



## EUROMETAUX CHEMICALS MANAGEMENT NEWS



**Please join us for:**

- **30 August: Zero Harm/Sustainable Roadmap Working Group**
- **1 September: Chemicals Management Steering Committee**
- **19-23 September: Chemicals Management Autumn Week**
- **28 September: Risk Management Taskforce**

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Dear All,

One of the key messages I try to convey to the students I have the chance of being in contact with, is the importance of critical thinking.

Not simply “critical”, as this easily becomes “judgmental” as soon as emotions and beliefs come into play (and is less convenient to manage when teaching 😊).

What I am referring to is the ability to engage in a “reflective and independent thinking” or become an active learner rather than a passive recipient of information. Francis Bacon defined it nicely (in 1605!): “Critical thinking is a desire to seek, patience to doubt, fondness to meditate, slowness to assert, readiness to consider, carefulness to dispose and set in order; and hatred for every kind of imposture.”

But this exercise does not appear to be as simple as that! Based on what I can infer from their end of year works in regulatory toxicology, for which I asked the students to reason starting from content on ECHA’s website. As my verbal encouragements during the course to “think critically” did not seem to prompt any reactions, I went further and promised a better score to those who would ‘do’ it. And still, I can count on less than one hand the students who refused to accept subject matter at face value or questioned the information. And this is not the first time.

This situation triggered a reflection on what went wrong and why those students did not engage in the reasoning while “a priori” the university context allows for this? Is it the fear of the possible consequences (which would highlight a weakness of the system and/or me), a lack of motivation or a lack of capacity? Which then led to: do we provide the correct settings and tools to “read and listen, become haunted by what is unknown or not (yet) understood and start the reasoning from there”?

I rarely watch TV, unless my brain goes on strike or I have an absurd task to carry out for which background noise is most welcome, e.g., matching the decoupled socks spread all over the house. This was the case last week, so I switched it on. I had no ambition of finding something of high quality (a cutesy and predictable romance works well for re-marrying socks). But the first thing that appeared on the screen was a kind of game with multiple choice questions. I was invited to select the right option, send it by (costly) SMS (1 question = 1 SMS) and if I was really fortunate and provided three correct replies, I might even win some lottery tickets.

Ok, I got the fact that their aim is that as many people as possible reply to their questions as the gain increases with the number of messages, and hence the triggers prompting people to send SMS should be simple.

However, that simple? Asking how many seconds there are in one minute and proposing 3 options: 30, 45, 60 seconds or how many days in a week (3 choices: 5, 6, 7)?

Seriously, do they think we are imbeciles? I refuse to envisage that this downright basic level is the one needed to trigger a “critical mass” of reactions. Or they should not call them “questions”! Actually, I wonder if people do reply to those questions. Or are they angry to be considered as idiots, and hence switch off like me, questioning what they have just seen?

Later that day, still upset, I went to the theatre to see a fantastic play (*Discorsi alla Nazione*, from A. Celestini) that illustrates the possible manipulation in the rhetoric and how easy a concept can be sold to a non-questioning population. In this case, it was about ‘the umbrella in a rainy country concept’ that allows to make a distinction between those having/deserving an umbrella vs. those not having an umbrella; convincing the population that the concept is a response to a need it has expressed (which it has not).

Of course, the selling is easier if you have a group of “imbeciles” (see above) or better said, if people do not receive the right settings to demonstrate they are not so stupid and do reflect. Balzac already wrote something along these lines (about women, but that can easily be “read-across” to the whole of humanity) “You must have a horror of education among women, for this reason it is easier to govern a nation of idiots than a nation of intellectuals”.

We need to ensure we do not become or are considered as a group that cannot think and question. It is vital to send out the message that we are not imbeciles. It starts with the younger generation who needs to be given the right conditions to be allowed to desire to seek, to doubt, to abhor imposture.

Right conditions... and time: it requires taking the time to contemplate the thought-process and identifying the best settings to facilitate it. This will at least help in tackling the possible lack of capacity...motivation should follow.

Violaine Verougstraete

# COMMISSION

## REACH Reform: Workshop on the methods and results of the impact assessment on the extension of the GRA

On 27 June, the consortium of consultants in charge of the impact assessment (IA) for the potential amendments of REACH to extend the use of the generic risk management approach (GRA) to further hazard classes and uses, presented the key assumptions, methodology and draft results of their study.

The workshop, a mix of plenary and breakout sessions, was attended by more than 350 participants (remotely).

The Commission representatives confirmed that the implementation of the GRA will be gradual, guided by a workplan/roadmap published by Commission. The GRA should target consumer and professional uses (not industrial uses) and start with uses of substances and mixtures, and later apply to selected types of articles and professional uses. Focus is on Category 1 harmonised classifications. For articles, “risk of exposure” there will be a prioritisation criterion. There will be a link with the ongoing work on Transition Pathways.

The consultants explained the approaches and methodologies used in their study, including the associated uncertainties. This presentation was needed as the report was only circulated just before the workshop.

Important to note is that the IA primarily focuses on organics and uses estimates (e.g., for profit loss, substitution) that may not adequately reflect the costs generated by the GRA for the metals/inorganics sector. For example, the cost for substitution and reformulation costs were estimated to be about 50 €/ton, while we may have much higher costs due to the limited alternative choices, the specificity of physical and chemical composition for the functionality. Another issue of concern is that metals/inorganics are in the scope of the GRA for their PBT/vPvB/PMT properties, based on use maps prepared by ECHA that include metals in these classification categories.

Hence, we see some significant issues with the outcomes of the IA and its representativity for our sector.

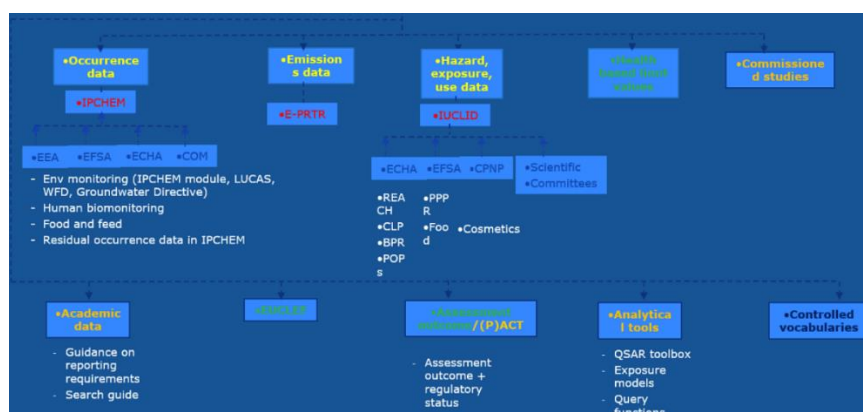
At the end of the workshop, Commission fixed a very tight deadline (3 days) to submit additional comments, stressing that those should focus on the IA (and not on the policy debate that will start at CARACAL). Eurometaux (re-)prepared a submission stressing metal specific aspects (more information: Caroline Braibant, France Capon, Kai-Sebastian Melzer, Mike Blakeney, Hugo Waeterschoot and Violaine Verougstraete).

## EU Commission initiative: to improve access to chemicals data for safety assessments

The European Commission has recently launched a new initiative called [“Chemical safety – better access to chemicals data for safety assessments”](#) to improve access, transparency, sharing, reusability and interoperability of chemicals data.

This initiative is of particular interest for Eurometaux since we are actively supporting generation/use of consistent, robust and quality data for regulatory purposes, in line also with the One Substance One Assessment (OSOA) principle.

The work is planned for the beginning of 2023. There are not many details available so far, except for a little information provided to the Member States Committee concerning the establishment of a common data platform on chemicals, linking multiple data sources such as IPCHEM, E-PRTR and IUCLID (see slide hereafter). More information will be shared as soon as available. The topic is expected to be discussed also within the Registration Taskforce (more information: Violaine Verougstraete, Federica Iaccino and Lorenzo Zullo).



# EU AGENCIES

## ECHA COMMITTEES

### **SEAC-55: Restriction on Pb in ammunition and continuation of the discussion on CTP in products.**

In the last news, we reported about the Pb in ammunition restriction and how it set precedent due to its new qualitative risk assessment approach whereby different human health, environmental and consumer endpoints were integrated. The discussion on this method continued early June resulting in the creation of a special working group that would finetune the methodology for further restriction cases. Stakeholders cannot be part of this group but interim reports will be shared with SEAC for discussion. This new approach will for sure be used in many cases in the future including the GRA so a careful assessment is required.

SEAC also discussed the restriction of CTP-HT (Coal Tar Pitch High Temperature) in clay targets, a topic relevant to the metals sector in two ways. The metals sector is large user of CTP-HT, hence the outcome of the debate on what indicative PAHs (Polycyclic Aromatic Hydrocarbons) should be regulated (even if the focus is only on clay targets for now) can be trend setting for workplace measures in the sector. The second point is the way how SEAC will interpret and handle the alternatives to CTP-HT. Indeed, the suppliers of CTP provided alternative PAH mixtures to our sector. The outcome of this restriction will provide insight if those alternatives are acceptable or not. Discussions at the next RAC/SEAC meeting will be instrumental in this respect (more information: Hugo Waeterschoot).

### **MSC-78: A live reunion after two and a half years**

MSC (Member States Committee) met face to face for the first time in 2 years, and welcomed a new chair, Katinka van der Jacht.

An interesting agenda point related to the number of comments received during the Public Consultation on the proposed prioritisation of 6 chemicals including lead metal. In effect, almost all comments related uniquely to Pb and most contested the relevancy of Pb metal being listed as a priority substance for Authorisation, raising arguments like being well controlled by Occupational Safety Health (OSH), environmental standards as well as by several existing Restrictions. Moreover, the present Committee system at ECHA would not be capable of handling the expected -more than thousand- applications. ECHA indicated that many comments seem repetitive but Eurometaux stated that inputs like the one from ILA represents hundreds of companies, which was fully acknowledged. ECHA and MSC will now review the submissions and a discussion in MSC is expected at the last meeting of the year (December).

Industry was less pleased with the closed session discussion on the Chromosomal Aberration test and the testing strategy. The new Chair concluded this procedure on a request of a Member State. The new guidance is most relevant for industry given any Testing Proposal on *in vivo* testing for mutagenicity will have to follow the new ruling from 1 September on. Industry and NGOs will follow up on this precedence in a letter to ECHA indicating the need for transparency on how such relevant MSC decisions are made and asking for them not to be held in closed sessions (more information: Hugo Waeterschoot).

### **MB-June: in camera discussion to identify the new Executive Director of ECHA**

The Management Board met for the first time face to face with as main agenda item the review of candidates for the post of Executive Director of ECHA after Björn Hansen's departure. The Management Board proposed Sharon McGuinness (Ireland) as best candidate given her broad suit of expertise relevant to the post. The candidate will still have to defend her position in the European Parliament but given her experience we expect she will succeed this endeavour very well. Eurometaux knows Sharon McGuinness well and since a long time, dating back to the policy discussions on the REACH proposal. Her experience in industry, industry associations, the Irish Government and as chair of ECHA's Management Board may certainly be important assets and give the background to understand the situation from industry's point of view, especially in this period of the development of the new REACH (more information: Hugo Waeterschoot).

## ECHA OTHER ACTIVITIES

### **ECHA-Industry: June call between ECHA and industry associations**

On 23 June, the regular call between ECHA and industry association took place. ECHA provided an overview on the updates' registration trends, clarifying that currently new registrations are mainly coming from importers (48%) and that in general the level of updates is lower than expected. The Ukraine crisis was identified by ECHA as a possible reason. The registration/update trends will be reviewed at the next September meeting. Diving into rationales for dossier updates, ECHA explained that these were mainly due to spontaneous updates. During the meeting, it was agreed to review ECHA's analysis of rationales for updates every 6 months, to better understand whether companies are following the Commission Implementing Regulation 2020/1435 (Article 22(1)). On the duty to keep information up-to-date for co-registrants, ECHA explained they will review the co-registrant check-list from the "Guide for compliance with EU REACH Article 22(1)", as this is not only the responsibility of Lead Registrants (LRs).

Lastly, ECHA explained that a project to contact LR's directly was launched in May, to improve the engagement of those who haven't logged in to their REACH IT account in the last two years. The project's goal is to remind LR's of their obligations to keep registrations & REACH IT information up to date (especially contact details).

ECHA also tackled a recurring question from registrants and explained how to inactivate a legal entity (LE) registration/LE account when the LE does not exist as REACH-LE anymore: the process of registration/LE revocation was presented together with the information on a pilot project ECHA is running with the Irish and German authorities who are working jointly on non-existing LEs (more information: Federica Iaccino and Lorenzo Zullo).

### **TCC: meeting with ECHA**

The June RAC and SEAC meetings taking place 'in vivo' (i.e., in Helsinki), offered the opportunity to have a series of useful chats with ECHA experts in between metals-relevant debates. For example, Eurometaux was able to stress once again the importance of having a 'feedback loop' on the Assessment of Regulatory Needs (ARNs) documents that are posted on PACT. To date, comments on those ARNs can be submitted via the Helpdesk but the ARN team has unfortunately not the resources/time to consider them and revise the documents. Eurometaux explained that while ECHA's efforts to ensure more transparency on grouping and possible risk management options are fully acknowledged, the impact of the proposals made for example in these documents should not be underestimated and justifies ensuring that the content is up to date and of high quality. We will further highlight this issue with the ECHA management in the coming months. Eurometaux also met the team in charge of the completeness check to raise issues like timelines and delays or the unpredictability of the outcomes that discourage updates. ECHA suggested that registrants who want to ask about the progress of their case or want to inform ECHA about the urgency of a case should use the contact forms specifying Technical Completeness Check/Manual Completeness Check (TCC/MCC), as it will allow the ECHA team to have a direct interaction. We also see some failures related to cross-checks in complex dossiers. ECHA explained that so far, they have not managed to include the cross-checks in the validation assistant as this aspect is only relevant for a part of the more complex dossiers and hence was not prioritised. This will however be key for the submission of the updated inorganic Unknown or Variable Composition, Complex Reaction Products and Biological Materials i-UVCB dossiers, hence Eurometaux will further follow up. Additional outcomes of the discussion, e.g., on the applicability of the TCC to the whole dossier and not only to the updated part or on the respective roles of the TCC/MCC vs. compliance checks were shared with the Eurometaux Registration Taskforce (more information: Federica Iaccino and Lorenzo Zullo).

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## EUROMETAUX CHEMICALS MANAGEMENT

### CHEMICALS STRATEGY FOR SUSTAINABILITY

#### **Chemicals Strategy for Sustainability: Strategic Research & Innovation Plan for Chemicals & Materials**

The Strategic Research & Innovation Plan (SRIP) aims to capture the outline of research and innovation needs for achieving safe and sustainable chemicals and materials across their lifecycle. The SRIP does not aim at being a detailed research agenda, but to give the directions where joint actions are needed by the EU, Member States, industry, researcher organisations and other Research and Innovation (R&I) funders and performers. A second Public Consultation (PC) has just closed (deadline 30 June). The first was in January this year, and Eurometaux gave some input that focussed mainly on metals specificities, what makes metals special, how to maximise the value of the metals "stocks" going forward, and what makes metals unique with respect to chemicals management.

Since January, the Commission has reworked the SRIP based on the input received from a wide range of stakeholders and produced the June working version. The quality is quite high, and they have incorporated some of the points that Eurometaux made in January e.g., the 2030 “Materials Manifesto”, the importance of R&I on wear resistance, corrosion protection and surface coatings. However – after a detailed analysis and comparison with the Eurometaux submission into the first PC in January, there are still two “themes” missing from the new SRIP working version:

- Recognition of differences between classes of materials in terms of valuable characteristics and properties e.g., metals and plastics (plastics are mentioned but metals are not)
- A proper holistic view that covers coherence between different objectives e.g., the 3Cs (there is not enough emphasis on climate and circularity objectives)

The second Public Consultation on the SRIP is very restricted in terms of the input that can be given, due to a very short total character limit and no possibility to send supporting information by other routes (email, for example). The approach taken by Eurometaux was to summarise the two themes that are missing where appropriate, and as far as practical, to repeat some key messages from the first Public Consultation, on specificities of metals (more information: Simon Cook).

### **Chemicals Strategy for Sustainability: Cross Industry meeting**

Another meeting of the Cross Industry Platform on the CSS took place on 14 June. This is a group led by Cefic, that consists of several technical sub-groups (8 in total) that follow, discuss and debate different aspects of the CSS. In recent months it has become clear that the amount of work needed to participate in all of these groups is rather high, and also that there is significant overlap between the activities of the different groups. But – most importantly – there is good value in having the possibility to share information, intelligence, experiences, and points of view on the many different aspects of the CSS.

For these reasons it has been proposed to simplify and streamline the process by grouping together activities that are similar, to reduce the overall number of groups by half. The proposal from Cefic is as follows:

- Merge all REACH-related topics (3 teams: essential use + GRA, MAF, other REACH changes) into one “REACH Revision cross-industry team”;
- Keep CLP Revision cross-industry team as the CLP legislative proposal is expected in September/October, rename as “CLP Revision cross-industry team”;
- Keep Enforcement cross-industry team (led by Euratex), which could be useful for REACH and CLP revisions;
- Merge Sustainable Products Initiative with SSbD as there are large areas of overlap, into “Sustainable Products cross-industry team”;
- Drop Economic Assessment (outdated).

This proposal has been universally welcomed by the platform participants, who all see the value in the continued interactions, but feel the need to reduce workload where possible (more information: Simon Cook).

## **ZERO POLLUTION ACTION PLAN**

### **ZPAP: Taskforce meeting**

On 14 June, Eurometaux held a ZPAP Project Group meeting to deliver an update on the latest development in the Zero Pollution Stakeholder Platform (ZPSP), on the review of the Air Quality Directives – including a presentation on the poster presented at SETAC as a pilot use-case study for the Air Quality Project, Water Framework Directives and on Soil legislation. Also, an overview was delivered on the Roadmap on Sustainable/Zero Harm metals initiative. Finally, an additional item was discussed (CSRD: development of Sustainability Reporting standards). More information can be found in the Taskforce minutes.

On 29 June, the Commission adopted the 2022 Strategic Foresight Report – “Twinning the green and digital transitions in the new geopolitical context”. The report identifies ten key areas of action with the objective of maximising synergies and consistency between our climate and digital ambitions. By doing so, the EU will strengthen its cross-sector resilience and open strategic autonomy and be better prepared to face new global challenges between now and 2050 (more information: Lara Van De Merck and Lorenzo Marotti).

### **Zero Harm/Sustainable Roadmap Working Group: 1<sup>st</sup> brainstorming meeting**

The EU’s Green Deal and its Zero Pollution ambition has increased the regulatory focus on reducing hazards and emissions from industrial activities and other sources. This goes beyond the 2020 SAICM (Strategic Approach to International Chemicals Management) objective of sound management of chemicals through their lifecycle, with

the European Commission now focussing on “reducing emissions to levels no longer expected to be harmful to health and environment”. The metals industry is a “sector of concern” in the EU’s Zero Pollution ambition due to the hazardous properties of many metals and the potential for pollution from our activities, even if our energy transition and circularity contributions are acknowledged. Eurometaux’s Executive Committee agreed in April to develop a Roadmap to demonstrate i) the metals industry’s achievements and plans towards the objectives of zero pollution; ii) that the metals needed for Europe’s clean energy goals will not result in harmful pollution or problematic emissions; and iii) to prioritise the circular management of metals in Europe’s stock through multiple lifecycles.

A Working Group was created to reflect about the format and content of this Roadmap and a first meeting was held on 13 June with the volunteers (thanks!!). A one-pager outlining more in detail what the objectives of the roadmap are, is currently in the making and will be circulated for comments by the Working Group before it is sent to the different Eurometaux committees (more information: Chris Heron and Violaine Verougstraete).

## RISK MANAGEMENT

### **Risk Management Taskforce: *brainstorming session to prepare for the upcoming REACH reform***

These last six months have been characterised by several proposals and workshops organised to progress on several new aspects of the future REACH Reform in the context of the CSS. These included debates on the Generic Risk Assessment (GRA), the Essential Use Concept (EUC) concept as well as the potential merger of the Authorisation and Restriction systems.

It is expected that the outcome of the Impact Assessment carried out for the REACH revision will be available by mid-September, with a recommendation of the Regulatory Scrutiny Board. From that moment on, we may expect intensive text drafting activities in preparation of the completely reviewed risk management section of REACH 2.0.

The Risk Management Taskforce feel that it is appropriate to be well prepared for this second phase and thus organised a special brainstorming to review its “guiding principles”, to identify which aspects were key for the sector in the reform and which were less important. The outcome of the brainstorming will be utilised by the secretariat and the co-chairs to prepare a “white paper” for the drafting and subsequent policy phase. This text will be debated at the next Risk Management Taskforce meeting on 28 September (more information: Hugo Waeterschoot).

## ENVIRONMENT

### **Environment Taskforce (30 June): *scanning the regulatory scenery on new priorities on Environmental hazards***

Given that for more than a year its focus was on the environmental classifications of metals (Pb, Ag and later this year Cu), the Environment Taskforce found it timely to conduct a screening of expected regulatory initiatives on environmental hazards for REACH and Classification Labelling and Packaging Regulation (CLP) purposes. The Environment Taskforce evaluated “if” and “how” the upcoming Endocrine Disruptor (ED) scheme, the terrestrial classification scheme, the criteria setting on Persistent, Bio-accumulative and Toxic Chemicals (PBT), very Persistent very Bioaccumulative chemicals (vPvB) and Persistent, Mobile and Toxic (PMT) could affect the sector and what the timing would be of these initiatives.

The soon to be published CLP update will provide further clarity on how Commission would like to integrate these new endpoints in the CLP involving the UN GHS and the OECD in the development of the criteria. The Environment Taskforce agreed to develop over the summer a first version of a workplan including a priority setting and suggestions on how to collaborate with ICMM on the classification criteria.

The group also debated about the challenge of metals of low solubility with no soluble metal ion toxicity reference. It was agreed to support the TiO<sub>2</sub> case as a key example and evaluate which other metals could be affected by this concern of ECHA. The aim would be to propose reasonable suggestions that are science-based given that at present ECHA’s attitude on those metal environmental hazard cases is very administrative in its focus. Draft minutes will be circulated soon (more information: Stijn Baken, Jelle Mertens, Hugo Waeterschoot).

## CLASSIFICATION

### **Li CLH: *Taskforce and other important meetings***

A Taskforce call took place on 20 June, to take stock on recent developments and prepare the discussions at the July CARACAL meeting. Several Member States have submitted comments in follow-up of the last meeting and ECHA has prepared a reply to the industry memo that was prepared and uploaded. Industry will again have the opportunity to

make a short presentation, bringing in elements that were not addressed at the March meeting, like the Boyle et al. 2016 paper that was identified recently and that sheds some light on the association between Li exposure and the heart anomaly that is used to support the classification as toxic for the development. After the CARACAL it will still be possible to submit comments. Commission will present the ATP (Adaptation to Technical Progress) it will submit -for scrutiny- to the Parliament and the Council in autumn.

Several meetings have taken place before and after the Taskforce call. Albemarle, Livent and Eurometaux met DG GROW, DG ENV and ECHA on 10 June to reiterate the scientific and socio-economic concerns.

On 21 June Eurometaux, accompanied by a delegation of companies, had an exchange with Cabinet Šeřčovič to raise the industry's concerns in detail. Cabinet Šeřčovič expressed understanding for the argument of stigmatisation and recalled the fact that Commission has worked hard with the French Presidency to give a strong signal to have resilient Li supply chains in the EU. The argument of coherence between the different Green Deal and EU's strategic objectives was stressed. Eurometaux has also sent a request to Timmermans' Cabinet for an exchange.

Also, ILiA and Albemarle had a call with the UK HSE and BEIS to discuss the process to classify Li in the UK. UK HSE clarified that they will develop a technical report on the RAC opinion, with a suggestion for classification. This report is likely to be published in August. After the publication of the report, they will assess socio-economic impacts to the UK economy, and be open to receive comments from the industry, above all on costs (more information: Francesco Gattiglio, Chris Heron and Violaine Verougstraete).

## INDUSTRIAL EMISSIONS

### Industrial Emissions: *Open Public Consultation*

On 23 June, [Eurometaux submitted a contribution](#) to the Open Public Consultation (Have Your Say initiative) on the new Industrial Emissions Directive (IED) Proposal. Eurometaux submitted the IED paper previously circulated, which has been discussed and agreed upon, which includes the most relevant points and comments received by the members of the Industrial Emissions Taskforce. A total of 97 feedback were published, of which the large majority from Business Associations (85%), NGOs (8%) and others, including citizens. Currently we are analysing the positions submitted.

Furthermore, Eurometaux has drafted communication material (e.g., a position paper, a letter and a table for amendments to the new IED Proposal) to be used for the next step of the advocacy, as the secretariat is currently designing the outreach strategy towards Parliament and Council (more information: Lighea Speziale, Lorenzo Ceccherini, Lorenzo Marotti).

### Air Quality: *follow-up on SETAC & EEA study*

On 14 June, Eurometaux presented the Air Quality Project poster submitted to SETAC, serving as a use-case example to demonstrate how the data and information collected under the Air Quality Project with ARCHE will be used, and what type of results can be expected. This exercise shows how the data is treated (in full confidentiality), and that the outcome confirms our underlying assumption: the burden to health attributable to the NFM sector's factory emissions is negligible. More data is currently being submitted by members who showed interest and an adjustment on the methodology is also ongoing. The aim is to further refine our analysis and make the study accurate in reflecting the real impact of the NFM sector.

On 28 June, [the European Environment Agency \(EEA\) published a study](#) that took into account the latest scientific evidence, and for the first time investigated the links between cancer and the environment. It reported that exposure to air pollution, second-hand smoke, radon, ultraviolet radiation, asbestos, certain chemicals, and other pollutants causes over 10% of all cancer cases in Europe via environmental and occupational risks... Political pressure on industrial emissions therefore continues to increase (more information: Lorenzo Marotti).

## METALS TOOLS

### Bioelution: *meeting of the OECD Expert group on the test protocol*

On 14 June, the OECD secretariat invited the members of the Expert Group on the 'metal release' protocol to discuss pending issues and a testing proposal submitted by The Netherlands. In May, the leads of the project on the protocol (i.e., EURL ECVAM/Commission) had circulated a response to comments collected over the last months from the OECD WNT (Working Group of the National Coordinators of the Test Guidelines Programme) and a revised Test Guideline. Pending issues related to technical aspects like the relevance to include a step to dry metal samples before testing (France) or the inclusion of a safety factor in the protocol to consider the uncertainties on the correlation between *in chemico* metal release data and uptake *in vivo* (ECHA). On the latter, views were divided as the uncertainties depend on



the applications of the release data (what they are used for) rather than on the data generation itself. Hence it felt more appropriate to indicate that uncertainties should be looked at when considering the applications.

The Netherlands had requested to further explore the relationship between particle size/surface area and release. In follow-up industry looked up data for metals included in the applicability domain of the Test Guideline, hoping to identify powders for which release data in pH 1.5 would be available for different particles sizes. This appeared to be the case only for Co and Ni (special thanks to Adriana and Kate for the huge detective work!). The presentation of the results led to a good discussion, where the group acknowledged that the nature of a substance's chemical bonds (metal, compounds or alloys) is the main determinant of metal release and that particle size also affects the release but probably much less than the chemical bond. However, the experts want to know how what is meant exactly by 'probably' is. To ensure the issue of particle size can be fully clarified, industry committed to collect test data for an alloy powder by sieving a powder into 3 sub-fractions and testing them separately for PSD-SSA with the discussed protocol. The NL will be involved in the design of the test (which sub-fractions) and the outcomes of the test will be presented to the Expert Group in autumn. We already would like to thank here EPMA and ECTX for their quick and efficient help! Canada raised some additional comments that will also be addressed in parallel by the leads over summer (more information: Adriana Oller, Kate Heim and Violaine Verougstraete)

## SOIL

### Update

The JRC is still working on the next version of the draft Clean Soil Outlook (CSO) (version 4) and is incorporating the comments received. The meeting of the Technical Working Group (TWG) on soil pollution originally scheduled for early June has been postponed to a-still to be determined- date in September. At this meeting, version 4 of the CSO (but also the High-Level Synthesis Report) will be discussed.

A draft version of the soil section of the High-Level Synthesis Report was shared with the TWG on soil pollution. This high-level synthesis report is intended to be a summary of the content of the CSOs (air-water/marine-soil) and will become part of the Zero Pollution Action Plan. Comments on the soil high-level synthesis can be sent to the JRC until Friday 15 July. They will summarise the comments received and work on a second draft over the summer (more information: Lara Van de Merckt).

## METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

### MEED: 2-day Workshop

The MEED June workshops were spread over 2 days, covering progress reporting and new project launches.

The first day of the workshop discussed the responses to comments submitted by the Sponsors on the metals mixture and metals organics draft literature overview reports. Based on the conclusions, ARCHE and the University of Ghent will prepare a draft testing program for the next phase of both projects.

The second day focused on presenting the outcome of the data and literature search of the Regional Exposure project (Project 1a), which resulted in an impressive overview of existing datasets. The sponsors discussed how these could be further complemented with existing national evidence, so as to allow ARCHE to update the reports and define *in situ* data gathering where relevant in the months to come. A presentation was made on the STP project, relating to the challenge of predicting how metal concentrations in the aquatic environment may evolve due to the increased demand for & use of metals to fulfil the Green Deal objectives (e.g., batteries) and changing metal material flows and uses. The outcome of the short brainstorming will be used to develop a survey to collect appropriate data to allow such predictions (more information: Marnix Vangheluwe, Hugo Waeterschoot, Violaine Verougstraete and Diana Dobre).

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## OUTREACH

## OECD

### OECD Working Party on Exposure Assessment: ESD for metals and presentation on MEED

Eurometaux participated (remotely) in the meeting of the OECD Working Party on Exposure Assessment on 27-28 June. The Working Party endorsed draft project proposals, e.g., the organisation of an online Workshop on Occupational Exposure Limit Settings proposed by Japan, but also agreed to declassify the Emission Scenario Document (ESD) for

Emission of Metals During Primary and Secondary Smelting and Waste Incineration, Covering Recycling of Electrical and Electronic Waste initiated by Japan some years ago (and commented on by the sector). Delegates presented recent achievements like the integration of the Canadian Human Biomonitoring data into IPCHEM (Biomonitoring Database Project), the compilation of new case studies on combined exposure compiled in eChemPortal, etc. The group also discussed how to tackle topics like Climate Change and Exposure to Chemicals, Covid-19 pandemic impacts: exposure from personal protective equipment, Wastewater Treatment Plant Models. BIAC contributed by presenting an update on European and US exposure research projects funded by the chemical industry associations and by giving a presentation on the Metals Environment Exposure Data Program (MEED), stressing that while the collected data will be EU-centric some of the concepts and approaches have a broader applicability. Draft notes are available on request (more information: Jan Urbanus and Violaine Verougstraete).

## OTHERS

### **Helsinki Chemicals Forum: *Eurometaux raised the need to expand attention to Climate and Circularity when defining Chemicals risk management***

On 8-9 June, Eurometaux (Lorenzo Marotti, Hugo Waeterschoot) participated in the Helsinki Chemicals Forum's special panel on improving Risk Management by considering a more holistic view on defining best risk management options. Hugo presented the '3Cs' concept (Chemicals, Circularity, Climate), mostly gathering very positive reactions including regulators and NGOs. Some clear examples were provided as a proof-of-concept contributing to project a strong sense of credibility vis à vis the NFM sector. Commission was very receptive to the concept and also recognised the importance of considering Circularity and Climate at the level of Risk Management Option analysis (RMOa). Eurometaux stressed that it is industry's co-responsibility to provide the data necessary to make effective policy-making decisions, calling for industry to step up its efforts in sharing data and to continue engaging in the discussions with regulators. At the event, ECHA directors were present, together with relevant people from Commission, whilst most Member States representatives followed online.

Overall, the Forum represented a very good chance for the promotion of the concept and the stewardship of the NFM sector. The event was also covered by Chemical Watch in [Conclusion Report of the 2022 HCF Conference](#) (more information: Hugo Waeterschoot, Lorenzo Marotti).

### **LIFEAsk REACH Policy Workshop: *prioritisation of instruments to support non-toxic circular economy***

[AskREACH](#) is an EU founded project intended to help consumers and companies to apply the "Right to Know" about substances of very high concern in consumer goods. 20 partner organisations, representing governmental institutions, research institutes and non-governmental consumer and environmental organisations, have been working together over the past years to raise consumer awareness about substances of high concern (SVHC) in articles and to raise awareness of SVHC related duties, including supply chain communication. On 31 May & 1 June, they organised a 2-day workshop to create a common understanding about how the various Green Deal policies drive the establishment of chemical traceability capacities. The following instruments were identified and prioritised as mean to support "non-toxic circular economy": extended Safety Data Sheets (SDS), Ecodesign for Sustainable Products Regulation, restrictions on specific substances, the SCIP database, standardisation of substance tracking "systems" and Digital Product Passports. A cross-impact analysis of the instruments is expected to be conducted as follow-up. The outcome of the workshop will be used by the AskREACH project consortium as input to the ongoing policy debates (more information: Lorenzo Zullo).

### **HBM4EU final stakeholder event: *last opportunity for industry to provide input, ahead of follow-up PARC project.***

The [HBM4EU](#) consortium organised a final Stakeholder gathering on 2 June. Besides summarising the main conclusions, already highlighted at the final conference in April, the event aimed at collecting views from stakeholders and setting the basis for a proper collaboration ahead of the beginning of the [new project PARC](#), which will build on the outcome of HBM4EU over the coming years.

Eurometaux took the opportunity to underline that human biomonitoring (HBM) is a very useful tool to identify where further exposure reduction could be needed. In particular, we believe that HBM data can help to further increase understanding of human population exposure for certain metals across Europe and the capacity of EU chemical policies in controlling the risk. However, it is essential to contextualise HBM data to ensure they are properly used.

We also recommended to focus on less data-rich substances rather than on metals, such as cadmium and lead, whose exposure is already well documented and risks are properly managed, in particular when it comes to environmental/consumers exposure.



In light of the attention that PARC expects to dedicate to the concept of “combined exposure”, Eurometaux underlined how moving from screening to target mixture assessment requires refined toxicity data and mechanistic knowledge for grouping and mixture hazard characterisation.

Overall, we recommended to increase awareness of both potentialities and limitations of HBM data as a tool to support regulatory developments and to increase synergies between researchers and relevant stakeholders to address existing HBM data/methodological gaps (more information: Violaine Verougstraete, Lorenzo Zullo) .

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## COMMUNICATION

### ***Eurobat Forum : participation in panel on raw materials and chemicals management***

Eurobat, the association of European automotive and industrial battery manufacturers, organised its Forum meeting in person in Brussels on 24 June. More than 100 stakeholders from across the European battery ecosystem came to discuss key developments in the battery market, sustainability and raw materials within the evolving policy framework and the innovation landscape for batteries.

Eurometaux was kindly invited to participate in a panel with Peter Handley, Head of Unit on raw materials (DG Grow), Valérie Plainemaison, Secretary-General of FEAD (European Waste Management Association) and Adrian von Mühlengen (PO Digital Material Passport Catena-X, BASF) to explore the connection between pressure on raw materials availability and stricter chemicals and environmental legislation.

Calls were made to ensure the security and sustainability of the supply of critical raw materials, by designing EU’s chemicals and environmental legislation coherently to provide long-term certainty and predictability and adding a policy support framework on mining, battery materials, battery manufacturing and recycling. Ensuring coherence will require the cooperation of all relevant stakeholders and proactive input in a series of policy and non-policy measures, ranging from the new raw materials legislation to the REACH Reform and the transmission of key information along the supply chain (more information: Violaine Verougstraete).

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# CALENDAR

Please find here below a non-exhaustive list of the meetings that are planned for Q3 – Q4 2022.

## For meetings at Eurometaux

The MCC has been opened to allow hybrid meetings, **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) but we do encourage you to try and join in person when possible.

**For meetings at ECHA:** this information is published on ECHA's [website](#)

- 1 July: CARACAL Taskforce
- 04-07 July: ECHA RAC-62 CLH + AfA WG
- 05-06 July: CARACAL Meeting (TBC)
- 18 August: ECHA RAC-62 REST WG
- 30 August: Zero Harm/Sustainable Roadmap Working Group
- 1 September: Chemicals Management Steering Committee
- 05-09 September: ECHA RAC-62 Plenary (reserve) & SEAC-56
- 12-16 September: ECHA RAC-62 Plenary & SEAC-56
- 19-23 September: Chemicals Management Autumn Week
- 29-30 September: ECHA MB
- 28 September: Risk Management Taskforce
- 10-14 October: ECHA RAC-63 AfA WG
- 10-14 October: ECHA MSC-79
- 24-28 October: ECHA RAC-63 CLH WG
- 3-4 November: ECHA RAC-63 REST WG
- 16-17 November: CARACAL Meeting (TBC)
- 22 November: MEED Workshop
- 28 November – 02 December: ECHA RAC-63 Plenary & SEAC-57
- 05-09 December: ECHA SEAC-57
- 06 December: Chemicals Management Steering Committee
- 07-09 December: ECHA RAC-63 Plenary (reserve)
- 12-16 December: ECHA MSC-80
- 15-16 December: ECHA MB
- 20 December: Risk Management Taskforce

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## GENERAL INFORMATION & ACRONYMS

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

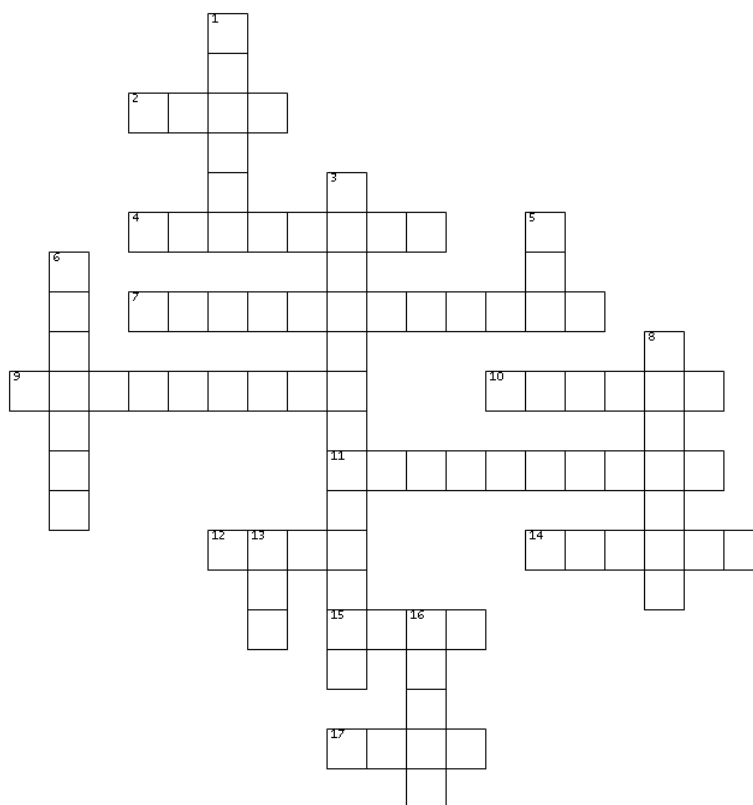


This website is a one stop information source for regulators & risk assessors dealing with metals/metal compounds and is tailored to the specific needs of the metals industry sector.

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



## I: Crossword

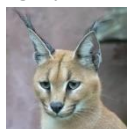


### ACROSS

2. I've been a miner for a heart of ..... (*Neil Young, for the real oldies*)
4. ....Chemicals Agency
7. Can be a hazard, can be an exposure (limit)
9. This metal's compounds got a regain of "popularity" thanks to Julia Roberts
10. Far above the world, Major Tom was floating in one (*2 words*)
11. Belgian gin made to a recipe comprising 5 botanicals: cardamom, juniper berries, orange peel, angelica and coriander
12. .... me far away on a summer holiday
14. Peyo, the author of the 'Smurfs' could have invested in the blue pigment of this metal sintered with alumina
15. A friend in ..... is a friend indeed
17. Let's take a walk in the .....

### DOWN

1. Every cloud has a .....lining
3. Eurometaux organised it to transmit and share knowledge on metals – providing participants with a toolkit supporting their daily job across industrial, regulatory, and environmental aspects (*2 words*)
5. Animal cry aiming at protecting professional uses
6. A song by Nirvana
- 8.



13. To be or not to be... (*from the essential Hamlet*)
  16. A REACH information requirement that you can have for breakfast
- II. Test your acronym knowledge

1.	ARN	
2.	BoD	
3.	SSbD	
4.	EOGRTS	
5.	KEI	
6.	NOFAS	
7.	PEC	
8.	SpERC	
9.	TWA	
10.	UWWTD	

**Answers I: Crossword**

**Across:** 2. Gold / 4. European / 7. Occupational / 9. Chromates / 10. Tin Can / 11. Copperhead / 12. Lead / 14. Cobalt / 15. MEED / 17. PARC

**Down:** 1. Silver / 3. Metals Academy / 5. GRA / 6. Lithium / 8. CARACAL / 13. EUC / 16. EOGR T

**Answers II: Acronyms knowledge**

**1/** Assessment of Regulatory Needs – **2/** Burden of Disease – **3/** Safe & Sustainable by Design – **4/** Extended One-Generation Reproductive Toxicity Study – **5/** Key Environmental Issues – **6/** No One Fits All Solution (principle) – **7/** Predicted Environmental Concentration – **8/** Specific Environmental Release Category – **9/** Time Weighted Average – **10/** Urban Waste Water Treatment Directive