



EUROMETAUX CHEMICALS MANAGEMENT NEWS



All our best wishes for 2021.
May it be a healthy & peaceful year for all.

Please find a list of 2021 meetings in our Calendar

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Dear All,

Amidst the pre-Christmas rush, while I was frenetically propelling emails to get rid of the 2020 action points, I noticed that I was using 'at will' the term 'new concept'. Either to refer to regulatory texts we were trying to 'tame', or to trigger your curiosity and reactions (i.e., to not feel lonely in the taming process).

Once the email storm subsided and I had settled cosily next to the Christmas tree, this 'new concept' resurfaced, slightly re-tinted by the coloured garlands and the (forced) calm of pandemic end of the year celebrations.

I quickly evacuated the question whether what I was referring to was really 'new': a bit of history shows that even in toxicology, the 'new' is often (not always!) a packaging of older concerns.

I became more puzzled by the 'concept' part. I started to wonder where concepts come from but also how to best apprehend them when they are conceived and written out by someone else. In particular, when the reasoning followed by that someone and the context in which she/he elaborated it is not that obvious or documented. How do we grasp concepts, how do we ensure we understand what their trigger and targets are, how do we think them through?

Let us be frank, it is tough to think by ourselves. Spontaneously, most of the time, we deliberate through the prism of what others are thinking, relying on the opinions of experts or a majority that seems to make sense. We make those opinions "ours", garnishing them with words like priorities, impacts, debrief, way forward. It is only curiosity that can force us to refuse automatisms and to privilege the disconcerting, that will allow us to go back to our own starting point (i.e., with neither prejudice nor opinion, nothing).

However, curiosity comes with a whole lot of decoding, peeling, analysis of all facets for which we do not always have the time.

No one will contest that such an exploration is a healthy brain activity: while human intelligence is undoubtedly made of exchanging, debating, and affirming, it is also about taking a risk, feeling uncomfortable, refuting generalities and imprecision.

Still, our agendas and daily preoccupations make the latter confrontation challenging. It has been said that to really understand something, we need to fight against our immoderate love for the 'known', the 'believed' and reassuring 'thought through' to face the bare unknown, without searching for something familiar, putting on hold the replies that come automatically to mind.

"Thinking" is accepting to look at things as they are, without plating them with an immediate appreciation or instantly unearthing comparisons. Understanding is hence not to 'know' but first of all challenge what you already know and be ready to explore it.

I can only wish to all of you that 2021 allows us to accomplish such an exercise once a day. That you all get the breathing space and opportunity to confront yourself with an idea or concept, without being pressurised to return to 'what is known', and find some comfort with generalities that don't hurt, or as mentioned by L. Devillairs- take pictures of everything before actually looking, transforming things and ideas in "clichés... Making the best use of our curiosity!

Happy 2021!

Violaine Verougstraete, Chemicals Management Director

COMMISSION

Batteries Regulation: Commission unveils its proposal

On 10 December, the European Commission unveiled its long-awaited “Sustainable Batteries Regulation”, a recast of the Batteries Directive aimed at strategically boosting the EU value chain for batteries and ensuring that batteries placed on the EU market are sustainable, circular, high-performing and safe all along their entire life cycle. The Regulation proposes a dedicated “restriction-like” procedure to manage risks from hazardous substances in batteries. Interestingly, the Commission has stripped away the power of Member States to initiate a dossier and to adopt the final measure. Certain elements of this measure will certainly be contentious during negotiations between the Council and Parliament. It also remains to be seen how this new procedure will fit in the overall chemicals management framework, at a time when simplifying and streamlining is a priority for both Commission and ECHA (more information: Noam El Mrabet).

2nd Annual Forum on Endocrine Disruptors: the European Commission will focus on CLP hazard classes and SVHC identification as part of the Chemicals Strategy for Sustainability

875 participants from 40 countries attended the second Annual Forum on Endocrine Disruptors (EDs) organised by the European Commission on 17-18 December. The objective was to present the ED-related actions of the Chemicals Strategy for Sustainability (CSS) and to serve as a platform for policy makers and stakeholders to discuss follow-up actions, also based on recent developments on endocrine disruptors. The opening message from the EU Commissioner Virginijus Sinkevičius was clear: “the overall intention is to remove EDs from consumer products as soon as they are identified, except in case of essential uses”.

Identification of EDs in the framework of CLP, is considered as the starting point on top of which other legislations, such as REACH, could be exploited to manage ED risks. Commission will develop a proposal for ED hazard classes in CLP, for environment and human health. ED subcategories for human health and the environment will be considered, based on the experience accumulated with substances classified as Carcinogens, Mutagens or toxic to Reproduction (CMRs). A targeted impact assessment will be run to identify the substances that could potentially fall under each hazard class and category. Despite the concerns voiced by industry, the introduction of hazard classes at GHS level will only be considered afterwards.

REACH Article 57 will include ED as a criterion for Substances of Very High Concern (SVHC) identification, in addition to the current generic criteria “equivalent level of concern”. This should speed up the process of identification of EDs as SVHC, and the following use of the REACH authorisation regime.

Besides recalling the importance of the OSOA (Once substance One Assessment) principle, ECHA described how the Expert Group on EDs is supporting the ED screening/grouping: out of 102 substances analysed, 18 have been already identified as EDs. The programme included a presentation of the Joint Research Centre (JRC) fitness check on EDs, advances in test methods and human biomonitoring.

The full video recording of the event is available on the European Commission website: https://ec.europa.eu/environment/events/second-annual-forum-endocrine-disruptors_en

(more information: Violaine Verougstraete, Lorenzo Zullo)

EUROPEAN PARLIAMENT & COUNCIL

WFD MEP implementation

The European Parliament voted the approval of the resolution on the implementation of EU water legislation with 622 votes against 23 and 43 abstentions. The Parliament corroborated the conclusions of the European Commission: even though the objectives of the directive have not been reached yet and half of the bodies of water in the EU are still not in good condition, the directive remains fit-for-purpose. Additional efforts will need to be directed towards implementing measures, and therefore no revision is needed.

Press release following the approval can be found here:

<https://www.europarl.europa.eu/news/en/press-room/20201211IPR93645/parliament-demands-that-eu-water-legislation-be-respected> (more information: Lara Van de Merckt).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-55: conclusion of the debate on V2O5

RAC started its two-week meetings by presenting the workplan, confirming the timing for the debates on the Li compounds Harmonised Classification and Labelling process (CLH) proposal and the restriction for the use of lead in ammunition & fishing tackle. It was confirmed that as restriction proposals go to wider groupings, the challenges to be addressed by RAC/SEAC and the amount of material to discuss are increasing. As an immediate illustration, RAC discussed the conformity of a restriction proposal by France on a range of substances used in single-use baby diapers.

RAC also discussed the Cd OEL proposal (see previous issue of the News). On the CLH side, RAC went back to the vanadium pentoxide dossier, RAC had agreed on carcinogenicity cat. 1B at RAC 54. However, a new publication was brought to the attention of the Rapporteurs by industry. The Rapporteurs went through this new material and prepared responses to address industry's concerns. These responses were presented to the RAC members who confirmed the assessment of the Rapporteur and the previously agreed classification. However, industry was able to intervene to reiterate clearly what the issues are (e.g., the vanadium blood levels and source of exposure). The Rapporteurs will consider these comments in the finalisation of the opinion, which will then be forwarded to Commission. Eurometaux also made a comment on the 'all routes' specification, which is given by default unless data are available to exclude the dermal and oral routes. Limiting the classification to the route for which there is clear evidence should be feasible with supporting evidence like e.g., toxicokinetics (more information: Rodger Battersby and Violaine Verougstraete).

RAC-55: a first round of discussions on the Pb environmental classification: it will be a challenging journey

On 9 December, RAC held a preliminary discussion on the lead metal environmental CLP classification proposal. As a reminder, this case was sent back by Commission to ECHA asking to assess the consequences of the new ecotoxicity evidence provided by industry that challenged the most sensitive endpoint (snail study) and to reconsider the relevance of a split classification (massive and powder) for lead metal. Surprisingly, at RAC the Rapporteurs presented their view in support of a single classification entry based on a creative interpretation of the criteria to allow such distinction. In complement, they suggested that the massive form of a metal could be exempted from labelling but not from classification. Both ILA and Eurometaux indicated that this was never the intention of the legal text nor the metals section of the Classification Labelling and Packaging Regulation (CLP) or Global Harmonised System of classification and labelling of chemicals (GHS) guidance and that it conflicted with previous metal environmental classification reviews. Based on factual evidence on the manufacturing processes of the powders and the lack of releases of fine powders from the massives during use, the metals sector fiercely plead for a split entry with different classification outcomes for the powder and the massive. The chair concluded the discussion by identifying a long series of additional information that would be relevant for the more in-depth debate on the case at the March 2021 RAC session. This request includes information on previous cases (Ni, Zn, ...) as well as the history of the guidance development and some legal aspects to be clarified (more information: Steve Binks, Jasim Chowdhury and Hugo Waeterschoot).

SEAC-49: restriction on microplastics agreed and first debate on the Substitution plans on plating with Cr6

During its second week, SEAC focussed mainly on the vast microplastics restriction case and held a first round of discussions on the submitted substitution plans for the Application for Authorisation (AfA) cases Commission returned to the applicants. Those were mainly upstream applications on Cr6+ use for decorative plating as well as some other substances.

Based on the outcome of a special session organised in October, SEAC updated the microplastics restriction case by reviewing the information received in the Public Consultation. SEAC adopted its opinion without making a clear choice among the different Risk Management Options (RMOs) that were proposed, given they all seemed proportionate on a cost/benefit basis, and hence the choice was becoming more of a political than a scientific nature. This case is most important for the plastic sector given its extensiveness, but also

for the metals sector given it is setting precedence on how to handle a restriction for a substance for which a real risk can hardly be proven but for which exposure should be prevented and on what grounds. Moreover, the restriction includes measures to prevent releases from rubber infill material based on milled tyres that include Zn and other metals in its releases. The rubber sector claimed that this part of the restriction would challenge the recycling of large volumes of tyres in the EU. On this issue, it was announced that ECHA is expected to file a specific restriction proposal at the request of the Commission, with the support of the Netherlands, focussing on the environmental impact of tyre wearing due to rubber infill use. SEAC also held an exploratory debate on a series of substitution plans it received on Cr plating. SEAC agreed to consider each of the plans individually on its own merits which is an important point given that - as expected- they all differ quite extensively even in the way they identified the sub-uses (utilisations) for which a substitute could be potentially generically available (SAGA). The request for those substitution plans is driven by the Commission's concern to re-establish its statements of reasons and motivation to grant authorisations for upstream applications. A full debate on this is expected during the March 2021 SEAC sessions (more information: Hugo Waeterschoot).

MSC-72: CoRAP update clarified and 10th list of priority substances for authorisation further discussed

MSC discussed the first opinion for the 10th list recommending new priority substances for authorisations to the Commission. The outcome of the Public Consultation was the main discussion point. Besides one borate compound (expected by industry), the proposed list does not include metal compounds. MSC will adopt the list at its next meeting in February. One interesting comment related to the Commission's activity on Annex XIV indicating that they are preparing a new update in the months to come focusing on the more recently recommended priorities by ECHA (9th and 8th lists?).

On the annual Community Action Rolling Plan (CoRAP) update (list of Substances candidate for Substance Evaluations including the areas of concern), MSC debated the Rapporteurs' suggestions including the postponement of cases such as CeO₂ (nano). The concerned metal consortia are informed about the outcome and an adoption of the CoRAP list is expected for February.

A third important issue debated at MSC related to the launch of an extensive Extended One-Generation Reproductive Toxicity Study (EOGRTS) review project by ECHA and the Member States with OECD's involvement. ECHA received (close to) enough reports and registration updates to conduct a first in-depth evaluation of this relatively new test. Stakeholders can participate as observers in the study (Eurometaux presented this at the HHTF), important also for Eurometaux given the long list of metals presently conducting or scheduled to conduct such a study (more information: Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

MB-60: the multiyear planning and budget being the main challenge

Last month we informed you about the preparatory work conducted by the ECHA Management Board (MB) sub-group on planning and strategy. Since then, the Council has adopted the multiyear EU funding which includes a stable support for ECHA but no compensation for the reduced registration fee income. The December Management Board meeting was attended by Marco Mensink (Director General Cefic) as industry observer. We have not yet analysed the minutes of this important meeting but noted from the preparatory material that ECHA still proposes to cut the Exchange Network on Exposure Scenarios (ENES) and supply chain activities as well as replace half of ECHA's meetings by remote sessions to compensate for their income gaps. In reaction to this, industry proposed that ECHA consider reducing staff for registration related activities due to their decrease and also that they consider the relevancy of diminishing the meetings held in Helsinki, given issues that impact industry require interactive debates.

And finally, it is not yet known what ECHA's Management has presented to the MB in respect to the new transparency improvement goals for 2021-2022, an issue for which we really look forward to hearing what was proposed and agreed upon; as well as hearing about the key messages Ms Florika Fink-Hooijer (new Director General of DG Environment provided to the MB (see next month) (more information: Hugo Waeterschoot).

Nanomaterials: work is progressing on Human Health endpoints.

On 11 December, a cross industry group chaired by Cefic held a web-conference in preparation for the meeting of the Partner Expert Group (PEG) on Nanomaterials/Human Health Endpoints. Most of the extensive comments previously submitted by industry were taken into considerations in the revised draft

Guidance on information requirements for nanoforms, confirming the success of the work done by industry experts.

The group focused on identifying remaining issues to be raised. In general, the data requirements for genotoxicity seems to be disproportionate and it is not clear why that is important only for "nano". Additionally, the work done by OECD providing support on both *in vivo* and *in vitro* testing might not be sufficient for complementing the current lack of practical experience. Regarding interferences in *in vivo* and *in vitro* test methods, creating a list in the appendix would make it easier to update it in the future.

Several parts of the guidance certainly need more details; the risk is that, if more guidance will be provided at later stages, this could invalidate the test results that industry would have carried out in the meantime.

A possible option that was discussed was to update the tests in the context of substance evaluation, however, this option would require that it fits properly within the timeframe set in the implementing regulation on dossier updates. There are some remaining concerns regarding terms of reference and some issues with definitions, in particular with regards to "dissociations", "dissolution" and "poorly soluble particles"; this topic was not even listed in the agenda, but it is an important one.

The guidance update process foresees that a revised version is circulated after the PEG meeting, but that only final minor comments are accepted at that stage. However, considering the importance of the above points, the group agreed on the necessity to ask for more time to discuss.

The actual PEG meeting took place on the 14 and 15 December. Arne Burzlaff (EBRC) attended the meeting on behalf of Eurometaux. More information about the outcome of the meeting will be provided in the coming weeks after the industry experts have had the opportunity to wrap up conclusions and next steps (more information: Arne Burzlaff, Violaine Verougstraete, Lorenzo Zullo).

EUROMETAUX CHEMICALS MANAGEMENT

EUROMETAUX FUNCTIONING

Chemicals Management Steering Committee: *last meeting of the year*

This last meeting of the year was mostly devoted to a reflection on the need for extra resources to address the upcoming challenges (e.g., the Chemicals Strategy for Sustainability (CSS) & Zero Pollution Action Plan (ZPAP), but also the coherence with the Circular Economy (CE) Action Plan and Products Policy developments). The secretariat presented the outcomes of an assessment of priorities, available resources and expertise in the CM department and the group discussed possible ways forward. The main outcome from the discussion was the support of the Chemicals Management Steering Committee for extra resources, which has since been approved by the Eurometaux Management Committee. Thus, the Chemicals Management team will grow in 2021!

Other topics that were discussed included the new concepts of "Essential uses, Substances of Concern (SoC) and Most Hazardous Chemicals (MHC)" mentioned in the CSS for which the sector needs to estimate the impact and define agreed positions! To facilitate this, the secretariat has developed a Template Framework that includes a self-assessment reflection tool to identify and estimate the potentially most relevant impacting concepts and measures and identify common issues to focus advocacy activity on.

Also, the Zero Pollution Action Plan "Towards a Zero Pollution Ambition for air, water and soil" and the IED Revision were evoked, including the ongoing/forthcoming Public Consultations. The key aspects from ECHA Programming 2021-2024 document were presented as well as an overview of the EC survey on End of Waste (EoW) and by-products. Environmental classification, and in particular the turmoil created by the lead classification, was the last agenda item of an intense but very stimulating meeting. The full minutes have been circulated to the Steering Committee (more information: Violaine Verougstraete).

Human Health Taskforce: *end of year update*

After a brief update on some Occupational Exposure Limit (OEL)-related actions agreed during the last Science Forum meeting, Noömi Lombaert (IZA, ICdA) presented the learnings of the first RAC debate on the Cd OEL. The RAC Rapporteurs presented their first draft opinion on the background document prepared by ECHA, recommending an OEL (8h Time Weighted Average (TWA)) of 1 µg/m³ (inhalable fraction) + a Biological Limit Value (BLV) of 1 µg/g creatinine, lowering the BLV proposed in the ECHA report. Along the discussion, RAC members asked for a solid justification to be compiled for the derived levels plus a clear quantification of the cancer risk, considering the recent work from the AGS and its

sublinear approach. Noömi also reflected on industry's interventions, stressing the need to have a combination of an OEL & BLV and on the relevance of human lung cancer data to consider in the derivation of the air limit value. Industry also highlighted the uncertainties associated with the use of data from the general population at very low exposure levels to derive a BLV for the workplace.

A status update on the work done by the ECHA Expert Group on the T25/potency method under CLP was provided by Lara Van de Merckt (Eurometaux) and Ruth Danzeisen (CI). This work, triggered initially by the cobalt metal classification and its associated concentration limit, is of high relevance for inhalation carcinogens. The current CLP methodology to derive the potency is based on results obtained with carcinogens administered via the oral route, requiring a series of assumptions to be made when applied to inhalation studies. These assumptions may result in most inorganic substances being classified as high potency carcinogens following inhalation exposure. Another approach is to refer to the Benchmark Dose Modelling (BMD) that takes all the doses tested -instead of one for the T25 method- therefore taking the dose-response curve into account, increasing the robustness of the derived potency estimate. The BMD modelling is promoted by several major regulatory and scientific organisations such as the US EPA. The Expert Group's work aims at producing a database that includes inhalation carcinogens, starting from the inhalation studies posted on the OECD eChemPortal, the ECHA dissemination pages, and the NTP database. Outcomes of different ways to calculate BMDs and T25s will be compared.

Next came an overview of the status of the bioelution process, both at OECD and CARACAL level. With the next steps being to further reflect on possible advocacy before the next CASG Bio meeting, on possible small-scale testing with alloys and to come back to the Taskforce on the repository issue.

Hugo Waeterschoot mentioned Extended One-Generation Reproductive Toxicity Study (EOGRTS) review that ECHA will carry out, aiming at assessing the overall study design, the statistical power, etc. of the study. MSC regular stakeholders will be allowed to participate in the exercise, accompanied by one expert (deadline for nomination: 15 January).

To end the meeting there was a quick update of the Human Biomonitoring for Europe project (HBM4EU), which involves about 30 different countries and for which two prioritisation exercises have been carried out. Input will be requested from stakeholders, with the need for new knowledge, hazardous properties, exposure characteristics, regulatory status, public concern, technical feasibility. Up to now the sector has submitted some comments on Al, As, Ni and Sb and further input could be provided if e.g., we consider that biomonitoring is not appropriate for some substances or suggest other substances to prioritise.

The detailed minutes of the meeting were circulated to the Taskforce on 17 December (more information: Adriana Oller, Ruth Danzeisen, Daniel Vetter, Lorenzo Zullo and Violaine Verougstraete).

ENV Taskforce: *scheduled Environmental Classification cases may set a precedent for previously classified metals*

The ECHA RAC committee started reviewing the Pb metal environmental classification (see above) and the opinion will most probably set a precedent for other metals, with regard to the criteria and information needs to enable different classification entries for the powder and the massive forms. But lead is not the only metal that is challenged. The Ag metal environmental classification case will also be discussed by RAC in the coming months and in this case, the Dossier Submitter (Sweden) has proposed a specific classification entry for nanoforms but NOT for the massive form. The reasons why they suggested this ("info lacking in the registration dossier"), differ from the lead case (different view on the criteria and information needs). The third upcoming CLH case relates to another proposal from Sweden aiming at rationalising the entries for Cu metal. Their exact proposal is not available yet, but it is expected to reduce the number of entries for biocide forms to (hopefully) a powder AND a distinct no environmental classification for the massive form. ECHA noted these different approaches for different metals and stresses that they are caused by "*the lack of clarity in the guidance requiring an update of the metals guidance later in 2021*". Moreover, ECHA indicated they would investigate how earlier metal cases were assessed and would consider the potential need to update those accordingly. Eurometaux indicated that the guidance is sufficiently clear and includes a very clear example. The problem rather lies in the experts' implementation, who for some reason are deviating from the guidance. The ENV Taskforce has been informed about these upcoming challenges that may have far reaching consequences for metals in massive form including alloys and other forms like frits, UVCBs in massive form, slags, ... A session on 20 January has been scheduled to discuss and review the situation and possible actions (more information: Jelle Mertens, Stijn Baken and Hugo Waeterschoot).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability: Eurometaux launches its industry impact assessment

The Chemicals Strategy for Sustainability (CSS) proposes a series of new concepts, definitions and measures that will potentially affect the metals and inorganics sectors. To get a better understanding of the magnitude of the impact of the CSS, Eurometaux has developed a self-assessment tool for companies, commodities and consortia to identify and estimate the potentially most impacting concepts and measures, as well as the common issues to focus our advocacy activities on. All information received will be processed confidentially through a dedicated mailbox (CSS-team@eurometaux.be). A webinar will also be organised on Thursday 14 January 2021 (10:00-11:30 CET) to explain the tool and its template (more information: Noam El Mrabet).

RISK MANAGEMENT

Risk Management Taskforce meeting: extensive update on ongoing regulatory activities and plan the 2021 agenda

The RM Taskforce of 15 December reviewed a long list of recent regulatory initiatives related to the risk management of chemicals. First and most importantly are the risk management actions resulting from the recently published CSS (Chemicals Strategy for Sustainability) including new challengeable concepts like essential uses, a higher and more distinctive role for the RMOa tool and a scheduled extensive review of the restriction and authorisation schemes. Besides these more strategic aspects the taskforce was updated on SEAC activities, and especially on how SEAC assesses the Substitution Plans on upstream applications as well as on the request from the Commission for better motivated opinions on the economic feasibility of authorisation and restriction options. The morning session ended with the learnings from the last NeRSAP meeting and the conclusions and precedents set by the microplastic restriction case (see report on SEAC hereabove) complemented amongst other smaller points this session.

In the afternoon, in a more interactive session, the Taskforce debated the need for further advocacy follow-up on the “intermediates definition” as a result of the last CARACAL meeting. The large impact on industry of the extended conditions on the intermediate definition (like the storage requirement) does not seem well understood and requires recognition in an improved Impact note from the Commission.

Finally, Eurometaux explained the status of the web-based version of the ind-RMOa tool and the invitation we received from ECHA and DG Grow to present it later in Q1 2021. The review of ongoing and scheduled regulatory challenges allowed the co-chairs to conclude on an overall agenda for 2021 (more information: France Capon, Klaus Kamps, Michel Vander Straeten and Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

IED and E-PRTR revision: stakeholder workshop

The morning session -devoted to the IED- featured around 300 participants between Member States, industry representatives and NGOs. The context of the revision of the Industrial Emissions Directive was explained (i.e., the Green Deal and the Zero Pollution Action Plan) as well as the process that will be followed. Due to the synergies between the IED and the European Pollutants Release and Transfer Register (E-PRTR), their revisions will be run together and are expected to have similar timings. This was confirmed by the launch of the Open Public Consultation IED and E-PRTR Open Public Consultation on 22 December. The Commission is aiming at the finalisation of the process via publishing the communication and Impact Assessment (both for IED and for the E-PRTR) by the end of 2021 that would enable the opening of the legislative proposal one year from now, early 2022. A call will be organised with the IED Taskforce in January to discuss how to address the consultation and further liaise with the Industrial Emissions Alliance partners.

During the afternoon session, devoted to the E-PRTR Regulation Impact Assessment, **key topics that were discussed** included the addition of sectors and pollutants to the E-PRTR datasets; the wish to include circular economy indicators where possible under the E-PRTR datasets; and also the desire to increase the interaction between the E-PRTR regulation and the decarbonisation potential. It is still unclear how the reporting would happen and for which greenhouse gases, but it is under discussion (more information: Eva Tormo (EA) and Violaine Verougstraete).

WATER

SG-R of Priority Substances list meeting

On 15 December, a sub-group meeting on the candidates for the Priority Substances list took place. The aim of the meeting was to give an overview on which substances they will be going forward with within the next months. Only the silver dossier is planned to be finalised by the end of January 2021. Uranium and selenium are being cast aside for the moment due to lack of sufficient data and the need to prioritise. Their timeline, considering the number of substances, is incredibly ambitious and brings concerns about the scientific process to be impaired. They mentioned that they want to start the impact assessment even if the Environmental Quality Standards (EQSs) are not finalised for the candidates (including silver) and submit the EQS documents to SCHER to receive validation to go forward. But this will leave unanswered questions instead of solving them within the experts' sub-groups. Questions were also raised concerning the urgency to publish the guidance for metals assessments in order to discuss the metals cases; this was stated as being on the to do list for December, but no further information has been received since then. A deselection of the existing PSs could not be added to this meeting's agenda, a SG-R meeting in January was mentioned by Helen Clayton but has not been confirmed yet (more information: Lara Van de Merckt).

Diffuse Emission: EEA Project

The aim of this project led by EEA is to help Member States improve their reporting of emissions, by helping them focus on the reporting of main pathways (or sources). ETC-ICM and CIS Working Group's mandate ran to December 2020. Therefore, near-term aims -for the work related to the WG Chemicals sub-group on emissions- are targeted for the WG Chemicals meetings expected in March and October. The project is an opportunity for the metals industry to provide valuable information, as Deltares and EEA do not get much input from the Member States.

The ETAP project is the core of this exercise and Sean Comber reported on the work he is doing under ETAP on multi-metal inputs to the Urban Waste Water Treatment Directive (UWWTP), and on source apportionment of copper. Both projects sound very relevant to EEA / ETC ICM / WG Chem sub-group interests. The work should help to better explain the metal concentration levels in our water, as for now, only European Pollutants Release and Transfer Register (E-PRTR) data is used and does not take into account either background levels or Sewage Treatment Plant (STP) inputs.

The ETAP-STP project is to be concluded by Q1 2021. Next for the EEA diffuse emissions project is to analyse the pathways of emission and identify the most relevant pathway for each substance. What is expected from industry is that they fill in the Table sources' pathway example that was provided. The plan is to start with the 3 metals (Cd, Ni, Pb) to use as examples and steer the assessment, which could be reported upon at the next bilateral call, planned for 21 January 2021 (more information: Lara Van de Merckt).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

MISA: Extension of the programme and posting of minutes/executive summaries

ECHA informed CARACAL about its intention to prolong the MISA programme until the end of 2021, to benefit from the progress made in the MISA programme so far and to be able to conclude on the remaining priorities, considering the impact Covid had on the activities and timeframes. ECHA will continue monitoring dossier updates on human health and environment as well as updates of UVCB dossiers, continue the work on exposure (the next webinars on environmental exposure are scheduled for 26-27 January!), start the work on supply chain and impurities, and reporting on the progress of the MISA programme and development of the final report. This extension has been formalised via an agreement between Eurometaux and ECHA.

Also, ECHA and Eurometaux have prepared detailed minutes and executive summaries/learning lessons of the two first MISA exposure webinars. Detailed minutes and presentations have been posted on the MISA blog. Executive summaries and learning lessons are available on the ECHA MISA webpage and the public part of the REACH Metals Gateway.

A big thanks to all the MISA consortia for their investment and input in the MISA programme despite the difficult conditions! (more information: Federica Iaccino, Hugo Waeterschoot and Violaine Verougstraete).

Inorganic UVCB exchange with ECHA: update

Following the October web meetings, we have addressed several of the ECHA team's questions on the Inorganic Unknown or Variable Composition, Complex Reaction Products and Biological Materials (iUVCB) assessment methodology. In December, ECHA provided a last set of clarification requests and proposed a scheme to visualise the assessment steps. We have provided regulators with full replies that will feed into the scheme and help get ready for its final refinement. The last piece of the exchange with ECHA is the identification of the workable IUCLID reporting, using ad hoc IUCLID 6 functionalities. We are trying to organise a meeting in January with the ECHA iUVCB & IUCLID technical teams to define the best options (for more information: Federica Iaccino and Violaine Verougstraete).

OUTREACH

OECD

OECD guidance on safer alternatives nearing publication: a reference for the EU?

The OECD has finalised its guidance on “safer alternatives”, the homologue of “substitution” in the EU. The OECD Guidance is likely to be published in early 2021. The work on the guidance was sponsored by the US EPA and the Commission and supported by ECHA. It is expected that the outcome of this OECD guidance will be recognised under REACH and thus impact us. The original OECD guidance version focused very much on “hazard” but thanks to industry interventions this was broadened to a better recognition of exposure/risk and sustainability considerations. The OECD will now further define in practice what this means, providing an additional opportunity for BIAC (industry representation at OECD level) to continue progressing the concept of “technically, economically and sustainable safer alternatives” as a more pragmatic way forward (more information: Kai-Sebastian Melzer or Hugo Waeterschoot).

CALENDAR

**Please find here below a non-exhaustive list of the meetings that are planned so far for 2021.
This list will be kept up to date on a regular basis and communicated throughout the year.
Please save the dates for the meetings of interest for you.**

For meetings at Eurometaux

For the moment due to the current situation beginning of 2021, it will be possible to join our meetings by Webex (links to join will be sent ahead of the meetings).

Any further update, decisions and/or cancellations will of course be communicated in due time.

For meetings at ECHA

ECHA confirmed that **until the 30 June 2021 all ECHA meetings will continued to be held remotely**. ECHA will keep the situation under review and will provide any further information as appropriate. Please note that all dates for ECHA meetings are “tentative”.

This information is published on ECHA's [website](#)

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

- 11 January: Human Health (EOGRTS Review) Meeting
- 20 January: Environmental Taskforce Meeting
- 25 January: Industrial Emissions Directive (IED) - Article 13 Forum 15th Meeting
- 26-27 January: MISA 4 – 3rd Webinar (Environmental Exposure and Man via the Environment)
- 04-05 February: REACH Committee Meeting
- 8-12 February: ECHA MSC-73 Meeting
- 25 February: Chemicals Management Steering Committee Meeting

- 02-03 March: WPC meeting TBC
- 03-04 March: CARACAL-38 (TBC)
- 8-12 March: ECHA RAC-56 & SEAC-50 Meetings
- 15-19 March: ECHA RAC-56 & SEAC-50 Meetings
- 25 March: Risk Management Taskforce Meeting (TBC)
- 25-26 March: ECHA MB-61 Meeting
- 19-23 April: Chemicals Management Spring week
- 27-28 April: REACH Committee Meeting
- 28 May: Chemicals Management Steering Committee Meeting
- 31 May-4 June: ECHA RAC-57 & SEAC-51 Meetings
- 7-11 June: ECHA RAC-57 & SEAC-51 Meetings
- 14-18 June: ECHA MSC-74 Meeting
- 15-16 June: WPC meeting
- 22 June: Risk Management Taskforce Meeting (TBC)
- 23-24 June: ECHA MB-62 Meeting
- 24-25 June: REACH Committee Meeting TBC
- 29-30 June: CARACAL-39 TBC
- 31 August: Chemicals Management Steering Committee Meeting
- 06-10 September: ECHA RAC-58 & SEAC-52 Meetings
- 13-17 September: ECHA RAC-58 & SEAC-52 Meetings
- 21 September: Risk Management Taskforce Meeting (TBC)
- 23-24 September: ECHA MB-63 Meeting
- 22-23 September: ECHA Committee Meeting TBC
- 27 September-1 October: Chemicals Management Autumn week
- 05-06 October: WPC meeting TBC
- 11-15 October: ECHA MSC-75 Meeting
- 17-18 November: CARACAL 40 TBC
- 22-26 November: ECHA RAC-59 & SEAC-53 Meetings
- 29 November-3 December: ECHA RAC-59 & SEAC-53 Meetings
- 08 December: Chemicals Management Steering Committee Meeting
- 07-08 December: ECHA Committee Meeting (TBC)
- 13-17 December: ECHA MSC-76 Meeting
- 15-16 December: ECHA MB-64 Meeting
- 21 December: Risk Management Taskforce Meeting (TBC)

GENERAL INFORMATION & ACRONYMS

Follow the logo and check out our new Metals Gateway website.



This website is a (new) one stop information source for regulators & risk assessors dealing with metals/metal compounds and is tailored to the specific needs of the metals industry sector.

A continuously updated list of acronyms is available under the Reach Metals Gateway (RMG)
