



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in September:

05/09: Endocrine Disruptors Course

11/09: Water Taskforce

19/09: Industrial Emissions Taskforce

23/09: Risk Management TF B2B with CM Steering Committee

29-30/09-01/10: Chemicals Management Autumn Week

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Dear All,

Summertime means, among others, that I have the time to read something non-work-related without falling asleep after 1 sentence (and a half). I can also scroll through the collection of magazines left in waiting rooms (outside of this period, I tend to search for the wifi code to stay on top of my emails). I can even ponder buying one of the glossy (and often heedless) summer journals to read whilst enjoying an ice cream sitting on a bench in Montgomery. Of course, editors know how to attract one's attention in these less frantic periods. They blend some existential questions whose relevance you can hardly contest, with quizzes, a recipe of a colourful (m)cocktail, and glimpses of far away (sustainable?) beaches.

So, my eye got caught by one of them stating white on a blue-sky background (+ bright yellow sun and a tonic green grass field): "why we overcomplicate our life". This rather blunt title did not even leave one the leeway to not feel concerned.

I gave it the time of the ice cone to get to more clarity and flicked through the pages, identifying a range of hypotheses between pages 23 and 38. For example, we are overcomplicating situations just to have an excuse to not enjoy the present simple moments and hence avoid existential anxieties. Or that, as we have been raised with the idea that everything that is true and beautiful cannot be easily achieved but to the contrary needs to be deserved, we add complexity to simple things. Also: reality itself being complex, we fear that oversimplifying may lead to mistakes and confusion and hence we make it difficult.

The results of the quiz ('what type of homo complicator are you?', page 30) showed that I was "average", i.e., neither overly programming nor letting it go, rather tempted to follow Bergson's flux of the real rather than a streamliner with Excel formulas.

The key recommendation was to admit the speckle of reality without being irremediably dissatisfied and anxious.

All this felt half-finished and imperfect but somehow still fine, although the latter feeling was undoubtedly caused by the fact that I had reached the end of the cone (simply the best part in Belgium as it contains dark chocolate). And maybe, by looking for replies to why we tend to complicate, I was myself complexifying again, looking for too knotty reasonings for a guileless question, torturing (my) brains in July.

Making a meal out of a magazine

Making a mountain out of a molehill

Creating a tempest in a teacup

Or the French way: looking for noon at 14 hours (chercher midi à 14 heures)...

Which reminded me that my lunchbreak was actually over, and that it was time to go back to my desk for non-complicated points...



Violaine Verougstraete

COMMISSION

CARACAL-55: *before a summer...break?*

The CLP session started by a short report on the outcomes of the closed session, which primarily discussed how to strengthen EU's input in the July UN GHS Sub-Committee meeting (particularly on ED and mutagenicity) and the follow-up actions of the reality check on the CLP workshop held mid-May. This was followed by a short discussion on the 24th ATP, during which Eurometaux recapped the outcomes of the expert Round Tables organised by ILiA in March 2025, and a presentation by ECHA of the methodology to set specific concentration limits. ECHA has now included the revised methodology in its updated CLP guidance draft that is up for comments by mid-August. It will be important to recall the boundaries of the revised method when it comes to site-of-contact carcinogens for the inhalation route. Commission also explained why they will not inject more resources in the bioelution project, stressing that while they have stopped the development of the method, it nevertheless exists and can be part of the information to be used in the classification of alloys and read-across. This triggered comments from the usual suspects Member States, with however welcome support from Spain for all the technical work done. The cross-industry Particles Platform invited CARACAL to a workshop on inhalation/particles toxicology to be held on 2 October and a brief heads up on the Chemicals Action Plan announced for 8 July (see below) was given. The session concluded with the announcement that the RAC opinion on talc was finally released, attributing the delay to its complexity and the need to integrate feedback from the ECJ on the necessary clarity of RAC opinions.

To note during the Joint CLP-REACH session: an interesting presentation on the Defence Omnibus, including links to derogations under chemicals legislation. The status of One Substance One Assessment (OSOA) and the ECHA Foundation (Basic) Regulation were also presented.

News on the REACH Revision during the REACH session was limited. Commission referred to the Action Plan for Chemicals as a result of the chemicals strategic dialogue held with key stakeholders on 12 May, indicating that there may be some announcements on the REACH Revision and clarity on PFAS. The REACH Revision is still scheduled most probably for November, but final decisions and political guidance are still pending on Essential Use Concept, Generic Approach to Risk Management, Mixture Allocation Factor (EUC, GRA, MAF) and polymers. Commission also announced they are working on how to better go for upfront decisions and priority setting, getting information early on to better target risk management, activities on the link to Digital Product Passport (DPP) and simplification of substances in articles.

The detailed notes of the CARACAL discussions were circulated to the CARACAL Taskforce on 7 July (more information: Violaine Verougstraete).

EU Action Plan for the chemicals industry: *what's in for metals?*

On 8 July, the European Commission published its [Action Plan for the Chemicals Industry](#) accompanied by a proposal for the simplification of certain requirements and procedures for chemical products (Omnibus).

The Action Plan, aimed at strengthening the competitiveness and modernisation of the EU's chemical sector, proposes measures around resilience and level playing field, affordable energy and decarbonisation, lead markets and innovation and PFAS. On the level playing field aspect, Commission announces it will be strengthening its monitoring activities under the newly created Import Surveillance Taskforce and a specific system introduced in March 2025 for certain industrial chemicals. Enforcement of chemicals legislation will be also a top priority to close loopholes exploited by non-compliant imports, particularly those entering the Single Market via online platforms or unregulated intermediaries.

Regarding **REACH**, the Action Plan refers to the targeted revision planned for the end of the year but without more details. There is a reference to PFAS stressing that the scientific assessment of the Universal PFAS restriction by the ECHA's committees is scheduled to be concluded in 2026 and the Commission will follow asap once they have the opinion. They confirmed the RO3 route explored for now for batteries and semiconductors in the last RAC/SEAC meetings and refer to the development of an EU-wide PFAS monitoring framework to centralise data as well as to promote practical, science-based solutions for a sustainable shift by EU industry. The Action Plan also discussed substitution by including a reference to the Safe & Sustainable by Design (SSbD) framework and the creation of EU Innovation and Substitution Hub(s) and a possible EU Network of Substitution Centres. Interestingly, the Commission proposes to address challenges related to environmental permitting including for decarbonisation projects under the environmental omnibus, to be expected this autumn.

The sixth [Omnibus](#) includes proposals (including a stop-the-clock) to streamline labelling requirements under CLP Regulation, changes in the EU cosmetics laws, and facilitating the registration of fertilisers.

Finally, the [ECHA Basic Regulation](#) that also came out as part of the package includes proposals to ensure ECHA has the resources, flexibility, and structural adaptations required to fulfil the duties under a growing mandate in chemicals management legislations (from REACH, BPR and CLP to “import and export of hazardous chemicals”, waste management and water). A more detailed analysis was circulated on 9 July and will be further discussed at the next Chemicals Management Steering Committee on 23 September (more information: Violaine Verougstraete).

Meeting with Ms Sysaite from Mr Séjourné’s cabinet: *discussing REACH*

Eurometaux, IZA and ILiA met Ms Vilija Sysaite, Social and Health Adviser Cabinet of EVP Séjourné, to discuss the forthcoming REACH revision on 11 July. The discussion allowed us to highlight specificities of metals when it comes to chemicals management legislations and the extensive expertise, data and information of our sector from dealing with this complex landscape. The aim was also to offer concrete proposals in finding ways forward in regulations and initiatives not designed with metals in mind (e.g., REACH, EU Action Plan for the Chemicals Industry described above etc.), making a plea for more cooperative dynamics by being proactively consulted and in turn offering closer collaboration and assistance in drafting metals specific guidance. Commission explained that they are finalising the revised Impact Assessment on REACH and that the actual drafting of the text will continue after the summer break. Commission would be keen to receive concrete examples of issues in REACH and solutions, highlighting how metal specificities can be better considered in REACH 2.0. On the difficult issue of coherence between different EU legislations objectives, and on the Li case in particular, Commission confirmed they understood the issue of predictability for businesses and the importance of data. Eurometaux will coordinate the preparation of the concrete input that has been requested and is to be submitted by end of August (more information: Howard Winbow, Roland Chavasse and Violaine Verougstraete).

Environment Omnibus: *call for evidence launched*

The last sprint before the summer! The Commission has in fact launched a call for evidence on the simplification of the administrative burden in environmental legislation (so called the Environment Omnibus), open from 22 July 2025 to 10 September 2025. The initiative aims to streamline environmental rules and reduce unnecessary reporting and administrative costs, while ensuring that environmental objectives remain fully protected. It reflects the Commission's political priority to make EU legislation more effective and less burdensome, in line with the target to reduce administrative burden by at least 25% for all companies and 35% for SMEs (Small and Medium-sized Enterprises). It is also mentioned that the initiative will consider permitting challenges relating to environment assessments. This proposal follows the findings of a study conducted for DG Environment by Trinomics, discussed in February 2025, which assessed environmental reporting obligations and identified areas with high potential for simplification.

According to the consultation document, the Commission is considering various simplification measures across areas such as the circular economy, industrial emissions, and waste management. These include streamlining and digitalising reporting obligations, eliminating overlaps, and reviewing notification and permitting procedures, all without weakening existing environmental standards. We would like to stress the importance of our involvement in the environment omnibus process, given that many directives have recently been reviewed (e.g., the Air Quality Directive and the Industrial Emissions Directive) and the revision process for others (e.g., the Water Framework Directive) is almost complete. This process may be the only opportunity for legislative change relating to these directives for several years. It was strongly advised by some policymakers, for example, that some of the issues we have regarding the Water Framework Directive, the non-deterioration principle and permitting could be solved through this omnibus process. The momentum is now so let's use it.

For action:

- Share any comments, or suggestions you may have (especially regarding the other legislation mentioned in the call for evidence, like IED for example) by 25 August 2025, so we can compile an internal contribution to EM’s input (all data will obviously be used anonymously).

Thank you all in advance for your contributions (more information: Lara Van de Merckt, Kamila Slupek and Andrea Pellini).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA OTHERS

ECHA has launched three calls for evidence: deadline 29 September

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 the exposure to a combination of substances. The assessment will focus on chemicals that have similar health effects and act on the same target organ. The findings of this report may inform and support further regulatory initiatives for the protection of workers from chemical risks, with a view to prepare union guidelines. The call intends to collect any new and existing scientific information on tools and methodologies to identify health effects, and modes of action of substances which could be used simultaneously (combined exposure) at the workplace, as well as any other relevant information.

On Poorly Soluble Low Toxicity particulates (PSLTs), ECHA has been tasked by the European Commission to prepare a scoping study aimed at grouping PSLTs for hazard identification and clarifying the definition of the term PSLT. The findings of this scoping study may be used to support further regulatory initiatives on occupational exposure limit values for the protection of workers from chemical risks, to be set at Union level in accordance with Directive 98/24/EC (Chemical Agents Directive). The call intends to collect any new and existing scientific information on PSLTs, including the definition of PSLT, the identification of representative substances, approaches for occupational exposure limits, exposure, health effects, toxicology, epidemiology and modes of action, as well as any other relevant information.

And finally, on Li compounds: ECHA has been tasked by the European Commission to evaluate exposure to lithium compounds to assess the reproductive toxicity. The call intends to collect any new and existing scientific information on uses, exposure, health effects, toxicology, epidemiology and modes of action, as well as any other relevant information. On the latter, a preparatory call has taken place with the Li Taskforce. On PSLTs, Eurometaux will support the actions of the cross-industry Particles Platform, unless members request some more specific input (more information: Violaine Verougstraete).

EUROMETAUX CHEMICALS MANAGEMENT

CLASSIFICATION

Lithium OEL: call to prepare possible interaction with ECHA

The call for evidence for the definition of an OEL was launched by ECHA on 26 June and intends to collect any new and existing scientific information on uses, exposure, health effects, toxicology, epidemiology and modes of action, as well as any other relevant information. Eurometaux has requested the possibility to have an exchange with the ECHA OEL team to discuss the evidence to be submitted before 29 September. While the date of such an informal exchange has not been confirmed yet, industry volunteers had a preparatory call on 23 July. Similar exchanges have taken place for previous OEL derivations and have been an opportunity for industry to present its views on e.g., the scope of the OEL, effect levels etc. and for ECHA to specify what kind of information they would like to receive. Discussions were held based on a thought-starter prepared by Albemarle and the draft notes & slides were circulated on the 24th of July to the Taskforce. Further actions and work will be carried out in the coming weeks (more information: Ruth Danzeisen and Violaine Verougstraete).

Downstream consequences of the environmental classification of Pb: call and development of tool on transport

The 21st Adaptation to Technical Progress (ATP) including the Pb metal entries enters into force on 1 September 2025, and the companies/associations are taking care of the consequences of the environmental classifications on the CLP classification of complex inorganic materials containing Pb but also on downstream legislations (waste, transport and Seveso). ILA and several commodities have prepared notes to support companies'

assessment of their obligations. In parallel, there are ongoing efforts to update the existing MERAG classification fact sheet (by ARCHE Consulting), alongside a practical guide for companies on how to implement environmental classifications. Following a difference in interpretation of the transport ruling (classification under ADR/RID) for Pb containing materials like scrap, a call was held on 15 July to find possible ways forward. A joint note will be issued soon, accompanied by a user-friendly Excel tool to evaluate the transport classification in case Transformation/Dissolution protocol data on the transported materials is not available. The tool, which goes beyond the Pb classification only, will be presented during the next Science Forum meeting (more information: Lara Van de Merckt, Dagobert Heijerick and Violaine Verougstraete).

ENVIRONMENT

Endocrine Disruptors: sub-group brainstorming session

Several technical issues were identified during the Endocrine Disruptors (EDs) discussions during the first part of the year as requiring follow-up work, amongst others with ETAP. A brainstorming meeting was held on 14 July to discuss some of these issues, namely the existence of a threshold/non-threshold, the consideration of bioavailability (ionic form, physical form) and essentiality, and the application of additivity for mixtures? The main action points stemming from this session are to: i) integrate key insights into the updated version of the simplified ED guidance document; ii) continue the development of the MeClas solution for ED assessments; iii) create and maintain a shared ED literature repository; iv) prepare for an ED training course to be organised on 5 September; v) monitor and share any developments from the Commission on REACH information ED requirements; vi) review and potentially contribute to the EFSA public consultation on thyroid assessment and New Approach Methodologies (NAMs) by the 1 August deadline; and vii) plan an ED follow-up session during the Eurometaux Science Forum (Autumn Week). The draft minutes were sent out on 18 July (more information: Diana Dobre and Violaine Verougstraete).

RISK MANAGEMENT

RMOA project: work with eftec has started

Eurometaux's industry Risk Management Option Analysis (RMOA) guidance -available on the REACH Metals Gateway- has been regularly updated over the years. The idea from the start has been to further update and improve it based on the experience and learnings. Work has started with eftec to review the current version of the guidance and identify where and how it could be strengthened and made more user-friendly. As the RMOA tool seems to be better accepted in the context of e.g., the REACH revision, it seems a good time to improve it and support its acceptance. The project -funded by the remaining REACH Forum reserves- includes two tasks:

- Task 1: develop a proposed structure for a revised RMOA guidance, including a content mapping that indicates where information from the existing guidance would fit, a description of new content to be added, and other recommendations for future revisions
- Task 2: developing the overarching methodology and principles, with an emphasis on the core logic and key components of the RMOA and similar approaches (e.g., Multi-Criteria Analysis (MCA)).

Apeiron, who has also used the guidance, is kindly sharing its experience as well in this context.

The project is aimed to be finalised by autumn (more information: France Capon and Violaine Verougstraete)

INDUSTRIAL EMISSIONS

LAN BREF: background paper for kick-off meeting

On 17 July 2025, EU-BRITE circulated the Background Paper (BP) for the kick-off meeting of the Landfill BREF. The BP is a preparatory document developed to facilitate structured and informed discussion at the kick-off meeting. It includes proposals on key elements such as the scope of the BREF, the Key Environmental Issues (KEIs) to be addressed, and other aspects that will be further discussed and agreed upon by the Technical Working Group.

Among the main changes compared to the initial proposals:

- Chapter 2 (Applied processes and techniques) has been restructured: the previous distinction between hazardous, non-hazardous, and municipal landfills has been removed, and now only a general classification is used.

- Underground storage has been excluded from the scope of the BREF, while end-of-life and aftercare phases have been confirmed as included.
- PFAS: Information is being collected on the presence of PFAS in landfill gas. Information is being collected also for PFAS emissions to water, in order to assess whether it should be defined as a Key Environmental Issue (KEI).

Next step: The kick-off meeting is expected to be held from the 6th to 9th October 2025 (tentative) (more information: Lorenzo Ceccherini and Andrea Pellini).

WATER

Update

As you know, the revision of the Water Framework Directive has reached the final stage of negotiations at the trilogue. An agreement could not be reached under the Polish Presidency, but the Danish Presidency has now taken over the file and has made it a high priority. Technical meetings continued throughout July, and regulators are optimistic that a final agreement will be reached at the next trilogue meeting, which is currently scheduled for 23 September.

Meanwhile, Eurometaux continues to engage in advocacy activities with EU legislators. The latest of these was a meeting with DG ENVI on 24 July to discuss the shortcomings of the Water Framework Directive and possible solutions. We left this meeting with some homework to complete by next autumn.

This coincides with the latest call for evidence published by the EU Commission Environment omnibus, mentioned earlier, where the issues with the water file will also be put forward (more information: Lara Van de Merckt).

KAMILA'S SUSTAINABLE CORNER

Green-listing of waste: *for intra-EU shipments*

The European Commission (DG ENV) has launched a consultation under the Waste Shipment Regulation (WSR) for harmonising classification of waste to accelerate the transition to the Circular Economy. Open until 31/10, it can be directly accessed [here](#).

The Waste Shipment Regulation provides the possibility for the Commission to identify, via delegated acts, specific waste streams that should be subject to the “green-list” procedure for shipments between Member States whose purpose is for recovery (recycling, ...). The aim of this Public Consultation is to gather information from stakeholders to prepare delegated acts “green-listing” certain waste to facilitate the shipments of waste for recovery intra-EU.

The Commission wants to receive the following information:

- How to further boost the recycling market in the EU under the current legislation?
- Which specific waste streams could qualify for the green-list procedure within the EU (via inclusion in the WSR Annex IIIA or IIIB)?
- Which criteria (e.g., contamination thresholds for metals) should be established for certain (mixtures of) waste to green-list them?
- E-waste:
 - What criteria to adapt to better distinguish e-waste from other waste type?
 - The future regime for intra-EU shipments of non-hazardous e-waste.

Eurometaux is consulting members in the view of preparing the answer (more information: Kamila Slupek (slupek@eurometaux.be)).

COMMUNICATION

REACH Metals Gateway & Metals Toolbox: update

We are pleased to announce that over the summer, both the [REACH Metals Gateway](#) and the [Metals Toolbox](#) are being updated with new, fresher, up to date information and links. This is a work in progress, which will be finalised by September (more information Ailsa Lee, Diana Dobre and Violaine Verougstraete).

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](#)

- 01-02/09: RAC-74 REST WG (Provisional)
- 03-04/09: RAC-74 DWD WG
- 05/09: [Endocrine Disruptor Workshop](#)
- 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)
- 19/09: [Industrial Emissions](#)
- 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)
- 08-09/12: [Trends in OSH Workshop](#)
- 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](#)

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).



CHEMICALS STRATEGY for ZENITUDE



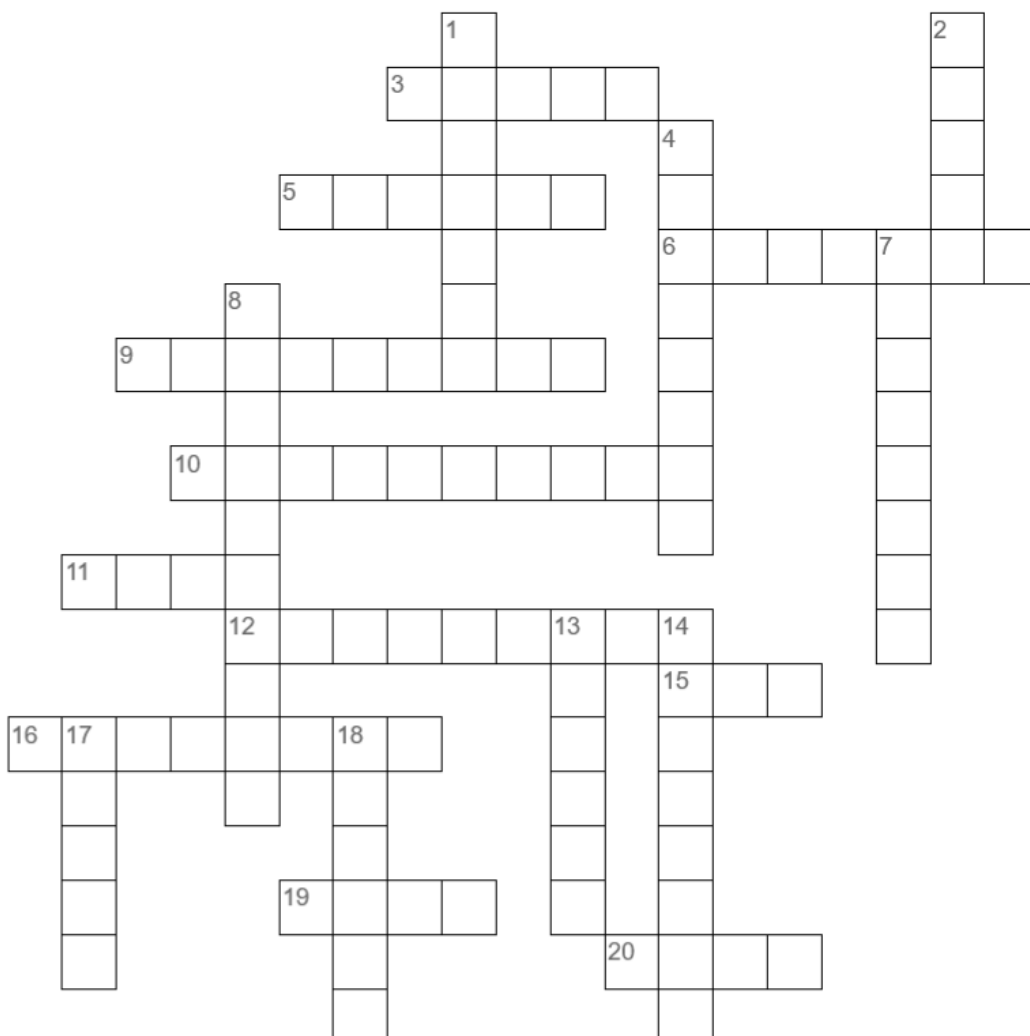
I: Metals Summer Crossword

Across

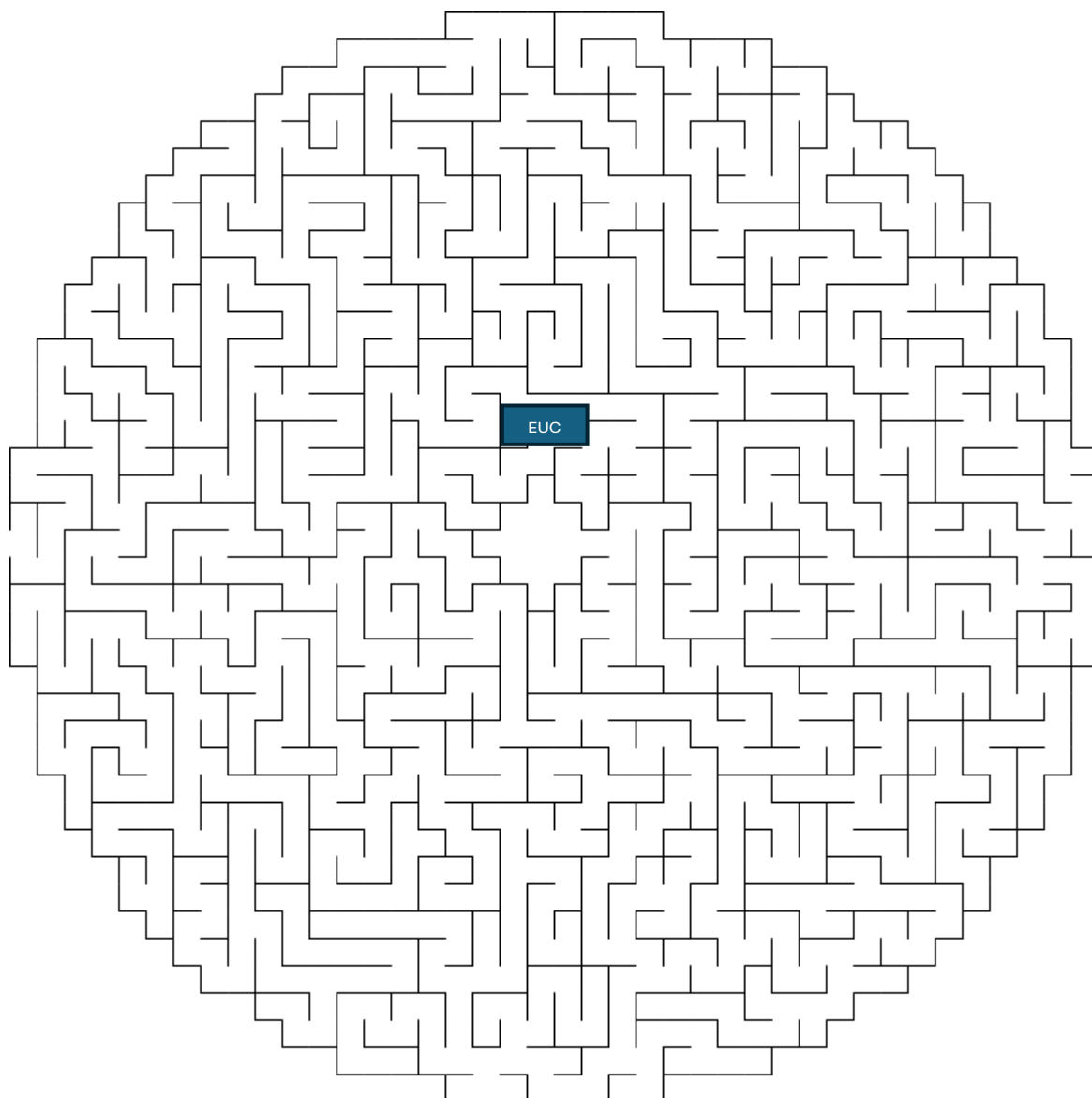
- 3 Usually found as a shiny solid, a good conductor of electricity & heat
- 5 Able to absorb water, air or other fluids
- 6 A substance made up of only one type of atom
- 9 The scientific study of properties and reactions of the elements
- 10 Which pathway did the EC publish in 2023
- 11 Comes from the Latin Plumbum
- 12 A person who experimented with chemicals before the science of chemistry began
- 15 A rock or mineral from which a useful element/metal can be isolated
- 16 A substance that speeds up a chemical reaction
- 19 The practical unit of electrical power
- 20 The smallest particle of an element which can exist alone or enter into a chemical combination

Down

- 1 A build-up of sediments
- 2 The third most abundant gas in the atmosphere (after nitrogen & oxygen)
- 4 The process of melting ore to extract the metal it contains
- 7 A 'rare earth' named after our continent
- 8 Which can be reduced, broken down or chemically separated
- 13 The physical introduction into the customs territory of the European Community
- 14 A measure of the poisonous properties of a substance
- 17 A metallic material consisting of two or more elements combined so they cannot be readily mechanically separated
- 18 The total of organic waste and wastewater generated by residential and commercial establishments



II: Find your way in & to the Essential Use Concept.....



III: See how many elements you can find in this wonderful song by Tom Lehrer (04/1928-07/2025)

<https://music.youtube.com/watch?v=qyNkrlwKs7c>

Answers on page 11

I: Metals Summer Crossword
Across: 3/ METALS – 5/ POROUS – 6/ ELEMENT – 9/ CHEMISTRY – 10/ TRANSITION –
 11/ LEAD – 12/ ALCHEMIST – 15/ ORE – 16/ CATALYST – 19/ WATT – 20/ ATOM
Down: 1/ DEPOSIT – 2/ ARGON – 4/ SMELTING – 7/ EUROPIUM – 8/ DEGRADABLE –
 13/ IMPORT – 14/ TOXICITY – 17/ ALLOY – 18/ SEWAGE

III: The Elements – Tom Lehrer

There's antimony, arsenic, aluminum, selenium
 And hydrogen and oxygen and nitrogen and rhenium
 And nickel, neodymium, neptunium, germanium
 And iron, americium, ruthenium, uranium
 Europium, zirconium, lutetium, vanadium
 And lanthanum and osmium and astatine and radium
 And gold, protactinium and indium and gallium
 And iodine and thorium and thulium and thallium
 There's yttrium, ytterbium, actinium, rubidium
 And boron, gadolinium, niobium, iridium
 There's strontium and silicon and silver and samarium
 And bismuth, bromine, lithium, beryllium, and barium
 There's holmium and helium and hafnium and erbium
 And phosphorus and francium and fluorine and terbium
 And manganese and mercury, molybdenum, magnesium
 Dysprosium and scandium and cerium and cesium
 And lead, praseodymium and platinum, plutonium
 Palladium, promethium, potassium, polonium
 And tantalum, technetium, titanium, tellurium
 And cadmium and calcium and chromium and curium
 There's sulfur, californium and fermium, berkelium
 And also mendelevium, einsteinium, nobelium
 And argon, krypton, neon, radon, xenon, zinc and rhodium
 And chlorine, carbon, cobalt, copper, tungsten, tin and sodium
 These are the only ones of which the news has come to Harvard
 And there may be many others but they haven't been discovered