



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in July:

- 14: ED sub-group brainstorming

And on the last page for your summer games..... 🌴

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Dear All,

You have most probably all experienced (more or less) directly the following moment: a child in a supermarket that suddenly bursts in tears, screaming its frustrations with the parent(s) around trying out a range of (risk management) measures that are more or less successful? It is probably life that ensures that such moments don't occur when the shop is empty (besides friendly persons ready to help) and there is no time pressure to get the groceries done.

One thing is clear though: fixing the mood of the child to go back to a 'functioning mode' (and hence not having to withstand the stares from the public), will hardly work if there is not at least some willingness, even very limited, of the child, to move on. It can be a small, inner move. Just the perception that there may be another scenario, a slight benefit to consider. But it is necessary.

While it is less acceptable that adults adopt such behaviours, there are those situations where you cannot prevent yourself to do analogies with the situation above. Maybe because the feelings you are experiencing as (more or less) direct audience are quite resemblant: a mix of surprise that this situation is actually taking place, embarrassment in front of the outburst of emotions, a search -that can become frantic- for a solution to either address it or escape from it.

But again, without a small, even tiny, movement of your interlocutor towards problem solving, it won't work. And then, indeed, the scenario of letting it go should be considered.

Among others, to not completely alter the overall story or messages behind the situation. Refusing to buy a x^{th} plastic toy for your kid or a bag of sugar-overloaded sweets may have very good grounds and clearly justifies sticking to the "no" for consistency reasons with the education you want to provide.

But with adults, you can hardly use that educational argument- you are not at the right place (the job should have been done). In addition, adults have many more tools at hand than tears and shrieks. Among other things, they will invoke principles and ethical values, modulate their tone, change arguments (including yours), and bizarrely (at least for a scientist) leave the depth of the problem floating on the surface to refer to the 'whole picture'. Personal interpretation becomes the benchmark. This is very efficient to create confusion and chaos and at that moment, there is really a high risk that the overall story will capsize, or that the initial intentions are transformed in an irreversible way.

I believe that, at that instant you realise that there is no single atom of alacrity to move on, then consider throwing in the towel (at least provisionally) can be a preserving way out. For yourself but also for the overall cause.

Doing that as elegantly as possible of course, so as to not close doors. Keeping 'bella figura' on your way out as one of our colleagues would say.

"Life is like a wheel. Sooner or later, it always comes round to where you started again" (Stephen King)

Violaine Verougstraete

COMMISSION

EU Chemicals & Sustainability Conference: *where is chemicals legislation going?*

Eurometaux attended a conference on 12 June that took stock of the direction that chemicals legislation is taking. Among its speakers were DG ENV's Chemicals Head of Unit Paul Speight and Elisa Roller, Director for Prosperity and Competitiveness in the Secretariat General of the European Commission. They explained that the European Commission is rethinking its Chemicals Strategy for Sustainability (CSS), integrating it into a broader competitiveness agenda, as outlined in the Draghi Report without sacrificing protection. While core principles remain, they are being adapted to current geoeconomic realities. A new Chemicals Action Plan is expected for July, focusing on energy, innovation, lead market creation, and international market access. Simplification efforts are also underway with an Omnibus package, though a full legislative revision isn't planned. The founding regulation for ECHA is a priority, aiming to ensure resources for new tasks and streamline inter-agency collaboration. The REACH revision is a major focus, consuming 30% of Elisa Roller's time, specifically addressing protection gaps, business concerns, and simplification. DG ENV's Paul Speight highlighted the need to balance environmental urgency with competitiveness. He sees solutions in enhanced enforcement, non-animal testing, reduced authorisations, and digitalisation. However, more challenging solutions like Generic Risk Approach (GRA) are being considered cautiously to avoid market fragmentation. Concerns exist within DG ENV regarding CARACAL's shifting dynamic, with a loss of consensus and open dialogue and increased politicisation (more information: Ainhoa González Pérez).

Commission Roadmap to move away from animal testing for chemical safety assessments: *third workshop in Helsinki*

The European Commission and ECHA organised a third and final workshop in Helsinki on 16 & 17 June to share and discuss the progress made in developing a roadmap to phase out animal testing for chemical safety assessments. The objective of the roadmap is to define both short- and long-term actions that will accelerate the development, validation, and regulatory uptake of New Approach Methodologies (NAMs), enabling robust safety assessments while reducing reliance on animal testing. The roadmap, expected to be published early 2026 as a Commission Communication (policy document), is intended to guide implementation across 15 European legislative areas. While these legislative frameworks will continue to function independently, the roadmap will provide overarching strategic direction for integrating NAMs in a coherent and harmonised manner. The roadmap was presented in the form of a 'recommendation' paper, seeking to structure the transition away from animal testing whilst allowing for flexibility in the selection of methods and timelines, depending on each specific legal framework. Eurometaux only attended the first day, but full details of the presentations given during the workshop—as well as the report from the previous event—are available on the [ECHA event webpage](#) (more information: Federica Iaccino).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-73: *full plenary week*

During its plenary meeting (2-6 June), RAC discussed its fourth draft opinion on the scientific evaluation of an occupational exposure limit value (OEL) for Bisphenol A (and screening of other bisphenols). Interesting parts included the discussion on the wording for a qualitative statement for developmental toxicity effects to protect the unborn and breast-fed child after BPA exposure in utero and early in life as some participants and stakeholders raised the possibility of unintentional discrimination as it may prevent women having access to work. The RAC agreed on the proposed statement "*Exposure of pregnant and breastfeeding women to BPA should be avoided in the workplace, as the recommended OEL of 24 µg/m³ may not be protective for the offspring*", stressing that the impacts associated with this statement will be analysed at a later stage of the OEL process. The discussion also revealed the different views on whether the ED effect is

thresholded or not. For three other bisphenols (BPS, BPF, BPAF), RAC noted the differences and similarities in toxicokinetics with BPA and agreed that the analysed evidence indicates a comparable mode of action to the one of BPA for the reproductive endpoint. However, effects occurred sometimes at different levels and hence RAC agreed that the recommended BPA OEL for fertility may not be considered conservative enough for these bisphenols. RAC noted that in case of co-exposure to other bisphenols, the possible combined effects should be taken into account. In this context, it should be noted that ECHA has been tasked by the European Commission to prepare an interim report, including the definition of the tools and methodologies to underlie a scientific assessment of the effects of exposure to a combination of substances at the workplace. Their assessment will focus on chemicals that have similar health effects and act on the same target organ and the call for evidence will last until 29 September.

RAC also adopted its opinion on the scientific evaluation of limit values for ethylene dibromide (EDB) under the OEL process, with discussion on the assessment factors to be applied regarding the quality of the database.

On harmonised classification, RAC agreed on -among others- the phys-chem entries for H₂O₂ and the repro effect for the strontium compounds. The latter had been discussed in the RAC CLH Working Group meeting end of April during which read-across and classification as Repr. 1B; H360D proposed by the Dossier Submitter and the Rapporteur were supported (based on clear and consistent evidence, with a plausible and human-relevant mode of action for the main effect, increase of skeletal abnormalities). What remained to be discussed on the strontium compounds was the need for specific concentration limits. RAC agreed that those are not needed as strontium compounds were considered as mid potency. Differences in solubility between the compounds, as stressed by industry, were not considered. The Rapporteur also proposed to add a note 12 to the future Annex VI entry to consider the presence of several compounds and hence additivity: “The classification of mixtures as reproductive toxicant is necessary *if the sum of the concentrations of individual substances* covered by this entry in the mixture as placed on the market is equal to, or above, the applicable generic concentration limit for the assigned category”. Industry argued that a note 1-as for the other heavy metals (!) would be more appropriate. The RAC secretariat will further assess whether it should be 1 or 12 but additivity will be considered.

RAC also had an intense restriction agenda with the assessment of the conformity of the Annex XV prepared by ECHA for the restriction of chromates compounds. The discussion was not easy even if the submitted dossier was considered conform as several comments were made on the interface/overlap with Occupational Safety Health (OSH), the fact that substitution seems no more in scope and that the justification appears to be the fact that the Application for Authorisation (AfA) system does not work efficiently enough. The learnings were shared with the Risk Management Taskforce on 17 June. RAC also discussed the Universal PFAS (U-PFAS) restriction, focusing on the uses of PFAS in the following sectors: medical devices, lubricants, electronics and semiconductors. Regarding the latter, this was only an introductory discussion and Eurometaux had an accompanying expert. The discussion will be picked up again in September. Here as well, the key learnings were shared with the Risk Management Taskforce.

Among the AOB, Commission made a presentation on the interface REACH/Waste (legal elements), a difficult point in the context of the PFAS restriction. Commission recalled that REACH restrictions are adopted to address an unacceptable risk arising from their manufacture, use or placing on the market of substances. This includes risk at the waste stage lifecycle resulting from such manufacture, placing on the market or use. Conditions related to that stage should be able to limit the risk in an effective manner and ensure effective enforcement and be based on the “analysis of the risk at waste stage lifecycle stage *resulting* from the manufacturing/placing on the market/use”. In other words: conditions regarding the waste lifecycle stage as proposed by RAC for the PFAS are lawful but the link to the manufacturing/placing on the market/use needs to be clear. It should be clear that a risk arises -and why- at the waste lifecycle stage but RAC cannot enter in the conditions the Waste legislation imposes (e.g., hazardous waste etc.).

RAC ended its week by enjoying a joint session with the RAC Drinking Water Directive Group (more information: Violaine Verougstraete)

MSC-90 meeting : 10-12 June 2025

The Member States Committee met in Helsinki and also had a busy agenda discussing typical aspects related to dossier and substance evaluation, identification of Substances of Very High Concern (SVHCs) and ECHA's recommendations of priority substances to be included in Annex XIV. An interesting discussion took place in follow-up of a Board of Appeal case on how to assess compliance of a study provided in the

REACH dossier, especially when the Technical Guidance (TG) used at the time of the compliance has been amended and a new version is available. The discussion focused on what could be ‘fundamental changes’ in test guidelines and the possible options that can be followed by ECHA in such a case. In theory three options could be followed: i) ECHA could require -under compliance check- a new study according to the latest version of the TG, ii) require the study under substance evaluation if there was a concern or iii) Commission updates the REACH standard information requirement for the endpoint in question. Aspects of proportionality and equal treatment were raised and will be considered case-by-case. There was also a discussion -but in closed session- on the consequences of differences in reported uses in the registrations of the same substance at different tonnage levels for the standard information requirements for triggering the F2 generation (i.e., extension of Cohort 1B) in the Extended One-Generation Reproductive Toxicity Studies (EOGRTS) and for relying on exposure-based adaptation under Annex XI, Section 3. The MSC secretariat explained that the compliance of the registration dossier of each registrant must be evaluated individually based on the data provided by, and in relation to the standard information requirements applicable for that registration. A status update was also provided on the EOGRTS test guideline update following the review of the available studies between 2021 and 2023. The update of the Test Guideline should be finalised by 2026-2027. Also the (target) number of compliance checks (CCH)/year was discussed with some stakeholders asking for more resources to be put on dossier evaluation as the number of CCHs seems to have decreased since three years. Commission clarified that ECHA reached the objectives of the Joint Action Plan and appropriately handled its resources but that statistics/number may not reflect this well. On testing proposals ECHA presented some plans aiming at streamlining and improving the process, based among others, on the findings from an internal audit of the TPE process. Actions for the coming months include considering how to improve the process and what could be implemented within the framework of the current REACH legal text; how to improve communication to the registrants and the stakeholders on the status of the testing proposal and analysing the reasons for the backlog as well as identifying resources needs.

MSC also agreed on the addition of newly identified SVHCs to the Candidate List and discussed ECHA’s updates to its draft recommendation for Annex XIV based on the revised prioritisation criteria scheme and how the comments and registration updates had impacted the priority scores, transitional arrangements and exemptions. The most interesting discussions were on melamine and the key learnings were summarised in the Risk Management Taskforce 17 June slides. The draft 12th list recommendation was supported by MSC. A representative of the Board of Appeal provided an update to MSC on decisions taken of relevance to MSC and the MSC secretariat gave an overview of pending appeal and court cases and recent judgements on Evaluation and SVHC identification in open and closed sessions. The key learnings will be presented to the Registration Compliance Taskforce during its next meeting.

Finally Commission made a presentation on the REACH Revision, focusing on the elements of relevance to MSC. Several questions were posed in follow-up regarding e.g., Annex XIV, the scope of the testing proposal procedure, follow-up to compliance check and testing proposal procedures, ad-hoc completeness check and possibility for ECHA to request adaptations to the standard information requirements rather than tests. Commission took note of the comments raised (more information: Violaine Verougstraete).

SEAC-67: *chromates authorisation and restriction*

The flow of Authorisation for Application (AfA) cases for chromates continues and is expected to continue until mid-2026. Further cases were discussed, all from small metal plating companies. The backlog of cases is clearing slowly. Challenges in obtaining the level of granularity and quality of the information provided by applicants were again very evident. There were some useful learnings for Eurometaux, for example that the functional requirements for each use applied for by an applicant must be well-described and also well justified. If not, authorisation for a use may be refused even though other uses for the same applicant are allowed.

There was a first discussion on the proposed restriction of certain chromium VI substances and the conformity check of the Annex XV dossier. This started with a summary of the outcome from the RAC discussion the week before. A presentation by the dossier submitter followed, with questions for clarification only. The SEAC rapporteurs then gave their view of the proposal – which passes the conformity check. Generally, the dossier is well-written and concise, and contains a highly technical and elaborate impact assessment. A series of recommendations were presented, coming directly from the conformity check. For example – more clarity on how the different restriction options were determined; how could a

removal of the authorisation obligation for chromates impact the number of companies using Cr^{VI}; what benefits are there related to endpoints other than carcinogenicity. These “key issues” will be fed back to the dossier submitter to improve the dossier further. The session closed with a short exchange of views from SEAC members – no particularly contentious issues were identified with the proposal (more information: Simon Cook).

SEAC-67: U-PFAS restriction, further sectoral reviews were started

The universal PFAS restriction (a generic ban introduced 18 months after the Entry into Force unless derogated for a temporary period of 5 or 12 years) in SEAC discussed two new sectors, lubricants and medical devices, and had a second discussion on transport (introduced in the March meeting). For lubricants, SEAC identified much overlap with other sectors in the proposed restriction. SEAC identified no technically and economically feasible alternatives for industrial / professional uses of lubricants containing PFAS due to “harsh conditions” of use (e.g., high temperature, high pressure, both together).

A definition of “harsh conditions” was considered not possible due to the diversity of situations covered – but “harsh conditions” was taken by SEAC as a proxy for PFAS use in industrial / professional lubricants. This approach was not well-received by some stakeholders as it prevents granularity for the uses under discussion, but no other way forward was suggested. Costs and benefits for lubricants are not yet covered by SEAC and will be presented later in the year. For medical devices, again there was much overlap with other sectors of use. The SEAC Rapporteurs considered that the requirements of the Medical Devices Regulation were not properly taking into account by the dossier submitted (cf. F-Gas Regulation from the March meeting). Data gaps mean that SEAC cannot conclude on the proportionality of the restriction options. With respect to the transport sector, again there is overlap. More significantly however, there is a significant lack of data which means that SEAC cannot conclude on feasibility of alternatives, on costs, or on proportionality of the restriction options proposed.

The expected discussion on the energy sector (including batteries and fuel cells) did not happen and is now expected for September, together with a conclusion on lubricants, and first discussion on electronics and semiconductors, PFAS manufacturing, and a group of “horizontal issues” such as practicality and enforceability (more information: Simon Cook).

RAC-73: Drinking Water Working Group

A hybrid meeting of the RAC DWD Working Group took place on 5-6 June 2025. Discussions covered the RAC Assessment methodology and new RAC DWD opinion templates for various material types, including organic cementitious, enamels, inorganic, and metallic materials. A significant point of discussion involved the requirements for laboratory accreditation and compliance for migration testing. Participants questioned whether only accredited labs would be accepted, noting that while ISO 17025 compliance is crucial, labs may not be accredited for all specific migration test methods, particularly for metallic materials where few accredited labs exist. The ECHA invited feedback on what information would be needed to ensure reliability from non-accredited labs.

Another critical discussion focused on the implications of missing MTCTap values for ceramics and enamels. Eurometaux raised concerns that some starting substances on the current EU Positive List (EUPL) lack relevant MTCTap (Maximum Tolerable Concentration at the tap) values in Annex V, questioning if these substances could be used until an MTCTap is derived or until the expiry date of these starting substances is reached. ECHA asks for the industry to submit an application for such starting substances as soon as possible in order for ECHA/RAC to derive an MTCTap value, which would require migration and toxicity data. It was clarified that a pragmatic value of 0.1 MTCTap, though not legally based, could be applied in the meantime for missing MTCTap values, but only for enamels and ceramics, for product certification. The meeting also addressed aspects of toxicity assessment, risk acceptance, and future meeting plans (more information: Lara Van de Merckt).

ECHA OTHERS

ECHA- Industry: meeting held in Helsinki

On 17-18 June, ECHA hosted industry in a two day hybrid meetings with industry associations (Eurometaux, Cefic, Concawe) and their members. Discussions focused on IUCLID 6.9, Chesar, REACH-IT, and the ECHA CHEM dissemination website. Industry participants highlighted practical issues and proposed

improvements. Key outcomes included the creation of dedicated “focus teams” to address ECHA CHEM’s search functions, display logic for classification and labelling (C&L), and the handling of specific information on species and nanomaterials. A list of actionable follow-ups will be shared with the Registration Compliance Taskforce to plan further exchanges with ECHA.

On the second day, the agenda focused on OECD’s ongoing activities on the development of harmonised test guidelines, good laboratory practice standards, prediction tools (QSAR Toolbox), and the OHTs (OECD harmonised templates) and Grouping Guidance, REACH Revision reporting from Commission, future of the Assessment of Regulatory Needs (ARNs) activities and industry reporting on the updated Guidance for compliance with EU REACH Art. 22(1) prepared by Cefic and Eurometaux.

A full report of the meeting prepared by industry and validated by ECHA will be available after summer (more information: Federica Iaccino).

EUROMETAUX CHEMICALS MANAGEMENT

CHEMICALS STRATEGY FOR SUSTAINABILITY

CARACAL Taskforce: *online meeting*

The CARACAL Taskforce met on 30 June to prepare for the 3-4 July CARACAL. With a light agenda, key topics in the last CARACAL before the summer include for CLP bioelution for metals, the 24th Adaptation to Technical Progress (ATP) (including Lithium salts), the workshop on Poorly Soluble Low Toxicity particles and the Chemicals omnibus simplification. REACH topics include the pending ECHA founding regulation, a short update on the status of the REACH revision, and the update of the Restrictions Roadmap. Eurometaux, together with the Taskforce members, has prepared interventions for most of those key topics. A summary report of the meeting will be circulated shortly after the meeting (more information: Ainhoa González Pérez).

CLASSIFICATION

Lithium classification: *taskforce meeting before the summer*

This last meeting before the summer gave the opportunity to provide an update on the status of classification: there will be a short point during the CARACAL/CLP session on 3 July and Commission is preparing the draft act which will be circulated for Interservice Consultation and WTO consultation. Further interactions with Commission are foreseen in the coming weeks and the Taskforce members will be kept updated of the outcomes.

In the context of the definition of an Occupational Exposure Limit (OEL) for the Li compounds, ECHA has launched a call for evidence with the intention to collect any new & existing scientific data on e.g. uses, exposure, effects. Eurometaux will contact the ECHA OEL team to ask for a call over summer to exchange on the inputs to submit and hold beforehand a preparatory meeting with interested members.

ILiA gave a status update on the Li-related projects: i) the EQS-SSD (Environmental Quality Standards-Species-Sensitive Distribution) project, with the outcome of the call held mid-June and ii) the status of the industry Risk Management Option analysis (I-RMOa), where we are currently waiting for the final report. And finally, the participants were informed that the French RMOa was presented at RIME+ in May and France is in the process of finalising it.

The draft minutes of this meeting were sent to the Taskforce on the 3rd of July (more information: Francesco Gattiglio, Roland Chavasse, Ailsa Lee and Violaine Verougstraete).

ENVIRONMENT

Environment Taskforce meeting: *2 key topics*

This online meeting held on 18 June covered two topics. Dagobert Heijerick (Arche Consulting) started by explaining that he is currently working on the updating of the MeClas classification factsheets, using the 2019 documents as starting point. The aim is to have two documents: the MERAG alloys fact sheet that will be posted on the ARCHE/EM/ICMM websites and a more practical guidance that will include a Q&A

section to be kept as a living-document. The first questions for this guidance were discussed during the meeting. With the participants' feedback the work on the practical guidance should be completed over the summer (before the entry into force of the Pb classification on 1st September). In the meantime, Eurometaux will circulate a "one-pager" that will provide some practical replies regarding the Pb classification, based also on useful notes prepared by ILA, WVM, EA, Assomet and others.

The 2nd topic, presented by Lara, was about the yearly update of ECHA's "[Key Areas of Regulatory Challenge](#)" report. The 5 key areas were highlighted and include in nearly all points the mention of NAMs. This report is something to bear in mind and to continue to explore as it will probably feed into numerous discussions in the months ahead. The draft minutes of the meeting will be circulated asap (more information: Lara Van de Merckt and Dago Heijerick).

RISK MANAGEMENT

Risk Management: pre-summer taskforce meeting

The Taskforce members gathered for a meeting on the 17th June. On the agenda was an update on the REACH Revision, given by Ainhoa. She reminded participants that the April CARACAL meeting was considered the last step in its drafting process, and the overarching objective of this revision remains simplification, with several elements of the regulation needing to be modernised, which will in turn bring in new requirements. The group mainly discussed the proposals on risk management, which include improving and formalising the Risk Management Option Analysis (RMOA), but also changes on Authorisation & Restriction. Political advocacy is ongoing and meetings have been scheduled with the Commission to emphasise the metals specificities but also solutions to existing difficulties in risk management. It was agreed to reflect/act on a communication strategy, and consider including practical examples and solutions; ensure that all actors are at the table; and also focus on the political & not only technical level in our advocacy strategy.

Next came the updates on U-PFAS: the main learnings from the RAC and SEAC debates were presented as well as a short status update on ECaBaM. It should be noted that the reports of all 3 workshops are now posted on the [REACH Metals Gateway](#). A 4th workshop is foreseen early 2026.

The group was provided with a first analysis of the restriction proposal for chromates and of the concerns expressed along the RAC/SEAC meetings. A six-month Public Consultation was launched on 18 June 2025 and the first draft opinion will be discussed in September. It was agreed to closely monitor the situation. Some learnings were also shared regarding the chromates Application for Authorisation (AfAs) discussed in SEAC and the SVHC/prioritisation items in MSC.

Finally a project aiming at updating the I-RMOA guidance was discussed, and a very short update was provided regarding the Commission Substitution Project. The draft minutes were circulated to the RM Taskforce members on 4 July (more information: France Capon, Klaus Kamps, Violaine Verougstraete).

INDUSTRIAL EMISSIONS

Industrial Emissions Taskforce

On Monday, 16th of June 2025, the meeting of the Industrial Emission Taskforce was held online. Around 25 members attended the meeting.

The topics discussed during the meeting were:

- IED Article 13 Forum Meeting
- Review of the BREF Guidance
- Compliance methodology under Article 15a of the revised IED
- Status Update of the ongoing BREFs
- Internal NFM BAT survey
- Developments of OECD BAT project.

Next step: The date of the next meeting will be decided through a Doodle poll circulated via email to the Taskforce after the summer break (more information: Sebastiano Fornasari and Andrea Pellini).

Compliance methodology under Article 15a of the revised IED

A workshop on the draft compliance assessment methodology developed under Article 15a of the revised IED was held virtually on 12 June. Article 15a requires the Commission to adopt an implementing act

establishing harmonised rules for assessing compliance with emission limit values (ELVs) set in permits, including how measurement uncertainty is taken into account. The draft methodology prepared by the consultants covers continuous and periodic monitoring of air emissions and emissions to water, with correction factors linked to the uncertainty of validated measurement methods. For continuous air emissions, the approach builds on Quality Assurance Levels (QALs) defined in EN 14181, the European standard for ensuring the performance of automated measuring systems (AMS) in industrial installations. For emissions to water, the methodology focuses on the Limits of Detection and Quantification (LOD/LOQ) and laboratory validation practices. Stakeholders raised concerns over the lack of harmonisation in uncertainty calculations, diverging interpretations of how to treat values below LOQ, and the proposed use of net concentration adjustments. Further input was invited, particularly on the frequency of exceedances and the application of correction values.

Next step: The final implementing act must be ready by September 2026 (more information: Sebastiano Fornasari).

IED Article 13 Forum Meeting

The meeting of the IED Article 13 Forum was held virtually on 10 June in Brussels and welcomed participants from the Commission, JRC, Member States, and representatives of Industry, including Eurometaux.

The topics discussed were:

- INCITE workshop, held from 13th to 15th of May on the Iron and Steel sector
- The review strategy for the chemical BREFs (four options to be discussed)
- The review of BREF guidance (timeline and overview of the 1139 comments received)
- BREF drafting and review progress: status updates on current BREFs under revision
- Work Programme 2025–2027: discussion of the upcoming priorities and planning for the exchange of information under the IED framework

(more information: Sebastiano Fornasari).

Review of the BREF Guidance

The review of the BREF guidance is currently in the phase of analysing the comments received during the consultation phase.

During the IED Article 13 forum meeting, on 10 June 2025, the European Commission provided an overview of the consultation process, summarising the 1139 comments submitted by 33 Forum members. The most frequently raised issues concern the need for:

- Greater clarity and accuracy in the phases of data collection and data analysis
- A more precise definition of Key Environmental Issues (KEIs)
- Simplification of questionnaires and assessment procedures to streamline the BREF review process.

Ahead of the meeting, a joint statement was published by Germany, Belgium, France, and Italy. This statement included comments on key sections of the BREF guidance, such as the definition of KEIs, the use of BAT-AEPLs and benchmarks, and the need to reduce the complexity of data assessment and the questionnaire.

These comments were consistent with the position expressed by Eurometaux in its submitted remarks.

Next step: The final draft is expected to be published in Q4 of 2025 (more information: Sebastiano Fornasari).

Latest OECD - BAT project meeting was held on the 2nd of June 2025.

The objective of the project is to promote Best Available Techniques (BATs) use in environmental permits and support Sustainable Development Goals.

The OECD Secretariat have presented the activities carried out since the 9th meeting of the Expert Group:

- Comparative analysis of BREFs in thermal power, cement, textile sectors (Activity 6) and in iron-steel, pulp-paper, waste incineration sectors (Activity 7)
- Activity 8: Workshops in Vietnam and India to apply BAT conclusions.
- Activity 9: Study of emerging techniques as potential BAT conclusions.

The OECD Secretariat have also presented the draft scopes of the new activities:

- Activity 10: on hydrogen production
- Activity 11: on recovery of Secondary Raw Materials (SRMs)

- Activity 12: on Capacity building for BAT-based systems and knowledge exchange.
- Next step: The next meeting is scheduled on 9 July 2025 for Activity 11 (SRMs). Focus will be on metal waste and wood waste (more information: Sebastiano Fornasari).

Mining BREF

The first draft version of the questionnaire was released on the 16th of April 2025 with a commenting period of one month. The MIN BREF Team is analysing the information received which will be assessed and considered in the second version of the questionnaire (Q2). The delivery of Q2 has been postponed until after the summer.

In the first questionnaire draft, leaching processes are generally included but there is no definition.

The Eurometaux Secretariat is working on a statement regarding leaching processes to clarify which leaching processes belong to NFM BREF and ensure that they are addressed in the future NFM revision and not in the MIN BREF, to make sure there are no overlaps between the two BREFs on this topic.

Inputs provided by the sub-group on the site-remediation step and of the sub-group on chemicals have been considered in the development of the remaining worksheets for the questionnaire, more specifically “worksheet 6. Process chemicals” and 14 on remediation/post-mining steps. Although the mandates of the sub-groups were not fully complete, their work have been paused to request feedback from the whole technical working group.

EU BRITE postponed the questionnaire workshop scheduled for 17 June until the release of the second draft questionnaire (Q2), to better support the progress of the MIN BREF. A tentative date will be proposed to the technical working group in due course (more information: Andrea Pellini).

Landfill BREF

In May, EU BRITE launched a dedicated frontloading phase, led by ECHA, to prepare for discussions on chemicals used in landfill operations, such as leachate and wastewater treatment, gas treatment, odour control, and stabilisation. The main purpose is to provide a complete list of chemicals used in landfill operations.

A Table to review ECHA’s preliminary contribution -listing the potentially relevant substances- has been circulated by EU-BRITE, and includes a worksheet for the chemicals used and another for the chemicals emitted. EU BRITE also asked to share views on the proposed approach to identify substances present in the waste that is landfilled.

Action point: The deadline of the chemicals frontloading phase for providing comments has been extended to the 29th of August (more information: Sebastiano Fornasari).

WATER

Updates:

- Water Resilience Strategy:

The European [Water Resilience Strategy](#), released on 4 June 2025, addresses the critical need for water security in the EU in a time of climate change impacts and pollution, positioning water resilience as a matter of security, crisis preparedness, and a significant economic opportunity. This Strategy outlines a pathway to make Europe water resilient by restoring and protecting the water cycle, building a water-smart economy that supports EU competitiveness and attracts investors, and securing clean and affordable water for all. It identifies five key areas of EU action—governance, finance, digitalisation, research and innovation, and security—to support Member States in achieving these objectives. The strategy, as announced, does not have any legislative proposal or set legally binding targets regarding water abstractions/consumptions.

The Strategy presents water resilience as a significant business opportunity for EU industry, aiming for at least a 10% enhancement in water efficiency by 2030. It emphasises the "water efficiency first" principle, urging intensive water users to reduce demand and prioritise reuse. The revised Industrial Emissions Directive will prompt large industrial actors to increase water efficiency and reuse, with a pilot project planned for industrial clusters. The Commission will also assess water usage in strategic sectors like data centres, proposing minimum performance standards. Investment in innovation for dry cooling and sustainable desalination is encouraged. Furthermore, the Strategy plans a "Water Smart Industrial Alliance"

and a new Knowledge and Innovation Community (KIC) to boost competitiveness and skills in the water sector.

- **Water Framework Directive revision:**

The last trilogue to discuss the review of the Water Framework Directive (WFD) under the Polish Presidency took place on 17 June. The negotiations are coming to a close, and it seems that an agreement will be reached by the next trilogue under the Danish Presidency on 15 July.

Of concern to us, it seems that the prioritisation process and setting of environmental quality standards (EQS) for priority substances will remain under the ordinary legislative procedure (OLP) and not under delegated acts, as was proposed by the EU Commission. In addition, the EU Parliament has succeeded in proposing an amendment for the Commission to investigate, shortly after this revision is adopted, the possibility of introducing an Extended Producer Responsibility (EPR) mechanism (like that introduced in the recent revision of the Wastewater Treatment Directive) for the WFD. An agreement on the non-deterioration principle and its exemptions under Article 4.7 is yet to be reached, but it seems that the Council of the EU is yielding to the EU Parliament, further narrowing the scope of activities that can be exempted, especially with regard to timeframes, and introducing additional safeguarding criteria for exemptions to be granted (more information: Lara Van de Merckt).

SOIL

Update:

- **EU Commission Soil Expert group meeting (24/06/2025)**

The last EC SOIL EG meeting primarily focused on the provisional agreement of the Soil Monitoring Law (SML), which was reached on 10 April 2025, and is pending formal adoption by the Council and European Parliament. Key objectives of the SML include establishing a robust soil monitoring framework, addressing degradation and contamination, and promoting soil health, with introduced flexibility for Member States in monitoring and governance. Significant changes since the EU Commission published the proposal include a shift in Article 10 to focus on "soil resilience" and a narrowed scope for "land take mitigation" in Article 11.

The meeting also covered the development of an indicative list of soil contaminants which is to be developed for diffuse pollution assessment under the SML and the EU Zero Pollution Monitoring Outlook. The process of setting this new list began in spring 2025 and is scheduled for a first draft by April 2026, involving various stakeholders and based on criteria like ecotoxicological risk and exposure data.

- **Final steps of adopting the Soil Monitoring Law:**

As mentioned above, the final agreement on the Soil Monitoring Law proposal was found during the trilogue on the 10th of April 2025, it was then voted in COREPER I by the Member States and in the ENVI Committee of the EU Parliament (with a not so decisive vote: 53 in favour, 27 against and 2 abstentions). The SML still needs to be confirmed with a vote in EP plenary (in October 2025), but rumour has it that the new Soil Monitoring Law will not be passed... to be continued! (more information: Lara Van de Merckt and Koen Oorts).

METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

MEED: sponsors meet in Antwerp to present current pre-feasibility study results

On 24 June 2025, the MEED sponsors met for a dedicated workshop hosted by the University of Antwerp. The meeting provided a status update on the pre-feasibility tests carried out in preparation of a possible full-scale mesocosm study. Participants reviewed metal behaviour data, examined the experimental protocols, and held initial discussions on possible next steps. The meeting helped to clarify key considerations and expectations for the way forward. The session concluded with a site visit led by Prof. Ronny Blust, offering sponsors first-hand insight into the experimental set-up.

The full results of the mesocosm pre-feasibility study will be presented between September and December 2025. At that stage, sponsors will have the opportunity to take a formal decision on whether to move forward with the full-scale mesocosm study.

Before that, the MEED sponsors will be provided with the minutes of the 24 June meeting and an updated financial overview (more information: Marnix Vangheluwe, Koen Oorts, Diana Dobre and Violaine Verougstraete).

KAMILA'S SUSTAINABLE CORNER

Batteries & due diligence obligations: “Stop the clock” proposal by the European Commission

In May, the European Commission published the 4th Omnibus Package for Simplification that has postponed the compliance with the Batteries Regulation, Chapter VII on due diligence of 2 years, until 18 August 2027. This “stop the clock” proposal is of key importance for the industry as there are still no due diligence guidelines approved by the Commission and the verification bodies in Member States are not appointed yet. The guidelines are expected to be published in 2026, one year before the due diligence obligations take effect.

In addition to the above, the 1st public report will be required one year after 18 August 2027 and the following reports will have to be issued every 3 years. It is also important to highlight that due diligence requirements will have to be fulfilled by the economic operators with €150 million annual turnover. This provision elevates the threshold of €40 million as currently written in Batteries Regulation.

Procedure-wise, the 4th Omnibus proposal requires agreement from the Council and the European Parliament. While the Council has already expressed its support, the Parliament still awaits its votes in July. For that purpose, Eurometaux, EUROBAT and RECHARGE will put forward a common statement in support of the new provisions (more information: Kamila Slupek).

COMMUNICATION

Chemicals Management Team: a sad departure and a welcome new addition

To start on a positive note, we are very pleased to announce that Sophia Verbrugghe joined the Chemicals Management Team on the 23rd June. For the last 5 years, Sophia has worked at Umicore in the R&B department. She is qualified as a chemist, and is much looking forward to taking on new challenges, more of a regulatory nature to take over from our beloved colleague Ainhoa who will be leaving Eurometaux to explore new horizons from the 4th July. We thank Ainhoa for her dedication, high intelligence, fast-working mind and lovely personality, who made working with her a pleasure. We will miss her, but wish her all the best in her new ventures.

OTHERS

OECD

CBC: meeting in Paris

The OECD Chemicals and Biotechnology Committee (CBC) met on 11 and 12 June 2025 in Paris. The main discussion points were the following: the status of the EHS programme, the activities related to the transition towards New Approach Methodologies (NAMs), the regulatory and non-regulatory risk management approaches, the CBC outreach and capacity building strategies, the high-level ministerial meeting between EPOC and CBC and the future program of the CBC.

The meeting started by financial concerns raised by the secretariat, such as the decrease of voluntary contribution of the member countries, as the additional costs related to publication and communication of CBC documents have a serious impact on the function of the CBC secretariat. So far, the Secretariat was able to implement the agreed workplan despite some cuts and savings but if the situation does not improve,

there will be some cuts in the staff. All parties are invited to consider how they can financially support the CBC's effort.

Despite the situation some important documents will be available soon like the Draft Report to the Council on the implementation of the Recommendation on the Safety Testing and Assessment of Manufactured Nanomaterials which should be available Q3 2025.

The secretariat presented the activities related to OMICS (Any of several areas of biological study defined by the investigation of the entire complement of a specific type of biomolecule) and related challenges. Since June of 2021, a number of projects have been launched at the OECD to develop reporting templates, standards and guidance for the use of different types of omics technologies in a regulatory context. This will be a critical aspect of the NAMs development. The metals industry has not been deeply involved so far but it is recommended to follow this work to avoid a "one-size fit for all" approach. The work is also progressing in the context of the new endpoints under the GHS (ED and persistent and mobile) in collaboration with the UN GHS sub-group. The main outcome of the work for now is the conclusion that there are gaps in GHS to properly address these new endpoints. Next steps should be discussed in the coming weeks.

Lastly, in the context of the Risk Management Working party, a lot of work has been conducted on PFAS but also on hydrogen risks and more generally risks related to new energy sources. The focus is currently on safety at the workplace gathering incidents and the related learnings.

The next Risk Management working party will be organised in September 2025 and will also discuss RMOs approaches.

The next CBC meeting will be organised from 2 to 6 February 2026 and will focus on the 2027-2028 workplan (more information: France Capon (EPMF)).

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).**

CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for 2025.

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](#)

- 01-02/07: RAC-74 CLH WG
 - 03-04/07: CARACAL-55
 - 14/07: ED sub-group brainstorming
 - 01-02/09: RAC-74 REST WG (Provisional)
 - 03-04/09: RAC-74 DWD WG
 - 11/09: Water Taskforce
 - 11-12/09: NeRSAP
 - 08-12/09: RAC-74 Plenary
 - 08-12/09: SEAC-68 (I)
 - 15-19/09: SEAC-68 (II)
 - 23/09 (am): Risk Management Taskforce
 - 23/09 (pm): Chemicals Management Steering Committee
 - 25-26/09: ECHA MB-79
 - 02/10: Drinking Water Workshop
 - 06-10/10: MSC-91 (Tentative)
 - 07-09/10: RAC-75 AfA WG
 - 27-29/10: RAC-75 CLH WG
 - 29/09-01/10: Chemicals Management Autumn Week
 - 05-06/11: CARACAL-56
 - 11-12/11: RAC-75 DWD WG
 - 17-18/11: RAC-75 REST WG
 - 01-05/12: RAC-75 Plenary
 - 01-05/12: SEAC-69 (I)
 - 08-12/12: SEAC-69 (II)
 - 08-12/12: MSC-92 (Tentative)
 - 11-12/12: ECHA MB-80
 - 16/12: Chemicals Management Steering Committee
 - 17/12: Risk Management Taskforce
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I: Metals Summer Quiz (*answers at the end of the Newsletter*)

1/ Which metal has the highest melting point?

- a) Tantalum
- b) Tungsten
- c) Molybdenum

2/ Which metal is most abundant on earth's crust?

- a) Iron
- b) Aluminium
- c) Titanium

3/ How many tonnes of gold are lost each year in Europe, by not properly recycling all electronic waste?

- a) 4 tonnes
- b) 5 tonnes
- c) 2 tonnes

4/ Which metal has been labelled as a “Life Saving Commodity” by the UN?

- a) Selenium
- b) Copper
- c) Zinc

5/ Which metal has the highest electrical and thermal conductivity?

- a) Copper
- b) Silver
- c) Aluminium

6/ Out of the modern periodic table's 118 elements, how many are metals?

- a) 91
- b) 97
- c) 85

7/ What was one of the first metals used/forged by humans?

- a) Lead
- b) Tin
- c) Copper

8/ Which metal is the lightest, whilst being the strongest?

- a) Lithium
- b) Titanium
- c) Beryllium

II: Chemicals Management in literature, in the following extracts of Alice in Wonderland, take a couple of fluo pens to highlight:

- **in green: relevant to REACH revision**
- **in pink: relevant to Omnibus Chemicals**
- **in orange: relevant to Water**

Extract 1:

"Come, there's no use in crying like that!" said industry to itself, rather sharply; "I advise you to stop that this minute!" Industry generally gave itself very good advice, (though it very seldom followed it), and sometimes it scolded itself so severely as to bring tears into its eyes; and once it remembered even trying to box its own ears for having cheated on itself in an advocacy game it was playing against itself, for this curious sector was very fond of pretending to represent at least several views. "But it's no use now," thought poor industry, "to pretend to represent all views! Why, there's hardly enough of me left to get one respected view!" Soon industry's eye fell on a little glass box that was lying under the table: industry opened it, and found in it a very small leaked Commission document, on which the words "BELIEVE ME" were beautifully marked in currants. "Well, I'll believe it," said industry, "and if it makes me more competitive, I can keep the EU market; and if it makes me grow smaller, I will creep under the door to delocalise..."

Extract 2:

"What do you know about this business?" UVdL said to industry.
"Nothing," said industry.
"Nothing whatsoever?" persisted UVdL
"Nothing whatsoever," said the industry.
"That's very important," UVdL said, turning to the jury. They were just beginning to write this down on their slates, when Roswall Rabbit interrupted: "Unimportant, your Majesty means, of course," she said in a very respectful tone, but frowning and making faces at her as she spoke.
"Unimportant, of course, I meant," UVdL hastily said, and went on mumbling to herself in an undertone, "important—unimportant—unimportant—important—" as if she were trying out which word sounded best. Some of the jury wrote it down "important," and some "unimportant." Industry could see this, as it was near enough to look over their slates; "but it doesn't matter a bit," it thought to itself.

Extract 3:

The Ribeira Cat only grinned when it saw industry. It looked good-natured, she thought, still it had very long claws and a great many teeth, so industry felt that it ought to be treated with respect.
"Great Commissioner," it began, rather timidly, as industry did not know whether it would like the name: however, it only grinned a little wider. "Come, it's pleased so far," thought industry, and it went on. "Would you tell me, please, which way I ought to go from here?"
"That depends a good deal on where you want to get to," said the Cat.
"I don't much care where (as long as it is in the EU)—" said industry.
"Then it doesn't matter which way you go," said the Cat.
"—so long as I get somewhere," industry added as an explanation.
"Oh, you're sure to do that," said the Cat, "if only you walk long enough."
Industry felt that this could not be denied, so tried another question. "What sort of people live around here?"
"In that direction," the Cat said, waving its right paw round, "lives DG ENV: and in that direction," waving the other paw, "lives DG GROW. Visit either, as you like: they're both mad."

"But I don't want to go among mad people," industry remarked.

"Oh, you can't help that," said the Cat: "we're all mad here. I'm mad. You're mad."

"How do you know I'm mad?" said industry.

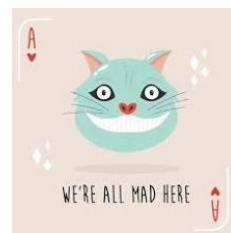
"You must be," said the Cat, "or you wouldn't have come here."

Industry didn't think that proved it at all; however, went on with another question "And how do you know that you're mad?"

"To begin with," said the Cat, "the Council is not mad. You grant that?"

"I suppose so," said industry.

"Well, then," the Cat went on, "you see, the Council growls when it's angry, and wags its tail when it's pleased. Now I growl when I'm pleased and wag my tail when I'm angry. Therefore, I'm mad."



I : Metals Summer Quiz.
1/b) Tungsten (3.422°) 2/b) Aluminium (8.1%) 3/a) 4 tonnes
4/c) Zinc 5/b) Silver (105) 6/a) 91 7/c) Copper 8/b) Titanium