



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us on:

- 14 October: Registration Taskforce
- 26 October: Li CLH Taskforce

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Dear All,

A night in one of these wonderful places Italy has to offer. Imagine the remainders of warmth left over from the sunlight hours, reflected at the end of the day by the old stones; people wandering around, the colours of Aperol glowing on the tables. A podium is occupied by a group of musicians led by a (gorgeous) drag queen, singing about love and getting the public to clap their hands. The band contributes to the lightness in the air, the delicious feeling of nonchalance or recklessness. La vita è dolce?

It may not remain so. Tonight, the extreme right Party has won in Italy with statements and beliefs that may prevent part of the public in the coming years -and certainly the singer- from cheering or applauding such events. This victory, coming after the Swedish elections and the apparently unstoppable ascension of right-wing parties in other EU (or non-EU ones) democracies, associated with references to the past that should not be repeated, should create anxiety and drive people to action rather than only be reported with a couple of fleeting headlines in the stream of the news bulletins. The headlines say: The EU looks worried about the outcomes ... "... but tonight, here people are dancing!

I could not stop my partner from going to speak to the flamboyant singer at the end of the concert, showing the first results -on the phone- and asking whether it would not have been more appropriate to use the podium to launch a message, to draw attention to the fragility of what we have today: the possibility to choose, to become, to welcome, to struggle as well of course but with the liberty to think, to act and reflect about differences. Would this still be possible with politicians claiming, "A nationality, one religion, tradition, 'clear gender' rules" and above all that they seemingly know what is good for us?

"Speriamo" was the reply.

A bit short? A bit easy? Probably.

The question too probably...

One could argue that partying in such a moment is rather thoughtless, but another would interpret this as celebrating as long as we can. If things take a turn for the worse, would the public remember the statement of an artist one evening in Lecce that may have darkened the crowd's mood and shattered its pleasure or wonder for a second where the show of that nice drag queen has vanished?

Hope and hoping.

Can we hope without acting? Can we still do so?

Analysts write that at the least there should be vigilance. Vigilance from the start. To identify what may drive the votes later on, to work at the source, to call for engagement in "moving together for better" and in due time.

In the EU's green ambitions, this translates also by "leaving no one behind". Maybe a too easy analogy, but it also seems crucial to reflect about the social acceptance of the ambitions and preserve the sustainability elements that keep people in a positive network and allow them/us to move together.

To preserve that sparkle of hope, as well.



Violaine Verougstraete

COMMISSION

4th Annual Forum on Endocrine Disruptors: need for validated test methods to support ED identification and assessment

The 4th Annual Forum on Endocrine Disruptors (EDs) took place in Brussels on 21-22 September. The event, organised in cooperation between the European Commission (DG Environment) and ANSES, the French National Agency for Food, Environmental and Occupational Health & Safety, was highly attended both physically and online by representatives from institutions, industry and civil society from all over the world.

The European Commission opened the event by underlining its front-running role in the international arena, stressing the need to improve understanding and reduce the impact caused by endocrine disruptors, using the Chemicals Strategy for Sustainability, REACH and CLP as primary legislative tools for their identification and assessment. The proposal to introduce in CLP new hazard classes for EDs is expected to be adopted in November and will be followed by two months of parliamentary scrutiny. The revision of REACH is currently being debated and a proposal is expected to be adopted by the Commission in the first half of 2023. Activities related to identification, improvement and development of test methods is also considered crucial.

During the first day, DG SANTE and EFSA shared their experience on ED assessment developed in the framework of Biocidal and Plant Protection Products. JRC provided an overview of the Endocrine Active Substances Information System (EASIS), which contains information on endocrine activity and effects of chemicals (data on over 600 chemicals collected from around 10,000 study entries).

Research activities on new tests methods were presented, such as those conducted by the Heidelberg University (Germany) on the “integrated Fish Endocrine Disruptor Test” (iFEDT). Difficulties to move from experimental work to validated methods and test guidelines are considered major roadblocks to be addressed.

The second day was dedicated to Endocrine Disruptors effects on thyroid and on recent development on bisphenols, including Member States activities on grouping.

Cristina de Avila, Head of Unit, Sustainable Chemicals, DG Environment, concluded the event by underlining the need to continue funding scientific activities on EDs, with a particular focus on test methods validation and on the “adaptation” of scientific data to allow early regulatory involvement.

The recording of the event is available [online](#) (more information: Violaine Verougstraete and Lorenzo Zullo).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-62: full blow on OELs, biomonitoring, grouping and drinking water

The RAC members joined Helsinki for 4 days of meeting, discussing the usual CLH, restrictions and authorisation-related topics but also two Occupational Exposure Limits (OELs) and the added value of biomonitoring.

On the cobalt OEL, the RAC rapporteurs presented their draft opinion on the background dossier prepared by ECHA. Key issues at stake include for example the scope of the proposal (and more specifically, the inclusion of poorly soluble cobalt substances), the consideration of a threshold for the cancer value, the data used to support a lung function decrease and the distinction between hard metal and cobalt (compounds) exposures. RAC agreed that all cobalt compounds should fall under the scope of the OEL, stressing that there is not enough scientific data to derive separate OELs for the poorly soluble and complex salts of cobalt and that when measuring the air levels at workplaces, it is not possible to distinguish between different cobalt compounds. RAC also agreed to use a similar approach as was done for nickel and to not propose a biological limit value (BLV) but a biological guidance value (BGV). The next and last discussion on the cobalt OEL is planned for end of November.

An exposure-risk-relationship was also discussed for Polycyclic Aromatic Hydrocarbons, using lung cancer as key effect. The approach is based on a single exposure indicator (Benzo-a-Pyrene), supported by the fact that it has the highest carcinogenicity potential and is metabolised in genotoxic metabolites, but also that not enough data on PAHs are available to derive a dose-response.

An afternoon seminar on biomonitoring aimed at addressing the following questions in the context of Authorisation for Applications (AfAs), and more specifically for the uses of CrVI: how does RAC want to use biomonitoring and can it provide added value on top of the risk management measures additional conditions' (automation or closure) proposed by RAC, good industrial practices and air monitoring programs? Can biomonitoring be systematically recommended by RAC to check the efficiency of the personal protective equipment and to better quantify the exposure? The aim was to also assess the costs in terms of the extra effort that RAC and ECHA would have to put into the evaluations against the possible benefits to the authorisation process? Main reason for the latter is the announced number of AfAs expected to come in, which will require more than 200 Cr(VI) opinions and 4-5 years for ECHA to process. ECHA is intensively searching for ways to streamline the work to be done. RAC agreed that biomonitoring could be of use in the cases of "highest concern" and the secretariat will develop a set of criteria to identify such cases.

Two interesting presentations were provided by ECHA staff on grouping and read-across for classification. The first one made the link with the mapping of the chemicals universe and Assessment of Regulatory Needs (ARNs) documents, explaining that grouping helps to increase efficiency and effectiveness but also to treat related substances consistently. The second one presented the work of a trainee who dived in the 2017-2021 CLH opinions to look for the use of read-across as well as to the criteria used to accept or reject read-across and related considerations. The conclusion was that many groups have already been assessed by RAC, opening the door for a more systematic use of grouping but it will be important to ensure that robust read-across arguments are presented and documented and that group entries are carefully scoped.

Finally, it is worth mentioning that ECHA has started to reflect intensively on how to organise its activities on the Drinking Water Directive, and more specifically related to Article 11 that sets up minimum hygiene requirements for materials to protect human health (supposed to capture direct and indirect effects on human health, plus effects on environment and levels of contamination). ECHA has a number of tasks spread over 2021-2024 (i.e., creation of the first European Positive List and prioritisation of entries, support to DG ENV in drafting implementing legislation, setting up the application process, and associated IT tools and systems. The first applications are expected from 2025 onwards (more information: Violaine Verougstraete).

SEAC-56: a heavy meeting, no direct metal issues but lots of precedent- settings & learning lessons

The SEAC reviews of Applications for Authorisation focused almost exclusively on Cr plating whereby for the first time it was raised that the substitute for Cr VI, i.e., Cr III, may have lower hazards but requires extensive use of borates. Also, the Cr III is manufactured from Cr VI. Hence, Cr III is not considered being a safer alternative despite RAC and SEAC progressing for years down this route!

SEAC, RAC and industry agreed to set up a specific workshop on 10 October to analyse this challenge. Eurometaux and the consultants from Apeiron are in the lead.

A second important learning related to the relevance of further (standard) exposure reduction requirements (closed systems) as proposed by RAC when the exposures were 50 times below the Occupational Exposure Limit (OEL) for Cr. SEAC concluded that this could challenge the benefits assessment but that the applicant forgot to indicate the cost of such investment, hence could not prove the non-relevancy of the risk control measure.

The restriction on DMAC and NEP also included interesting precedent settings. Whilst there are alternatives (hence an authorisation could have been chosen), a restriction proposing risk control via a Derived No-Effect Level (DNEL) for inhalation and dermal exposure was proposed and agreed upon. Listing the substances for a binding OEL was considered but rejected given this would take too long.

Finally, SEAC discussed the transitional period (TP-res) for the implementation of the restriction of CTP-HT in clay targets. The Authorisation applicant who lost its case previously (his demand for authorisation was rejected) made a strong plea for giving NO TP-res, as they had lost their licence to put the material on the market for that use without any TP. SEAC rejected this reasoning based on the uncertainties with the availability of alternative materials. This precedent is most relevant given ECHA was mandated by Commission to look into other uses of CTP-HT (PS: widely used in electrodes in the metal sector) (more information: Hugo Waeterschoot).

MB-67: a lightweight agenda in open session but the appointment of the new MB chair and Executive Director in closed session

The lack of leadership due to the absence of an Executive Director for ECHA led to a lightweight agenda for the Management Board (MB) meeting of September, which was prepared by a session of the SPI (Strategy, Planning and Implementation) working group of the ECHA Management Board (attended by Guy Thiran). The most important strategic discussion on the (rolling) Programming Document for the MB, including the main priorities for ECHA for the coming 3 years was therefore postponed.

One of the more important points that was discussed related to ECHA's activities to promote New Approach Methodologies (NAMs) covering how they could be used in the Integrated Regulatory Strategy (IRS) to identify chemicals of concern, the investment in OECD activities on NAM and making NAM data better available. Following Cefic's initiative, industry stated that the MB note did not express a high-level of ambition coming from ECHA on the development and suitable implementation of NAMs. NAMs can play an important role in reducing the need for testing or identifying priorities. However, at this stage, NAMs should not -have as main aim to- substitute all animal tests given the scientific challenges remain high.

The MB met without observers on the formal appointment and contractual agreement of the new executive director. Dr Sharon McGuinness will start her first five-year term on 1 December 2022. The MB re-elected its current chair, Paul Krajnik, for two more years. He is the Deputy Director for Chemicals Policy at the Austrian Federal Ministry for Climate, Environment, Energy, Mobility, Innovation and Technology (more information: Guy Thiran and Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

ECHA-Industry: Dossier update screening campaign on harmonised classifications

The last Registration Monthly Update call between ECHA and industry was held on the 1st of September. During the call ECHA, announced the kick-off of the second campaign to check registration dossier updates with focus on harmonised hazard classifications for monoconstituents. It was found that for more than hundred registrations the hazard classifications were not aligned with those agreed at European level and the respective registrants were contacted, giving possibility to reply until 30 November. The number of cases is considered to be minor compared to the amount of registration dossiers that were screened.

It was reported that the [practical checklist on the ECHA website](#) to clarify obligations to update the registration dossiers was revised over the summer (more information: Lorenzo Zullo and Federica Iaccino).

EUROMETAUX CHEMICALS MANAGEMENT

Chemicals Management Steering Committee: 2022 penultimate meeting

This hybrid meeting, celebrating the first day of September, discussed among others the outcomes of the meeting on the Zero Harm/Pollution Roadmap (see August News), supporting the proposal to build on the KUL study that illustrates that metals demand/volumes (will) increase with the transitions (and briefly discusses some impacts) to propose a 'follow-up initiative', stressing the sector's intention to contribute to Zero Harm. The CMSC agreed that it will be key to include in the roadmap the coherence of Green Deal objectives and how we could move towards their best articulation. A presentation was provided on the Raw Materials Initiative and possible links to the REACH Review as the timing for both is similar. The timings for the CLP & REACH Reviews were presented and in order to focus on advocacy, the group discussed the key priorities for REACH. It was agreed to also identify some high-level priorities for CLP (a proposal was circulated on 21/09).

An intense discussion took place on a short advocacy paper prepared by Allen & Overy that aims to better understand the boundaries that should be considered when applying the Precautionary Principle (PP).

The group was updated on both Safe and Sustainable by Design (SSbD) & Transition Pathways. The latter seeks to combine some of the Green Deal goals, the updated Industrial Strategy & the CSS and to map out what is needed to realise the twin transition in a resilient way. Further updates were given on the Air Quality Project whose purpose is to quantify the NFM sector's emissions to air and impact on human exposure and health, the Industrial Emissions Directive advocacy, classifications and on some strategic choices to be made on rapid removal and bioelution. The meeting was concluded with an update on the Metals Academy, see below [Communication](#). The draft minutes were circulated on 12 September (more information: Violaine Verougstraete).

Chemicals Management Autumn Week: *Science Forum*

The Chemicals Management Autumn week kicked off with the Science Forum meetings, co-chaired by David Boyle (Cobalt Institute) & Martin Wieske (WVMetalle), in hybrid format.

Day 1 started with the now traditional Occupational Exposure Limits (OEL) update by Martin Wieske, highlighting among others the value of 4:10,000 that is paving the way for non-threshold carcinogens (with an update clause) and the precedent-setting of a guidance for hazardous medicinal products.

Vanessa Viegas (Cobalt Institute) provided an update on the development of the health-based value for Co. It is currently being discussed in RAC, with the committee coming up with values that diverge from the industry values and questions on the scope. The proposed Exposure-Risk Relationship (ERR) is quite conservative.

Blanca Serrano (ECETOC) explained ECETOC's work and provided possibilities for non-members to be more involved in their activities. Jan Urbanus (Shell) provided a view of the European Exposure Science Strategy 2020-2030 to enhance the role of exposure in chemicals management from an industry perspective. Finally, Eurometaux provided an overview on the challenges on grouping and how it is being used by regulators and the possible implications this may have for CLP and downstream legislations.

Day 2 of the Science Forum started with Stijn Baken (Copper Alliance) who explained how they updated the Predicted No-Effect Concentration (PNEC) water for copper. Jelle Mertens (EPMF) gave a generic insight into recycling and the role of Technology Critical Elements (TCEs) in a Circular Economy.

An Jamers (DG ENV) gave a presentation on the One Substance One Assessment (OSOA) approach and presented the Common Data Portal.

David Boyle (Cobalt Institute) gave the learnings from ETAP (Ecotoxicity Technical Advisory Panel) summer meeting that focused on the thematic of climate change, and the possible consequences on metal releases, speciation & bioavailability. The challenges in terms of data and risk assessment were identified.

The day ended with an interesting presentation by Eric Pirard (Liège University) who presented the principles of metal stewardship in Circular Economy (CE) and insisted that it is a necessity to look at the fate of metals through the whole lifecycle, with primary resources being really important.

This second day of the Science Forum ended with a most enjoyable (first post-pandemic) live Social Event.

Detailed minutes will be circulated as soon as possible (more information: Ailsa Lee, Violaine Verougstraete & Hugo Waeterschoot).

Chemicals Management Autumn Week: *Regulatory Forum*

The Regulatory Forum was chaired by Lisa Allen (International Lead Association) and Sandro Starita (European Aluminium).

Day 1 was themed around the future expectations of the NFM sector on the REACH and CLP reviews. Simon Cook (Eurometaux) presented 'The Sustainable Metals Concept', framing the discussion ahead on the 'Safe and Sustainable-by-Design (SSbD) Chemicals and Materials' concept presented by Carla Caldeira from the Joint Research Centre (JRC). The hazard-based approach proposed is in apparent contrast with the objectives of the Green Deal (green and digital transition), the Chemicals Strategy for Sustainability and the EU Industrial Strategy. Timo Unger presented the 'NOFAS Principle (No One Fits All Solution)' in the context of the REACH Review and provided a concrete approach on how to define sustainability of products integrating the current regulatory requirements and the future CSS and ZPAP ambitions from the perspective of the Automotive Industry, this being one of the major downstream users of the materials produced by our sector. A panel discussion followed, where Inneke Claes (FuelsEurope), Liisi de Backer (Cefic) and Violaine Verougstraete (Eurometaux) discussed the review of the CLP and the expectations for the future, and how to tackle the upcoming challenges in a more streamlined and collaborative way building common messages across sectors.

Day 2 was entirely dedicated to industrial emissions, with a focus on the ongoing review of the Industrial Emissions Directive (IED). The agenda included a first intervention by the European Commission (Michael Bennett and Toon Smets, DG ENV, Industrial Emissions and Safety Unit) presenting the main aspects of the new IED proposal and the Commission's rationale on the most critical aspects. This was followed by the European Chemicals Agency (Andreas Ahrens) explaining its role and contribution to the IED process. The programme continued with Euromines (Jaap Van Nes) delivering the perspective of the mining industry and with Eurobat (Maxime Castes) conveying the perspective of the battery manufacturing sector. Both sectors are facing a possible inclusion in the new IED, as the new proposal includes an extension of scope aiming to cover additional sectors and processes. The discussions were balanced by the final intervention of the European Environmental Bureau (Jean-Luc Wietor, EEB) providing their point of view on the new IED Proposal. This provided the occasion for Eurometaux and its members to learn further on the issues and challenges related to the new IED Proposal, to be exposed to different/complementary perspectives and to reiterate their messages

towards regulators. Detailed minutes will be circulated as soon as possible (more information: Simon Cook and Lorenzo Marotti).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability: CSS Project Group meeting 29 September

The group met for the first time since March, with a very full agenda. The chair started the meeting with a reminder to the group of its strategic, cross-cutting role where a key goal is to achieve consensus in our messages. The purpose of the meeting was to cover developments since the previous meeting, and then discuss immediate next steps. Updates included many different CSS-related topics: the High-Level Roundtable (HLRT) and outcomes of the meeting in May, Essential Uses, the Generic Approach to Risk Management (GRA), One Substance One Assessment (OSOA), the Strategic Research & Innovation Plan (SRIP), Safe and Sustainable-by-Design (SSbD), transition pathways for the chemical industry, high level messaging, participation in cross industry groups, and the revisions of REACH and CLP (the timing for both of which has slipped backwards – possibly into 2023).

With respect to next steps, the focus was on messaging around achieving coherence between high-level EU objectives – a subject which has run through the work of the group from the beginning. On this occasion the group discussed the “strategic transition materials” (STMs) idea, which would include any metal (directly or indirectly) central to achieving the Green Deal twin transition, and/or any other EU key objective. The proposal is to develop a list of such metals by taking a forward-looking, value chain approach, and then highlight concerns around those metals with a “traffic light” system. Concerns would include chemicals management issues, as well as issues already highlighted by the Critical Raw Materials list e.g., supply risk. A second step – once the list is populated and assessed with green/orange/red indicators – would be to investigate what actions need to be taken to turn a red light to orange, and an orange light to green.

The group also discussed preparation for the next HLRT meeting in December. The chosen discussion topic is “transition pathway for the chemicals industry” (see next section). The Eurometaux secretariat has an action to reach out before the meeting to members of the HLRT who have been vocal on the transition pathway and its deficiencies – principally lack of coherence between objectives – and discuss the STMs concept as a possible solution.

Another next step relates to the Sustainable Metals Concept (SMC) which will be presented at a Chemical Watch event in October. The SMC is relevant to the Commissions work on SSbD and helps to highlight how SSbD could be better tailored for metals, rather than applying a “one size fits all (= nothing)” approach, as is currently proposed (more information: Simon Cook).

Transition Pathway for the Chemicals Industry: 3rd draft released for discussion by European Commission

This workstream was born out of the updated EU Industrial Strategy 2020, and was precipitated by the global Covid pandemic and the effect it had on disrupting global supply chains. The pathway draws together some objectives from the CSS, the Green Deal, and the updated Industrial Strategy. The 2nd draft of the pathway was released in June, inviting written comments by 22 August. As reported in the August CM News, Eurometaux provided detailed comments with the following “headlines”:

1. Inorganic minerals and metals are different and distinct from organics/plastics, and must be regarded as such.
2. There is a lack of coherence between the high level objectives of the Green Deal, the Chemicals Strategy for Sustainability (CSS), and the updated EU Industrial Strategy, that is also evident in the 2nd draft of the pathway.
3. The interdependencies between different industrial sectors are hidden by the “ecosystem” approach used. There are a small number of key value chains that will be relevant for many different ecosystems (e.g., batteries), which are enabled by many different metals.
4. Points 2 and 3 have a “double effect” on metals because: i) the negative impact of the CSS is neglected, hindering the EU’s ability to deliver the twin transition together with strengthened resilience and strategic autonomy; and ii) the importance of metals in delivering the twin transition across ecosystems is underestimated.
5. The “Safe and Sustainable-by-Design” (SSbD) concept introduced in the CSS does not work for/excludes metals due to the hazard-based approach that is used.

In response to written comments from many stakeholders, the Commission released the 3rd draft of the pathway, which was discussed at a stakeholder group workshop on 21 September. There were many edits to the draft before and during the workshop, but they do not address the deficiencies above. In the meeting Eurometaux introduced the idea of

“strategic transition materials” (STMs) to help address the lack of coherence, with chemicals management issues being highlighted. Follow-up was offered to the Commission authors, but was not taken up.

The final draft is due to be completed by 30 September, with implementation starting in early 2023. The subject is also the chosen discussion topic for the 4th meeting of the CSS High Level Roundtable (HLRT), which will take place in the final quarter of 2022. This is another opportunity to raise STMs in a multi-stakeholder forum (more information: Simon Cook).

CLASSIFICATION

Li Classification Taskforce meeting: update on 15 September

A catch-up call took place mid-September. The chair briefly recalled the timeline: it is expected that Commission will consolidate in the coming weeks the entries in the 21st Adaptation to Technical Progress (ATP) draft, for a final discussion at the November CARACAL meeting. The Commission proposal will then go for scrutiny by the European Parliament and the Council; and the formal publication of the ATP can be expected beginning 2023. The comments submitted by the CARACAL members in follow-up of the July meeting were reviewed, as well as the comments submitted by non-EU countries.

Participants were also informed about the letter co-signed by several actors in the supply chain that was sent to Commission and the reply that was received. Two meetings took place early September with Breton’s and Timmermans’ Cabinets, to highlight the issue of inconsistency between Raw Materials and Chemicals Management objectives, using the Li classification as example.

An update on the UK activities on lithium was provided by ILiA, followed by an overview of the outreach activities and media coverage.

The group agreed on a number of actions, reported in the minutes circulated on 16 September. These included a further reflexion on ways to better articulate the chemicals management and the twin transition/strategic autonomy objectives to continue the discussion with the Commission Cabinets, but also re-sending a letter to Commission to request the opportunity for impacted companies to explain their concerns. The group will also need to prepare the next CARACAL meeting, but this will be the topic for a call to be organised when we have seen the final ATP draft (more information: Francesco Gattiglio, Chris Heron and Violaine Verougstraete).

REACH REGISTRATIONS

Reply to EU’s Commission initiative to improve access to chemicals data for safety assessments: *Eurometaux contribution*

As part of the EU Commission initiative to improve access to chemical data for risk assessment, Ecorys in partnership with Ramboll, Öko-Institut and VITO has been mandated to run a study to support EU Commission in identifying options to: i) streamline chemicals related data flows and increase data interoperability, dissemination and re-use, ii) improve the implementation of legal requirements to consider all available data in a chemical safety assessment, and iii) establish a mechanism to enable monitoring and data generation. Eurometaux responded to a dedicated online questionnaire.

While Eurometaux supports data-sharing to enhance the adoption of the One Substance One Assessment (OSOA) principle, we took the occasion to remind of the need to ensure protection of data ownerships and guarantee a level playing field. Clear and consistent definitions of substance identity is also crucial to ensure that hazard/risk data remain associated to the specific compositions or forms for which they were generated (e.g., powder vs massive forms).

Concerning the option of establishing data generation mechanisms, we consider fundamental that any request for data is properly justified and supported by resources and capacity to execute it. Focus should be on what really matters and a prioritisation approach should be envisaged.

As we have learned from the exchange we had with the European Commission during the Chemicals Management Week, such an initiative could lead to the development of a self-standing regulation on chemicals data and to the amendment of existing legislations, for example by introducing mechanism to notify when new data generation activities are launched.

We will keep monitoring this initiative closely, offering the possibility to share the extensive experience of the metals sector in data generation/handling developed in the context of REACH and in other initiatives such as the multi-metallic database (more information: Violaine Verougstraete, Federica Iaccino and Lorenzo Zullo).

INDUSTRIAL EMISSIONS

Industrial Emissions Taskforce meeting: IED & IEP Reviews

On 20 September, at the Industrial Emissions Taskforce meeting, Eurometaux provided an update on the latest developments on the Industrial Emissions Directive (IED) and Industrial Emissions Portal (IEP) review, including timelines, overviews on the proposal discussions in Parliament/Council and of our advocacy actions. Additional comments on the position paper and the amendments table previously circulated and approved were collected. Furthermore, Eurometaux's advocacy strategy at large and possible options were discussed. A short update on the status of the Large Volume Inorganic Chemicals (LVIC) BREF Review was delivered. A detailed report will be circulated.

On 30 September, Eurometaux met at the European Parliament with MEP Radan Kanev (Rapporteur ENVI, EPP, Bulgaria) and his assistant Boris Gurov to discuss key priorities for the sector on the IED Review. Our advocacy towards Parliament continues with a series of outreach actions and additional meetings with MEPs.

And finally, Eurometaux is continuing its engagement at OECD-level in the Pollutants Release and Transfer Register (PRTR) Working Party and in the BAT Experts Group. A series of workshops and meetings are foreseen later in October (more information: Lighea Speziale, Lorenzo Ceccherini, Lorenzo Marotti).

Air Quality: update

On 21 September, Eurometaux presented the Air Quality Project at the EUROFER Air Quality Working Group Meeting, during which Eurometaux received positive comments and constructive questions from EUROFER members. Limitations and strengths of the project were recognised and it was acknowledged that the study will contribute to improve the image and credibility of the sector, and that the evidence coming from the study will concretely inform and support policy making towards proportionate and effective actions. EUROFER's members praised our project and resolved to possibly carry out a similar exercise for their sector.

The publication of the new Air Quality Directives package is expected on 26 October. Most likely, it will be accompanied by the 3rd Clean Air Outlook. At the moment, no further information on this revision is leaking out from the Commission. Earlier this year, Eurometaux provided extensive technical input to the Targeted Stakeholder Survey (more information: Lorenzo Marotti).

LVIC BREF meeting: position paper for KoM discussed

On 22 September, during the LVIC BREF Working Group meeting the position paper for the Kick Off Meeting (KoM) of the LVIC BREF was discussed. The main points were discussed and refined.

This Kick off Meeting will be held in Seville from 24 to 28 October. Eurometaux will be attending the meeting, together with some interested members.

This Kick off Meeting (KoM) Position Paper gathers all comments received by members (before the 5 October deadline) and is being refined with the input of the LVIC Working Group. A detailed update will be circulated to the LVIC BREF Working Group (more information: Lighea Speziale, Lorenzo Ceccherini and Lorenzo Marotti).

METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

MEED program: sponsors meeting kick starting the mixtures testing project testing phase

A MEED sponsors meeting was organised on 21 September to present the proposals from ARCHE and the Steering Team on the proposed selected test work for the metals mixtures project. The literature phase reported in June triggered the development of a robust assessment on how to best (smartly) design metals mixture testing with the aim of identifying how environmental relevant metal mixtures react. The sponsors followed an extensive presentation of the recommendations that conclude that it is a very robust approach and also provided some additional proposals like including relevant rare earths.

MEED's next step, in respect to the metals mixtures, is the development of a comparable plan on the metals-organics mixtures, which is even more of a challenge given the limited knowledge and experience on those mixtures. These new milestones should allow to define a Mixture Interaction Factor as an alternative to the MAF proposed by the Commission under the REACH review (more information: Hugo Waeterschoot, Violaine Verougstraete, Marnix Vangheluwe and Diana Dobre).

OUTREACH

OECD

OECD WPRM: a major step forward in the development of Willingness to Pay (WTP) evidence

The OECD Risk Management Working Party held its 2nd meeting recently in Paris back-to-back with a workshop on substitution in chemicals policy. Kai-Sebastian Melzer attended the workshop and commented/represented BIAC in a panel debate on incentivising substitution, preventing regrettable substitution and recommendations for sustainable substitution approaches, based on input material provided by Eurometaux.

Eurometaux attended the subsequent Working Party Risk Management (WPRM) meeting. The most important headline was the reporting by the OECD on their Willingness To Pay project. WTP plays an important role in socio-economic studies on chemicals restrictions and substitution in that they provide a monetary value on what society is prepared to pay to avoid a disease. The OECD, amongst others financially supported by ECHA, developed the most extensive investigation ever on WTP covering 10 toxicity endpoints (including serious kidney impact and IQ impact). Reporting of the first batch is still expected this year with the other 5 by the end of 2023. This WTP evidence will allow to much better assess the societal value of compensating for health impacts in a standard way. It would be most interesting to see/check how this compares to the values used in previous restriction impact assessments like on Pb uses (more info: Kai-Sebastian Melzer and Hugo Waeterschoot).

COMMUNICATION

European summit - Chemical Watch Conference, 26 September: a 2 year review...industry learnings & recommendations

Eurometaux represented by Hugo Waeterschoot presented a short review on the experience with the CSS development for the last 2 years. Key points were the potential high impact the CSS could have on the Mixture Assessment Factor (MAF) or the Generic Risk Assessment (GRA) and the need to align with the EU policy objectives on Climate and Circularity. This was demonstrated with examples like the Eurometaux impact assessment, the experience with the present Risk Management systems (Authorisation and Restriction) and the need to anticipate the MAF implementation (by MEED).

Finally, Eurometaux raised the Sustainable Metals Concept as an “inorganic” view on the Safe & Sustainable by Design (SSbD) concept the Commission has, as one of the key objectives of the CSS. The presentations were followed by a panel debate including Cristina De Avila from DG ENV who responded relatively positively to some of the comments and learnings presented by Eurometaux (more information: Hugo Waeterschoot).

Antimony Day: Eurometaux participation

Eurometaux (Guy Thiran, Lorenzo Marotti) participated in the Antimony Day 2022 (Brussels, 28-29 September) organised by the International Antimony Association (i2A). Guy chaired the event delivering an opening and closing speech, addressing the current regulatory landscape, the upcoming regulatory challenges as well as the future opportunities for the Antimony sector. Lorenzo Marotti presented Eurometaux’s Sustainable Metals Concept and took part in the panel discussion on sustainable and responsible Antimony Industry, following up on the regulatory issues introduced by Guy and providing the audience with ‘a winning formula’ to address these challenges with stakeholders (more information: Guy Thiran and Lorenzo Marotti).

European Battery Raw Materials Conference: *lithium on the menu*

Eurometaux, ILiA and Albemarle were invited to participate in a panel devoted to the lithium classification on 20 September (Barcelona). This was the opportunity to highlight the expected impacts but also to explain once again how the scientific evidence is interpreted by both regulators and industry, what it would mean to the Electric Vehicle (EV) battery industry in Europe if lithium and its components were to be classified as Category 1A of toxic substances and reply to the challenging question on how close Europe is to being priced out of the market? (more information: Roland Chavasse, Francesco Gattiglio and Violaine Verougstraete).

Metals Academy: *change in dates!*

As promised the Organising Committee is currently working on updating (slightly) the Basics programme and elaborating an Advanced one and more information will be circulated as soon as possible.

But contrary to what was announced in the previous edition, the Metals Academy 2023 **will take place from 25 to 28 April 2023**, therefore if you are interested in attending please save these dates.

If you have any further questions, or wish to be added to the list of “potentially interested” participants, please send an e-mail to Ailsa at lee@eurometaux.be (more information: Ailsa Lee and Violaine Verougstraete).

CALENDAR

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

For meetings at Eurometaux

Most of our meetings will now be held as hybrid meetings, and **our members will be informed ahead of the meetings** (links to join will be sent ahead of the meetings).

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

- 04 October: Industrial Emissions Alliance
- 05-06 October: Working Group Chemicals Meeting (hybrid)
- 10 October: ECHA workshop on implications of use of trivalent chromium in functional plating with decorative character [All Events - ECHA \(europa.eu\)](#)
- 14 October: Registration Taskforce
- 10-14 October: ECHA RAC-63 AfA WG
- 10-14 October: ECHA MSC-79
- 24-28 October: LVIC BREF Kick off Meeting
- 24-28 October: ECHA RAC-63 CLH WG
- 26 October: Li CLH Taskforce
- 26 October: Commission: Discussion on the Integrated Water Management
- 27 October: Strategic Coordination Group Meeting
- 3-4 November: ECHA RAC-63 REST WG
- 16-17 November: CARACAL Meeting (TBC)
- 22 November: MEED Workshop on Regional exposure Assessment (Sponsors only)
- 28 November – 02 December: ECHA RAC-63 Plenary & SEAC-57
- 05-09 December: ECHA SEAC-57
- 06 December: Chemicals Management Steering Committee
- 12-16 December: ECHA MSC-80
- 15-16 December: ECHA MB
- 20 December: Risk Management Taskforce

GENERAL INFORMATION & ACRONYMS

Follow the logo and check out our 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)
