

EUROMETAUX CHEMICALS MANAGEMENT NEWS



In May please join us on GoToMeeting for:

- 7 May: Environmental classification of metals workshop
- 12 May: Risk Management Taskforce meeting
- 19 May: Evaluation Taskforce meeting
- 26 & 27 May: Water & Industrial Emissions Taskforce meeting

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Dear All,

These last weeks, I have really appreciated the opening sentences of most of the incoming mails, expressing empathy and hope during these challenging and unsettled times. Soothing words creating a moment of relief in the overall agitation.

One month on, and we can hardly say that we are reconciled with the situation. We cannot ignore the fact that we are still in for a bumpy and most probably long ride but, amazingly, some “things” seem to have settled in the unsettled. We have of course had to “adapt” our activities and behaviours a lot, learn “on the spot” by “trial and error” and been carried away by a carousel of emotions. But in doing so, we have also regained some margin to reflect, analyse, make links and even... retrieve in the unknown some traits that are more familiar.

Take “fear” for example: the individual or collective one, rationalised and/or visceral, invading our daily environment and sneaking in at night for a number of weeks. How many different forms can it take, how variable can its expression be? We can actually observe a tangible range: from the panic that paralyses one person to the recklessness and complete nonchalance of another. From one extreme to the next, the ‘fear’ pattern and how we cope with it will directly influence actions and attitudes. And also, empathy.

Looking at this array, I was wondering what could shape and feed it and hence, whether some ‘median’ (or compromise?) could be reached. And one factor at play -I believe- is something we have some familiarity with from our regulatory experience, from non COVID are(n)as. I call it the data and beliefs balance. We live in a world -including this one in crisis- of overwhelming and often good information, but also driven by beliefs. And we usually act by integrating both dimensions, but sometimes the one or the other emerges more clearly in some personalities and discussions. We all know people who crusade on what they believe in as being appropriate, and don’t hesitate to discard data and make doomed scenarios -supported more by convictions than evidence- a generality to justify their attitude. On the other hand, you have the data freaks who will have difficulties in deviating from the ‘proof’ and the information fluxes, and resist including suppleness in their arguments (or actions) that wouldn’t be duly substantiated.

Of course, there is a golden mid-way but the balance between data and beliefs is not only difficult to find, it is even more challenging to sustain. It is very easy to “unbalance” it, by throwing in a political context, hidden agendas and in particular by making no attempt to reach understanding for each other’s expressions and actions. This brings us back to “empathy”, a key element “at stake”. It is much easier to express understanding when being in the mid-way and empathy is needed to reach the balance.

A chicken and egg story? Luckily not as human nature is wonderfully multi-dimensional and intricate. We can move -even in a crisis situation- towards the mid-way, wherever we stand on the array. But we need to initiate or trigger the first move. And to do that, we will need to further “act”, create, encourage; sometimes with yet unexplored capacities. The in-between will be needed to emerge. Because somewhere between fear and recklessness, there is what we call bravery...

Violaine Verougstraete, Chemicals Management Director Eurometaux

This special edition is also the opportunity to give the word to our editor-in-chief, Ailsa, who ensures behind the scenes that you get the News in all circumstances 😊

Dear All,

This number 100 introduction was meant to be full of joy and a reminiscence of all that has gone on in our (metals) world since January 2012 when our N°1 was published

I took this N° 100 opportunity to go through the editorials since the beginning, and derived much pleasure in reading them all and remembering the events/transformations that have taken place in our “hamster-turning wheel” of a world that have been related with excitement, sometimes a certain frustration or even anticipation by means of the REACH/Chemicals Management News (editorial).

From society's politics (Brexit, elections, terrorist attacks); meetings taking place all over the EU; changes in Eurometaux and the metals industry; to the newer ventures such as the Metals Academy being put in place to ensure that the wisdom accumulated over the years doesn't disappear and can be transmitted to the younger/newer generation to further build on it.

But all of these happenings, could not really prepare us for the uncertain times we are living through today. This unknown situation seemed to emerge almost from one day to the next. What we know/knew, what we had foreseen, planned, was all of a sudden turned topsy-turvy and we had to quickly fall on our feet and adapt to new ways of living, innovative manners of working,which we have done quite well up to now. All generations are reacting to this current situation differently, but whatever our ages, our dissimilarities, we will need (to bring each other) hope, strength and the wisdom to do it right. To follow the quote: "Our greatest glory is not in never falling, but in rising every time we fall." – Confucius

We will be so happy to once again be in an overcrowded train or metro, stay late in the office, listen to our colleagues on the phone whilst trying to concentrate on our own work....all the little things that sometimes seemed so annoying, were in fact synonym of a "normal" life, that we maybe didn't realise was so precious and fragile.

But one thing at least remains "nearly" immutable, and that is our News 😊 and the pleasure we have in sharing it with you. "Nearly", in the sense that we have introduced a few subtle changes. We trust you will enjoy this slightly improved edition and of course welcome any comments you might have.

And finally, we would hereby like to thank you all for your reading and enthusiasm, and those who were selected to fill in the little survey for their positive and honest (we hope) opinions.

We wish you well, we hope you stay safe and that whatever the future brings us, it will be a place where we can once again be together, albeit – let's face it - maybe in a different way.

Ailsa Lee, Chemicals Management Assistant



COMMISSION – EUROPEAN PARLIAMENT

Sub-group Water Framework Directive Common Implementation Strategy Working Group Chemicals: *“Improving emissions to water data” Webinar 22/04/2020*

A year ago, the European Environment Agency (EEA) kicked-off the new project to create a diffuse emissions inventory in Europe. The project was started because the EEA observed a lack of data and difficulties for reporting in the 2nd River Basin Management Plan (RBMP) regarding diverse diffuse emissions. The project aims to improve the next cycle of RBMPs reporting and identify an overall approach where experience and knowledge on data reporting can be effectively exchanged. Most important for Eurometaux is the aim to establish a methodology regarding the quantification of emissions which could be used by the Member States when reporting. Last month, the contracted Consultant Deltares was invited to join a webinar. Previously planned as a two-day workshop (postponed to mid-September) they decided to host a webinar to enable first discussions focusing on data reporting practices of the Member States and the previously shared draft report. Eurometaux participated, supported by two experts (Professor Kevin Farley & Dr Sean Comber) from Manhattan College and Plymouth University, along with nine Member States and two other industry stakeholders. In the end, the webinar did not provide much opportunity to discuss the report. Many participants highlighted their low knowledge on the technical possibilities and low data availability. Eurometaux will need to make sure that available information and knowledge is made accessible to the group, especially when e.g. Emission Factors are estimated and when metals specificities (e.g. inorganics vs. organics, natural background) are important.

The short presentations of the Member States on their data reporting practices revealed that several among them are working on the consideration of natural background (e.g. DK, IE).

Mid-May, Deltares plans to share a draft version on Urban Waste Water Treatment Directive (UWWTP) emissions factors for comments, which will be analysed within our internal working group (more information: Nathalie Kinga Kowalski).

CARACAL: goes DIGITAL

Who would have thought that a virus that began its journey in China would have led to the digital transformation of the European Commission? As the 34th meeting of CARACAL had to be cancelled due to the COVID 19 lockdown, the CARACAL Team of the European Commission decided to deal with many issues digitally. Eurometaux prepared a number of submissions, including a joint paper with Cefic on good restriction practises, comments on the limited outcomes of nanomaterials registrations, a paper questioning a proposed approach to deal with combined toxicity, and a letter calling for more public consultations under the new Classification Labelling and Packaging Regulation (CLP) delegated act procedure (more information: Noam El Mrabet).

ECHA REACH & CLP

COMMITTEES

MSC-69: *April meeting held remotely*

The Member States Committee held its April meeting remotely, evaluating in parallel to the discussions, how holding the discussions over the web potentially impacts the running of the agenda and quality of the debates. Regular stakeholders were allowed to participate, after some initial hesitations, provided they could commit to a series of conditions ensuring confidentiality of the debates.

The agenda focused primarily on dossiers evaluations and substance evaluations for organic chemicals but included some interesting aspects, like the type of tests used to evaluate endocrine-disrupting effects and the link between positive findings in such tests and SVHC listing. An update on appeal and court cases of relevance to MSC was also provided and under AOB, an interesting question on possible divergences between the conclusions reached by different agencies on a same substance was posed. The importance of striving towards the One Substance One Assessment (OSOA) principle and thus paying attention to consistency between assessments was recalled.

Stakeholders were briefed by the MSC chair on the main outcomes of the (usual) closed sessions.

Overall, the meeting was considered as quite successful as the members overcame the possible IT difficulties to express opinions and contribute to polls when asked for. Also, some stakeholders were quite enthusiastic about the formula. We believe that it will be important to re-assess this at the end of the next MSC meetings (also taking place remotely) when the agenda items will also address topics such as SVHC listing and prioritisation for example, and thus more interventions are expected to ensure having a representative debate and decision-taking (more information: Violaine Verougstraete).

OTHERS

ECHA re-establishes an informal communication channel with industry: welcomed!

The unpredictable disruption that COVID-19 is causing across society has led ECHA to establish an informal communication channel with the industry to better monitor the evolving situation and to quickly capture and solve emerging issues that could compromise REACH implementation. To do so, and similar to what has been done in the past ahead of major REACH deadlines, ECHA has proposed to hold regular meetings in the form of monthly phone conferences. This initiative is well accepted by industry as it gives the possibility to exchange information and raise potential issues more promptly compared to – but without replacing – more official communication channels such as CARACAL. The idea is to limit participation to only a few associations to facilitate discussions. The first call, attended by ECHA, Cefic, Concawe, Eurometaux, AISE and ORO (only representative organisation), was organised on the 22nd of April and covered the following topics: i) COVID-19: industry impact, ECHA support actions, ii) registration statistics, comparison with previous years (discussion on ongoing trends) iii) implementing regulation on registration updates: state of play, iv) summary of key points discussed with REACH-IT/IUCLID IT group, v) scope and frequency of these meetings. The notes taken by Eurometaux during the first meeting have already been circulated to the Registration Taskforce. The next call will be organised on the 20th of May. Do not hesitate to contact us if you wish Eurometaux to raise specific topics (more information: Violaine Verougstraete and Lorenzo Zullo).

ECHA's annual report available: how ECHA reorganised in 2019 and plans to support the Green Deal

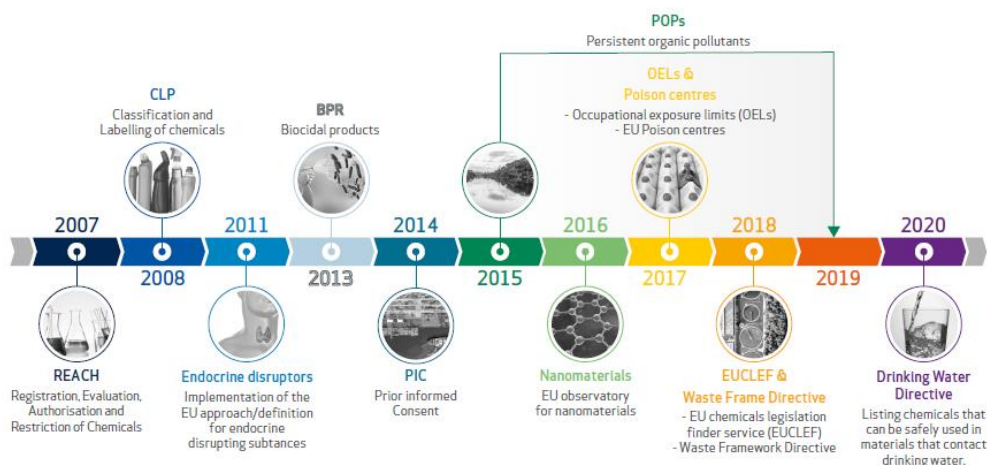
ECHA's detailed annual report, available via the following link: https://echa.europa.eu/documents/10162/29387629/annual_report_2019_en.pdf/ explains how the Agency focused its priorities and reorganised considering the new political priorities (the Green Deal for Europe, the growth strategy for Europe), the start of ECHA's five-year strategic plan for improving chemical safety, the preparations for the move to new premises for the Agency and the uncertainty related to the withdrawal of the UK from the EU.

The report details the achievements on the strategic priorities: 1. Identification and risk management of substances of concern, 2. Safe and sustainable use of chemicals by industry, 3. Sustainable management of chemicals through the implementation of EU legislation.

The way ECHA expects to contribute to the Green Deal is certainly worth a read to articulate and focus some of our actions! ECHA believes that their ongoing work can deliver synergies and efficiencies in scientific and technical tasks under various EU laws. This would not only simplify but also strengthen the legal framework by bringing transparency to how the EU coherently legislates chemicals and product safety in Europe; evaluating the potential application of a 'one substance – one assessment' approach; assessing groups of similar chemicals to speed up risk management and add consistency; and establishing ECHA's scientific work as the basis for defining safe values for chemicals and protecting workers. ECHA can also play a stronger role in promoting the competitiveness of European industry, by assuming a more robust stance on checking and controlling that chemical safety laws are followed and complied with at the EU's borders, for example, by sharing information with customs authorities.

The report also provides some nice visuals and info boxes summarising the evolution over the years and a good overview of the new tasks they have embarked on (e.g. EUCLEF) (more information: Violaine Verougstraete).

FIGURE 2: ECHA's new areas of work during the years



EU Chemicals Legislation Finder (EUCLEF): *launched*

ECHA has launched the COSME funded EU Chemicals Legislation Finder (EUCLEF) (<https://echa.europa.eu/legislation-finder>). This is a new online service that gives companies access to a free-of-charge overview of 40 pieces of EU chemicals legislation they may need to comply with, including legislation on occupational health and safety, environment, product control and many more. EUCLEF enables companies to search for their substances using a chemicals database to check whether there are restrictions or bans on them across different pieces of legislation. A dedicated regulatory advice service is also available to help companies on the content of different legislation and related regulatory obligations. For further assistance, ECHA proposes a [20 minute webinar](#) introducing EUCLEF and the [video tutorial](#).

EUROMETAUX CHEMICALS MANAGEMENT

EM FUNCTIONING

Eurometaux's Executive Committee: *meeting on 9 April*

The Executive Committee met remotely to have an exchange on the COVID crisis and specific needs for the sector. Eurometaux is collecting and aggregating the information received from its members on the impacts of the crisis, to share it with the Commission and in parallel has set up a communication channel to provide the members with very regular updates, information on support measures taken by Member States and EU institutions. Mr Peter Handley, DG GROW, Head of Unit "Energy Intensive Industries and Raw Materials" joined the discussion and exchanged with members on the EU support measures, confirming that monitoring through associations is extremely important to define measures to be taken in response to the needs expressed.

Other topics discussed by the Executive Committee included: the outcomes of an exchange with the German Ministry of Economy, the approval of the 2019 accounts and the presentation and approval of the 3 years advocacy and communication plans for its priority political advocacy topics including the Zero Pollution agenda: air and water and the Chemicals Strategy for Sustainability. These advocacy plans are used to structure Eurometaux's political advocacy in 2020. Each plan outlines the objectives, approach, advocacy timeline and key performance indicators.

The topic for the annual October conference was agreed upon, even if the conditions in which it could be held are still to be confirmed. It will focus on resource security and making Raw Materials a European strength, including a strong link with Circular Economy and recycling, as well as value chains and primary raw materials supply. The Executive Committee also agreed to have a separate event on the EU's sustainable chemicals strategy, bringing together key stakeholders from ECHA, Commission, OECD, Member States and others more information: Guy Thiran, Chris Heron and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

European Parliament on chemicals: *Eurometaux secures key amendments*

Last February, we explained that Eurometaux had started to reach out to Members of the European Parliament (MEPs) who began working on a non-binding text listing their wishes for the upcoming Chemicals Strategy for Sustainability (see CM News 98).

Well, our efforts were not in vain, as we secured a series of key amendments, such as:

- increasing support for chemicals that enable the Green Deal
- improving the effectiveness of control measures
- promoting substitution where technologically feasible, appropriate and in line with other policy goals
- promoting voluntary programmes between ECHA and industry to improve registration dossiers

But there is no time to rest on our laurels as we are only at the early stages of the Parliamentary process. Eurometaux will now secure the support of MEPs ahead of a vote on these amendments expected in June (more information: Noam El Mrabet).

REACH REGISTRATIONS

REACH registration updates: *i2a is leading the discussion with ECHA to solve the problem of free riders*

For a long time now, we have been faced with the problem of companies that don't contribute to the costs faced by consortia to update the registration dossiers. Especially for small consortia who have not requested co-registrants to allocate a budget for future updates, running behind companies to collect additional funds is vital and in most of the cases a mission impossible. And completing the registration process and obtaining a registration number is not the end of the story. Registration dossiers must remain aligned with emerging scientific evidence. Additionally, when a substance is evaluated, ECHA can request to conduct additional expensive tests, to which costs, theoretically, all co-registrants have to contribute. The reality is that, currently, there are no regulatory mechanisms that force co-registrants to do so and, in this case, REACH does not foresee the possibility to withdraw their registration numbers; everything relies on private contractual arrangements between companies within consortia, and ultimately on Court decisions. Being one of the first consortia to severely face this problem, whilst undergoing a group evaluation, the International Antimony Association (i2A) has initiated a dialogue with ECHA to find possible solutions and ensure a level-playing field between co-registrants. ECHA realised that the problem is serious and on the 30th of April organised a phone conference with i2A. Six ECHA high-level representatives attended the call. From an initial brainstorming, it seems that ECHA cannot do much without the introduction of changes in the legal text. While that will be considered as part of the REACH Review, a temporary solution could be to use the "opt-out" option for all co-registrants that contribute to the cost of new studies; in this way, companies who don't contribute to it and continue to refer to the 'old' joint submission, would become visible to ECHA, who could then launch the applicable compliance actions. More thinking is needed and, considering the important role of enforcement authorities, the topic could also be discussed in the Enforcement Forum. Considering that other metal consortia could face the same problem in the future, Eurometaux will closely monitor this topic and address it in the Registration Task Force (more information: Caroline Braibant, Violaine Verougstraete, Lorenzo Zullo).

RISK MANAGEMENT

RoHS Review 2021: *need for more transparency and scientific robustness*

On the 27th of April, the European Commission hosted, with the support of Öko-Institut, a stakeholder webinar to present the outcome of the assessment, prioritisation and shortlisting of substances for possible restriction in electrical and electronic products (EEE), including: cobalt dichloride, cobalt sulphate, nickel sulphate, nickel sulfamate, beryllium and its compounds, indium phosphide and diantimony trioxide (i.e. RoHS Pack 15 study). The webinar, attended by more than 100 participants, was also intended to formalise the methodology for granting exemptions under Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS). Several industry associations, representing producers of the shortlisted substances, expressed their concerns regarding the fact that several of their comments, raised during prioritisation process were not taken into consideration. Specifically, they believe that the studies used as reference were arbitrarily selected. For example, for antimony trioxide they referred

to Persistent, Bio-accumulative and Toxic Chemicals (PBT) Canadian studies that are not aligned with discussions/conclusions taken in the EU. Additionally, the methodology used leads to the prioritisation of some substances that are not used in EEE. The overall prioritisation process, including its criteria and their implementation, is not considered transparent and its scientific robustness is challenged. The conclusions of the substance-specific reports, expected to be finalised in May, will most likely only be considered by the European Commission in 2021, taking into account the upcoming RoHS review process, for which an inception impact assessment is expected to be published around the summer. In order to discuss the possibility for preparing a joint industry statement as input to the RoHS Review, a phone conference between “RoHS-substances” producers is scheduled on 6 May. The aim is to reiterate the request to establish transparent methodologies and to promote the importance of using the extensive knowledge on chemicals that has been built in Europe under REACH. (more information: Caroline Braibant, Violaine Verougstraete, Lorenzo Zullo).

Authorisation: support chromates

In February 2020, applicants of authorisation under Regulation (EC) No 1907/2006 (REACH) for the use of chromium trioxide in ‘functional chrome plating with decorative character’ received a letter from the European Commission regarding their analysis of alternatives and the possible requirement of a substitution plan. This letter is a consequence of the EU General Court judgment of 7 March 2019 in Case T-837/16, Sweden v. Commission. In this judgement, the Court gave its interpretation of the condition set out in Article 60(4) and (5) and Article 62(4)(f) REACH as regards suitability of alternatives and the requirement of a substitution plan and it differs from the interpretation currently available in the ECHA guidance.

The main difference comes from the fact that the Court links the requirement to provide a substitution plan, not to the availability of a suitable alternative specifically for the applicant (as this was reflected in ECHA’s guidance) but to the availability of a suitable alternative in general (i.e. not only for the applicant but for any economic operator in the EU). In the applications related to chromium trioxide-based functional chrome plating with decorative character, it is unsure if substitution is available or could become available within a short period of time. Therefore, the Commission has given the applicants the opportunity to complement their applications under the light of the new ruling, asking them to submit their substitution plan by end of the summer. However, there is still some unclarity on what such a plan would look like and how to fulfil expectations. A workshop facilitated by Eurometaux and involving key stakeholders like Commission, ECHA, applicants and users had been initially scheduled for 31 March to discuss the way future Applications for Authorisation (AfAs) for the surface treatment sector could be tackled. This workshop had to be cancelled due to COVID, but it is proposed to hold a webinar end of May with the same stakeholders, focusing on the requirements related to the substitution plan. The draft programme, defined by ECHA and Eurometaux, is currently being examined by the EU Commission and modalities will be communicated soon (more information: France Capon and Violaine Verougstraete)

INDUSTRIAL EMISSIONS

Industrial Emissions Directive: Inception Impact Assessment

The Commission officially started the process of the Industrial Emissions Directive (IED) revision by opening a consultation on the Inception Impact Assessment (IIA) end of March until the end of April. With the support of the Industrial Emissions Taskforce, Eurometaux successfully submitted comments on European Commission’s proposal. We restated our calls to secure the IED’s main objectives and also avoid overlaps with different legislations such as the Emissions Trading System (ETS) or the Waste Framework Directive. Most important to keep and strengthen are the integrated approach and a Best Available Technique (BAT)-based pollution control.

A total of 250 positions were submitted to the consultation, mostly originating from different organisations (industry, environment or other) and authorities of Member States (more information: Nathalie Kinga Kowalski).

TOOLS

MeClas: on YouTube!

MeClas was developed in 2010 to help industry fulfil its classification duties under the EU CLP, the UN GHS and US OSHA for complex inorganic materials like ores and concentrates, alloys or UVCBs. The web-based

tool, used by industries, authorities and consultants, is built on a limited number of simple and basic principles like high quality data, transparency, legal compliance. It recognises the specific properties and assessment techniques for inorganics and it is based on the most updated information on toxicity references and the self-classifications made available by the sector.

To promote MeClas and facilitate its accessibility, the MeClas Steering Committee has decided to launch a series of video tutorials, explaining how the tool works. The first tutorial recalls the classification background and the specificities of our complex materials explaining how the tool can help. It can be viewed here: <https://youtu.be/lv4sU7rz4x4>.

Special thanks to the members of the Steering Committee who supported the idea of this tutorial and Arriba SA for its realisation (more information: Frederik Verdonck and Violaine Verougstraete).

Bioelution: or metal release test?

On 21 April, the OECD Testing Guidelines Working Group examined the project proposal submitted by EURL ECVAM/Commission, aiming at developing a test guideline for the generation of bioelution data in gastric fluid. The proposal was submitted in November following the thorough validation by EURL ECVAM's expert group of the protocol developed initially by industry and all related evidence. The proposal primarily aims at ensuring that the gastric test results that are generated are considered reliable and reproducible. It was envisaged by Commission and industry as a way forward to avoid mixing the discussions on the generation and the use of the data, the science and the regulatory applications. To address the latter, Commission has set up a CARACAL subgroup that will define how to use the data for classification and read-across/grouping from September onwards.

The decision to include a test guideline in the work programme of the OECD Working Group is taken by a consensus of the National Coordinators, meaning that it is sufficient for one country to oppose for the process to stop. On 21 April, whilst support for the project was expressed by several countries and ICAPO, three countries opposed it (NL, DE, DK). The meeting chair decided to postpone the vote until 24 April to give the three countries a chance to sort out the divergences with Commission and EURL ECVAM. Over these three days, some editorial changes were made to the project proposal in an attempt to encounter the countries' concerns, namely replacing the term "bioaccessibility" and "bioelution" by "metal release" and replacing "bioelution method" with "HCl 0.032M method." On 24 April, the countries acknowledged the efforts but indicated that they still had some issues preventing them to support the project. As the "issues" at stake remained quite vague, the chair proposed once again to postpone the discussion. He asked the three countries and Commission to have further bilateral discussions to find a compromise and have the inclusion of the project voted during a special session, scheduled for 27 May.

We are in further liaison with Commission and EURL ECVAM to support them where they would need it, but clearly the hope to split science and politics, beliefs on how industry will apply the test and actual data, did not work. This must be carefully considered when preparing the work of the CARACAL expert group. Good news though is that the validated Standard Operating Procedure (SOP) will be published, that will already give huge recognition for the work done over the last years. We will also continue working on the setup of the physical repository as this is a condition sine qua non for a test guideline and reflect how to group materials like alloys and UVCBs, as the selection of representative materials will be at stake as well (more information: Adriana Oller, Kate Heim and Violaine Verougstraete).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

Quick tour of the horizon

Whilst the MISA 4 workshop on Exposure, initially planned for 22-23 April, had to be cancelled, further preparatory work is ongoing like the finalisation of the Self-Assessment Tools, exchanges with ECHA on the workshop's format and the identification of potential difficulties with the new Technical Completeness Check -running also on the Chemical Safety Reports (CSRs)- that should be implemented in autumn. An exchange is planned with ECHA in the coming days to identify a possible new date for the workshop. ECHA has invited the consortia to further communicate their difficulties in updating -including due to COVID- via the MISA functional mailbox. This is important as ECHA is continuing to closely follow the potential improvements in our dossiers as MISA KPIs.

Further, the counterion document environment -key to support the environmental read-across justifications under the RAAF- was finalised and posted on the MISA blog.

A revised version of the minutes of the Taking-Stock workshop of 13 February is being checked by ECHA and will be posted soon.

A catch-up call with ECHA and the consortia will be planned for June – information will be circulated soon (more information: Violaine Verougstraete).

Inorganic UVCB under MISA: iUVCB Platform Screening Phase & IUCLID Reporting

The inorganic Unknown or Variable Composition, Complex Reaction Products and Biological Materials (iUVCB) Platform work was launched in March with a preliminary screening of the Article 10 iUVCB Dossiers that were submitted in 2014. ARCHE Consulting prepared a defined list of data to be checked in the each iUVCB dossier and assigned quality scores according to their availability, so as to ensure objective analysis of the dossiers' status and to define expected efforts in the dossiers' refining. The quality scores helped to estimate how much work is expected to refine reporting on (i) Substance Identification and Classification, (ii) Hazard Assessment and (iii) Exposure Assessment. On 24 April, a web meeting took place with the iUVCB Platform to discuss the methodology developed for the screening exercise and the overall outcomes, prior to sharing and discussing the specific results with each Consortium. The next step of the Platform is to proceed with the refinements of the Dossiers that have been identified in the Screening Phase to finally submit the updates in Q1 2021 (tbc, upon work-plans finalisation). In parallel, Eurometaux is working on the iUVCB International Uniform Chemicals Information Database (IUCLID) reporting strategy, to define a clear methodology to limit robust study summaries reporting (as from Article 10 requirements) to the lead assessment entities per route of exposure only. ECHA asked to better understand the application of this approach using the case study shared during the MISA workshop. Eurometaux is following the development of the complete IUCLID dossier of the Slags, Doré furnace case study with the intention to submit the example early May and ideally get ECHA's final feedback by June. Once the reporting strategy is defined, the iUVCB Platform will be able to finalise and submit the work-plans to ECHA (more information: Federica Iaccino).

OUTREACH

Eurometaux: advocates for “sustainable substitution” at OECD-level

The OECD is drafting a guidance document to help practitioners when choosing to substitute chemicals. Their first draft was published last month and Eurometaux, together with colleagues from the Nickel Institute, submitted comments on this draft under the umbrella of BIAC, the voice of industry at the OECD. Our main goal: ensuring that sustainability, such as climate mitigation potential or circularity, is considered when looking for substitutes. We were subsequently invited to a webinar to illustrate our arguments with practical examples, which were well received by the drafting group (more information: Kai-Sebastian Melzer, Noam El Mrabet & Violaine Verougstraete).

HAZBREF project: “Best practices in chemicals management in the industry”: Webinar 27 May 2020

The Hazardous industrial chemicals in the IED BREFs (HAZBREF) project, kicked-off in September 2018, is based on the observation that 'Best available technology Reference document (BREF) documents currently lack specific information on certain hazardous substances. The project aims to close this knowledge gap so that industry and authorities can manage hazardous substances being released into the Baltic Sea. The 4th work package on best practices in chemicals management in the industry evaluations are based on the examples of three sectors' (textile, surface treatment of metals and plastics) measures to promote non-toxic material cycles to enable Circular Economy. For this project a consultant from Sweden efficiently analysed the different sector specific possibilities by evaluating technology-based difficulties and acknowledging the IED borders that regulate the production stage and not a product's whole lifecycle.

The webinar was very much anonymised as no participants list nor 'public chat room' were made available. The presentations showed once again that some participants (e.g. DE) are careful about proposing new Key Environmental Issues (KEIs) which would require confidential data or proposing techniques which are not yet largely approved. According to the project leaders' findings, it is not yet clear how this is supposed to link to ECHA's database. It will be important to make sure that work being done under ECHA is not doubled during the BREF writing process.

Though this project is the Baltic Sea Countries' own initiative, it showed that their concepts and ideas are taken highly into consideration for the IED Evaluation by the Commission. Before the webinar, Eurometaux submitted its comments on the draft report, for which final comments can be submitted until 15th May. A

pre- ultimate webinar is planned for the 4th June, where the end-results of the different projects will be discussed. Due to the confinement situations in Europe, it was decided to postpone a face-to-face meeting until September (more information: Nathalie Kinga Kowalski).

CALENDAR

For meetings at Eurometaux

For the moment no measures have been taken to cancel our next meetings, but due to travel restrictions imposed on certain member companies/associations, it will be possible to join meetings by GoToMeeting, Skype (or remotely). Any further decisions and/or cancellations will of course be communicated in due time.

For meetings at ECHA

ECHA will keep the situation under review and will provide any further information as appropriate. This information is published on ECHA's [website](#)

Further information on the COVID-19 situation can be found on the [ECDC website](#).

- 5 May: Eurometaux discussion on combined toxicity (GoToMeeting)
- 7 May: Environmental classification of metals workshop (GoToMeeting)
- 12 May: Risk Management Taskforce meeting (GoToMeeting)
- 13-14 May: WFD – CIS: SCG & Art. 21 – Postponed by a few weeks – TBD – to be held virtually
- 19 May: Evaluation Taskforce meeting (GoToMeeting)
- 26 & 27 May: Water & Industrial Emissions Taskforces Back-to-Back meeting (GoToMeeting) -
- 27-28 May: Substitution Plan workshop (tbc), to be held virtually
- 1-5 June: SEAC-47 – ECHA (to be held virtually)
- 2-5 June: RAC-53 – ECHA (to be held virtually)
- 5-6 June: Final Stakeholder Meeting HAZBREF project (Webinar)
- 8-12 June: SEAC-47 – ECHA (to be held virtually)
- 8-12 June: RAC-53 – ECHA (to be held virtually)
- 8-12 June: MSC-70 – ECHA (to be held virtually)
- 12 June: IED 2nd BREF review Workshop – (Webinar)
- 15-16 June: WFD – CIS: Water & Marine Directors meeting – (Zagreb, Croatia)
- 17 June: Chemicals Management Steering Committee – MCC (to be held virtually)
- 17-18 June: MB-58 – ECHA (to be held virtually)
- 7-9 July: Metals Academy Course – The Priorij (Corsendonck) – **Postponed, date to be confirmed**

ACRONYMS

For a full list of acronyms, the structure of the Chemicals Management Department and a lot of other useful & relevant information from the metals industry and from authorities please follow the link to our:
Reach Metals Gateway <https://www.reach-metals.eu/>

This website is tailored to the specific needs of the metals industry sector, an overview is provided on responsibilities & contact points in metal commodity groups and national metal federations and all information relative to MISA.