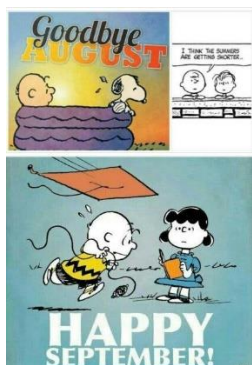


EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us on:

- 21 September: Risk Management Taskforce Meeting
- 27 to 30 September: Chemicals Management Autumn Week

And our last summer special on the last page

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Dear All,

540 days since I was last in Finland ... And frankly, I did not think I would miss it. Taking the early morning plane on Monday, reading documents from boarding to landing, frantically typing emails in the bus and walking into an ECHA meeting room with a smile and a sore stomach...I did not think it could become a kind of routine. The long days, the busy evening hours spent writing reports, the short nights...so in the beginning, moving to virtual meetings seemed to be a good move for health reasons.

But then, a couple of months later, it started.

Softly at first.. a reminiscence of the metal ladies' favourite 'recovery cocktail', mixing cucumber juice, mint, lime, ginger...(and loads of gin) while I was preparing a salad

Wondering for a second why I had woollen gloves in my backpack.

Then progressively, some strange symptoms appeared:

- The increased personal space imposed by COVID reminded me of the 'invisible magical barrier' Fins seem to maintain, even in public transports
- I got irritated when seeing people on the zebra crossing when their light was red, even when there was not a car in sight as far as the eye could see
- I started to search for salty liquorice in the chocolate shop

I understood that I was experiencing deprivation effects when my nephew wished me happy birthday in fluent Finnish, and it sounded exotic and jubilant!

But my diagnosis was fixed when I realised that one of my neighbours was from Finland because he looked me directly in the eye for several days without replying to my (increasingly embarrassed) 'hellos', and it made me smile!

I was wondering whether I should communicate this to my family. Would they consider it as a(n) (additional) sign of workaholism? Take it as an indication that I was suffering from the no travel lockdown? Would they understand it was everything but ECHA work related?

I could not really hide it longer. The recommended treatments to take care of such conditions - when you are not able to return to Finland- are not that discrete. So, I started to build a summer cottage in my small garden, to draw Moomins in the bathroom, to compare recipes of Lohikeitto, and followed imaginary mooses on my bike.



The situation may improve in 2022. If COVID allows...

In the meantime, my neighbour became very active in my recovery: we indeed managed to get to the hug stage, and he can be funnily insane!

You are welcome to join our evenings where we imagine the sunlight!

Violaine Verougstraete, Chemicals Management Director

COMMISSION

CARACAL

REACH data requirements for Endocrine Disruptors: *new Public Consultation*

As part of the Revision of REACH, the Commission is looking to introduce data requirements for endocrine disruptors (EDs) at each tonnage level (Annex I and Annexes VII to X). Two options (previously discussed under the CARACAL Sub-Group on EDs (CASG-ED)) are being considered, and Eurometaux provided feedback in favour of the second option, mainly because it was more logic and transparent, and because in the second option *in vitro* tests do not trigger *in vivo* tests if no adverse effects have been observed. Now the Commission is conducting a dedicated Impact Assessment to amend REACH by considering the two options.

In this context, it has opened a [public consultation](#) that will run until 8 October. Anyone can respond and Eurometaux Secretariat is currently analysing the questionnaire (more information: Noam El Mrabet).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC Restriction Working Group CLH: *restriction on lead ammunition: introducing a conceptual model to compare environmental and health risks in a qualitative way*

RAC reviewed in extenso the status of the Lead Restriction case on ammunition and fishing sinkers during a working group session to resolve as many issues as possible before going to plenary in September.

The main focus of the discussion in the working group were i) the level of uncertainty related to the impact of lead from shooting ranges on ground water contamination, ii) the predictability of MEASE (Occupational Exposure Assessment Tool for REACH) and other models for consumer and professional exposure for those who prepare sinkers and iii) the amount of lead that could be consumed by eating contaminated game. Each of those items included methodological components relevant to the metals sector. Such as how to define vulnerable soil conditions for metal contamination or the comparative predictability of MEASE (specially designed for metals) compared to other models. In addition, this is one of the first restrictions whereby very different environmental (groundwater risks, impact of secondary poisoning on birds, ...) and human health risks (local exposure of shooters and lead exposure of professional users) had to be compared. ECHA as Dossier Submitter therefore presented a conceptual model for a qualitative comparative risk assessment that allowed to express the level of risk (from very low to very high) based on probability and severity. The approach was reviewed and considered valid and will now be applied and discussed at RAC in September. Eurometaux will for sure come back on this comparative qualitative risk assessment approach at its next meeting of the Evaluation Platform to define how this could impact metals assessments with different impact endpoints (more information: Frederik Verdonck and Hugo Waeterschoot).

EUROMETAUX CHEMICALS MANAGEMENT

EUROMETAUX FUNCTIONING

Chemicals Management Steering Committee: *after summer meeting*

Building on the energy accumulated over the summer break, the Steering Committee reconvened to discuss together how to profile the metals sector in the drive “Towards the Zero Pollution Ambition – while supporting the Green Deals objectives”. Whilst it is obvious that today, some hazardous substances are needed to meet the Green Deal objectives, we need to respond to the concerns expressed by authorities on the “hazard” of our substances by demonstrating that they can be handled safely and in a sustainable way. This can be done by ensuring compliance today but also by anticipating the applications and volumes of metals that will be in use “tomorrow” and proposing an efficient risk management of the possible emissions and exposures, identifying who can act and how.

Chemicals management should be done using a holistic approach, also taking into consideration circularity and climate transition goals, and our value chains. Three axes of work were debated: defining a clear strategic view of the sector (including for example considerations on the long-term materials use of metals and exposure tracking), a communication strategy (including high-level messages and the setup of an Eurometaux conference) and the technical support activities. The secretariat presented an update of its work on key value chains and on the very interesting topic of 'interdependencies between metals', i.e. the fact that lifecycles of metals are all intertwined and interrelated in many ways (the production-, the use - and the end of life / recycling phases). Hence it is not possible to look at metals in isolation. On the technical axis, the Eurometaux secretariat presented a multi-year programme on environmental exposure, including 6 projects whose outcomes will be used to reply to the Zero Pollution Action Plan, MISA and the Mixtures Assessment Factor challenges. The Committee expressed support for the main principles and directions proposed by the secretariat, who will now work on a series of concrete proposals. The Committee was also updated on One Substance One Assessment (OSOA), the sector's input on the Restrictions Roadmap, and the concerning developments on classification. Draft minutes and slides will be circulated soon (more information: Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

CSS Project Group: *summer break*

The main area of activity for the CSS PG before the summer break was the High-Level Roundtable (HLRT). There has been little activity since late July and the Commission is behind their stated timeline for preparing the next HLRT meeting. The discussion topic for the next meeting is "strengthening enforcement" and the Commission was expected to release a background document before the end of July, to start the preparation process. This did not happen, however. The Commission has now communicated a tentative date for the next (virtual) meeting of HLRT: 25 November, 14:30 - 17:30, Brussels time (CET). In order to pre-work a joint HLRT members' report on the meeting topic (enforcement), the Commission foresees two meetings within the HLRT Sherpas structure:

- 17 September: general Sherpas meeting with a first participatory discussion on enforcement, to understand all different points of views and the main topics of interest; and,
- 14 October: participatory workshop on enforcement with structured discussions. A professional writer will prepare the joint report on the basis of the joint discussions. (Note – this is a change, previously the intention was for the Sherpas to jointly prepare the meeting reports.)

This joint report will be presented and adopted at the 2nd meeting of the HLRT. Further to this, the Sherpas will also be asked to finalise the Rules of Procedure. These will be shared by the Commission at the beginning of September, alongside the background document on enforcement and a revised list of topics of interest (more information: Simon Cook).

REGISTRATIONS

ECHA's interest: *in NFM 'residues' and further request for a small survey among EM members*

In 2020, the ECHA team of experts working on exposure assessments contacted Eurometaux to refine the classification and the uses' information they had on a number of substances identified as 'residues', meaning by-products that could possibly be identified as waste in some countries.

During exchanges with involved consortia and companies, classification and uses of specific substances listed by ECHA, were checked and updated if needed: the specific feedback allowed ECHA to improve their understanding on non-ferrous metals (NFM) by-products substances and uses (i.e. intermediates or substances put on the market).

They have now recontacted us to provide them with some further information on the NFM by-products, mainly to ensure full awareness on REACH registration duty vs waste identification.

We will launch another small survey in the coming month to meet as much as is feasible ECHA's expectations, i.e. "to get a complete picture of the substance types co-produced in the NFM industry, including their tonnages and uses". ECHA also expressed interested in all the mass flows of the materials co-produced, whether the materials are registered on the market or non-registered and still considered as waste. We intend to build on this exercise to clarify due diligence in identifying substances subject to REACH, but also demonstrate to ECHA several limitations of the mass flow analysis (as conveyed during the MISA Exposure Assessment workshop) (more information: Federica Iaccino and Violaine Verougstraete).

RISK MANAGEMENT

Restriction Roadmap: a first step towards a reform providing more transparency and predictability on restriction proposals that could affect the metals sector

At the CARACAL end of June, the Commission presented interim measures to improve the transparency and resource efficiency of restrictions under REACH. The proposal covers the period from now until the new REACH enters into force somewhere between 2025-'27. Stakeholders including Eurometaux were invited to respond to the proposals by 10 September. An Eurometaux team reviewed the proposals concluding "*they contain many positive points*" including: restrictions will remain risk-based under art. 69 (1) of REACH meaning that they remain focussed on unacceptable risks that require EU-wide management, a rolling list will be introduced (like the CoRAP for evaluation) to provide more transparency and coherence and an early call for information would become more standard. Alternatively, the proposal includes annexes listing the restrictions the Commission would like to progress on during this period. While for some the risk-based nature has been demonstrated there is no transparency how others -including some on metals- appeared on that list. A second concern is the proposal *to group chemicals for restrictions to prevent regrettable substitution*. However, this makes no sense when different metal compounds are used for different uses.

The most relevant areas for improvement of the Commission's proposal defined in the draft Eurometaux position are that: grouping should always be considered with a specific use in mind that requires regulatory risk control, the need for recognition of the RMOA as a pre-assessing tool to define if a restriction is the best risk management option and a more priority-based selection of the most relevant and important restrictions. Eurometaux's draft response, based on the sector's long experience with restrictions, is now circulating to be approved by the Risk Management Taskforce and the Steering Committee before submission to the Commission.

In addition, we will use the opportunity of the upcoming Chemicals Management week to inform members about the overall view of the sector on how the regulatory risk management can be improved under the new REACH proposal (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

HUMAN HEALTH

Call on 24 August: the route from bioelution to welding

End of July, a bioelution "package" was circulated to the Human Health Taskforce, including two draft guidance documents on how to group alloys and how to select a representative sample for testing and a set of slides including a stepwise approach for the refinement of the classification under CLP, using metal release data. This package was further discussed during a call and helpful comments were made, allowing to prepare revised versions to be circulated soon. Once agreed upon, these documents will be submitted to the Commission, ahead of the next discussion in the CARACAL Sub-group on Bioelution in Q4 2021.

The other item on the agenda of 24 August was the call for evidence on welding fumes launched by ECHA. ECHA has been tasked by the Commission to identify, assess and define the scope of these process-generated substances of mixed and varying composition to allow for a description of the relevant processes, or sub-processes, to be included in Annex I of CMD (Carcinogens and Mutagens Directive) to ensure legal certainty of inclusion within the scope of the directive. The call aims at collecting any relevant available data on the process-generated substances of mixed and varying composition to allow for a description of the relevant processes, or sub-processes to conduct the scoping study. ECHA would also like to gather data to identify if there are substances that could be used as potential marker(s) for monitoring exposure to welding fumes. The participants in the call agreed to go for a generic submission on behalf of the sector, including an overview of the complexity and the variety of the processes and exposure conditions. A series of documents will be included in the submission, among others a guidance on safe use for downstream users with regard to fume and gases generated during welding of metals and alloys, prepared in 2010 in line with the REACH requirements and more detailed descriptions of some of the processes.

The summary notes of the call were circulated on 25 August (more information: Adriana Oller, Ruth Danzeisen, Daniel Vetter, Simon Cook and Violaine Verougstraete).

METALS & INORGANICS SECTORIAL APPROACH (MISA)

Preparing for the future of the Zero Pollution Ambition and MISA: Eurometaux designs a *research package*

MISA already confirmed that the regional environmental exposure sections of the REACH registration files would benefit from a *structural update to increase the geographic and time trend representativity* and to *define the allocation of the main contribution sources* (being REACH or non-REACH). In addition, the new combined exposure risk assessment obligation that will be introduced by the Mixture Assessment Factor (MAF) under the REACH review, the Zero Pollution Action Plan (ZPAP) and Green Deal requirements to demonstrate that even under increased uses and volumes metals should not impact biodiversity and environment, led us to develop a strategic research package to deal with the conceptual and practical challenges in an integrated, coherent, and efficient way.

The package is designed with the overall aim to demonstrate today's compliance for manufacturing and use of metals in respect to environmental exposure and "future proof" of metals use under the ZPAP and Green Deal. It covers two main workstream programmes, one on the REACH-ZPAP related aspects and one on the MAF. It was presented to the Chemicals Management Steering Committee where it received broad interest. The concept is to run it in a partnership mode with consortia/associations/commodities and other contributors (like ETAP) in a stepwise mode for the coming 3 years to maximise the output and coherence in a cost-effective way, while assuring scientific robustness and credibility. The extensive project proposal will be further finetuned in the weeks to come and be presented to the Eurometaux Management Committee as a crucial contribution to demonstrate metals are credible partners for the future. The deliverables will be used in Eurometaux's communication and advocacy (more information: Violaine Verougstraete and Hugo Waeterschoot).

OUTREACH

OTHERS

ETAP: *several topics of regulatory relevance presented for scientific review at the ETAP meeting*

ETAP is a core group of high-level independent scientists that advises sponsoring Commodities on scientific challenges the sector is facing as well as areas of emerging scientific issues that are relevant and important for the sector to consider. This year's meeting was again organised in webinar mode whereby Eurometaux was invited as an observer. At least 3 of the selected topics presented for external input from the panel cover direct EU regulatory interests: i) the combined exposure and toxicity of metals and organics (this interaction between metals and organics is a crucial issue in the MAF discussion), ii) the environmental toxicity of metal nanoparticles whereby the ETAP panel provided an overview on metals- nanoparticles toxicity data and knowledge gaps and iii) a topic on the speciation and solubility of metals from diffuse sources that reviewed amongst others the Sewage Treatment Plant (STP) contribution of metals.

Eurometaux will follow those activities with care and identify which of those outputs can be used for the long-term research planning on regional environmental exposures for REACH, ZPAP and the Green Deal to ensure maximal use of the existing evidence and guidance (more information: Chris Cooper, Stijn Baken, Jelle Mertens and Hugo Waeterschoot).

COMMUNICATION

Chemicals Management Team: *growing (in importance ☺)*

We are very pleased to announce that both Diana Dobre and Lorenzo Marotti have joined the Chemicals Management Team.

Diana (dobre@eurometaux.be) will work as fulltime Chemicals Management Assistant who is most eager to learn all about our metals world will assist Ailsa and the team and answer all our members' requests.

And Lorenzo (marotti@eurometaux.be), who previously worked for ECHA, will start by concentrating on Air Quality.

CALENDAR

Here below a non-exhaustive list of the meetings that are planned so far for after the summer 2021.
Please save the dates for the meetings of interest for you.

For meetings at Eurometaux

The meetings at Eurometaux will be held online until end of September.

The MCC is planned to open **on 1 October 2021**, thus from then on meetings will be held in a hybrid manner, both in attendance for those who can attend and according to the limitations in numbers (Covid safety measures) and online for those who are unable to attend in person.

For meetings at ECHA

ECHA meetings, including those of formal ECHA bodies, **will be held remotely until further notice**. 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](#)

- 06 September: Water TF Call
- 06-10 September: ECHA RAC-58 & SEAC-52 Meetings
- 13-17 September: ECHA RAC-58 & SEAC-52 Meetings
- 21 September: Risk Management Taskforce Meeting
- 23-24 September: ECHA MB-63 Meeting
- 22-23 September: ECHA Committee Meeting TBC
- 27 September-30 September: Chemicals Management Autumn week
- 05-06 October: WPC meeting TBC
- 11-15 October: ECHA MSC-75 Meeting
- 26 October: Evaluation TF Meeting
- 10 November: CARACAL TF Meeting
- 18 November: Water TF Meeting
- 17-18 November: CARACAL-41 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

GENERAL INFORMATION & ACRONYMS

Follow the logo to check out our 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)



Find the words back...

to go back to the CSS



ANSES	AUTHORISATION
BJORN	COURAGE
DATA	ESCAPE
HAZARD	HERUSHINKI
LEAD	LOVE
MASSIVE	OUTLOOK
PRECAUTION	SPRITZ
YOGA	ZEN

Two monsters fighting for a toxic-free environment: who are they? Write a 5 line story and send it to verougstraete@eurometaux.be -thanks

