

EUROMETAUX CHEMICALS MANAGEMENT NEWS



In September please join us on GoToMeeting for:

- 2 September: Risk Management Taskforce
- 4 September: Chemicals Management Steering Committee
- 17 September: Registration Taskforce
- 22- 24 September: Chemicals Management Autumn Week

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Dear All,

Alike others, when I was much (😊) younger, I got carried away with superheroes from animated series, in particular those drawn in manga style, where heroes have big eyes in which a blinking star appears -backed by a light crystalline sound- to express the sudden emotion of the -usually feeling lonely- hero. A short demonstrative moment, with the sunset or the galaxy displayed in the background, to conclude a 'quest' and often a series of fights against improbable robots and/or nasty protagonists. A way for the hero to share his/her regrets that these fights are unavoidable to 'save humanity' and intrinsic to our (lame) condition, but also - to lower the tension at the end of the episode - reassuring the kid that I was, that at least for that evening, everything was 'ok'. Not solved, not fixed, but fine enough to move on to other activities. My vigilance could be put a bit 'on hold'. There was something in all this that was quite reassuring even though I knew that the next day, when I would switch on the TV, the adventure would resume, once again following the same plot. The same personages would embody the good and the bad, be faced with slightly different challenges, but with their determination remaining the same: saving the blue planet!! A comforting consistency!

And by the way, these superheroes were saving the whole planet! Not just a bubble of 5 (COVID in Belgium) or a preferred region (EU vs. rest of the world?!). Their ambition was at the scale of the rescuers that they were! Let's go wide, let's go global, let's do it! I could only envy their lack of fear, the expansion of love without boundaries and non-discriminating, the seemingly endless energy and openness towards all human beings!

Thinking about it, the authors of the manga were however also careful enough not to propose a too dichotomic categorisation, the good vs. the bad! Probably more to avoid us feeling 'blasé' after a couple of episodes rather than because they wanted to be closer to reality. And it worked! By carefully introducing some (not 50 shades of virtuousness!) nuances in the personages, feelings were warranted. The goodies had some weaknesses and moments of doubts...whilst even the worst opponent had some traits that could trigger a brief moment of empathy. This also allowed for one's imagination to keep going, complement the plot, anticipate the next episode etc.

But what am I heading for? Now that it is the end of the summer break, I have a big temptation, especially knowing that the Chemicals Strategy and the Zero Pollution Ambition are waiting around the corner, to redraw what will come out along the same lines. A super programme for superheroes with multiple episodes, reconciliating emotions, global understanding, consistency and imagination as an aim to keep the dynamics ongoing!

You are welcome to join my spacecraft 😊



Violaine Verougstraete, Chemicals Management Director Eurometaux

COMMISSION – EUROPEAN PARLIAMENT

Implementing Regulation on Dossier Updates backed in the REACH Committee: *what's next?*

Member States, via the REACH Regulatory Committee, expressed unanimous support to the draft Implementing Regulation on REACH registration dossier updates, which shall now be adopted by the European Commission. Once adopted, it will be published in the Official Journal in a matter of weeks.

Such regulation is intended to clarify REACH registrants' duties and timing for updating the registration dossiers by indicating when and within which timeframe updates are required to be submitted. Eurometaux has been directly involved in the discussion since the beginning of the debate in 2019.

Unfortunately, the timings specified in the regulation do not take into account the complexity of the reality in which consortia operate. One such complexity, is that for metals, read-across approaches have been widely used to assess the properties of metal compounds. This means that new scientific evidence/data on a specific substance might lead to the update of multiple registration dossiers within a single consortium. In this kind of situation, updating all the dossiers within the deadline set in the draft implementing regulation is not realistic.

ECHA and national enforcement bodies are planning to discuss in the REACH Enforcement Forum a series of activities to be conducted in 2021, including an awareness-raising campaign and screening of the registration dossiers. Meanwhile, at Eurometaux level, the work is focused on developing a joint industry guidance document in cooperation with Cefic, to support the definition of best practices for registrants and co-registrants. The topic will also be on the agenda of the next Registration Taskforce meeting to be held on the 17 September (more information: Caroline Braibant, Sandra Carey & Lorenzo Zullo).

ECHA REACH & CLP

COMMITTEES

RAC: preparatory activities on Cd Occupational Exposure Limits

ECHA has been tasked by DG EMPL “to assess the option of an airborne occupational exposure limit and/or a combination of an airborne occupational exposure limit and a biological monitoring value for cadmium and its inorganic compounds based on their possible equal effectiveness in protecting the health of workers”. Starting points for ECHA's report are the existing scientific evaluations made by the Scientific Committee on Occupational Exposure Limits (SCOEL) ‘considered to be up to date, unless new scientific information indicates that this is not the case’. A call for evidence was launched in spring, to which industry contributed extensively, providing up to date information/reviews on uses and occupational exposure, genotoxicity and modes of action and repeated dose toxicity/carcinogenicity. Two follow-up calls were set up by ECHA to allow industry to explain the key elements of their submission and to inform industry about the timing of the next steps. ECHA enquired about the status of the data presented to be able to refer to it in their scientific report, the data needs to be publicly available (publications in peer-reviewed journals or posted on websites etc.). ICdA will follow up on this. The Public Consultation on ECHA's draft report should be launched around the end of September and last for 60 days. RAC will be consulted in parallel as it needs to issue an opinion (with ECHA's report becoming the background document). The first RAC plenary discussion is expected to take place in December (remote). RAC's opinion and the report should be finalised and sent to DG EMPL by April/May 2021 (more information: Howard Winbow, Mik Gilles, Patrick de Metz, Noëmi Lombaert, Christine Spirlet and Violaine Verougstraete).

OTHERS

ECHA & Industry call: catching up at the end of the summer

The 4th ECHA/Industry representative call was held on 27 August. ECHA presented updated statistics on REACH registrations that confirmed a lower registration rate than was expected (-12%).

Regarding the new Technical Completeness Check (TCC) rules and more specifically on the automated checks, ECHA reported that there has been an increasing amount of TCC failures/rejections (at the validation assistant phase). ECHA suggested to carefully read the letters containing instructions on how to

correct these failures as these should help in avoiding rejections. Checks on the Chemical Safety Reports, including on the documents, are expected to start in October.

The call also covered a brief discussion on the possibility to revoke REACH registration numbers. ECHA explained that the topic was discussed at the REACH Enforcement Forum due to an issue raised by an individual Member State. The problem came down to the failure in a Compliance Check of an Only Representative, who was not directly introducing its substance on the EU market. Following the impossibility of enforcing the Compliance Check decision, the Member State asked for the possibility to revoke the registration number. ECHA investigated this request with the Commission, but it seems that the REACH legal text does not permit this. On the other hand, a separate discussion is ongoing on the revocation of registration numbers for non-existing companies which seems to be feasible in this case. Eurometaux took the opportunity to explain the importance of establishing a revocation number mechanism to avoid free riders. It was suggested to keep this in mind and to look for possible solutions within the current legal text or future revisions. ECHA will consider this issue in the framework of the REACH Review, for example in the report on the functioning of REACH it is expected to prepare.

The next ECHA/Industry call will be held on 25 September and it will include an analysis of the Brexit situation. Notes of the call will be circulated in the coming days (more information: Violaine Verougstraete and Lorenzo Zullo).

EUROMETAUX CHEMICALS MANAGEMENT

ENVIRONMENT

Environment Taskforce meeting: *a busy agenda with focus on environmental classification aspects*

The Taskforce met via webinar on 26 August focussing on a series of methodological issues. The Taskforce expressed support for Eurometaux's proposal to contribute to the ongoing Public Consultation on the environmental classification of lead metal. The aim is to ensure proper attention for the existing metal's environmental classification guidance (see further).

On the Rapid Removal issue, the Taskforce welcomed the conclusions of the DHI report that had been ordered by Eurometaux and some commodities. DHI had been contacted as independent consultant to conduct a critical review of the Extended Transformation Dissolution protocol (TDP-E), in follow up of the challenging meeting on the Rapid Removal concept held in ECHA in June 2019, during which a number of issues compromising its acceptance were identified. DHI's report concludes that the scope of the protocol can be restricted to metals (so excluding organics) and confirms, based on the available results, the robustness of the TDP-E. On the other hand, the report also indicates it could be helpful to work further on demonstrating the assessment of the irreversibility of the binding of metals to particles. It was agreed that each consortium/association will consider these conclusions as part of the weight-of-evidence assessment for rapid environmental transformation of metals, to be included in the self-classification in the REACH registration dossiers.

Still on classification, the taskforce took note of the status update on the review of the UN GHS annexes on the environmental classification of metals. Many countries (mostly EU Member States) provided extensive comments on the suggestions made by industry. A lot of these were constructive but some tried to use the UN GHS to progress with issues that could not be achieved at EU level, and this is regrettable. Eurometaux will prepare a response to the comments document and a revised version of the guidance while the ICMM working group headed by Claudine Albersammer and Stijn Baken will take this further at the advocacy level with the members of the Correspondence Group (more information: Stijn Baken, Jelle Mertens, Claudine Albersammer (on UN GHS aspects) and Hugo Waeterschoot).

Environment Taskforce (ENV TF) meeting: *attention for strategic emerging issues*

The EU is moving forward with its Endocrine Disruptor (ED) programme, supported by the recognition the issue got in the Roadmap for the Chemicals Strategy for Sustainability. In addition to the policy path (inclusion of an additional endpoint under the Classification Labelling and Packaging Regulation (CLP) or being tackled under REACH), the application of the ED concept to metals and its assessment present a number of outstanding challenges. The taskforce supported the idea to increase knowledge by organising a scientific workshop with external high-level experts to identify the metal-specific issues that would require

attention if a CLP classification scheme is set up. Further scientific concept development could then be included in an Environment Toxicity Advisory Panel (ETAP) project in the coming year, while Eurometaux could focus on the communication and advocacy aspects.

The combination effects topic is the second strategic emerging issue that requires attention, in particular the evaluation of the impact of the Mixture Assessment Factor (MAF) for metals. The Mixture Assessment Factor is a policy concept that aims at identifying the chemicals that require a refined assessment (and hence, those that have a large margin of safety and do not require follow-up). The sector fears that this concept is discriminatory for metals due to aspects like natural occurrence and data richness. The Taskforce reviewed and agreed on a Terms of Reference (ToR) for a study to assess the impact that different MAF scenarios may have on the sector. The outcomes will support the advocacy to promote alternative and more refined approaches, including the possible drafting of guidance. The ToR will be presented to the Chemicals Management Steering Committee for adoption (more information: Jelle Mertens, Stijn Baken and Hugo Waeterschoot).

WATER

Sediment Management: background and best cases

Eurometaux joined as a 'reader' the activity for developing a technical document on sediment management. The work is organised under the Common Implementation Strategy (CIS) Working Group on Ecological Status (ECOSTAT). For each of the four chapters a sub-group was created. Representing Eurometaux, the most wonderful Chris Cooper joined the 'Sediment Contamination' group at the beginning of the year.

A first draft document, prepared under the lead of SedNet and the Dutch representatives, was recently shared for feedback. It includes some recognition for metal specific considerations, such as 'natural background'.

Further, Eurometaux was asked to share proposals for case studies. The group aims to collect experiences that emphasise specific aspects of sediment management practice. A possibility would be to give links to existing risk assessment reports or provide sediment-related information that has been developed under REACH. Please feel free to come forward with ideas or proposals to Chris (more information Chris Cooper and Nathalie Kinga Kowalski).

TOOLS

Bioelution: draft Test Guideline circulated to OECD Expert Group

EURL ECVAM and industry made use of the supposedly quieter summer weeks to prepare a draft "Test Guideline" that could serve as a starting point for the discussion of the OECD WNT Expert Group, scheduled for the end of September. This Expert Group has been set up by the OECD secretariat in follow-up of the formal inclusion of the project to develop a test guideline for bioelution on OECD WNT's workplan. The draft Test Guideline, now named: HCL 0.032 M method - Determination of relative metal release using a simple simulated gastric fluid, is based on the Standard Operating Protocol (SOP) developed by industry and extensively reviewed by EURL ECVAM's Expert Group. EURL ECVAM has also published its final opinion on the scientific validity of the bioelution method (hurray!!). It can be found here:

<https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/esac-opinion-scientific-validity-bioelution-test-method>

The CARACAL sub-group, who will discuss how metals release data can be used in policy (CLP, read-across and bridging) will meet for the first time on 25 September. As announced in our previous edition, important for these discussions will be to have an industry agreement/alignment on the use of metals release data but also to provide a proposal on how to group materials that will have to be tested to avoid extensive testing programmes. A discussion on possible schemes is scheduled for the Science Forum meeting on 22 September (more information: Adriana Oller and Violaine Verougstraete).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

MISA SATs: questions & answers webinar

The upcoming (date/modalities still to be defined) MISA 4 meeting will be focused on exposure. As for the other activities, self-assessment tools were prepared and circulated. To facilitate the completion of the surveys, a Q&A online session was held on 6 August. The session was kicked off with a presentation by Carol Mackie who reported on recent exchanges with ECHA on the copper compounds Chemical Safety Report (CSR). ECHA's aim was to have a closer look at the CSR, to evaluate their understanding of the provided information (in view of the new TCC) and identify possible issues for discussion at the MISA workshop. The main conclusion of this exercise was that the right information was present in the dossier, but not in the right format, and on the whole discussions were declared very positive from both sides.

Daniel Vetter (EBRC) then went through the SAT-1 on Lifecycle Tree/Use Description, the SAT-3 on Workers' Exposure and the SAT-4 on Consumers' Exposure, kicking off a discussion with the participants and providing clarifications where needed. In follow-up, the SAT-1 was slightly updated and recirculated to the participants along with the full meeting report.

During the second part of the webinar, Maxime Eliat-Eliat (ARCHE Consulting) explained the SAT-2 on Environmental Exposure Assessment. The participants were reminded to send in their completed SATs before end of August (latest mid-September) and also to suggest best cases for exemplifying typical aspects of the exposure assessment for metals/inorganics for the workshop (more information: Daniel Vetter, Maxime Eliat-Eliat, Hugo Waeterschoot and Violaine Verougstraete).

OUTREACH

ETAP

ETAP 2020: good input on a series of metal sector scientific concerns and new emerging issues

ETAP is formed of a panel of senior highly recognised environmental scientists and meets every year. The intention of the ETAP meeting is to review and discuss so-called 'issues of concern' raised by industry; to find scientific solutions as well as to advise industry on emerging issues. As a consequence of the COVID pandemic, this year's meeting was turned into a series of 4 subsequent webinars. The panel is sponsored by a series of metal consortia/associations and Rio Tinto and coordinated by Emily Garman (NiPERA) and Eric Van Genderen (IZA). Eurometaux is allowed to attend as an observer, which allows to pick up suggestions and emerging issues of relevance for the EU metals sector. This year's agenda included review issues covering 1) the bioavailability and toxicity of metal precipitates relevant for difficult-to-test metals like Al, Ga, Ge, In, Sb and others, 2) metal & antimicrobial resistance in the environment to respond to the concerns that metals may increase antimicrobial resistance, 3) interactive toxicity of metals and major ions (an issue which is high on the MISA agenda) and 4) Deep Sea Tailings Placement relevant for specific mining companies. An additional topic that was raised is metals and climate change. Eurometaux will participate in one of the follow-up working groups headed by Chris Cooper (from IZA) on "Expanding Biotic Ligand Models (BLMs) to support risk assessment / Environmental Quality Standards (EQS) for mixtures". The topic is indeed highly relevant as a potential refinement step for the combination effects challenge (see also under Environment) and demonstration of the good water quality. A further point that Eurometaux picked up from the interesting sessions was the growing use and experience with "eDNA (Environment Deoxyribonucleic acid) profiling" allowing to detect the impact of metals on biodiversity at the genetic level, before and after emissions. We should take this emerging issue seriously as a possible technique that could help in solving the challenge of monitoring combined exposures (more information: Emily Garman, Eric Van Genderen, Stijn Baken, Jelle Mertens, Chris Cooper and Hugo Waeterschoot)

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](#)

- 2 September: Risk Management TF meeting – GoToMeeting (Brussels)
- 4 September: Chemicals Management Steering Committee – GoToMeeting (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)
- 17 September: Registration TF meeting – GoToMeeting (Brussels)
- 21-24 September: Chemicals Management Autumn Week – GoToMeeting (Brussels)
- ~~23-24 September: WFD – CIS: SCG & Art. 21 – (Meeting cancelled)~~
- 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.

CHEMICALS STRATEGY for ZENITUDE

Food and chemistry ☺, a little “food” quiz

| | | |
|-----|---|--|
| 1. | Where does the story about carrots helping people to see in the dark come from? | |
| 2. | What unlikely medical use has been found for coconut water? | |
| 3. | Which food was used as money by early North American settlers? | |
| 4. | What were the first teabags made from? | |
| 5. | What is tasseography? | |
| 6. | Which vitamin is the only one that you will not find in an egg? | |
| 7. | What is the chemical formula for table salt? | |
| 8. | Apple seeds contain cyanide - true or false? | |
| 9. | When and by whom is tea said to have been discovered? | |
| 10. | What ingredient is included in food in a Florentine style? | |
| 11. | What is the spiciest chilli in the world? | |
| 12. | How many segments are inside most oranges? | |

Find the word

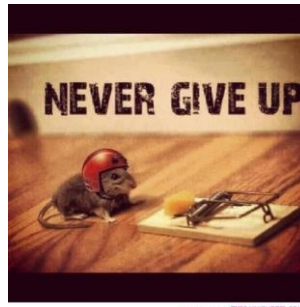
1. NNEONTEIVMR:

2. EGNMTAEANM:

3. VLAAUINOTE:

4. SMACLECHI:

5. TNYLUAIBIISTSA:



Answers to games

Answers: Game II. Find the Word
1. Environment / 2. Management / 3. Evaluation / 4. Chemicals / 5. Sustainability

Answers: Game I. Quiz
1. It was made up by the RAF during the Second World War / 2. Coconut water can be used as a substitute for blood plasma in emergencies / 3. Corn / 4. Silk / 5. Telling fortunes by reading tea leaves / 6. Vitamin C / 7. NaCl / 8. True - but you'd have to eat a huge number of them to feel any effects / 9. In 2737 BC by Chinese Emperor Shen Nung / 10. Spinach / 11. The Carolina Reaper / 12. Ten