

EUROMETAUX CHEMICALS MANAGEMENT NEWS



Next Chemicals Management Meetings

- 4 December: Chemicals Management Steering Committee
- 15 December: Risk Management Taskforce

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Dear All,

The present times are brutal. They are about angst and (lack of) control.

It would be tempting to dive -like a teenager with a heartbreak- under a warm quilt and wait without moving until the situation improves.

It has been described that human beings when confronted to an event or series of events, typically adopt the following postures: they flee, they (re-)act (and attack) or stay prostrate. An additional attitude is to take a step aside, through humour or dance.

This is the main theme developed by Jean Van Hemelrijck, a psychologist who explains how, today more than ever, Nietzsche's statement 'we should consider every day lost during which we have not danced at least once' is appropriate and why it presents some way out.

Dancing puts into scene what a human has as first pulsion, his/her vitalism and intemperance.

Dance is movement, a strength in the making, even in a complete chaos.

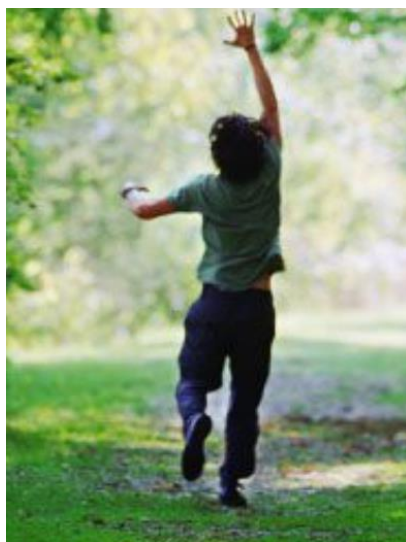
The world around us, even now, is dancing. The earth is full of movement, coordinated or frenzied: at each moment every particle of life is actually dancing. Look at the stars and the clouds, the (last) leaves on the trees, water finding its way, grass blades shivering in the breeze, or even, more flatly, a plastic bag blowing away. There is continuous movement around us. If you take the time to look at it with some poetry you will see its dance.

It is important to continue to stay in movement, even with slight moves. As long as we dance, as we move, we live. We need to remain in awe of the leaf trembling in the wind, we need to continue to be able to look at and watch movement. As without movement something in us is extinguished.

But in addition, dancing or contemplating the dance allows us to remain in the instant. We are not in memories, nor in a project: we are in the second that passes, the actual time we have.

And finally, behind the gesture, there is also something that sends us back to our own respiration, to our heart beats, something that revives our thinking process. By deciphering the movement, by conferring it with a meaning, our reflection resumes.

That's what dance allows: leaving prostration, feeling emotion and positive vibrations again. Thinking and feeling. Rebelling against sideration and fear, reminding ourselves that it can be good to live, that the world is beautiful. It is a way to remain in (r)evolution. And with all these current petrifying messages it is key to extract ourselves. As long as there is a breath, even an anxious one, as long as there is some light we can dance, and this is such a relief.



Violaine Verougstraete, Chemicals Management Director Eurometaux

COMMISSION – EUROPEAN PARLIAMENT

CARACAL and Member State Committee: *Eurometaux renews key positions towards EU*

Every year, the Member State Committee (MSC) of the European Chemicals Agency (ECHA) reviews the list of stakeholders allowed to attend its meetings, and Eurometaux's seat as regular industry stakeholders was confirmed. This very privileged position was secured by Hugo Waeterschoot for the tenth year in a row, thanks to the quality of his input, interactions, and overall performance. Please also note that the European Commission renewed its list of stakeholders attending meetings of the CARACAL expert group composed of Member State Competent Authorities (MSCAs). Despite the large number of applications received by the Commission, Eurometaux successfully secured a seat (full list available here). Noam El Mrabet will represent our sector and continue coordinating activities towards CARACAL. Both events confirm Eurometaux's position as a key stakeholder in EU chemicals discussions at various levels of the decision-making process but also justifies the energy and time injected to secure this position (more information: Violaine Verougstraete).

WG Chemicals: *challenging agenda but all 11 items tackled*

The main item on the agenda was the Priority Substance (PS) review conducted by JRC. Individual substances were shortly discussed (giving summary responses to questionnaires- for which not all comments seemed to have been taken into account-, overall issues, selection criteria, work ahead and people leading the dossiers). Metals in the PS list include silver, uranium and selenium. Biocides were also mentioned. Deselection criteria for the new PS list were also explained. In general, the WG is very ambitious regarding the number of substances to assess in the very short timeframe they seem to target, but no clear information regarding the organisation of the work or exact timelines were given.

On the EQS Directive: the JRC mentioned the need to start establishing the working groups and proposed to have a discussion among experts beginning of December. The aim is to put a proposal out for the middle of 2022.

Updates on several activities were also presented, like:

- Emissions inventories (EEA). This report's aim is to improve emission reporting (in the 3rd RBMPs (River Basin Management Plans). The output of the work will be 2 papers "Emissions factors from Urban wastewater treatment plants (UWWTPs)" and "Emissions from diffuse sources". Two more webinars will be organized in the first half of 2021 about the UWWTPs and diffuse emissions papers.
- Watch List (WL) revision report on quality of data (JRC). Assessing the data in terms of quantity, quality and representativeness to determine the risk posed by WL substances at EU level. A risk assessment to the aquatic environment of the WL substances report will be available soon and some results were discussed during the meeting. It was mentioned that for now, specific bioavailability EQS are not relevant for the WL.
Watch list data call: <https://www.eionet.europa.eu/etc/etcs-icm/etc-news/etc-icm-data-call-wise-soe-data-call-2020>
- ECOSTAT guidance on sediment management. Focuses on the relation of contaminations to ecosystems. Final technical document is to be published in May 2021.
- Drinking Water Directive (DWD) Watch List: a risk-based approach was promoted as well as the revised limits for antimony, boron, chromium, lead and selenium and a new limit for uranium. The new DWD will be implemented in 2022.
- Sediment EQS for copper

The next WG chemicals meeting is scheduled for the 3rd & 4th of February (more information: Nathalie Kinga Kowalski and Lara Van der Merckt).

Third CARACAL subgroup on Endocrine Disruptors (CASG-ED): *waiving versus testing, two options on the table for discussion*

The third CASG-ED meeting was held on 19 October. The Commission announced that the inclusion of ED in CLP is now a requirement brought in by the Chemical Strategy for Sustainability, and hence the possible establishment of specific hazard classes for ED will be considered in parallel to UN GHS discussions. This topic will be further discussed at the next meeting (probably in December).

The second and main part of the meeting was dedicated to the possible amendment to REACH Annexes in relation to ED information requirements. Commission explained that from a regulatory perspective there is a need to clarify both when testing is needed and how to handle the results. Three conditions for ED identification need to be fulfilled: i) evidence of endocrine activity, ii) evidence of an adverse effect, and iii) plausible link between ED activity and adverse effect. The focus will be limited to the EATS modalities (estrogen, androgen, thyroid, steroidogenic) due to a lack of sufficient knowledge and testing approaches for other modalities. Commission has prepared a document containing two proposals, one that is more waiving-oriented and a second one, stricter, with compulsory *in vivo* testing requirements. Other

intermediary proposals will also be considered. CASG members have the possibility to comment the proposals before 19 November (more information: Marnix Vangheluwe, Violaine Verougstraete and Lorenzo Zullo).

ECHA REACH & CLP

COMMITTEES

MSC-71: the remote nature of the sessions due to Covid, are starting to have an impact for Stakeholders

The MSC meeting was shortened to 2 days of meetings as a result of the Covid pandemic. Indeed, it seems that Member States are not making significant progress with Substance Evaluations and hence ECHA will delay the further CoRAP update to the December meeting or even later. In addition, Member States adopt more and more decisions on compliance checks and testing proposals in written procedure, often due to a lack of comments or proposals for amendments. This makes it more difficult for regular stakeholders like Eurometaux and Cefic to pick up the learning lessons from these cases and their collective benefits for industry (i.e. capacity-building). This is made even more challenging by the trend to shorten the minutes and focalise more on process rather than content description. Another important change stakeholders were informed about during the meeting, is the shift from the S-CIRCABC knowledge and communication database to INTERACT early 2021, which is a new tool developed by the EU agencies. While it is a much more modern tool, industry noticed that the transition will not secure past knowledge / documentation, challenging herewith the potential to check for outcomes and learnings from previous cases. While this is the result of the search for more “efficiency”, the impact Covid is having is here also made more and more clear, with the a consequence that the learnings can only be captured during the sessions and no more from the documentation (more information: Hugo Waeterschoot).

MSC-71: terrestrial toxicity: a new priority endpoint for the Integrated Regulatory Strategy and MSC amending the requirements for chronic fish testing according to a recent BoA decision

The Integrated Regulatory Strategy defines the substances and endpoints that require detailed review on completeness and quality. This subsequently results in Compliance Checks and potential Risk Management Measures when/where relevant. MSC agreed with ECHA’s proposal to focus on the process and criteria to identify the substances where it matters to assess the terrestrial impact / data completeness. The proposal includes a decision tree for priority setting. Following MSC’s agreement, ECHA can now prioritise substances for this concern in 2021. This decision was taken in closed session meaning that stakeholders were not informed of the criteria selected by MSC. However, the work on this endpoint should be considered as a clear signal to the consortia to ensure that in their registration files, the terrestrial endpoint is complete and updated.

Also, as a result of a recent BOA decision (appeal case 20XX-011) the FSDT fish test (OECD 234) can now be requested as a chronic fish test requirement at Annex VII level. The BoA conclusion thus impacts the REACH Annexes and how MSC is interpreting these. This means in practice that MSC can now request this chronic fish test in Compliance Checks. This may impact the more data-poor metal registration cases that will have to review the need for fish testing to complete the data sets (more information: Hugo Waeterschoot).

SEAC: microplastics session: preparing the debate for plenary on this large restriction case

Before the summer, SEAC and RAC provided an opinion on the microplastics restriction case, one - if not the largest - restriction case ever in the EU. This case is also quite relevant for metals given it covers recovered rubber infills from tyre debris, which contains important quantities of metals like zinc used as catalysts but also some unintended metals like nickel and others. The (expected) large number of comments received during the second consultation over the summer stimulated SEAC to organise a special session in which stakeholders could present their main comments and SEAC rapporteurs and members could explore their potential impact on the present opinion. The SEAC rapporteurs used the opportunity of the second consultation to pose some specific questions that would allow them to check some of the restriction’s critical aspects. One of the most important ones was the minimal cut-off size limit for the scope of the restriction. Most comments that were submitted relate to the scope of the restriction and the reporting requirements that were not up for a change, but some sectors used this opportunity to provide relevant new information on refined cost estimates for the proposed restriction actions. Rapporteurs will consider the outcome and the plenary discussion to finalise this important opinion that is expected to take place at the December SEAC meeting. During its annual stakeholder review session Eurometaux requested that the SEAC chair organise more of these hearing-like sessions,

notably after each (first and second) consultation on restriction cases; as we believe it could enhance the quality and relevancy of the opinion (more information: Hugo Waeterschoot).

OTHERS

NeRSAP - Webinar session 1: *effects of Authorisation as seen by practitioners*

NeRSAP, the network of Socio-Economic and Assessment of Alternatives Practitioners, is an informal tool that was set up several years ago by ECHA, Eurometaux and Cefic to allow to discuss and test new ideas on socio-economic assessment and assessment of alternatives. The network grew fast and now comprises close to 100 participants, involving many SEAC members, regulators and Commission representatives. The 10th meeting had to be cancelled and has been replaced by 2 webinars due to the Covid pandemic. ECHA, being in the lead this year, organised a first session on sharing comments and experiences from Industry, Consultants and SEAC/regulators on *what worked well or less so* and *what learning lessons could be drawn* from more than 10 years of experience with authorisation systems. Three panels provided their views on process comments and suggestions on how the authorisation process could be improved. The suggestions covered the entire process from prioritisation up to authorisation approval and were sometimes quite innovative. In follow-up, the organising committee (of which Eurometaux is a member) distributed a questionnaire that solicited the reactions of all NeRSAP members on the suggestions made and/or for collecting additional ideas. These will be presented at the second webinar early November together with ECHA's formal reviews on the process learnings from restrictions and authorisations opinion development, in preparation of the regular review processes. Eurometaux actively participated in the webinar and the preparation of the questionnaire given it is a unique opportunity to raise suggestions to bring more attention to the RMOa phase, and other concerns related to the authorisation process (more information: France Capon and Hugo Waeterschoot).

Public consultation on Cd OEL: *first discussion on Cd OEL in November, detailed comments submitted by ICdA*

ICdA has prepared and submitted a very interesting and robust set of comments on ECHA's scientific report for the evaluation of limit values for cadmium and its inorganic compounds at the workplace. The comments focus on the preference the report gives to animal data over human epidemiological data and related consequences, the existence of a practical threshold for cadmium in lung cancer and the consideration of a sublinear dose-response relationship, and the choice of the workplace air fraction to be considered to control adverse lung effects. ICdA's comments also include a thorough analysis in support of the Scientific Committee on Occupational Exposure Limits (SCOEL) 2010 and 2017 Recommendation/Opinion, which combine an OEL of 4 µg/m³ (respirable fraction) with a Biological Limit Value (BLV) set at 2 µg Cd/g creatinine, stressing that this is an effective alternative to the OEL currently set in the Directive. RAC will discuss a first opinion on 30 November (more information: Mik Gilles, Noëmi Lombaert, Christine Spirlet, Patrick de Metz, Howard Winbow and Violaine Verougstraete).

EUROMETAUX CHEMICALS MANAGEMENT

EM FUNCTIONING

Slags: *draft advocacy & stakeholders mapping (call 6 October)*

A webinar was held on 6 October, bringing together the members interested in 'final slags' to discuss the actions recommended by the Eurometaux Management Committee, namely i) building up technical knowledge going in the direction of the Life Cycle Assessment (LCA) for slags; ii) developing advocacy based on a EU Stakeholder mapping generate an overview of regulatory measures impacting slags and drafting messages. Aurubis presented its iron silicate LCA study and the group discussed both the stakeholders' mapping and available advocacy documents. Eurometaux reported on an exchange with DG ENV. Participants were asked to further review the available documents and to contribute to a list of potential slags that could undergo LCA assessment to strengthen this advocacy work. Draft minutes were circulated on 13 October (more information: Guy Thiran, Kamila Slupek and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability: released

On 14 October, the European Commission finally unveiled its Chemicals Strategy for Sustainability (CSS) as part of its “zero pollution ambition for a toxic-free environment”. The long-anticipated strategy sparked disappointment from industry as it lacks coherence between several proposed measures and Europe’s wider climate change and circular economy goals. The CSS sets out an objective where chemicals are produced and used in a way that maximises their contribution to society while avoiding harm to the planet. It introduces concerning measures aiming to address impacts from the most harmful chemicals, such as putting attention on a new “Substances of Concern” category with more widespread coverage and looking into introducing an “essential use” concept, which would allow the use of “most harmful chemicals” only if proven essential for society. The CSS lists 55 key actions to deliver on its objectives, which entails a “targeted” reopening of REACH (more information: Violaine Verougstraete, Hugo Waeterschoot, Chris Heron and Noam El Mrabet).

Chemicals Strategy for Sustainability and 8th EAP: call to discuss actions

In follow-up of the publication of the CSS, the Eurometaux secretariat organised a call to discuss the first learnings from the strategy and how to tackle the various actions as a sector. A table listing all the actions, highlighting possible concerns for the sector and proposing a first prioritisation effort was circulated ahead of the call to facilitate the discussions. The participants agreed on the priorities that absolutely need to be tackled. Next steps are the development of more specific action plans, identifying objectives, milestones and timing but also resources as it is clear that the CSS (and the Zero Pollution Action Plan (ZPAP) to follow) will require continuous work and inputs (technical, advocacy, communication) in the years to come. A specific project group will be set up, bringing together experts from the Chemicals Management Department and Sustainability Committee, to further work on the key priorities. But also, regular communication channels on the developments of the CSS will be set up, using amongst others this News (more information: Guy Thiran, Kamila Slupek, Chris Heron and Violaine Verougstraete).

Combined toxicity: analysis of impacts

Eurometaux asked EBRC and ARCHE to analyse the potential impacts of a generic Mixture Assessment Factor (MAF) for the metals sector. The implementation of the CSS will bring in this factor in the coming years to cope with the potential cocktail effect of unintended aggregate exposures. Based on the RCRs provided by the Consortia (our sincere expression of thanks!), EBRC for the Human Health endpoints and ARCHE for the Environmental endpoints are defining how many exposure scenarios would require updating and refinement under different MAF scenarios. In addition, they are exploring what the impact of aspects like natural background and essentiality concentrations could be and if we can reduce the need for monitoring in case refinements based on exposure data would be needed. In the short term, the outcome of this reviewing activity would be most helpful in response to the upcoming political debate and some initial thoughts would already be helpful for the Member States workshop on MAF (see next issue). In the longer term, it should help Eurometaux and the Consortia to help define the needs for an efficient and metal specific refinement programme which could include common research activity on unintended mixture exposure monitoring using new techniques (more information: Violaine Verougstraete and Hugo Waeterschoot).

Combined toxicity: second KeMI/RIVM workshop

KeMI and RIVM organised on 27-28 November the second *Member States workshop on searching for a pragmatic way to implement a MAF under REACH*. The first workshop organised in March 2020 brought more than 50 Member States representatives together and explored the benefits and drawbacks of a MAF approach. The recently published CSS provided the countries with the policy support to progress with their views on how this could be implemented in practice. The Commission (DG ENV) used the workshop platform to clarify their planning on the MAF implementation indicating that a draft Roadmap will be published in November followed by a consultation of 4 weeks aiming to close it before the end of this year. Subsequently, Commission will launch a study on the provisions for introducing MAF in REACH and lastly Commission may feed all this into a general Impact Assessment of a possible revision of REACH. The general ambition is to present a proposal for revising REACH in 2022 and introduce the MAF by then. The outcome of an extensive questionnaire reported at the workshop indicated that most countries promote a common MAF (of 10) as a default allowing refinements to prove safe use. The workshop also brought to the surface that ECHA’s vision on the purpose of the MAF is different than that of other EU ENV programmes such as water quality. For ECHA it is a way to demonstrate safe use of a “single substance” considering its role in the overall combined exposure; contrary to demonstrating good quality status for other legislations quoted. The workshop allowed Eurometaux to raise our points and views and it was

formally noted that special attention would be needed for metals given their natural occurrence, essentiality, and other aspects (more information: Hugo Waeterschoot).

ZERO POLLUTION ACTION PLAN

Zero Pollution Action Plan: *consultation and input from the sector*

On 29 October, the Eurometaux secretariat successfully uploaded the sector's position to the consultation platform. Funnily enough, there are 111 contributions to the roadmap consultation. As Eurometaux we decided to highlight several elements of different policy frameworks and strategies that we find important to consider when writing the Zero Pollution Action Plan. Our messages covered the integration within the Green Deal, but also aspects and links with data collection & monitoring, the Chemicals Strategy for Sustainability, the Industrial Emissions Directive, Water Policy, Air Policy and Waste Management. The paper comes with a set of six general must-have recommendations and 20 key recommendations. For the support of the writing of the Action plan, the Commission is planning an open public consultation, a series of stakeholder meetings and workshops, and some dedicated outreach activities (not specifically defined yet). The Action Plan is supposed to be finalised and published beginning of summer next year, together with the kick-off for the Green Week 2021, which will run under the theme 'Zero Pollution' (more information: Nathalie Kinga Kowalski and Violaine Verougstraete).

E-PRTR consultation: *input on 4 key aspects*

On 26 October, Eurometaux submitted the answer to the consultation on the European Pollutant Release and Transfer Register Inception Impact Assessment. The sector's submission addressed four key points: i) requesting to not mix E-PRTR with IED data collection; ii) to secure alongside the update of reporting requirements the confidentiality of Confidential Business Information (CBI) data; iii) supporting a harmonisation of criteria for the reporting to the E-PRTR across the European Union; and iv) making the plea to also involve other stakeholders than Member States in the Expert Group discussions. In total there are 37 contributions published in the consultation. A big thank you to the members who helped in contributing to these consultations, even with short timelines (more information: Nathalie Kinga Kowalski and Violaine Verougstraete).

CLASSIFICATION

Pb ENV Classification: *first discussion planned for 9 December*

Earlier this year the Commission supported by CARACAL, returned the environmental classification proposal for lead metal back to RAC requesting it to consider the impact of the new ecotoxicity data and the relevance of splitting the classification for massive and powders. The latter issue is beyond doubt a critical one for the metal sector at large given that failing to recognise this split for lead (despite the data being present to fulfil the criteria) could have a wide and severe impact on all metals with ecotoxicity properties. ILA and Eurometaux are therefore closely following the developments of the new RAC opinion as the outcome will also highly depend on the understanding and acceptance by RAC of metal-specific aspects and related CLP guidance. Eurometaux has submitted comments during the RAC targeted Public Consultation, focussing on methodological and conceptual aspects defending the split and providing the justification for it. Eurometaux also requested RAC to recognise all aspects of the metals CLP guidance including the pH-based classification. Indeed, the scientific evidence on lead demonstrates that the pH of highest release and highest toxicity are opposite. Not recognising this would in effect mean that available science would be substituted by a precautionary approach which is unacceptable. ILA was invited by ECHA to present short videos on lead metal processing at the RAC September meeting and to reply to follow-up questions from RAC members and Rapporteurs. Eurometaux will further support ILA in defending these conceptual aspects at the RAC meetings in December and March 2021 (more information: Jasim Chowdhury, Lisa Allen, Steve Binks and Hugo Waeterschoot).

Alloys classification schemes: *is grouping of help?*

The CARACAL Subgroup on Bioelution (CASG Bio) debating the use of bioaccessibility for a refined classification of alloys will most probably hold its second meeting by the end of this year or in early 2021. A number of follow-up actions have been identified and proposed to Commission -who was chairing the meeting- after the lively discussions that took place end of September. Most of these actions relate to providing (or recirculating) additional information or (re-) providing clarifications that would allow the discussion to progress beyond precautionary. However, one important follow-up action for industry is to reflect about a possible grouping of alloys, so as to make a proactive proposal to the group and limit the bioaccessibility testing -should it become mandatory- to representative samples for a group and not apply to all

alloys. This question of grouping is becoming even more important now that the CSS focuses on hazardous substances in consumer articles, referring to 'content' of hazardous substances. If we also want to be able to promote bioavailability in this context, we will need to have a strategy in place to communicate our (metallurgical, physico-chemical and toxicology) knowledge on these materials and propose grouping to limit the burden of the assessments (more information: Adriana Oller, Hugo Waeterschoot and Violaine Verougstraete).

REACH REGISTRATIONS

Revision of the ECHA guidance documents on Registration and Data-sharing: *Eurometaux comments built on consortia's experience*

The activities of the ECHA Partner Expert Group set up to review the update of two ECHA guidance documents on Registration and Data-Sharing have now started. The experts of the PEG have been asked to comment the proposed changes suggested by ECHA. These changes aim at providing registrants with up-to-date support on the registration obligations under REACH and reflect the situation after the end of the last registration deadline in 2018. The revised text includes, for example, references to the validity of pre-registrations, jointly submitted data and calculation of the registration tonnage bands. Particular attention was also given to its alignment with the new Commission Implementing Regulation on the duties placed on registrants to update their registrations. The proposals on Data-Sharing reflect the clarifications brought about by Implementing Regulation 2019/1692, in particular concerning the cease of operation of SIEFs and the exclusive application of Articles 26 and 27 of REACH to data sharing negotiations. Eurometaux, thanks to the support of the Registration Taskforce, has submitted a series of comments taking into consideration consortia's experience gained over the past years (more information: France Capon, Caroline Braibant, Sandra Carey, Federica Iaccino, Lorenzo Zullo)

RISK MANAGEMENT

Intermediates: *REACHLaw assessment and letter co-signed by different sectors*

The Commission Impact note on intermediates presented to CARACAL included several conditions that deviate from the definition of intermediates in the REACH text. Those conditions go far beyond the conclusion of the final court outcome on the acrylamide case and are hence unacceptable for industry on principle grounds. Moreover, additional conditions like the storage requirement for the transformed intermediate would challenge the status of many intermediate uses in the inorganic sector. At its last meeting CARACAL was not able to conclude and requested that Member States submit written comments. Several did so, resulting in very different views. In order to be well prepared for the upcoming CARACAL discussion in November, Eurometaux asked REACHLaw to review these comments from a legal perspective. REACHLaw provided this analysis at short notice including recommendations for legal technical comments that we could raise at the next CARACAL and a table that allows assessing the different interpretations between the legal text, ECHA's guidance and the Commission's impact note. The latter would help Consortia and Companies to assess the impact for their specific cases. On the initiative of Eurometaux, several industry sectors including Cefic, Eurofer, Euromines and other industry sectors co-signed a letter to request the Commission to postpone the debate on the issue until all parties including industry could assess the expected new version of the impact note and guidance (more information: Kai-Sebastian Melzer and Hugo Waeterschoot).

WATER

Water Taskforce meeting: *08 October 2020 – Big challenges ahead*

Beginning of October, the secretariat invited the Water Taskforce to meet virtually in order to discuss the coming months' challenges under the Water Policy. One of them is the start of the Priority Substances Review (see also the news on the WG Chemicals meeting). The Group agreed that the informal group of experts for nickel, selenium, silver and uranium shall continue to work on the issue and take the needed decisions. At this stage, Eurometaux is missing a dedicated expert for uranium, i.e. volunteers are welcomed. Also, WCA gave some insights on what the tutorial videos for outreach on the use of the BIOMET tools would look like. IZA presented some updates on the EEA's diffuse emissions project (EEA will follow up with Eurometaux experts in bilateral meetings still to be held this year), and on a Sediment Guidance document. Aside the 'daily activities', the Taskforce also discussed the developments resulting from the Green Deal activities, including the Zero Pollution Action Plan and the E-PRTR Review (more information: Nathalie Kinga Kowalski).

MEP Secretariat webinar Pernille Weiss: *a successful exchange*

On 26 October, Eurometaux had the opportunity to meet virtually with MEP Pernille Weiss's Head of Policy Alexander von Wildenrath Løvgreen. Together with Cefic, Eurofer and Euromines, Eurometaux presented a few examples of water management at our sites and general considerations about the future of Water Policy. The meeting was very constructive: Alexander Løvgreen explained that MEP Weiss is fairly new to the topic and that they are now gathering knowledge about the issues to be tackled. The focus of their work will be the enhancement of water reuse and treatment. Besides, they wish to bring back evidence-based discussions to the Parliament. In their opinion, in particular on Water Policy, it is needed to have knowledge-based exchanges between the MEPs. This will be followed up (more information: Nathalie Kinga Kowalski).

INDUSTRIAL EMISSIONS

Industrial Emissions Taskforce meeting: *16/10/2020 – next phase of the IED revision to start soon*

Mid-October, the secretariat organised a webinar meeting for the Industrial Emissions Taskforce to sum up the developments regarding the IED revision announced last year in the Green Deal. In particular, the publication of the evaluation report and its conclusions (with a half year delay), the links to the review of the E-PRTR and the drafting of a Zero Pollution Action Plan were discussed. In addition, the secretariat gave an overview on a set of other activities, namely the planning of the 2nd BREF review cycle, the NFM BREF implementation (some members gave information about the status of delayed permit finalisations), but also the status of the HAZBREF projects that had more impact on Commission related activities than expected and the OECD series of Best Available Technique (BAT) projects that are entering their last phase before finalisation (more information: Nathalie Kinga Kowalski).

Workshop to Study on the wider environmental impacts of industry decarbonisation: *soon an interview?*

Mid-October, Wood hosted a series of three workshops, each focused on a different sector, to discuss the potential technologies for and environmental impacts of industry decarbonisation. Next to mineral and chemical sectors, a session focussed on the production and processing of metals. The non-ferrous metals sector was represented by several members in addition to the CM and ECC secretariats. After the workshop, we sent in some written comments on the background paper that was circulated ahead of the workshop and we hope to get a confirmation for an interview soon (more information: Nathalie Kinga Kowalski).

TOOLS AND METAL SPECIFICITIES

Endocrine Disruptor (ED) as a potential new hazard endpoint: *an ETAP expert panel to explore the ED science challenge for the metals sector*

Stimulated by ECI and supported by Eurometaux, Environment Toxicity Advisory Panel (ETAP) set up on 1 October a science expert panel to review some key questions related to ED and metals. Eurometaux opened the workshop by setting the policy scene confirming that EU REACH authorities are exploring the option to define an Endocrine Disruptor (ED) hazard classification scheme under the Classification Labelling and Packaging Regulation (CLP). Authorities are proposing this possibility to facilitate the "warning" for this property and the identification as a Substance of Very High Concern (SVHC)/equivalent concern. While recognising the importance of this hazard endpoint in general, industry does not support a "solo-slim" hazard classification activity at EU level given this is not in line with the concept of harmonised criteria at worldwide level under the UN-GHS system. Moreover, the CSS proposes to apply the ED hazard identification system across all legislations in the EU, once established at CLP level. The expert workshop aimed at increasing the knowledge of the relevance and importance of ED properties and mechanisms for metals. Undoubtedly, some essential metals have a direct role in the normal functioning of the endocrine system which may complicate the assessment of whether a metal is, or is not, an ED of concern. Moreover, test guidelines and test media used in *in-vitro* tests for ED hazard identification strongly influence metal bioavailability, which along with the strong homeostatic control all complicate the interpretation of ED effects for metals. The expert panel provided interesting opinions and suggestions, some relevant in the short-term for the technical debate that will soon be launched, while others would be more valuable as longer-term research objectives for consortia (more information: Stijn Baken, Violaine Verougstraete and Hugo Waeterschoot).

Metals Gateway is launched: *have a look!!!!*



The [Metals Gateway](#) online portal was launched on the 19 October. It brings together a wealth of information to provide regulators and risk assessment professionals with the metals risk assessment tools they need to help protect people's wellbeing; the protection of the health and safety of consumers, workers, communities and the environment being a prerequisite of equitable and productive societies

The Metals Gateway package includes:

- [Metals in the Environment](#) – Factsheets on what makes metals different, how they interact with other substances and biological organisms under different conditions, water quality, pH etc.
- [REACH Metals Gateway](#) – Guidance for the EU and International Metals Industry in the implementation process of the EU REACH and CLP Regulations. The REACH Metals Gateway allows quick and structured access to relevant information from authorities and the metals industry.
- [The Metals Toolbox](#) - Tools and guidelines to enable regulators and stakeholders to accommodate metal-specificities in hazard identification and risk assessments.

Developed by a group of metal commodity associations this is a free and open knowledge platform that provides easy access to science-based models, data, literature, factsheets and information that are essential for understanding why the risk from metals exposures are different than from other substances. For more information, please contact eurometaux@eurometaux.be

MeClas Steering Committee: call on 19 October

The MeClas Steering Committee came together -virtually- to review the achievements of the past year and identify the priorities for the following year. Getting the input of the Steering Committee members is critical to ensure the tool remains up to date, of high quality and responds to the needs/challenges. The 2020 achievements include the improvement of the input of inorganic composition and bioaccessibility data into MeClas, the finalisation of a MeClas tutorial video (see: <https://www.youtube.com/watch?v=lv4sU7rz4x4&t=89s> -not to be missed!) and the credibility of the MeClas tool in the inorganic Unknown or Variable Composition, Complex Reaction Products and Biological Materials (UVCBs) discussions. Agreements were made on how the tool's display could inform the user as efficiently as possible on how the metals consortia handle metal-specific concepts like Rapid Removal and the massive-powder split. The proposed priorities for 2021 were supported by the Steering Committee and include, in addition to the aspects mentioned above, the organisation of a quality review, a specification for the inhalation route for carcinogenicity and further outreach, e.g. to the UN GHS Subcommittee and SAICM (more information: Frederik Verdonck, Dagobert Heijerick, Hugo Waeterschoot and Violaine Verougstraete).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

MISA Exposure: first webinar to discuss lifecycle

The first discussions on the 4th MISA priority, i.e. exposure assessment, were kicked off on Friday 23 October. This first webinar will be followed by 3 additional web meetings to be scheduled in the coming months, so as to balance the challenge of being in virtual conditions with the complexity of the topic. This first webinar aimed at setting the scene and discussing the lifecycle aspects. The second will focus on the workplace assessment and take place on 23 November. The webinars on the environmental exposure assessment and on consumer, man via the environment, Chesar issues will be organised early 2021. The 23 October webinar started with ECHA sharing a series of high-level messages on MISA, including on the participation in the programme/meetings and the progress made on a number of issues during these months of forced teleworking. Eurometaux presented some first learnings on the Self-Assessment Tools (SATs) on Exposure that were carefully completed by the consortia over summer. ECHA made a very nice and detailed presentation

on the requirements and expectations with regard to the lifecycle and the Chemical Safety Report (CSR), explaining the relevance of having a complete Lifecycle Tree (LCT) for each substance registration as the first step to correctly set up the exposure scenarios. This highlighted the need for any registrant to establish good communication up and down the supply chain, and allowed industry to share some specific examples on how they work on this communication (data collection and traffic light model to clarify uses having enough information, questionnaires, mass flow analysis). The presented examples allowed to illustrate what works and what doesn't and the typical hurdles. The minutes will provide details on the presentations, the questions raised, and feedback provided. They will be circulated soon to the MISA community (more information: Violaine Verougstraete, Federica Iaccino, Hugo Waeterschoot)

Inorganic UVCB web-meetings (Friday 9.10 and Monday 12.10): on methodology and reporting

The inorganic UVCB assessment is a complex topic in which methodology and reporting aspects are strongly linked. In order to solve pending issues and allow finalisation of the discussion on the reporting in IUCLID, ECHA proposed and further worked with Eurometaux and consultants on a scheme to summarise all steps in the iUVCB assessment approach and their reporting. This also allowed to discuss terminology and to clarify specific assessment steps that could lead to misunderstanding by regulators. A further meeting with ECHA IUCLID experts will be organised in November and aimed at identifying practical solutions exploiting the IUCLID 6 functionalities. All these steps are targeted at defining a clear assessment methodology, pragmatic reporting strategy and having a full defined terminology, so that by the end of 2020 the strategy is perfectly clear. Workplans will then be prepared, to set updated dossiers submissions by the end of 2021 (more information: Federica Iaccino and Violaine Verougstraete)

OUTREACH

OECD Guidance on Key Considerations for the Identification of Safer Alternatives: close to finalisation

The OECD organised on 8 October a second workshop to review and finalise the guidance they developed for practitioners on "Key Considerations for the Identification of Safer Alternatives". The version discussed at the workshop certainly made important progress in recognising the need for a broader view on alternatives other than only hazard aspects, but it still failed to include other aspects than hazard that are sufficiently prominent when defining the term "safer". Moreover, while considered relevant, even by ECHA, the examples of Sustainable Substitution as submitted by industry will not be included in the guidance. While the guidance included some relevance to exposure information, the US based authors continued to defend the view that CMR substances can never be safer candidates while industry stated this can absolutely be the case based on exposure or risk management considerations (e.g. CMR metal compounds in closed batteries). BIAC further insisted on recognising aspects such as the route of exposure, thresholds and other consideration when defining the hazard parts rather than the exposure considerations. Based on industry's intervention clear progress was made in that use-specific exposure data instead of physico-chemical characteristics should form the basis for the exposure assessment when such evidence is available. Lastly industry contested the use of authoritative lists like IARC as a starting reference for claiming hazards. It was agreed that the guidance would indicate that a discordance check should be made to check the relevancy of hazard classification for a region (e.g. EU). This first OECD Risk Management Guidance on Safer Alternatives will be finalised and published early 2021. It is expected that it may become an important reference also in the EU. The OECD closed the session stating that due to the growing importance of Risk Management Measures (RMM) activity at OECD level, the OECD Joint Meeting had decided to group all Taskforce activities in a more formal higher-level Working Party on Risk Management. One of the first actions of this WP would be to gather recommendations on what further aspects related to Substitution should be focused on in the future. The OECD Secretariat itself raised one topic, i.e. the one of 'sustainable substitution'. Thus, while not fully covered in the Guidance, we successfully drew attention to this aspect and can expect progress on this in the future (more information: Kai-Sebastian Melzer and Hugo Waeterschoot).

Business Europe Workshop: presentation on Circular Economy under IED

On 30 October, Eurometaux was invited to present at the BusinessEurope workshop. The secretariat organised an internal workshop for its members of the Environment Group in order to prepare for the upcoming Industrial Emissions Directive (IED) revision. They wanted to discuss three crucial topics to the IED revision: Greenhouse gases (GHG), energy efficiency and circular economy. FuelsEurope and Eurofer were invited to present the issues on GHG and energy, while Eurometaux gave a presentation on circular economy under IED. The meeting was important, as it was meant to mobilise

the members of BusinessEurope to engage also within their MSs on the IED revision (more information: Nathalie Kinga Kowalski and Kamila Slupek).

COMMUNICATION

Metals Academy: *postponement to an undefined date*

Considering the evolution of the Covid-19 pandemic, it is clear that scheduling a Metals Academy for early January 2021 is not realistic. So, we have regretfully decided to postpone the Metals Academy until an undefined date (the conditions should be confirmed safe and stable before doing so). We will of course inform participants and speakers along the process and there will be ample time to make arrangements, when the time is right. And we might even be able to attract new participants!

We have taken the decision, for the moment, to not “go virtual” as we consider the personal interactions as being a very important aspect of this course (more information: Ailsa Lee, Violaine Verougstraete, Frank Van Assche).

CALENDAR

For meetings at Eurometaux

For the moment no measures have been taken to cancel our next meetings, but it will only be possible to join meetings 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 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](#)

- 3-4: OECD Global Forum on Environment: Towards cost-effective management systems for industrial and consumer chemicals
 - 5 November: WeRSAP (NeRSAP Webinar)
 - 5-6 November: OECD Joint Meeting
 - 6 November: OECD WNT Expert Group meeting (Bioelution)
 - 12-13 November: WFD – CIS: SCG & Art. 21 –
 - 12-13 November: OECD Expert Group on BAT
 - 17-18 November: CARACAL
 - 23 November: 2nd MISA Webinar (Exposure – Workplace Assessment)
 - 30 November-11 December: SEAC-49 – ECHA
 - 30 November-11 December: RAC-55 – ECHA
 - 1-2 December: WFD CIS: Water & Marine Directors meeting (Potsdam, Germany)
 - 4 December: Chemicals Management Steering Committee – To be defined (Brussels)
 - 7-11 December: MSC-72 – ECHA (Held remotely until further notice)
 - 10 December: OECD WNT Expert Group (bioelution)
 - 15 December: Risk Management Taskforce
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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.
