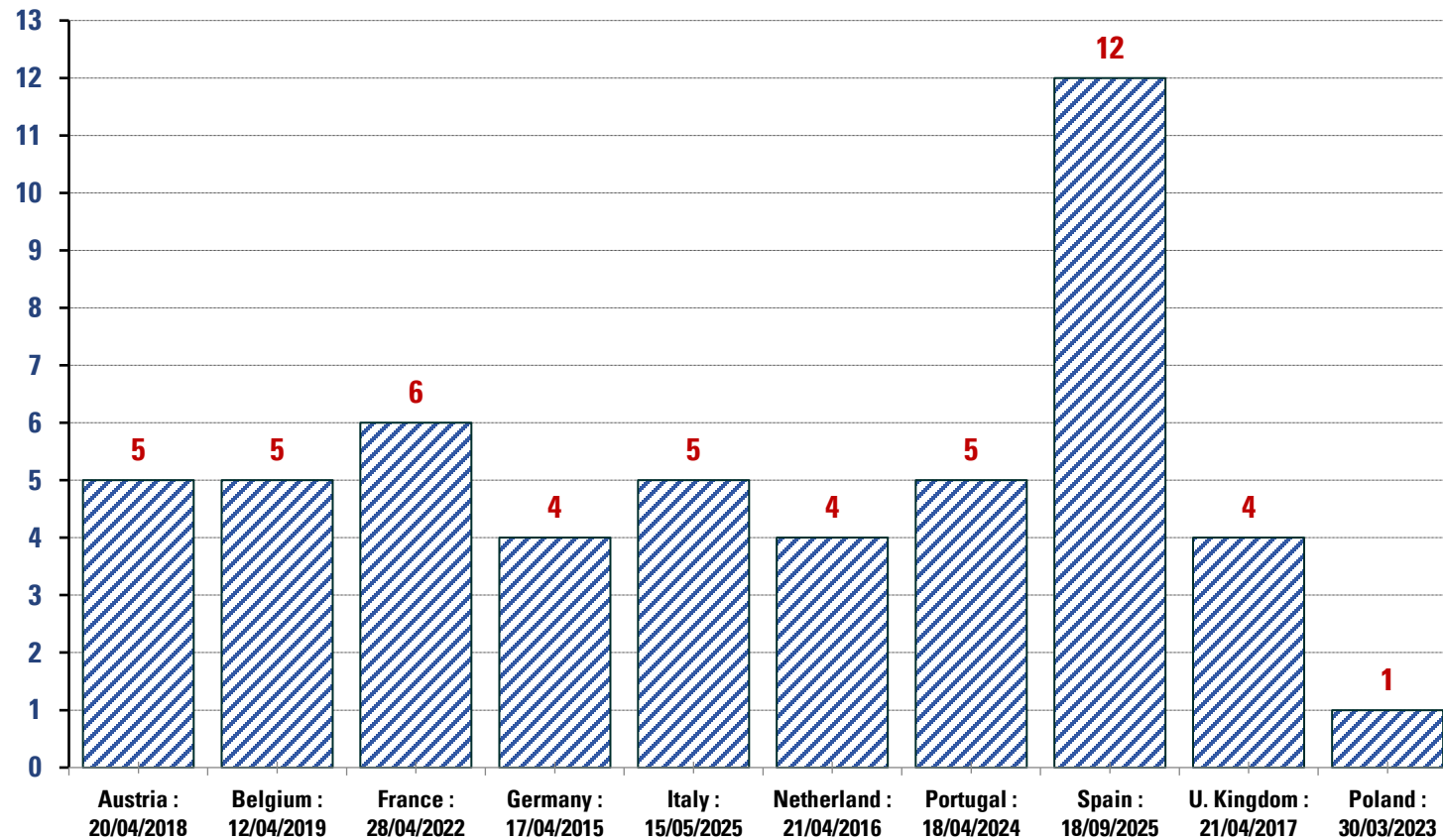
- In spring 2025, EUROPULP was circulating unaccurate information about a bill that would not have been paid by UTIPULP for the participation of the UTIPULP delegates to the EUROPULP Seminar.
- It seems that EUROPULP had forgotten that, in June 2024, they have written that « *In the past Utipulp has met the cost of their members who attend the seminar and dinner in Barcelona. As Utipulp will no longer be involved in this way as their members can attend free of charge, we will no longer include the name of Utipulp in the branding of the event which will now be known simply as the Europulp Annual Event* ».
- The situation has now been clarified: all pulp buyers (but not the people working in association) are invited free of charge to the Seminar and dinner.

# Any Other Business

Requests/questions from delegates ?

# Close out

## Date & location



# Close out

## Date & location

- Next General Assembly will take place in HAMBURG

### Detailed schedule

- Excom 15 April (15:30/16h45)
- Social event and diner (Elbephilarmonie)
- General Assembly on 16 April morning (8:30/12:30)



**We made a block reservation at the AMERON Hotel in Hamburg at a special rate. (deadline for booking : March 18, 2026)**

Utipulp

Thank you



# Utipulp

---

23, rue d'Aumale – 75009 Paris, France | 01 53 89 24 00

# Standardization of the Technical Data Sheets

## Data mentioned in ALL the TDS

- Weight and size of the bales and units ; material of the wires ; date of release/validity of the TDS.
- Key physical properties (single values)
  - Brightness
  - pH

# Standardization of the Technical Data Sheets

## Data mentioned in ALL the TDS

- Physical properties (in array depending on PFI Beating revolutions OR drainability)
  - Drainability/freeness
  - Tensile Index
  - Tear index
  - Opacity (sometimes as a single value)
  - Air resistance OR permeance
  - Density AND/OR Bulk

### COMMENTS regarding

- Opacity?
- Density OR Bulk?
- Air resistance OR Permeance?
- Homogeneity of the wording?

# Standardization of the Technical Data Sheets

## Data DATA NOT always mentioned in all the TDS

- Single values Species (only NBSK)
  - Dirt
  - Coarseness
  - Fibre length
  - Fibre width
  - Vicosity
  - Specific conductivity
  - Acetone extract
  - Ash content
  - Grammage
  
  - Wrappers
  - Dryness of wrappers
  - Tensile strength of the wires
  - Marking design

# Standardization of the Technical Data Sheets

Data DATA NOT always mentioned in all the TDS

- Data in an array
  - Tensile stiffness index
  - Burst Index
  - Light scattered coefficient
  - Specific refining energy

# Standardization of the Technical Data Sheets

## What feed-back to EPIS?

- As a general comment, it would be valuable to harmonize the units and the standards used for the measurements.
- Regarding the values:
  - Do we consider that some not systematically mentioned should be given in all the TDS ?
  - Do we consider that the test done anyhow on the samples of pulp by the pulp buyers make unnecessary any change in the TDS?