Eurometaux
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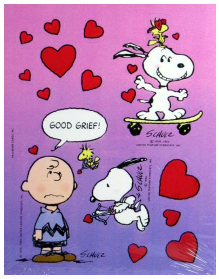
EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in February for:

- 21 February: Risk Management Taskforce
- 24 February: Chemicals Management Steering Committee
- 28 February: MEED Webinar Workshop

Contents

Dear All,

Wondering what to do what in Brussels, on a grey rainy Sunday afternoon? Visiting its museums is a good plan: there is always something to learn, and the probability is high that you treat yourself or even better, are treated 😊 to a hot waffle at the exit.

Hence, I was strolling around, until the moment my eye was caught by the piece of work above. It is called 'industrial landscape' and was painted by Constantin Meunier (1831-1905). Difficult to ignore the smoking chimneys that entice the viewer's attention away from the 'a priori' more bucolic action at the forefront. Well drilled by my job here at EM, I immediately thought about 'exposure via the environment', local assessment, transfer models etc. but then I looked around with surprise. You have all most probably experienced that phenomenon: the 'curiosity clustering' in exhibitions. If you stay long enough in front of an artwork, tilting your head and creasing your brow, you will inevitably be joined by others wondering what you are looking at. This was the case and by reflex, I looked at those now also contemplating this landscape, pondering if they had, let's dare say it: 'authorities faces'? (yes, Brussels on a Sunday afternoon is a small world).
Would they realise that this was painted 100 years ago? That this relates to the past? Would they see this confirmed by the fact that the man on his horse does not seem to possess a car and a GPS? Or to the contrary, would this image remain fixed on their retina and pop up when next discussing Zero Pollution, giving them the feeling of the urgency to act?

Thinking further, I acknowledged that we all have images in the background of our heads that also influence our thoughts (and actions). Thanks to the job, I have had the chance to see, to be enlightened, to have access to information allowing me to know that there have been changes over time, good ones and others more challenging. But this is far from being the case for most of the interlocutors we may be dealing with (and could have been visiting the museum).
That is one of the assets and beauties of the MEED programme, formally launched end of January. We will have at hand data that should allow us to have an informed debate, to grasp where/what to focus on (as even in urgent times, there are only 24 hours in a day), sketch some coherence… providing we share what we know, including on the painful points, and understand the images fixed on the retinas.

"Ok, enough" said my partner, wondering why I had remained behind: "if you move on now, you get your waffle!". Magic Sunday afternoon…

Violaine Verougstraete

COMMISSION

CARACAL-43: *on the REACH Revision*

On 27 January, Eurometaux sat at the virtual table of the 43rd meeting of CARACAL: one full day dedicated to the revision of REACH. On the menu was the introduction of information requirements on endocrine disruptors, increased information requirements on hazard, uses and exposure, and also potential improvements of the REACH Evaluation chapter. But the main course was the reform of the Authorisation and Restriction processes, for which Eurometaux prepared extensively, including by gathering views from members at a joint call of the Risk Management and the CARACAL Taskforces. We decided for the purpose of CARACAL-43 to raise points of principles as an appetiser: (1) the need to focus on "what matters" by introducing a granular prioritisation system, (2) transforming the Candidate List into a "Waiting List" from which a substance can enter and leave and which does not presuppose the need for risk management or the type of substance, and finally (3) going one step further when it comes to supply chain communication when a substance is on that Waiting List, by gathering information not just on chemicals concerns, but also on circularity and climate, thus moving towards our so-called 3Cs approach. Now we will work on a detailed written response to be submitted by 24 February (more details: Noam El Mrabet and Simon Cook).

Endocrine disruptors: *upcoming new hazard classes in CLP*

The 6th CARACAL sub-group on Endocrine Disruptors (CASG-ED) met on the 24 January. Experts were consulted on the approach to assign ED classifications to "More than One Constituent Substances" (MOCS), mixtures composed of two or more substances, including impurities, for which the composition is not well characterised (example: UVCB). Since the documents were circulated just before the meeting, the debate was limited; experts will have the possibility to reflect and provide comments as follow-up.

The Commission introduced a study on the impact of new data requirements in REACH Annexes, with the objective to "*provide technical assistance and support by analysing and assessing information available from existing reports on the topic and, only where necessary, collect further information that could be used in the preparation of an impact assessment on policy options for possible amendments of REACH Annexes to include data requirements on endocrine disruption*". The contractor in charge of the study provided an update on the ongoing work, including an estimation of the amount of impacted substances.

The last part of the meeting was dedicated to the inclusion of ED criteria in CLP, as well as labelling and pictograms to be associated to ED hazard classes. Experts have the possibility to provide input until the 21st of February.

The Commission plans to complete the internal impact assessment by end of April. In parallel, a proposal will be discussed at CARACAL. The intention is to have the final text for a delegated act ready by the end of the year (more information: Marnix Vangheluwe, Violaine Verougstraete and Lorenzo Zullo)

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-60 CLH Working Group: *silver and sulfur*

The RAC Working Group discussing harmonised classification proposals met on 24-27 January, preparing the agreements for the next plenary meeting (March). The RAC WG discussed several human health endpoints for silver. On mutagenicity, the majority of the studies have used nano silver, and questions were raised on the quality and representativity of the data for bulk silver. Views were split between a classification in Cat 2 for the nanoform and 'no classification' for silver metal, up to some asking for a Category 1B or no classification for all forms. No agreement nor provisional recommendation was able to be reached on this endpoint. This discussion will continue during the next meetings and its outcome will be very interesting as it may create a precedent, by proposing different classifications for different forms in human health entries. On STOT-RE (Specific Target Organ Toxicity via Repeated Exposure): there was a provisional conclusion for no classification of silver metal (all forms) because of insufficient data. However, a concern was identified for neurotoxicity to be reviewed along the discussions on toxicity for reproduction

(and on the Extended One Generation Reproductive Toxicity study (EOGRTs) performed by the EPMF on silver acetate). Finally on carcinogenicity, the topic was only introduced by the rapporteur and the discussion will restart during the next meetings.
Eurometaux also attended the discussions on sulfur used as pesticide and plant protection product for foliar application e.g., in wine and other crops. Endpoints for discussion were phys-chem, eye irritation, skin sensitisation, STOT SE and STOT RE. On phys-chem, interesting quetsions were raised on the actual material that was tested and its particle size(s). For the other endpoints RAC members debated the data used to support the classification, in particular coming from uses where co-exposures with other substances can hardly be excluded, but also the impact of the vehicle used for testing for sensitisation. The formulation of the conclusions on an endpoint, when related to insufficient or limited data, is a reoccurring element of discussion in RAC. The proposals made in plenary will be submitted for approval by the plenary in March (more information: Anissa Alami, France Capon, Rodger Battersby and Violaine Verougstraete).

RAC-60 CLH Working Group: a good outcome for *Silver on the environmental classification of the massive form but confirmation of a dangerous precedent for many other metals*

The RAC CLH Working Group also finalised its review of the environmental classification of silver metal concluding that the massive, powder and nano forms warrant different environmental classifications, whereby the massive form would not be classified for this endpoint. This is a firm and favorable recommendation for approval by the RAC plenary in March, and clearly different from the unfavorable conclusion for lead. However, a detailed analysis of the motivation for the split silver environmental classification indicates that it confirms the reasoning followed by RAC for lead, namely that the assessment can be made on the releases of powder during the reasonable uses of the metal as an article and their End-of-Life phase, which in the case of silver, do not include pure metal particles but only Unknown or Variable Composition, Complex Reaction Products and Biological Materials (UVCBs). This has far-reaching consequences for many other metals with an environmental ion classification, which risk now being classified according to the lead case (i.e., having the massive classified as the powder). Eurometaux will suggest that its members launch a legal check to verify to what extent this approach is legal under the CLP (more information: Jelle Mertens & Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

ECHA - industry monthly call: *new ECHA page on dossier updates and an upcoming survey on data dissemination*

The last monthly call on registration updates between ECHA and industry representatives was held on the 28 January. Following tradition, the first topic was dedicated to registration trends, confirmed to be in line with last year's expectations and characterised by an increased number of Product and Process Oriented Research and Development (PPORDs) registrations.
In order to facilitate the interpretation of the Implementing Regulation on dossier updates, ECHA informed that their website now contains a detailed section explaining how to keep the dossier up-to-date, including interpretation of deadlines and triggers for updating. It is also clearly stated that "*all co-registrants have a shared responsibility to keep the jointly submitted information of the registration up-to-date*".
We also learned that a survey about the ECHA dissemination platform is expected to be launched in February to collect use cases and to understand how accessibility to chemical data could be improved. More information will be shared as soon as available. A dedicated study is planned to be completed in Q3 2022.
The next ECHA-industry representatives' call is scheduled on the 11 March. (more information: Lorenzo Zullo, Federica Iaccino and Violaine Verougstraete).

Registration completeness check: *industry experience & feedback from the registration monthly updates meeting with ECHA*

Since the introduction of the updated Technical Completeness Check (TCC) on the entireness of the REACH dossiers (both IUCLID and Chemical Safety Report (CSR)), Industry has submitted new and updated dossiers and monitored the level of requirements to ensure successful submission. Typically, failures are due to updated dossiers that often had 'old' structures compared to latest International Uniform Chemicals Information Database (IUCLID) updates and Chesar structure. And whereas some failures can be anticipated and fixed, others can be more difficult to predict. In January, some specific cases were discussed with consortia who were asked to contact ECHA to give an official follow-up: these were particularly related to situations where the Lead Registrant (LR) would cover different uses within the joint

submission, without sharing those specific conditions (e.g., LR registering Article 10 dossier, but also covering Article 17 or Article 18 cases or LR registering above 10 tons per year but covering co-registrants with <10 tons per year).
Additionally, during the monthly ECHA & industry call (see above), Eurometaux asked ECHA how/who to contact to receive support or address questions related to TCC. ECHA advised to use the official contact form and to mention "TCC" in the text, so that the question would directly be sent to the ECHA TCC team and also allowed for time in the upcoming registration monthly updates meetings to provide a brief presentation to explain the TCC process, including implications in case of failure.
Any feedback resulting from questions sent to ECHA on the specific LR dealing with different requirements under the Joint Submission, will be shared with the Registration Taskforce and the EM consortia. (for further information: Federica Iaccino, Lorenzo Zullo and Violaine Verougstraete).

Nanomaterials: ***proposed guidance on specific phys-chem endpoints not suited for metals***
ECHA organised a Partner Expert Group (PEG) consultation on its proposed guidance update on phys-chem and some environmental fate endpoints. The guidance update relies strongly on the recently published OECD Guidance Document for the testing of dissolution and dispersion stability of nanomaterials and the use of the data for further environmental testing and assessment strategies (OECD GD No. 318, 2021). The recent experience with the silver and especially the ZnO nano cases allowed the sector to check the relevancy of the proposals, based on experimental evidence. The conclusion was harsh: the proposal includes a testing strategy based on the dispersion stability test (TG 318) and the still to be developed dissolution rate testing with neither providing added value for chemical safety assessment nor allowing to steer for further ecotoxicity testing. To the contrary, the tested metal nano forms confirmed the relevance of the existing Transformation Dissolution test (OECD 29) on which the sector has lots of experience. This was however not reflected in the updated guidance document. Moreover, the proposed testing strategy is very expensive and includes several assessment steps that do not have ecological value. Eurometaux will therefore continue its action to contest the new proposals as applicable to metals and inorganic nanomaterials and to feed in the learning lessons from the activities for the metal nanoforms in the updated guidance document by participating in the ECHA PEG and by presenting the outcomes of the test work on metals at EU and OECD level (more information: Koen Oorts and Hugo Waeterschoot).

EUROMETAUX CHEMICALS MANAGEMENT

EVALUATION

Evaluation Taskforce: ***preparing for CoRAP, an assessment of recent BoA cases, and further learnings from the nano test case on ZnO***
The Evaluation Taskforce met on the 18th of January covering a regulatory session and a session focused on learnings on metal nanomaterials testing.
During the first session, participants were informed that ECHA will publish the updated CoRAP list containing substances that will undergo Substance Evaluation (SE) during 2022-2024, as well as their risk-based justification, by mid-March. However, it is already clear that ECHA and the Member States have reduced their ambition on Substance Evaluations (SEs) very substantively by eliminating substances for which dossier evaluation or registration updates are expected to eliminate the concern, or where the evaluating Member State cannot certify the assessment being finished by 2024. For Eurometaux members, this means that CeO2 will be deleted while Carbon Black remains. Despite lacking signals, all this leads to the assumption that the SE program will be revised under the REACH revision (post-meeting info: Commission has tabled a paper on the potential reform of the SE program).
The Taskforce was informed on 2 recent and most interesting Board of Appeal (BoA) cases whereby clarity was provided when tonnage changes/cessation of production should be considered during an ongoing evaluation or evaluation follow-up procedure. It is mainly the status (timing) of the decision that defines this.
In the afternoon, the Taskforce was updated on the final learnings of the environmental assessment of ZnO and interim learnings on the human health testing scheme. The environmental assessment was a real test case on how to conduct and interpret the Transformation Dissolution protocol (TDp) test on metal nano forms as well as the difficulties and lack of value of the Dispersion Dissolution test presently proposed as

"the" reference. The health testing part will not be fully finalised before the SE deadline of 9 February, hence IZA will keep the Taskforce informed of further learnings when the test work is finished.
The members explicitly thanked IZA and promised to help with the communication of the learnings and outcomes of this program at ECHA and OECD level (more information: Noömi Lombaert, Kai-Sebastian Melzer and Hugo Waeterschoot).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability Strategic Research & Innovation Plan

The EU Strategic Research and Innovation Plan for chemicals and materials in the Green Deal Era (SRIP) is a stated objective in the CSS and is intended to rethink research and innovation for chemicals and materials, working across sectors and addressing interdependencies of EU strategies. The Commission conducted a targeted stakeholder survey which closed on 20 January, addressed to identified stakeholder groups with knowledge about research and innovation for chemicals and materials across their lifecycle. Eurometaux was requested to give consolidated feedback as a sector - to help the European Commission to further develop the Research & Innovation (R&I) plan. The objective of the survey is to highlight key research and innovation needs (and not a technically detailed R&I agenda) to allow chemicals across their lifecycle to become Green Deal compliant and respond to the objectives of the Chemical Strategy for Sustainability. The main areas covered were:

1. Sustainable production processes and technologies (primary and secondary raw materials, green and efficient processes, innovative business models;
2. Safe and Sustainable-by-Design chemicals and materials;
3. Exposure – monitoring and models
4. Hazard assessment – human health and environment;
5. Risk assessment – human health and environment;
6. Decontamination and remediation of pollution;
7. FAIR data (Findability, Accessibility, Interoperability, Reusability).

Eurometaux's response addressed these topics and highlighted any R&I areas that may be missing with respect to metals and inorganics, and also pointed out priorities for R&I that capture sector specificities. Additionally, the response includes several key messages on metals and the importance of managing the metals stock moving forward to preserve its future value – recyclability, longevity of use, minimising losses and leakage from the stock, the many interdependencies between metals in all lifecycle stages, the fact that metals should never be regarded in isolation but as a family of interdependent members (more information: Simon Cook).

Chemicals Strategy for Sustainability High-Level Roundtable: *Sherpas Group meeting*

The first Sherpas meeting of the year took place on 14 January to start to prepare the ground for the 3rd meeting of the High-Level Roundtable (HLRT) which will take place on 18 May. The intention is to have a face-to-face meeting – but if that is not possible the meeting will be online only (a hybrid will not be used). The 3rd meeting will again be in two parts:

1. State of implementation of the CSS – including reports from HLRT members on work done as ambassadors of the transition to safe and sustainable chemicals;
2. Discussion on the joint report prepared by the HLRT on the discussion topic(s) of choice.

With respect to part 1 of the meeting there was a useful discussion between the Sherpas on the value of this, with the consensus being that this part of the meeting should stay, but should be restructured to focus on lessons learned rather than a list of activities undertaken by the member organisations. It is likely that for the 3rd meeting, ambassador reports will be required 1 month beforehand, to allow the Commission's contractor time to summarise the contents – which should facilitate more productive discussions and learnings.
For the second part of the meeting, two topics are selected – SRIP (see above) and Safe and Sustainable-by-Design (SSbD). Given that these topics overlap and are both owned by the same actors in the Commission (DG RTD), they will be dealt with together and one joint report will be produced (not two). The

Commission has committed to releasing background documents for these topics by 1 March, to start the process of preparing the joint report.
Follow up on the HLRT joint report on Enforcement is now owned by DG GROW who presented their proposed path forward. A "breakout" session for Sherpas has been set for 23 February to discuss this.
Also on the Sherpas agenda was the discussion topic for the 4th meeting of the HLRT. However due to time this was not discussed and the Sherpas were invited to instead give written input on the list of discussion topics. Eurometaux submitted comments on the topic list in July 2021. As the list has not changed since, these comments were re-submitted with a preference given to choose "Open strategic autonomy" for the 4th HLRT meeting (more information: Simon Cook).

Increased use of the DMEL concept for non-threshold substances: *options for the Impact Assessment*

Wood and Ramboll have been contracted by Commission to carry out a study to assess whether and how best to introduce the concept of Derived Minimal Effect Level (DMEL) in the REACH Regulation. A workshop was organised on 31 January to collect feedback, information and suggestions from Member States, industry, Agencies, ECHA Committees, civil society on "how to increase the use of the DMEL concept for non-threshold substances?". Their preliminary findings were reported in a background document circulated shortly before the workshop and served as a starting point for the presentations.
More than 100 participants attended the plenary discussions, followed by more breakout discussions focusing on the different task packages of the study. Commission recalled that the policy questions that triggered the study were e.g., are there any reasons why we should only request a qualitative assessment for substances where a dose-response relationship can be established? For which effect types is this possible? Which risk level would be politically acceptable? How can it be implemented in REACH?
For the first task of the study, which included the identification of the endpoints for which a DMEL could be derived and the estimation of the number of substances within REACH for which non-threshold hazards may exist/DMELs could be used, ECHA has provided a list of substances classified as CM 1A or 1B and Chemical Safety Reports (CSRs) for a subset of substances where DMELs have been used (N=146). These CSRs will be examined by the consultants. In Task 2, which aimed at providing a state of play for how dose-response approaches (DMELs or slope factors) have been implemented nationally and internationally, the consultants presented the outcomes of a literature search. The third package relates to the development of policy options to feed in the REACH Impact Assessment, which will weigh up all the costs and benefits in line with Better Regulation guidelines. A table was presented including a preliminary screening of these options including the scope of the DMEL (i.e., endpoints to be covered, populations, tonnage groups), who should develop those (i.e. industry or authorities), making qualitative/quantitative approaches mandatory or not, etc. Participants were invited to comment on their findings, but also provide additional data by 14 February. Detailed minutes have been circulated to the Human Health Taskforce on 31 January (more information: Ruth Danzeisen and Violaine Verougstraete).

CLP Revision and Impact Assessment: *interview*

In follow-up of its input to the Open Public Consultation (OPC), Eurometaux was invited to participate in an interview that is a part of the study carried out by RPA, FoBIG and Ricardo in view of Commission's Impact Assessment for the revision of the Classification Labelling and Packaging Regulation (CLP). The study investigates several topics, including the processes and outputs of harmonised classification and labelling. The interview aimed to get more insight into the nature of issues regarding harmonised classification and labelling as well as the consequences and impacts of these problems. The questions explored e.g., what are the main advantages and shortcomings of the current process for developing Harmonised Classification and Labelling process (CLH), its main strengths and/or problems, and the value of the CLH for the sector, but also what could be improved. In other words, what a well-organised CLH process with quality outputs should look like? What could be the role of the CLP Regulation and other non-regulatory initiatives in improving CLH? This exchange allowed us to reiterate the messages submitted along the consultation on the Inception Impact Assessment (IIA) and the OPC, but more in detail and to highlight the metal/inorganic specificities that are at stake. The proposals made in the IIA to provide the Commission with the mandate to initiate and develop proposals for harmonised classification and labelling of substances with the support of ECHA and to prioritise CLH proposals where national authorities' views diverge was also evoked. The consultants will now draft an analysis of the impact of the proposed policy options considering solutions identified through the consultation activities and draft a synopsis report of all consultation activities, which will be circulated to the members (more information: Hugo Waeterschoot and Violaine Verougstraete).

ZERO POLLUTION ACTION PLAN

Air Quality: *Eurometaux invited to complete the impact assessment support study*

The project team in charge of supporting the Ambient Air Quality Directives revision launched by the European Commission (Ricardo, Trinomics B.V., IIASA, MET Norway and VITO), currently carrying out the support study to the impact assessment, has reached out to invite Eurometaux to complete an online targeted stakeholder survey (TSS) questionnaire. In contrast to the Open Public Consultation, which included general questions for all stakeholders and the general public, in this survey Commission is seeking expert opinion on technical aspects of the revision. This survey is being specifically disseminated to targeted stakeholders including competent authorities, private sector organisations, academics and civil society organisations. The deadline to respond to the TSS is 11 February 2022 (more information: Lorenzo Marotti).

CLASSIFICATION

Pb Environmental Classification webinar: *what next after the publication of the RAC opinion?*

ILA and Eurometaux organised on 18 January a briefing webinar on the lead environmental classification. The RAC opinion became available end of December proposing a single classification for the massive and the powder forms that is even stricter than the present classification for the Pb compounds. As a result ,all mixtures such as alloys containing more than 0.0025% of Pb metal would be affected and from 0.025% onwards, Seveso requirements would apply as well as strict conditions related to the transport of hazardous materials. The details and justification of RAC's classification opinion were explained at the webinar together with an identification on what changes would be required to the (modified) concept applied by RAC to ensure lead would be treated equally to previously classified metals.

It was agreed to launch a socio-economic impact analysis focusing on the alloys and recycling sectors as well as to ask for a legal opinion on the legal relevance of the changed assessment ruling. Those activities should be launched in February, to ensure results are available in time for the first CARACAL discussions expected by the end of March. ILA will lead and feed the advocacy activity and produce a key messages paper that could be used by sectors and companies for national action later on in March.

Further follow-up calls in February and March will be scheduled to brief industry on progress and coordinate advocacy activities. While at this stage the advocacy is focussed on lead, the outcome will be most relevant for the upcoming classifications on silver and copper as well as existing classifications of other metals, hence justifying Eurometaux's high involvement and support (more information: Steve Binks, Jasim Chowdhury and Hugo Waeterschoot).

Cu Environmental Classification workshop: *informing members on input for the Public Consultation*

ECHA received a proposal from KeMI (Sweden) to streamline the environmental classification entries for different forms of copper metal. Subsequently ECHA ran a Public Consultation that was open until 28 of January. Mid-January ECI organised, supported by Eurometaux, a broadly attended briefing webinar for Cu manufacturers and users to define the argumentation to best respond to the Consultation. In complement of ECI, Eurometaux submitted comments in support of the Swedish proposal to classify only powders above a given surface and not forms that are larger. This proposal deviates in the positive sense from the one on lead; so for the future we will support the copper case as being an example of best practice. Although not all aspects promoted by industry were taken forward like the Rapid Removal concept that was not supported by Sweden in their proposal. This is a concern given the Cu case is very well-documented and scientifically robust, so arguments based on precaution, or lack of proper guidance, should not be used to prevent the scientific evidence being used for the derivation of the environmental classification category (more information: Stijn Baken and Hugo Waeterschoot).

Li Classification: *catching up on advocacy activities*

The first 2022 Li CLH Taskforce call took place on 25 January. It was agreed that the main objective is to correct the proposed classification of lithium carbonate, lithium chloride, lithium hydroxide (Cat 2 instead of Cat 1), as RAC's proposal for a Cat 1A is expected to have significant impacts, including on the means to reach the Green Deal objectives (e.g., batteries, use of lithium compounds in greases required for renewable energy). But this would entail that the Commission sends the dossier back to RAC via an Article 77(3) procedure.

Therefore, the Taskforce's most urgent action is to thoroughly analyse the RAC opinion and to compile all arguments –both scientific and those demonstrating the related consequences- that can influence this decision positively, also considering the minority opinion from one RAC member questioning the severity of the classification and the read-across to the hydroxide. The Taskforce members have also been requested to help mapping uses and pieces of legislation that would be impacted by the classification.
Commission will prepare a draft Adaptation to Technical Progress (ATP) for a first discussion at the March CARACAL meeting. In view of the meeting, the Taskforce will develop key messages that can be used to ask Member States for support. Interesting to note as well is that the UK is starting to look at mandatory classification and labelling (MCL) in the UK, with the HSE to draft an opinion about Li before end of June. A data package is currently being compiled and will be submitted to the UK HSE. The minutes of this call were circulated to the Taskforce on 28 January (more information: Jennifer Diggins, Bob Miller & Violaine Verougstraete).

INDUSTRIAL EMISSIONS

Industrial Emissions: *Taxonomy Regulations & LVIC BREF*

In January, the secretariat focused on the possible discussions in the context of the Taxonomy Regulation and the Large Volume Inorganic Chemicals (LVIC) BREF.
On taxonomy, the EM secretariat has prepared a background document aiming to support Eurometaux's proposal on the substantial contribution of the non-ferrous metals production (under NACE code C24.4) to the environmental objective of 'pollution prevention and control' in the context of the technical discussion ongoing within the Platform on Sustainable Finance. The document focuses on supporting the design of appropriate criteria, and how to define and measure the required level of environmental performance. The document was circulated for comments by the Sustainable Finance and Industrial Emissions Taskforces.
The review of the BREF on LVIC is expected to start in early 2022. The call for Initial Positions to draft the LVIC BREF is planned for the second week of February. Should this timing be respected, the kick-off meeting should be expected by mid/end of June 2022. Eurometaux has 4 representatives in the Technical Working Group. A IE Taskforce sub-group has been set up to support our TWG members and the secretariat will fix a short conference call in order to define the main issues and needs. A more detailed status update was circulated to the Taskforce on 18 January (more information: Lorenzo Marotti and Lorenzo Ceccherini).

WATER

There are several important meetings for the water files coming up in the next few months. For example, the next Working Group (WG) Chemicals will take place on 10 February and will hopefully provide discussions and some answers. In relation to the silver dossier, it was mentioned as an action point - for the Commission- at the last WG Chemicals (October 2021) that after the publication of the final SCHEER opinion, the expert sub-group for the draft dossier of the Environmental Quality Standard (EQS) for silver will meet and discuss further. However, nothing has been heard about it since. In addition, in November 2021, the Commission issued a call for comments on the review of the draft EQS for nickel. We sent in a comment in support of NiPERA and the Nickel Institute but received no response or further comment on the matter. We hope that the upcoming WG Chemicals will provide some answers to our outstanding questions. We held a call with interested members of the Water TF in preparation for this meeting. It was decided to address some questions on the recurring procedural problems and to get more information on the next steps, as there is still a question mark (they have not yet started the actual impact assessment (they are still dealing with the candidate priority substances dossiers), and this is supposed to be completed by May this year...). An announcement for the second workshop (originally planned for autumn 2021) of the Impact Assessment (IA) should also be made during this meeting. Stay tuned for the next issue of CM News, as it will probably be Water-News full 😊(more information: Lara Van de Merckt)

RISK MANAGEMENT

ECHA proposal for the 11th recommendation for priority substances for Authorisation

The lead sector and Eurometaux organised a briefing workshop on how to best respond to ECHA's proposal to include lead metal on the list of priority substances for Authorisation, a first step towards a potential

selection for this risk management tool. ECHA's announcement is imminent (and happened on 2 February) and would trigger the opening of 2 Public Consultations (PC). The first one to inform ECHA, whereby stakeholders can provide comments on the priority scoring system behind the selection of lead metal and a second one for the Commission, focussing on collecting information relevant for assessing the appropriateness of Authorisation as a risk management step. At the workshop, it was concluded that a streamlined input via ILA and Eurometaux would be the most relevant way forward for the ECHA PC, whilst for the Commission PC as many sectors and companies as possible should reply to the questions posed. Under this Public Consultation, members were instructed to provide all information that could help demonstrate the high impact, the lack of effectiveness due to overlap with existing risk management requirements on Pb and its uses and the high level bureaucracy compared to potential other risk management tools. Both Public Consultations will run in parallel until 2 May. More information can be found on https://echa.europa.eu/recommendation-for-inclusion-in-the-authorisation-list/-/substance-rev/68608/term or from Lisa Allen and Hugo Waeterschoot).

TOOLS

Multi Metallic Database (MMD): *the new centralised dataset for metals and metal compounds is now accessible*

At the end of January, after several months of testing and updating substances information by the respective data owners, Eurometaux has started to provide access to the Multi-Metallic Database (MMD), allowing to access easily, retrieve and compare key hazard information of metals.

Access can be requested by Eurometaux members and their respective members via the dedicated online form: https://www.surveymonkey.com/r/2F6Y2SJ and it is granted following verification of credentials and affiliations.

The database is built thanks to contributors, being Consortia/Association (C/As) that funded the Eurometaux REACH Forum and partly based on data retrieved via the ECHA dissemination website. They are responsible for maintaining the information associated to their substances up to date. To support that, every two weeks the MMD runs automatic checks of the information available in the ECHA dissemination website and flags data divergences; this functionality is still under fine tuning and optimisation (more information: Lorenzo Zullo, Federica Iaccino, Violaine Verougstraete).

METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

MEED program: *successful launch!*

The MEED program aims at anticipating and being prepared to respond timely to the MAF (Mixtures Assessment Factor) and Zero Pollution ambitions on "no-harm", by developing scientific and technical concepts and methodologies relevant for the metals and inorganic sector as well as screening and developing new environmental exposure datasets. The program will run over 3 years (2022-2024) and includes 6 defined projects organised in 2 pillars (addressing the mixtures and the ZPAP/REACH challenges). In view of its multi-metallic aspect, metals and inorganics were invited to join as sponsors and thus complement Eurometaux's financial and resource contribution. The call for support, closing on 28 January was very successful with a lot of metals joining and expressing a keen interest in the program (more information: Diana Dobre, Violaine Verougstraete and Hugo Waeterschoot).

First MEED workshop: *providing a fast launch on MAF and environmental assessment projects*

A first MEED workshop for the sponsoring metals took place on 31 January and 1 February, giving the program a good kick-off start. The presentation of the MAF 2 report was a main milestone delivery. Based on a very extensive review of monitoring data for a large set of metals, the report was able to identify potential Inorganic-Priority Contributing Substances (I-PCS) as a series of metals and metalloids for the aquatic and soil compartment. The identification is key to provide focus for the test program on metals mixtures and further monitoring data gathering. The workshop debated how the I-PCS list identification can be further refined. The aim would to be demonstrate that a low impact of the I-PCS would leave room for the mixture risks for other metals and that co-exposure with organics would not lead to additive toxicity. The planning and aims of the literature phase for these mixtures assessment follow-up studies was presented and debated.

The aims and planning for 2 other projects, one on updating the regional exposure database and another on assessing metals flows and cleaning efficiency of Sewage Treatment Plants (to improve the estimates for consumer and professional user releases) were debated. The potential impacts of increasing metals uses due to the Green Deal will also be assessed in a further follow-up program.
In complement to the planning schedules, several new MEED workshop dates have been defined and communicated to the sponsors. The reports, minutes and further supportive information of the MEED program are only accessible for MEED Sponsors (more information: Hugo Waeterschoot, Marnix Vangheluwe, Diana Dobre and Violaine Verougstraete).

OUTREACH

OECD

OECD Hazard Assessment Working Group: *guidance on grouping*

The OECD Steering on the update of the Guidance for the Grouping of Chemicals had a third call in January to take stock of the progress made since November. The US EPA, ECHA and ICAPO have proposed a series of changes and clarifications in the generic sections of the 2014 text (e.g., on the acceptance of grouping, uncertainty, New Approach Methodologies (NAMs) etc.). The work on these generic sections was a first priority to be handled before diving into more specific sections providing guidance on specific categories, like Chapter 6 on metals and inorganic compounds. A compiled text is available for comments. If you are interested to participate in the review of the revised texts, please let us know! (more information: Adriana Oller, Kate Heim, Chris Schlekat and Violaine Verougstraete).

OTHERS

HBM4EU: *stakeholders consultation on HBM indicators for Cadmium*

The EU-funded Human Biomonitoring for Europe (HBM4EU) project has recently shared some draft results on HBM studies conducted over the past years, as part of the project, for several substances, including Cadmium. It is indicated that "*the levels of Cadmium in food, recycled PVC and fertilisers continue to be reviewed by the Commission and a HBM-indicator on Cd could help better understand if exposure to Cd is decreasing*".
The draft results are accompanied by a questionnaire for stakeholders to collect arguments on the use of the results for societal and policy purposes. The questionnaire is currently being analysed (more information: Lorenzo Zullo, Violaine Verougstraete).

COMMUNICATION

Metals Academy: *update*

We are pleased to announce that most students who had shown an interest in the Metals Academy project in 2020 still intend to participate, and some new colleagues have also shown their interest in joining us on 04-06 May 2022.
The Organising Committee is currently working on updating the content of the course to fit in with the changes the world as gone/is going through since it was initially planned and speakers are preparing their presentations.
We will keep all interested parties up-to-date as soon as possible and look forward to hopefully being able to go ahead with this long-awaited project in May.
For any further information, please contact Ailsa at lee@eurometaux.be

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CALENDAR

Please find here below a non-exhaustive list of the meetings that are planned in Q1 & Q2 2022

For meetings at Eurometaux
The MCC has been opened to allow hybrid meetings with sanitary measures put in place (maximum n° of participants), but due to the still unstable conditions **we will inform our members if our meetings will be held as hybrid or online only** (links to join will be sent ahead of the meetings).
We hope that the situation will evolve positively as soon as possible.
For those travelling to Brussels: more details on https://www.info-coronavirus.be/en/

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

- 07-11 February: ECHA MSC (Debrief with industry)
- 09-10 February: ECHA RAC-60 REST WG
- 10 February: Working Group Chemicals
- 16 February: Technical Working Group meeting on Soil Pollution
- 21 February: Risk Management Taskforce
- 24 February: Chemicals Management Steering Committee
- 1-2 OR 3 March (TBC): Water Taskforce
- 3 March: stakeholder workshop on the Essential Use Concept (EUC)
- 7-8-9 March: stakeholder workshop on NAMs for DNT
- 07-11 March: ECHA RAC-60 Plenary & SEAC-54
- 14-18/19 March: ECHA RAC-60 Plenary (reserve) & SEAC-54
- 21 March: stakeholder workshop on the extended generic risk management approach (GRA)
- 21-24 March: Chemicals Management Spring Week
- 23-24 March: CARACAL Meeting (TBC)
- 22 March: SSbD Commission Workshop (TBC)
- 24-25 March: ECHA MB
- 19-22 April: ECHA RAC-61 CLH WG
- 25 April: 2nd Zero Pollution Stakeholder Platform
- 25-29 April: ECHA RAC-61 AfA WG
- 04-05 May: ECHA RAC-61 REST WG
- 04-06 May: Metals Academy (TBC)
- 16-19 May: SETAC 32 (Copenhagen)
- 18 May: CSS High-Level Roundtable
- 25 May: Chemicals Management Steering Committee
- 30 May-03 June: ECHA RAC-61 Plenary (reserve) & SEAC-55
- 06/07-10 June: ECHA RAC-61 Plenary & SEAC-55
- 08-09 June: Helsinki Chemicals Forum
- 13-17 June: ECHA MSC-78
- 15-16 June: ECHA MB
- 21 June: Risk Management Taskforce

GENERAL INFORMATION & ACRONYMS

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

This website is a 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)

♥ LOVE QUIZ ♥

1. **Saint Valentine is the patron saint of lovers, but for what other group of people is he also patron saint?**
   a. Bird watchers
   b. Bee keepers
   c. Chocolate makers

2. **Which Roman god was either depicted as a plump cherub with a bow and arrow, or as a handsome teenager?**
   a. Cupid
   b. Bacchus
   c. Vulcan

3. **Cupid is often associated with Valentine's Day but who was Cupid? He was the son of:**
   a. Juno
   b. Diana
   c. Venus

4. **What fruit is known as "The Love Apple"?**
   a. Strawberry
   b. Red apple
   c. Tomato

5. **Who had members of a rival gang killed on St. Valentine's Day in 1929?**
   a. Al Capone.
   b. Lucky Luciano
   c. Pablo Escobar

6. **Which famous explorer was killed on St. Valentine's Day by natives in the Sandwich Islands?**
   a. Louis Antoine de Bougainville
   b. Captain Cook
   c. Vasco Nuñez de Balboa

7. **Who was the legendary Benedictine monk who invented champagne?**
   a. Bernard de Clairvaux
   b. Odo de Cluny
   c. Dom Perignon

8. **Today we associate love with the heart, but this wasn't always the case. In medieval times, which internal organ was believed to cause love?**
   a. The liver.
   b. The brain
   c. The lungs

9. **Some alchemists adopted the Hermetic Qabalah assignment between the seven vital organs and the seven classical planets as follows, to which one is the heart related?**
   a. Jupiter
   b. Sun
   c. Venus

10. **From where was history's first valentine written?**
    a. A prison
    b. A castle
    c. A battlefield

1.b. Bee keepers – 2.a. Cupid – 3.c. Venus (Goddess of Love, Desire, Sex, and Prosperity)– 4.c. Tomato – 5.a. Al Capone – 6.b. Captain Cook (1779) – 7.c. Dom Perignon – 8.a. The liver – 9.b. Sun – 10.a. A prison (by Charles, Duke of Orleans)