Eurometaux
European Association of Metals

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EUROMETAUX CHEMICALS MANAGEMENT NEWS

Please join us online

- 25 March: Risk Management Taskforce Meeting
- 30 March: Registration Taskforce Meeting

Contents

Dear All,

I recently remembered that at some point during my childhood one of my preferred Disney characters was Tinker Bell, the fairy who joins Peter Pan on his exploits in Neverland. Not because she was particularly close to Peter Pan: being captured by Captain Hook, trapped in a lamp, and betraying the hero was not enviable. I was rather longing for the golden pixie dust that granted her and others the ability to fly, leave bedrooms through windows to see London from above and land somewhere else. Despite Tinker Bell's fairy language being quite unintelligible for humans, I managed to understand that to make the dust work and "have wings", one needed to think "wonderful thoughts". As a kid this seemed rather effortless – a clue that I had a happy-go-lucky youth!

What I noticed though was Tinker Bell's fragility! She was vivacious and gracile (and blond!), she was making all those cute jingling noises, but this never seemed to be enough! She was stubborn, hot-tempered and heavily reliant on others' (Peter's) approval. Loyal in the end but coming over as quite selfish along the way.
These 'imperfections' were far too real for a fairy, far too forthright for what I wanted a fantastic character to be.
And hence, exit Tinker Bell from my top 3 of beloved personas. I replaced her by Mary Poppins who had a spoon of sugar for every tricky situation, and an umbrella that comes in quite handy in our climes.

It is when becoming an adult -what Peter wanted to avoid by all means! - that one understands that 'your fragility is also your strength' (Pina Bausch). Or at least, that it is part of the equation leading to strength. Providing you can embrace it, acknowledge it and find the appropriate environment to develop and transform it.... ideally with the affection or at least others' attention. To confront it, to learn from it and work on it.
The current conditions – prolonged beyond our wildest predictions- where we live and work in quasi to semi-isolation, but with clearly less interactions do not help in dealing with fragilities. Tinker Bells -but also the Peter Pans- are having a rough time.

So today, please allow me to give you herewith, a bit of "pixie dust, faith and trust" -according to Miss Bell's formula- to all of you who would like to sail in a three-mast crossing the sky, continue to enjoy being/working in our(bed/home-office) rooms, taking care (even virtually) of the vulnerabilities around us.

Violaine Verougstraete, Chemicals Management Director

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

MSC-73: *opinion on CoRAP and 10th recommended priority list agreed by MSC*

At its last meeting in February, MSC agreed on the annual revision of the CoRAP list. This list includes the substances selected for Substance Evaluation for the next 3 years. The Substance Evaluation programme that is run by the Member States is clearly slowing down due to the multiple postponements that have been agreed and a low number of new entries. The rescheduling of CeO2 (2022, by Germany, for suspected Mutagenicity and Carcinogenicity) and Carbon black (2022, by France for suspected Reproductive Toxicity and exposure concerns) are for metals and the MISA community the most important ones. In addition, ECHA confirmed that the draft decisions on the Substance Evaluations conducted in 2020 will be released during the week of 6 April (Easter week), hence it is important for those involved to be well organised given there is only 30 days to respond to the draft decision.
MSC further agreed on the 10-priority list on recommendations of substances for authorisation. Besides an octoborate compound, this time the list did not include metal compounds. However, the closure of the 10th list triggers the start of activity on the 11th list for which first signs may be expected by the summer (June meeting) and which may include lead, and cadmium and/or cadmium compounds. This is therefore a kind hint to both Consortia to ensure their registration files are up to date in the weeks to come on any info that could influence prioritisation (more information: Hugo Waeterschoot).

MSC-73: *some interesting precedents on intermediates and suggested exemptions for authorisation*

The discussion by MSC on one of the substances included in the 10th priority list (the siloxanes D4,5,6) set quite some interesting precedents. The first related to the application of Article 58 (2) that allows exemptions on the authorisation obligation for uses already covered by another relevant Risk Management Measures (RMMs). MSC felt that the proposed restriction on D4,5,6 would qualify for such an exemption and suggested in their opinion that the Commission should take this into consideration.
The second issue related to the unreacted monomer being considered as an impurity of the silicone polymer hence NOT an intentional use while the intentionally added monomers that reacted to silicone polymers to improve the function, are a use and hence require authorisation (given they are not considered as an intermediate). Both these issues are undoubtedly very important precedents for the metals sector too and will be further explained and analysed at the upcoming Risk Management Taskforce later in March (more information: Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

RAC challenge: *responding to the need for massive AND powder metal entries*

The first RAC discussions on the environmental classification on lead metal (end 2020) did not go very well, with the Rapporteurs proposing and defending "*a single classification entry concept*" based on the powder form and suggesting that in turn, "*an exemption of labelling for the massive form*" should be considered. This would set an unbelievable dangerous precedent for all metals, as the massive forms would be classified like the powder forms with impacts on the Seveso requirements. Eurometaux supported by the many metal consortia submitted an extensive response based on a careful review of historical discussions and decisions on metals environmental classification practices and guidance development. The package included a demonstration that: i) the labelling exemption applies only after the need for classification and would thus require a separate entry if evidence for a classification prevailed; ii) the conditions to prove a different entry and historical overviews on how previous metal cases were successfully assessed and led to separate entries. ECHA appreciated and confirmed the receival of this large information package and forwarded it to the Rapporteurs in charge of the lead metal case.
Eurometaux sincerely hopes that the Rapporteurs will now carefully consider and agree with the presented historical evidence. We will know more when we receive the updated draft opinion early March for the continued discussion in RAC mid-March (more information: Steve Binks, Jasim Chowdhury and Hugo Waeterschoot).

New ECHA infographic on substances of concern:

Yesterday, ECHA promoted its new infographic on how they plan to tackle substances of (potential) concern in the Integrated Regulatory Strategy (IRS). Please have a look: each box is interactive and takes you to the relevant page. To note: 'Grouping' is now made more evident and the role of the Risk Management Option analysis (RMOa) is also well highlighted. The scheme mentions that a RMOa is preferably done at an early stage, for instance, when the group is identified but it has been revisited at a later stage, if necessary (e.g. after further information is generated and the hazard has been clarified or when new insights on uses are available). The RMOa can be done by ECHA or by a Member State. This infographic will be further taken up in the sector's discussions on the industry RMOa and how to improve efficiency of risk management Integrated Regulatory Strategy - infographic - ECHA (europa.eu)

EUROMETAUX CHEMICALS MANAGEMENT

EUROMETAUX FUNCTIONING

Chemicals Management Steering Committee: *active first meeting of the year-thanks!*

The first meeting of the year was held on 25 February and was very well attended. The agenda started with an update on the changes in the CM department staff, chairmanships and taskforces. The long-awaited Socio-Economic Assessment and Assessment of Alternatives Taskforce will soon start its activities now that its mandate and objectives for 2021 have been clarified. A call for 2 co-chairs (and for an easy acronym!!!) has been launched.

A status update on the CSS (Chemicals Strategy for Sustainability), with timelines summarising the information that is currently available, and the first learnings of the impact analysis and outreach was presented. The representation of the metal/inorganic sector in the High-Level Round Table on the Implementation of the CSS was discussed with the Committee. The experts in this Round Table shall support the Commission to realise the CSS objectives in a dialogue with the stakeholders concerned, to monitor progress of the Strategy's implementation and to support the transition to safe and sustainable chemicals and to a toxic-free environment. On the Zero Pollution Action Plan (ZPAP), the secretariat presented a state of play and a proposed way forward for the ZPAP Project Group.

Following this came a most interesting presentation by KGHM on the changes of the (Occupational Exposure Limit) OEL system and the socio-economic impacts of cumulative effect of lowering multiple OELs, both on sectors and individual companies.

The meeting concluded with a series of updates, starting with Water and Priority Substances and the related technical and procedural concerns. This was followed by a presentation on an OECD project using Pollutants Release and Transfer Register (PRTR) information to evaluate the progress towards meeting the UN Sustainable Development Goals (SDGs) and putting various metals in the spotlight. Several actions were defined with the consortia and ICMM to comment on the methodology that was used (USETOX) and prepare a response to the OECD and for the UN SAICM session. Finally, the state of play on the environmental classification was given, highlighting the important forthcoming discussion in RAC on lead metal (16 March). More information will be available in the detailed minutes that will be circulated shortly (more information: Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Council conclusions on the Chemicals Strategy for Sustainability: *the final stretch*

Eurometaux Secretariat continued its outreach towards Member States on the Council conclusions on the Chemicals Strategy for Sustainability (CSS) and on the Proposal for a Batteries Regulation and has now met with 11 out of the 19 Member States we decided to focus on. In this regard, we would like to thank our French, Polish, Finnish, Dutch, Austrian and German members for their support in organising and joining us in our meetings. Eurometaux obtained the last draft Council conclusions which are now being submitted to COREPER I, in view of being adopted by the Environment Council on 18 March. No more changes should be expected at this stage. The ambition of the Portuguese Presidency holding the pen for these conclusions was to remain as close as possible to the text and ambition of the Chemicals Strategy for Sustainability, rather focussing on rapid implementation and the need to clearly define new concepts such as "Substances

of Concern". Notably, though, the text calls on the Commission to develop an "essential use framework" rather than strict criteria, which should allow for a level of flexibility. Outreach will continue, rather focussing on the Proposal for a Batteries Regulation and the implementation of the Chemicals Strategy for Sustainability, as we move forward in the respective (legislative) timelines (more information: Noam El Mrabet).

Mixture Exposure Assessment: *Eurometaux concluded on a study on the impact of the introduction of a MAF factor for unintended mixture exposure*

One of the proposals of the CSS is the introduction of a Mixture toxicity Assessment Factor (MAF) to ensure that the "cocktail of exposures to chemicals" would not cause a combined risk for workers and/or consumers, for environmental compartments or Man via the Environment. The MAF (expected to be 10 by default) would be applied to the substance specific Risk Characterisation Ratio (RCR) in the Chemical Safety Report (CSR) and act as a trigger therefore identify chemicals for which the demonstration of safe use could be achieved and those it could not (hence requiring refinement). A preliminary ECHA study demonstrated that the need for refinement would only be relevant for approximately 20 % of the chemicals with clear and feasible options to refine the CSR. The metals sector noted the MAF approach as a real challenge and conducted with the help of EBRC for the Human Health endpoints and ARCHE for the environmental endpoints, studies to assess the impact and potential for refinement for metals. Both studies confirmed that the impact of a MAF of 10 or even a MAF of 3 would require more than 50 % of the metals to refine its demonstration of safe use for unintended mixtures. This issue seems to be most significant for the environmental compartments wherein for a small series of metals, if such a MAF were to be introduced, even the sum of natural backgrounds would exceed the risk level. The reports were summarised and presented to the Commission and ECHA. The Commission has already reacted positively indicating that this evidence will be considered in their impact study that will be launched before the summer. To further anticipate the discussions on the Commission's MAF impact study, Eurometaux will launch with the help of some Consortia a second phase of its impact study defining how/with what resources and to what extent the registration dossiers can be improved/refined for the unintended mixture exposure assessment (more information: Violaine Verougstraete and Hugo Waeterschoot).

CARACAL

CARACAL Taskforce: *first meeting*

On 23 February, Eurometaux Secretariat held its first CARACAL Taskforce meeting chaired by Roger Doome (Secretary General of the European Borates Association and Director General of IMA-Europe) to prepare for CARACAL 38 (3-4 March 2021). As usual, a Master Document compiling all relevant information and documents was shared ahead of the meeting. Issues discussed included: (1) Intermediates, with Eurometaux members agreeing to sign a letter with REACH Alliance and SME United calling for transparency, accountability and coherence in the process of reviewing the 2010 ECHA guidance document. (2) Essential uses, including a statement to be made during the meeting recalling our position to consider a flexible approach in regard to supporting the EU industrial, climate and circular goals. (3) REACH Review Action 3 and the recent decision from ECHA's Management Board to stop the agency's involvement in this initiative. (4) MISA, for which a progress report will be presented to the Member States by ECHA. (5) The 18th Adaptation to Technical Progress (ATP) to Classification Labelling and Packaging Regulation (CLP), which includes V2O5 on which Eurometaux will consider submitting written comments after the meeting (more information: Noam El Mrabet).

BATTERIES

Public Consultation on the batteries legislation proposal: *Eurometaux's reaction*

The Eurometaux Chemicals Management team supported the Sustainability team in its efforts to respond to the Public Consultation on the batteries legislative proposal put forward in December 2020. Besides extensive sustainability considerations Eurometaux included suggestions on the chemical's management aspect. Art. 71 of the proposal foresees a systemic review of chemicals used in batteries to define the need for restricting risks under the form of specific battery restrictions. Discussions with the different battery sectors raised the question on *what the best legal frame would be* to review and define risk management measures for battery chemicals: under the existing REACH and Occupational Safety Health (OSH) risk

management processes, or a special restriction path under the batteries legislation. Eurometaux concluded that instead of opting for any legal regime, it is key to highlight at this stage: (i) the fair prioritisation (as part of the review of all chemicals included in ECHA's chemicals universe assessment), (ii) the conditions on the need for risk management (risk based and recognition of the full lifecycle), and (iii) the level and type of proof (based on SEA and technical and economic feasibility of potential alternatives if needed) . Although, Eurometaux does not agree that Authorisation can be considered as a risk management tool for battery materials given it starts from the presumption of substitution without consideration of risk and would be applicable to all uses even beyond the use in batteries. Eurometaux has filed its position on 1 March and will continue collaborative action with the concerned metal consortia and battery sector representatives to defend the most optimal choice to enable the promotion of safe use of metals in batteries (more information Kamila Slupek and Hugo Waeterschoot).

REACH REGISTRATIONS

UK REACH: *inception stage - pooling our nascent knowledge*

UK REACH came into force on 1 January 2021, representing an additional piece of chemicals management compliance legislation for Consortia/Lead Registrants (LRs)/ Letter of Access (LoA) holders to address. It was agreed to 'home' the UK REACH specificities and related data-sharing issues under the EM Registration Taskforce and a first meeting was held on 15 February. The purpose of the webinar was to work on enhancing a common understanding of what needs to be tackled, sharing approaches, and flagging up key aspects to help the various parties to best organise their actions. After a quick recap on the timelines, several consortia presented their way of thinking regarding management and data-sharing. It was proposed to set up a structure that would allow cross-consortia cooperation, a bit of an analogue to the EM REACH Forum that ran until end 2018, to debate regulatory or technical issues and facilitate the identification of partners for contacts. Interested parties should express their interest by sending an email to Eurometaux and this will be rediscussed at the next Registration Taskforce end of March. It was also asked that the EM secretariat highlight details of secretariats involved in UK REACH on the REACH Metals Gateway and to contact Chemical Watch to check whether they would display a list of substances/contacts for UK REACH. Detailed minutes of the meeting were circulated on 22 February (more information: Sandra Carey & Kerstin Heitmann, Lorenzo Zullo & Violaine Verougstraete).

INDUSTRIAL EMISSIONS

IED Taskforce webinar: *catching up on 3 February*

The objectives of this 2-hour webinar were double: provide an overview of the IE 'landscape' and explain how the work will be organised at Eurometaux level. It was recalled that the Commission has committed to review the Industrial Emissions Directive (IED) under the Green Deal to support the goals on zero pollution, climate neutrality, biodiversity and a cleaner, more circular economy. The outcomes of the December Stakeholder Workshop as well as of the Industrial Emissions Alliance were discussed, to identify key aspects that need to be highlighted in the Open Public Consultation and Targeted Stakeholder Surveys. A draft reply to those consultations is under preparation and will be circulated to the Taskforce soon. To note is that the consultations also refer to the review of the European Pollutants Release and Transfer Register (E-PRTR). Its evaluation in 2017 showed it is fit for purpose but that some improvements could be made.

Eurometaux reported on the headlines of the OECD Working Party on PRTR January meeting and more specifically on the presentation of a project using PRTR for Sustainable Development Goals (SDG) progress measurement. The draft report of the project put several metals in the spotlight, due amongst others to the use of USETOX and lack of context. A follow-up call was set up with the metal commodities and outcomes discussed with the Chemicals Management Steering Committee. Short but useful overviews were provided on the ZPAP, Sustainable Finance and Air Quality

Eurometaux explained that a new Chemicals Management manager should arrive soon and take over the IE file/secretariat. In the meantime to facilitate and improve efficiency, Eurometaux will closely work with the IE Alliance on IE and PRTR Review and has asked Seeds Consulting for support.

The draft minutes were circulated on 8 February (more information: Eva Tormo, Juan Antonio Suarez and Violaine Verougstraete).

WATER

Working Group Chemicals & Priority Substances : *update*

The last Working Group (WG) Chemicals combined with the Priority Substance (PS) sub-group meeting took place on the 3rd and 4th of February.

The initial timeline and schedule for the Environmental Quality Standards (EQS) dossier finalisation (given in October 2020) shows that the process is already quite delayed for most substances. No information was received for the Uranium or Selenium dossiers and regarding existing Priority Substances such as Nickel, no further work has been done by the Joint Research Center/Commission either. Out of all the substances under scrutiny *(Silver, Neonicotinoids, PFAS, Pyrethroids, Glyphosate, Bisphenol-A, Carbamazepine & Triclosan, Azithromycin & Erythromycin)*, they have only worked further on Silver, Neonicotinoids and PFAS. Only the Silver and Imidacloprid dossiers were to be sent to SCHEER (Scientific Committee on Health, Environmental and Emerging Risks) by the 24th of February. The timeline given to the sub-group to review the draft EQS as well as the annex document -being sent to SCHEER- was ridiculously short!

While the long-awaited technical guidance documents on the Effects Based Methods and the Metals EQS implementation were mentioned in the agenda, no more information was given besides the fact that they will be out soon...As we know, the Metals EQS technical guidance is of utmost timely importance as MSs are currently writing the 3rd River Basin Management Plan which sets the framework of how each MS will monitor their river bodies over the next 6 years. This document is thus a priority as some metals have EQS bioavailable, for which a separate assessment (e.g., Priority Substance Ni) is necessary and that not many MSs know how to take this into account. We plan on reaching out directly to MEP Pernille Weiss' secretariat to raise and address this issue with Commission.

The work on the Impact assessment (IA) of the refit of the Water Framework Directive (WFD) was briefly presented by the WOOD consultancy: it started in January 2021 and is led by WOOD and Trinomics, who are focusing for the moment on the assessment of the impacts the policy options for surface water pollutants will have (a lot seems to overlap with JRC's work). The scope or terms of reference of the IA has not been given and it was stated that no more information will be shared on the matter. A workshop in September 2021 to present their results was mentioned (more information Lara Van de Merckt).

Prioritisation Process: *concerns & joint action*

The prioritisation process raises several technical and procedural concerns. The technical concerns are multiple, from the calculation of the STE (Spatial, Temporal and Extent) of PNEC exceedances (monitoring-based prioritisation methodology), the STE scoring (e.g., Ag), the non-accountability of monitoring data or the way sensitive data is treated (those below Limit Of Quantification (LOQ)). This last point is highlighted in the WCA paper co-signed by several commodities and was presented during the February WG chemicals. Commission/JRC prepared several presentations in response and a "response paper" was mentioned but has not been heard off since. Something to be taken from that experience is that several MSs took note and asked the Commission if we could go back and reassess the data following WCA's presentation. A 2nd paper is being prepared by WCA comparing the Watch List to the MS & EU-wide data to see if they are representative, which we doubt.

There are also several concerns from a procedural point of view. From the lack of progress and organisation to the lack of transparency and finally, the incredibly short timelines that keep on changing and illustrate that they seem to be putting the timeline before the science and the handling of the silver dossier is the paramount example of that.

We shared these concerns with the Joint Association Meeting (JAM) members, and we agreed on a common action way forward. A one-pager draft highlighting these issues is in the process of being reviewed and the plan is to have it co-signed by as many different associations as we can and address it to the Director and Head of Unit of DG Environment (more information: Lara Van de Merckt).

TOOLS

Multi Metallic Database*: the central place for data on metals soon to be released*

As previously announced, Eurometaux is developing the Multi Metallic Database (MMD), an online portal that gives access to human health and environmental REACH hazard related data for a broad range of metals and metal compounds. The MMD will allow users to compare data across substances and their various forms, in easy-to-read comparison tables which can also be downloaded in excel format. Data owners will

be able to modify and update their own data autonomously. Changes in the data will be recorded in a dedicated log so that users can quickly identify new or edited information in the database. The first version released at the end of last year has been extensively tested and the focus is now on checking the data that have already been uploaded for more than 120 substances.
The MMD has also been equipped with an automated process that is capable of periodically checking the alignment with the data available in the ECHA dissemination portal. In case of divergences, the respective data owners will be notified, and with one click they will be able to update their values or, in case the divergency is justified, introduce a clarification note visible to other users.
During the past weeks, this functionality has been successfully tested and is now ready to be deployed. The aim is to ensure the MMD will remain the main reference for good-quality data on metals.
The official launch of the MMD is expected towards the end of March (more information: Lorenzo Zullo, Federica Iaccino, Violaine Verougstraete).

Cobalt CLH Taskforce: *testing proposals, T25 and bioelution*

The Cobalt CLH Taskforce had an "update call" on 10 February to catch up on several developments since the last Taskforce call (June 2020). The timeline of the Testing Proposal (TP) for the oral carcinogenicity study, which aims at addressing the 'all routes' carcinogenicity classification was explained, as well as its possible outcomes. The submission of the Testing Proposal to ECHA was followed by a Public Consultation, which ended in November 2020. However, as several cobalt substances are bound by a read-across, the results of this oral carcinogenicity study will also apply to those substances. As a result, ECHA did not launch one but three waves of consultation on the different substances. The consultation on the last wave will end on 8 March.
Since the summer, significant progress has been made by the ECHA expert group evaluating the CLP approach to derive potency for (inhalation) carcinogens. This group has been examining both the possibility to have separate databases of carcinogenicity studies by route of exposure and the use of a Bench Mark Dose (BMD)-based metric to calculate potency and rank substances (instead of the T25). This has required a lot of literature review work and analyses to be set up, with the Cobalt Institute and Eurometaux's intense involvement. To note is that this sub-group is asked to focus on the methodology and not to "assign" Specific Concentration Limits (SCLs) to individual substances or cut-offs in the list of inhalation carcinogens currently ranked by potency as high-medium-low. This will still require a policy decision to be taken after the expert group has issued its report (mid- 2021).
Finally, the group was informed on the developments of bioelution, both at OECD level (drafting of a Test Guideline) and in the CARACAL Sub-group on Bioelution (CASG Bio). The next meeting of the CASG Bio is scheduled for 20 April and responses to the comments raised by Denmark, Germany, The Netherlands and Sweden are under preparation.
The draft minutes were circulated on 11 February. The next catch-up call will be organised once ECHA has issued the draft decision on the Testing Proposal (more information: Ruth Danzeisen, Adam McCarthy, Hugo Waeterschoot and Violaine Verougstraete).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

MISA: *thank you all for your energy and living up to your MISA commitments*

The MISA modalities foresee a regular review of and reporting on the progress to authorities. To this end, a set of indicators has been developed by ECHA and Eurometaux against which the performance is evaluated at regular moments and communicated to CARACAL or other groups like RIME. In view of the CARACAL March meeting, ECHA has prepared a detailed overview of the progress and accomplishments of the programme reached in December 2020 and on what has been done/remains to be done. In a nutshell, the report concludes that industry's participation is very good, covering most of the volume of non-ferrous metals on the EU market and that progress on the activities announced in the rolling action plan is good, with technical and scientific topics being handled in time until the COVID-19 pandemic started. While not all issues were able to be resolved, in most cases good quality deliverables or solutions were identified. Most consortia/associations lived up to their commitment to self-assess their files, participate in the workshops and provide work plans. By the end of 2020, a marked increased number of updates on human health and environment endpoints was visible for substances in the MISA programme. ECHA concludes that the balance in resource efficiency is positive and that they see a higher level of consistency of approaches. The MISA work was expected to end in 2020. However, considering the effects of the COVID pandemic, ECHA

and Eurometaux have agreed to extend the programme until end of 2021 in order to maintain the momentum and complete the work on the remaining technical and scientific topics. This policy report has been circulated to the CARACAL members, who can send in comments up to 31 March. We want to explicitly thank the MISA participants for these (their) great outcomes (more information: the MISA team).

MISA: *Checklist on substances' uses assessment.*

Following up on the MISA exposure workshops and the exchanges held with the ECHA's exposure experts, a short checklist on substance's uses assessment has been developed and just published on the MISA Blog. The blog page addresses specific uses information as provided by the registrants: the IUCLID Section 3 aims at reporting uses and tonnages to allow registrants to link these details to the exposure assessments and to enable regulators to define their screening and further activities. For these reasons it is extremely important to keep these sections up to date, as well as ensure that possible changes and updates in use descriptors - are in the context of REACH dossiers- considered as a correct and complete description of industrial, professional or consumer uses. Furthermore, companies are reminded that they have to evaluate their by-products status in the different Member States, to clarify when waste identification does or does not apply and to ensure they consider REACH requirements correctly. On the by-products as for slags, drosses, slimes and sludges to name a few, ECHA also recalls the importance of fully describing, assessing and communicating all lifecycle steps, including possible cases where non-ferrous metal substances might enter other industrial sectors (more information visit the MISA Blog News and Priority 4: Exposure pages or ask Federica Iaccino and Violaine Verougstraete)

OUTREACH

OECD

OECD-PRTR: *report on the use of PRTR data for SDG progress measurement challenges Nickel and Cadmium*

The OECD-PRTR Working party recently released a report demonstrating how PRTR data can be used to demonstrate progress with the UN-Sustainable Development Indicators (SDGs) especially n° 12. A pilot study based on the PRTRs of 7 country/regional data sets (including the EU-PRTR) including amongst others a series of organic chemicals and also 4 metals (Cd, Hg, Cr and Ni) confirmed that impacts and trends, hence progress, can be measured. For the concerned metals it indicated that Ni and Cd are by far the largest contributors to ecotoxicity impact while for HH carcinogenicity and non-CMR (Substances classified as Carcinogens, Mutagens or toxic to Reproduction) toxicity, Cr, Cd and Hg are the main contributors, much more so than the collective impact of more than 15 hazardous organic chemicals.

In addition, the report also demonstrated that the contribution of base metal manufacturing was a main contributor to atmospheric pollutants (SO2, PM, ...) while other sectors than the metal one contributed the most to the metals emissions. Unfortunately, the report is already at an advanced stage and will be presented at the next OECD Joint Meeting in June for approval and subsequently presented at UN-SAICM level. A meeting organised by Eurometaux with the concerned consortia and ICMM, revealed that while recognising that PRTR data can be used to measure SDG progress, the way the impact for metals was assessed -based on old USETOX evidence- provided incorrect assessments, while the focus of the emissions on point sources missed the main contributions which are often the diffuse sources. During the meeting it was agreed to respond at multi-level (Consortia, Eurometaux and ICMM) to ensure that OECD countries would interpret the results correctly and in the right context and to avoid that the OECD should present the report as such as its contribution of the monitoring of SDGs at the upcoming high level UN-SAICM meeting later this year (more information: Hugo Waeterschoot).

OTHERS

HeTAP: *avoid overlaps with other taskforces to ensure efficiency?*

The last activities of the Health Toxicology Advisory Panel (HeTAP), which brings together 14 metals/inorganics date back to 2018 with a genotoxicity workshop and a report produced in follow-up. Based on the learnings of the workshop, a HeTAP sub-group has started to prepare a draft publication, proposing

a metal specific strategy for the determination of critical data gaps central to the identification of mechanisms of actions for genotoxicity and carcinogenicity of metals.
All HeTAP members were invited to a call on 8 February to identify additional activities of interest for all sponsors in 2021. HeTAP's mandate is primarily to discuss the science underpinning issues of common interest, to exchange information and to produce documentation such as white papers, guidance and possibly publications where an agreement on the basic common multi-metallic solutions is made. The regulatory aspects of the science (e.g. classification, read-across to fulfil information requirements) are usually discussed in commodities or Eurometaux taskforces. The topics on the agenda of the 8 February call, related to inhalation issues, use of bioaccessibility testing for inhalation or Endocrine Disruptors fall in between science and regulatory implementation. To ensure that these topics are addressed with the best support possible, also considering the full agendas of the toxicologists, it was proposed in follow-up of the call to bring them back to the EM Human Health Taskforce and put HeTAP in dormant mode for now. The sponsors are invited to express their views on this proposal in the coming weeks. Minutes were circulated on 12 February (more information: HeTAP sponsors, Ailsa Lee and Violaine Verougstraete)

COMMUNICATION

Dr Simon Cook will be joining our team on 8 March, filling the Chemicals Management Adviser position. Simon is a Materials Scientist by training. His experience includes 25 years working in industry in 2 large multinational companies (20 years in mining in various market facing roles), and 2 years in the industry (metal) association space. During the last 7 years, his focus has been on market access issues for metals – product stewardship and regulatory affairs – from the industry, the industry association, and the downstream user point of view.

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.
This information is published on ECHA's website

Further information on the COVID-19 situation information can be found on the ECDC website

- 02-03 March: WPC meeting
- 03-04 March: CARACAL-38
- 4 March: ECHA Webinar on new Reach-IT functionalities
- 8-12 March: ECHA RAC-56 & SEAC-50 Meetings
- 15-19 March: ECHA RAC-56 & SEAC-50 Meetings
- 22 March: CARACAL Sub-group on Endocrine Disruptors Meeting
- 25 March: Risk Management Taskforce Meeting
- 30 March: Registration Taskforce Meeting
- 25-26 March: ECHA MB-61 Meeting
- 1 April: Evaluation Platform 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
- 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

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)