


EUROMETAUX CHEMICALS MANAGEMENT NEWS



And looking towards September.
Our Chemicals Management Steering Committee
is on the 4th September
The Chemicals Management Autumn Week
from 21-24 September.

More details will follow

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Dear All,

The “respite” was short-lived: a couple of weeks that flew away.

Although this de-lockdown period did not really deserve to be named ‘respite’. Some regions were still struggling with what seems to be an endless first wave while the voices warning about the imminence of the second wave(s) became louder every day. It had been announced here for the autumn, when a regular back to school and work rhythm had been resumed. But since then, acknowledged to be getting closer and closer, coinciding with the first people coming back from holidays and the consequences of others who had celebrated somewhat the ‘return of a certain normality’. In Brussels, we just had the time to see the “flatten the curve #stayhome” billboards be replaced by others promoting local tourism and barbecues, go out for a first drink (with social distancing), which seemed to entice us/some to avidly inhale a bit of sweet recklessness. Then the wave pushed us back into our seats -at home- overwhelming us with increasing numbers, local lockdowns, curfew and coloured zones.

“Welcome back anxiety! You hadn’t been away long enough”

I admit that I could not resist feeling some empathy for the people who believed it could not be true and decided to pursue their “respite mode” plans a little more, “whatever the reality”. Escaping for a short moment.

Reality has been depicted as “all of our experiences and knowledge of the world that determine how things appear to us. The state of the world as it really is rather than as you might want it to be”. Others claim that the state of being real has been defined as the genuine, the reliable, what one can safely lean on. “It is akin to truthful, valuable, even delightful. Its opposite is not illusion, but the fake, the counterfeit, that which can’t be trusted, has no cash value”.

Reality goes along with perceptions and hence individual realities based on distinct perceptions that are all part of one Reality. But it remains difficult to describe: a collection of indescribable objects that we cannot number, without knowing whether it is finite or infinite. Einstein wrote that “Reality is merely an illusion, albeit a very persistent one”.

Pandemic or not, humans -who are not philosophers- usually make a lot of efforts to not be ‘subdued’ by reality. One spontaneously prefers to live in an illusion with boundaries easier to handle. ‘The real has never interested anyone’ said once J. Baudrillard. “The finitude of our human condition, the intolerable perspective of getting older and of our death are sufficient to explain human’s constant obstinacy to turn away from reality” wrote C. Rosset, another philosopher who devoted his lifetime to apprehend it better.

The issue with the ‘real’ is that it will always catch up with you, resurfacing, whatever you have put in place. From there, one can either fall into profound discouragement or rejoice in every moment. The big difference is “desire” The best of the worlds is not the one where we obtain what we desire but a world where we can long for something” says the same C. Rosset. Reality is not an obstacle to desire. Desire is the healthiest attitude towards reality.

So, not knowing what our common Reality and common realities will look like tomorrow, this is what I wish you for the time being: to continue desiring, enjoying, to resist and reconcile with the world.

Violaine Verougstraete, Chemicals Management Director Eurometaux

COMMISSION – EUROPEAN PARLIAMENT

CARACAL: latest developments and immediate actions

CARACAL-35: The meeting was held on 30 June – 1 July. Of immediate importance, please note that the Commission has extended the deadline to comment on the “intermediates impact note” (CA/37/2020) to **31 August**. More details on our advocacy in a dedicated paragraph below (more information: Noam El Mrabet and Hugo Waeterschoot).

Sub-group on Endocrine disruptors: The 2nd meeting of the CARACAL sub-group on Endocrine Disruptors (EDs) was held on 2 July. The discussion was about options to include criteria for endocrine disrupting properties into the CLP Regulation. We can submit comments on the Commission’s discussion document “Options to include criteria for endocrine disruption in the CLP Regulation” (CASG-ED/2020/06) by **2 September**. Interested members should reach out to Eurometaux Secretariat by **14 August** (more information: Violaine Verougstraete and Lorenzo Zullo).

Sub-group on Information Requirements: The 2nd meeting of the CARACAL sub-group on Information Requirements was held on 2 July. The focus of the meeting was on genotoxicity and mutagenicity requirements. We can submit comments on the Commission’s document “Proposals for amendments of Annexes VII to X to REACH for Section 8.4. mutagenicity/genotoxicity” by **31 August**. Interested members should reach out to Eurometaux Secretariat by **14 August**. Additionally, we are looking for someone with direct experience on data generation for these endpoints who would be willing to participate in the next meetings on 4 September and 1 October (more information: Violaine Verougstraete and Lorenzo Zullo).

New DG ENV Director General: Florika Fink-Hooijer

The European Commission appointed Florika Fink-Hooijer as the Commission’s new Director General for Environment after Daniel Calleja Crespo was appointed as head of the Legal Service in June. For the last four years, Ms. Fink-Hooijer has been Director General of DG Interpretation. Prior to that, she was Director for Strategy, Policy and International Cooperation – DG Humanitarian Aid and Civil Protection from 2012 to 2016. In the preceding two and half years, she assumed the role of Head of Cabinet for the Commissioner responsible for International Cooperation, Humanitarian Aid and Crisis Response. She is a lawyer by background. The date of effect remains to be determined.

WFD Art. 21 Committee: Watch List final approval

On 1 July the Comitology Committee for implementing the Directive establishing a Community policy regarding water (WFD Art. 21 Committee) met virtually with their Member States’ experts. They discussed the proposed implementing decision on the new Watch List proposal, which was up to voting the next day in a written procedure. According to the results of the vote, Member State experts voted in favour of the draft measure. Following Member State experts’ opinion, the Commission may now adopt the draft measure (more information: Nathalie Kinga Kowalski)

Authorisations: is Parliament finally laying down its arms against?

The European Parliament (EP) has a few mechanisms to control the European Commission in the exercise of its implementing powers. Such implementing powers include delivering Authorisations on the use of substances. In recent times, upstream Applications for Authorisations (AfAs) for the use of chromium trioxide became highly political in Parliament, with Members of the European Parliament (MEPs) opposing them, starting with the broad and extensive CTAC application on CrO₃. By this they condemn Applicants and the Commission to revise their dossiers, much like Sisyphus ceaselessly rolling its rock to the top of a mountain. But it seems like Parliament is slowly changing its position on AfAs. Indeed, on 10 July, the EP rejected an objection to the Commission’s proposal to authorise certain uses of chromium trioxide (an AfA also known as the “CTAC clone”, which is led by REACHLaw Ltd for company Novotroitsk Plant of chromium compounds). The vote was extremely tight – in fact, it was the tightest possible, with 325 MEPs voting in favour and 325 against. Tied votes fail, and the result means the Commission doesn’t have to revise the authorisation proposal. This vote constitutes an excellent case study in determining how this new Parliament votes on chemicals policy and to conduct advocacy around AfAs moving forward, therefore

ECHA REACH & CLP

COMMITTEES

MSC, SEAC and RAC: survey for stakeholders

ECHA confirmed that the remaining Committee meetings (RAC, SEAC, MSC and MB) for this year and even in Q1 2021, will all be held remotely. Their reasoning for this is to avoid unpredictable situations with Covid-19 travel restrictions; but also, they want to take the time to further reflect on future meeting modalities (i.e. defining the balance between virtual and face-to-face meetings) and technical requirements. Moreover, we noted that cancelling the physical meetings this year will help in filling ECHA's budget gap. Björn Hansen agreed to consult Member States and stakeholders on the impact this decision would have on the functioning and the quality of the dossiers, building on the experience of MSC with remote sessions. The Committee chairs therefore set up a survey and bilateral calls to get feedback from the members and stakeholders. The RAC chair communicated the main outcomes, stressing that whilst everyone acknowledged the high level of the participants' engagement, several members and stakeholders in particular, mentioned the challenge to maintain the quality of the debate and thereby the robustness of the opinions. Many participants highlighted the social and communication aspects that normally play a large role in such meetings, and of course suffer greatly in a remote format. Eurometaux's input in the discussion mainly focused on the necessity to ensure good quality reviews by RAC and SEAC and enough input/expertise. A proposal of criteria was submitted to the RAC chair for defining whether written, remote or plenary formats would be the most effective. Other aspects like the importance of a timely distribution of documents and presentations - especially in remote settings - were picked up by ECHA as well. The questionnaires and assessment of SEAC and MSC are lagging a bit behind compared to RAC and we will keep you posted in case their conclusion would differ (more information: Hugo Waeterschoot and Violaine Verougstraete).

EUROMETAUX CHEMICALS MANAGEMENT

EM FUNCTIONING

Slags: moving on

As explained in the last issue of the news, a dedicated sub-group of Eurometaux members is reflecting about the contents and modalities of a project that would promote the added value of final slags as secondary aggregate and alternative raw materials in construction applications, demonstrate the contribution of final slags to circular economy and climate objectives and ensure a regulatory framework that supports the increased use of secondary aggregates. After the calls held in June and an agreement on the main axes of the work, a first proposal for an advocacy strategy was drafted and circulated for comments. Next steps will be to collect the experience and data on the Life Cycle Assessment of these materials (more information: Guy Thiran, Kamila Slupek and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability: Commission's internal feud goes public

On 7 July, the interservice consultation on the draft Chemicals Strategy for Sustainability started, allowing other Commission services to provide comments to the initial draft by DG ENV. In this context, an internal document from DG GROW mysteriously leaked to several NGOs and media outlets, revealing that the two departments became something like the Hatfields and the McCoys of the European Commission. In this

leaked document, DG GROW calls the initial draft from DG ENV “naive” and “negative” when it comes to drafting chemicals regulation. It also says that the current draft creates “unnecessary fear among citizens” and “should be less definitive and committing”. Concretely, among other elements, DG GROW opposes the introduction of a “toxic-free hierarchy” to unpin regulation, opposes the introduction of a Mixture Assessment Factor (MAF) to tackle combined toxicity, and wants to strengthen the Risk Management Option Analysis (RMOA) concept. This written joust prompted NGOs to vividly criticise DG GROW as being under the thumb of industry. On 24 July, they [wrote](#) to First Executive Vice-President Timmermans himself to express concerns over the Strategy being potentially watered down. This Strategy, which is probably the most transformative document in chemicals safety laws in the last two decades, is still expected to be published end of September. Will internal politics and quarrels affect its content and timeline? The next few weeks will tell (more information: Violaine Verougstraete and Noam El Mrabet).

Chemicals Strategy for Sustainability: Parliament formally adopts its resolution

On 10 July, the European Parliament [adopted](#) its non-binding resolution on the Chemicals Strategy for Sustainability by 579 votes to 18 and 84 abstentions. While we managed to shape parts of the report, notably by recalling the importance of voluntary programmes to improve dossiers (such as MISA), or the crucial conditions when seeking to substitute substances, unfortunately the final text remains a patchwork of chemophobic, non-scientific and emotionally charged statements, best exemplified by its paragraph 13, which states that endocrine disruptors are linked to COVID-19 (with no peer-reviewed scientific study to support such a claim). Fortunately, this resolution is non-binding, however it signals that there is a lot of work ahead in shaping the so-called “toxic-free environment” of the European Green Deal (more information: Noam El Mrabet).

CSS Roadmap: Eurometaux begins exploring value-chain project on exposure minimisation

As you may know from our public response to the CSS Roadmap, Eurometaux is working towards bringing together industry and regulators to further understand and minimise the exposure to hazardous metals throughout their lifecycle. Considering this, on 15 July Eurometaux organised a workshop with key Downstream Users (DUs) to have an exploratory discussion on such a value chain approach. Attendees included representatives from the batteries, wind and solar sectors. The automotive, medical devices and electronics sectors also expressed support to the idea but could not join us given the summer break (more information: Violaine Verougstraete and Noam El Mrabet).

REACH REGISTRATIONS

Chemflix project: the idea of creating an online marketplace for chemical data presented to the Registration Taskforce

On 3 July, a representative from Dow Chemicals presented the Chemflix project to the Eurometaux Registration Taskforce. The main idea is to enable trading of safety studies so as to facilitate read-across and reduce animal testing. Chemflix intends to foster matchmaking of consortia for new collaborative registrations by digitally accessing commercial material data with transparency and traceability certification, both in the framework of EU REACH registrations and for REACH-like programmes in e.g. Korea, Turkey, etc..). A group of companies, including Dow, P&G, Shell and Eni/Versalis, is trying to bring this concept to reality with the support of EU funds. A project proposal was submitted in July in the framework of the EU LIFE programme.

The aim of the call was to allow the Registration Taskforce to better understand the initiative and to receive all information necessary to decide to which extent Eurometaux should be involved. The taskforce supported the objective but wanted to give more thought to the scope of the project, so as to ensure that the outcome would fit well with consortia needs. Eurometaux has confirmed its interest in contributing to the discussion and future developments and to provide support in the dissemination of project results, but without further active involvement at this stage (more information: Caroline Braibant, Sandra Carey, Violaine Verougstraete and Lorenzo Zullo).

HUMAN HEALTH TASKFORCE

Human Health Taskforce: *well-attended summer GoToMeeting*

The main agenda point of this online meeting held on 16 July was combined/unintentional mixtures of chemicals, a key topic in Commission's Chemicals Strategy for Sustainability. The Chemicals Management Steering Committee had suggested at its last meeting to work along 3 tracks, namely assessing the "impacts" of the application of an additional Mixture Assessment Factor (MAF) in REACH, discuss which metal specificities we could bring into the discussion (e.g. essentiality, background levels) and liaise with other industry sectors. The Human Health Taskforce discussed how to best map the impacts of applying a MAF (of e.g. 2, 3 or 10) on the Risk Characterisation Ratios, starting from existing Chesar files, focusing primarily on consumers and indirect exposure via the environment. This mapping exercise will be run over summer and outcomes discussed with the metals having kindly agreed to participate in it. Results will be "anonymised" before being communicated more widely. The Environment Taskforce should launch a comparable exercise for environment and develop a tiered scheme to bring in current knowledge on metals interactions up to ambient effect- based approaches and environmental biomonitoring. The sector should have built up some evidence and proposals before the next policy workshop to be held on this issue (end of October).

Other topics discussed during the call included the possible refinement of the CLP guidance on potency/T25 for carcinogenicity (and hence, the derivation of specific concentration limits). The ECHA expert group had a call in July after being quasi dormant for several months. Ahead of the call, industry submitted a proposal for a possible way forward, which includes the compilation of a separate inhalation database and the calculation for the inhalation carcinogens of a potency value by linear ("T") and by non-linear Benchmark Dose (BMD) methods. The Expert Group agreed to review the outcomes. Of concern, was the request made by one Member State to consider the introduction of even lower Specific Concentration Limits (SCLs) for carcinogens of extremely high potency (0.001%). Only industry reacted to the request, asking to have a background document justifying why the current SCLs are not protective enough and what carcinogens would deserve more resolution. The follow-up will come in October/November 2020.

A status update was provided on the bioelution work, with the following steps being a call with EURL ECVAM on 24 July, the CARACAL expert group meeting in September and work on a physical repository. Finally, an overview of the latest HeTAP activities and the development of a peer-reviewed publication on mode of action/threshold for metals, taking into account the learnings from the 2017 HeTAP workshop, triggered the interest of the participants (and volunteers to review the paper). The draft minutes were circulated on 24 July (more information: Violaine Verougstraete).

ENVIRONMENT TASKFORCE

Pb CLH call: *launch of the Public Consultation on Pb metal imminent*

CARACAL concluded last year on the environmental classification of Pb in powder form and as a result the entry was included in an Adaptation to Technical Progress (ATP) to Annex VI of the CLP. However, they questioned the assessment made by RAC for the massive form. In addition, new evidence on a snail study demonstrated the importance of testing under standard conditions resulting in a different reference value to define the environmental classification for Pb. Both aspects convinced the Commission (DG ENV) to send the case back to ECHA with a request to consider the environmental classification of Pb metal in massive form. Although that is what we thought up until now...! As ECHA specified recently to Eurometaux that *"whether the forms of lead (massive and powder) should be considered separately for classification is an aspect on which RAC will need to conclude, the mandate is for the environmental hazard classification of lead, i.e. it is not only about the massive form"*. They further confirmed that the Public Consultation on Pb metal will be opened in the first week of August, allowing the sector to submit new information and clarification related to Pb in massive form, by the latest mid-September. Besides ILA, Eurometaux also intends to participate in the Public Consultation to ensure proper recognition for a distinctive classification between the powder and massive form (more information: Steve Binks, Jasim Chowdhury, Violaine Verougstraete and Hugo Waeterschoot)

RISK MANAGEMENT

Chromates-SAGA: the report of the second workshop available

Several applicants who were granted Authorisations have received letters from the Commission over the last months, inviting them to consider submitting a Substitution Plan within 6 months in case a suitable alternative would be generally available or alternatively to stop using the substance for the requested application use(s). The letters were mostly focussed on the plating sector with decorative character challenging upstream applications providing an Authorisation coverage for a series of small metal coating enterprises. This prompted a lot of discussion in industry on the meaning, the ways on how to demonstrate this, and the potential need for alignment between sectors, as well as by the SEAC Committee on how to judge such substitution plans. Eurometaux and CETS (the European surface treatment sector) were invited to initiate discussions and thus organised 2 webinar sessions to help define the most problematic issues and discuss how they could be best resolved. The last of them was organised on 18 June for which the report became recently available. In follow-up, the ECHA SEAC Committee invited Eurometaux to report on the outcome at its next meeting in September along a debate the Committee will hold on the issue. By then ECHA would have received the first Substitution Plans (from CTAC and others). Eurometaux's objective remains to promote a pragmatic assessment and application of the SAGA concept and to create a learning momentum for those applicants that will follow (more information: Hugo Waeterschoot).

Intermediates definition: industry aligned and stepping up for advocacy

A correct assessment of intermediate status is critical for industry to define the relevant Registration needs under REACH as well as to define the scope and relevance of Authorisation or Restrictions. While the REACH legal text (Article 3 § 15) is clear and conclusive, ECHA has, under the pressure of the Member States, tried to introduce additional conditions.

However, the Court of Justice case on Acrylamide C-650-15 P confirmed last year that the interpretation of Intermediate status should be restricted solely to the conditions stated in the legal text. Industry was therefore very surprised when, on the outcome of the Court Case, the Commission forwarded an impact note on the Intermediates definition for comments and approval by the Member States. The reply from industry to the CARACAL this month was not surprisingly “uni sono” and it was confirmed by a detailed legal assessment conducted by Steptoe (under the auspices of Cerame-Unie) that the note extended the conditions far beyond the legal judgment. Hence industry called on the Commission to withdraw the impact note. Some Member States, such as Poland, supported this view while others confirmed their support for the note without any legal consideration, prompting Commission to extend the deadline for comments on the note to 31 August. This triggered further advocacy from industry's side towards Member States informing them of this dangerous principle that the Commission and ECHA have of not aligning their views and guidance with the outcome of the Court Case. In this respect industry was able to meet the Head of Unit on “Competitiveness, Innovation & Digital Europe” of the Secretariat General, Olivier Girard to stress the importance of respect for the outcome of the Court Case. Eurometaux participated in this session, along with Glass Alliance Europe, IMA and Cerame-Unie the organiser. Furthermore, Eurometaux has set up a briefing call for its members on the 5th of August to further stimulate advocacy activity (more information: Daniela Vigilante and Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

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

Bioelution: calls with EURL ECVAM to have a first draft

Now that the OECD Testing Guidelines Working Group (OECD WNT) has agreed to include the drafting of a Test Guideline on ‘metal release’ in its work programme, most efforts go into preparing a first draft that could be discussed by the OECD WNT experts who volunteered to be part of the process. One of the challenges is to find the appropriate balance between technical aspects of the protocol and

use/interpretation of the data, without going into any of the applications' details, which are to be debated in the CARACAL Bioelution sub-group. The main objective for preparing such a first draft is to have a scientific, neutral basis for discussing the test protocol without interference of policy aspects. The sub-group of OECD experts should discuss this draft end of September. The CARACAL sub-group -discussing the policy aspects- will meet for the first time on 25 September. Important by then will be to have an industry agreement on how bioelution results should be used for refining the alloys classification scheme and how grouping could be performed (to avoid the testing of all metal-containing materials) (more information: Adriana Oller and Violaine Verougstraete).

Multi-Metallic database: a modern and easy approach to centralise and provide access to data on metals

The Multi-Metallic database (MMDB) is an online tool that Eurometaux is developing with the intention to store and facilitate access to a broad range of data on metals, including environment and human health properties, hazard classifications, Toxicity/Ecotoxicity Reference Values, MvE, TRV and bioelution.

Thanks to the MMDB, such information, previously stored in complex excel files, will now become accessible via a user-friendly online interface. Data owners will be responsible for their respective data, enabling the creation of a unique and centralised reference for data on metals. Substances will be organised by metal families and, among other functionalities, it will be possible to visualise and compare specific values across substances belonging to the same metal families.

The MMDB will also be integrated with data scraping technologies, provided by [Chemycal](#), to continuously and automatically identify potential differences between the data stored in the database and those published on ECHA's website. This will allow data owners to minimise their manual workload in maintaining the information of the database up to date, as well as providing explanations in case of differences between the information in the MMDB and on the ECHA website. A further functionality to support data sharing will be integrated in the MMDB, to facilitate both legal access agreements and practical IUCLID files sharing, thanks to the possibility for data owners to store and give access to authorised users to IUCLID Assessment Entity files.

The MMDB is currently under development. A first demo will be presented towards the beginning of September and the official release is planned in Q4 2020 (more information: Violaine Verougstraete, Federica Iaccino, Lorenzo Zullo)

METALS & INORGANICS SECTORIAL APPROACH (MISA)

MISA: follow-up actions

Further to the catching-up webinar of 16 June, draft minutes were circulated, and work has started on the actions that were agreed upon. To note among others: ECHA has provided replies on the survey we had in follow-up of the publication of the mapping of the chemicals universe (December 2019 and the counterion files on citrate/acetate (to be used in the read-across justification) have been posted on the MISA blog. ECHA has been sending or will send 'one-page' overview documents on the MISA substances and invites consortia to communicate via the MISA mailbox on the difficulties they experience in fulfilling actions they committed to in the workplans and/or updating.

The long-awaited Self-Assessment Tools (SATs) for exposure assessment, or in other words the preparatory 'homework' for the MISA exposure activity have finally been circulated to the MISA participants. SATs aim at helping consortia to dive into their registration files before MISA workshops, to identify aspects where they have possibly been incomplete or deviating from guidance because of specificities that require further discussions/work, to identify difficulties to bring up in the discussions. A Q&A session on the SATs will be held on 6 August. The exact modalities and formats of the MISA Exposure workshop still need to be defined with ECHA (1 webinar/topic?). Details will be circulated as soon as available (more information: Hugo Waeterschoot and Violaine Verougstraete).

MISA-iUVCBs: summer update on the ongoing iUVCB reporting strategy discussion with ECHA

During these summer weeks, exchanges with ECHA on the reporting strategy have decreased, but have not stopped completely. Following some specific comments shared on the test case used in the IUCLID reporting strategy discussion, a call was organised with ECHA this week to set up next steps and define timing.

A detailed list of pending items and identified actions have been prepared and will be used to organise 2 half-day virtual meetings mid-September, aiming at: addressing ECHA's concerns, defining most appropriate terminology and identifying solutions to finalise the IUCLID reporting approach.

OUTREACH

OECD BAT Expert Group: *webinar for the Expert Group on BAT*

On 2 July, the OECD held a webinar to provide an update on the Best Available Technique (BAT) projects and those related and to agree on the next steps. The secretariat explained that the final revised draft of the guidance document on determining BAT, BAT-associated environmental performance levels and BAT-based permit conditions was sent to the Joint Meeting for final approval. The declassification process by the Joint Meeting was successfully finalised, and hence the final document shall be posted in August. Eurometaux had been actively involved in the drafting of the BAT 4 project's Guidance Document, which included three commenting rounds. As a result, Eurometaux is mentioned among the list of experts involved in the drafting of the guidance document. Work on the other two remaining activities will now resume. Regarding Activity 5 on value chain aspects of determining BAT, it became clear that the ambitions need to be decreased, considering the limited availability of data. Also, a clearer scope of the activity shall be prepared before the next meeting, considering the very diverse set of interests expressed during a commenting round in 2019.

For Activity 6 (Cross-country comparison of selected BREFs (Best available technology Reference documents)) the expert groups decided to use thermal power plants, textiles and cement, as example sectors for the exercise. According to these sectors three sub-groups have been created to collect and prepare data. The next face-to-face meeting is planned for mid-November in Paris (to be confirmed 6 weeks beforehand) (more information: Nathalie Kinga Kowalski).

UN GHS Annexes 9.7 and 10: *countries are providing input and comments*

In a collective action between ICM and Eurometaux, industry proposed an update of the GHS Environmental Classification guidance (Annex 9.7) and the Transformation Dissolution Protocol (Annex X) to align the guidance to the GHS (Global Harmonised System of classification and labelling of chemicals) requirements for the long-term (chronic) environmental classification of metals. This update is an absolute need for the whole metals sector, given the discrepancy with the GHS guidance (running behind) as well as for the European sector to ensure the key reference for the Classification Labelling and Packaging Regulation (CLP) sections on metals. A correspondence group session at GHS (worldwide level) was organised early June explaining the modifications suggested, requesting a view on specific questions and soliciting comments. Contrary to the usual practice, the session was well attended by Member States who filed quite a lot of comments and suggestions in July. Besides Canada, and the UK, most of these comments were filed by EU countries, including ECHA and the European Commission. Feedback from the authorities is also expected. While this provides good support for an update of these GHS annexes it will for sure challenge some of the proposals made by the metals sector. The next steps include the preparation of a Response to Comments (RCOM) table by mid-August and the launch of the negotiations starting at the end of August (more information: Claudine Albersammer, Stijn Baken and Hugo Waeterschoot).

COMMUNICATION

ERRATUM: we apologise for a slight error that slipped into our previous edition, thanks Adriana for your acute attention 😊

SEAC-47: Co-salt restriction debate postponed but an opinion was reached on many other restrictions, including microplastics

The opinion on the Co-salts restriction was postponed after SEAC 46 went into its second Public Consultation aiming for a review of the outcome of the RAC and SEAC conclusions. In follow-up, the cobalt

sector focussed on gathering information to demonstrate that a Binding Occupational Exposure Limit (B-OEL) would be more effective and efficient than the suggested restriction on 5 salts proposing a value of 1 mg/m^3 (TWA) on a respirable basis a value of $1 \text{ } \mu\text{g Co/m}^3$ (as 8 h TWA, for the inhalable fraction) and $0.5 \text{ } \mu\text{g Co/m}^3$ (as 8 h TWA, for the respirable fraction). Given the Covid outbreak and the importance of the case, the sector asked for and received an extension, hence SEAC had to postpone its final opinion forming to the September meetings.

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 confirmed that the remaining Committee meetings (RAC, SEAC, MSC and MB) for this year and even in Q1 2021, will all be held remotely.

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 information can be found on the [ECDC website](#)

- **6 August:** MISA 4 - SAT Questions & Answers (Webinar – 14:30 CEST)
- **2 September:** Risk Management TF meeting – To be defined (Brussels)
- **4 September:** Chemicals Management Steering Committee – To be defined (Brussels)
- **7-11 September:** SEAC-48 – ECHA (Held remotely until further notice)
- **7-11 September:** RAC-54 – ECHA (Held remotely until further notice)
- **14-18 September:** SEAC-48 – ECHA (Held remotely until further notice)
- **14-18 September:** RAC-54 – ECHA (Held remotely until further notice)
- **21-24 September:** Chemicals Management Autumn Week – To be defined (Brussels)
- **23-24 September:** WFD – CIS: SCG & Art. 21 – (Location to be confirmed)
- **24-25 September:** MB-59 – ECHA (Held remotely until further notice)
- **30 September – 1 October:** WFD CIS WG Ground Water – Meeting to be confirmed (Germany)
- **6-7 October:** WFD CIS: ATG Water Reuse (Location to be confirmed)
- **12-13 October:** WFD CIS: WG DIS – (Location to be confirmed)
- **12-13 October:** WFD CIS: WG Ecostat – (Location to be confirmed)
- **12-16 October:** MSC-71 – ECHA (Held remotely until further notice)
- **20-21 October:** WFD – CIS: WG Chemicals – (Location to be confirmed)
- **21 October:** Evaluation Taskforce – To be defined (Brussels)
- **27 (am) – 30 (noon) October:** WFD CIS: SCG & Art. 21 – (Location to be confirmed)
- **12-13 November:** WFD – CIS: SCG & Art. 21 – (Location to be confirmed)
- **12-13 November:** OECD Expert Group on BAT – (Paris, to be confirmed)
- **30 November-4 December:** SEAC-49 – ECHA (Held remotely until further notice)
- **30 November-4 December:** RAC-55 – ECHA (Held remotely until further notice)
- **1-2 December:** WFD CIS: Water & Marine Directors meeting (Potsdam, Germany)
- **4 December:** Chemicals Management Steering Committee – To be defined (Brussels)
- **7-11 December:** SEAC-49 – ECHA (Held remotely until further notice)
- **7-11 December:** RAC-55 – ECHA (Held remotely until further notice)
- **7-11 December:** MSC-72 – ECHA (Held remotely until further notice)
- **12-14 January 2021:** Metals Academy – Priorij (Corsendonk) (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.

On the next pages, some fun & games for you to enjoy

CHEMICALS STRATEGY for ZENITUDE



Two little pearls found in the transcripts of the online meetings,
showing that machines do have some fantasy 😊

UVC Bees & Bio Lucian

Appreciated by some members, so here are another few quotes to associate with their author.

Socrates / Anonymous / Soren Kierkegaard / Charles Spurgeon /
A.A. Milne / Joyce Meyer / Benjamin Franklin / Lao-Tze

1.	People say nothing is impossible, but I do nothing all day 😊	
2.	Life is not a problem to be solved, but a reality to be experienced	
3.	Watch your thoughts; they become words. Watch your words; they become actions. Watch your actions; they become habits. Watch your habits; they become character. Watch your character; it becomes your destiny	
4.	Life's tragedy is that we get old too soon and wise too late	
5.	The secret of happiness, you see, is not found in seeking more, but in developing the capacity to enjoy less	
6.	Anxiety does not empty tomorrow of its sorrows, but only empties today of its strengths	
7.	Just when the caterpillar thought the world was ending, he turned into a butterfly	
8.	A positive attitude gives you power over your circumstances instead of your circumstances having power over you	

Non-ferrous metals quiz

1. Which of the following is the lightest among the following?
 - a) Magnesium
 - b) Aluminium
 - c) Titanium
 - d) Copper
2. Which of the following element when alloyed with magnesium does not reduce the tendency to crack under stress?
 - a) Aluminium
 - b) Silicon
 - c) Zinc
 - d) Copper
3. Which of the metal is alloyed with silver to make sterling silver?
 - a) Zinc
 - b) Copper
 - c) Magnesium
 - d) Aluminium
4. Tin has low viscosity.
 - a) True
 - b) False
5. Which of the following element when alloyed with magnesium does not reduce the tendency to crack under stress?
 - a) Aluminum
 - b) Silicon
 - c) Zinc
 - d) Copper
6. Which of the following is an alloy of tin?
 - a) Brass
 - b) Bronze
 - c) Pewter
 - d) Steel

Memory game

**On the next page look at the following advertisement for 45 seconds with attention.
Then turn that page over...**

PILULES DE BLANCARD
 A L'IODURE FERREUX
 INALTÉRABLE

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APPROUVÉES PAR
 L'ACADÉMIE DE MÉDECINE
 ET
 RECONNAISSANT TOUTES
 LES QUALITÉS DE
 L'IODURE
 ET DU
 FER

PILULES DE BLANCARD
 — à l'iodure ferreux inaltérable —

SIROP
D'IODURE DE FER
INALTÉRABLE
DE BLANCARD

L'ACADÉMIE DE MÉDECINE
 a décidé (Séance du 12 Août 1851)
 Que la propriété de conservation de ces Pilules
 et du sirop, de garantir de la falsification, dans le
 flacon de verre, au-dessous duquel se trouve le
 nom de son inventeur *Blancard*

Ces préparations ont une efficacité souveraine dans les cas
 d'Anémie, de Chlorose (Pâles couleurs), de Menstruation malade ou
 difficile, dans les Affections scrofuleuses (Tumeurs, engorge-
 ments, humeurs froides), etc etc.

... **AND reply** if the following statements are correct or false?

1. There are two women and a man with glasses
2. The pills that are prescribed are for chlorosis & tumours
3. The name that is written is Blanchard
4. It is conditioned as a syrup
5. The book refers to the academy of medicine (Académie de Médecine)

Answers to the games

Enjoy the rest of the summer & take care

Quotes:
1. A.A. Milne / 2. Soren Kierkegaard / 3. Lao-Tze / 4. Benjamin Franklin / 5. Socrates /
6. Charles Spurgeon / 7. Anonymous / 8. Joyce Meyer

Quiz: 1. b / 2. d / 3. b / 4. a / 5. d / 6. c

Memory Game
1. True
2. True
3. False (Blancard)
4. False (Pills – Pilules)
5. True