

EUROMETAUX CHEMICALS MANAGEMENT NEWS



*In chemistry, our theories are crutches; to show that they are valid, they must be used to walk.....
A theory established with the help of twenty facts must explain thirty, and lead to the discovery of ten more.
Jean-Baptiste-André Dumas*

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Dear All,

Holidays allow you to diversify your activities. As my out-of-office hinted at, I continued exploring the Calvados region, which also meant applying more practical skills when it came to the 'Calvados ground'. Having the luxury of having a garden over there means that I have some 'clearance duties' to ensure that it does not become impenetrable or, even worse, upset the neighbours.

The combination of the 2025 weather and a discontinued presence gave an incredible boost to the brambles, which we found cheerfully climbing up the walls, giving the house an air of Sleeping Beauty's residence. This invasion did not go without any benefits as a) it reminded me concretely about the added value of personal protective equipment and b) resulted in prolonged cooking sessions with the grandkids to make blackberry jam. It also made me ponder whether to tell them this tale and why the good fairy, after the princess falls asleep, summons a forest of trees, brambles and thorns to spring up around the castle to shield it from the outside world for 100 years. The fairy's choice was a good one to ensure rigorous containment and strictly controlled access.

Someone said brambles are intelligent because they master the art of defending themselves. And indeed, you start slashing away at a wall of brambles and suddenly, out of nowhere, a wayward strand lashes out, across your face or catches you by the ankle. And this is a reoccurring event, not a coincidence. You can of course try and be more careful by carrying out a screening to see if the brambles are connected but it does not help: you hack in one direction and are attacked from another, the head of the brambles dips to land in your hair just at the moment you turn your head and you quickly end up with scratches on the skin areas you did not protect.

So how did the prince fare in the tale? The French version by Perrault states that he had barely approached the woods when all the tall trees, brambles, and thorns moved aside of their own accord to let him pass. And, that he walked toward the castle, which he saw at the end of a wide avenue, which he entered, and, to his surprise, he saw that none of his people had been able to follow him, because the trees had closed in on them as soon as he had passed.

What? Without a single effort? What did I miss?

In other versions the prince has at least had to take out his sword and demonstrate his determination to get some splinters.

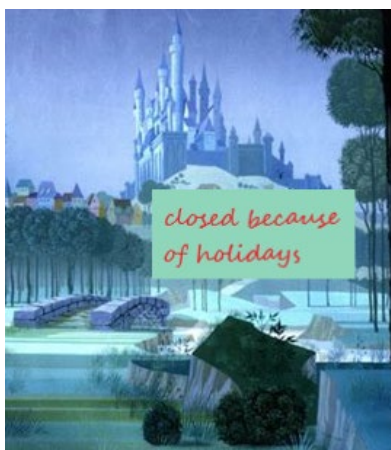
But most probably there is some magic behind explaining that they 'moved aside of their own accord'.

I noted also that in Perrault's original version, the prince does not kiss the princess (without consultation) but sits next to her and that "they had been talking for four hours, and they still hadn't said half the things they had to say". Which brought my thoughts back to advocacy (and now that I think of it, deprived the kids of the storytelling): a sleeping princess who is difficult to get access to, a shielded castle with thorns, but also some magic moments that allow us to get in.

To talk for hours...

Violaine Verougstraete

EU COMMISSION



EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

Occupational Exposure Limits: *more as a reminder...*

ECHA launched three calls for evidence end of June. Regarding combined toxicity: ECHA has been tasked by the European Commission to prepare an interim report, including the definition of the tools and methodologies to support a scientific assessment of the effects of 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 preparing European 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 will 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 European 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, 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. The cross-industry Particles Platform led by Cefic reflected further in August on how to organise the generic and sector-specific contributions.

Finally, on Li compounds: this 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. Following exchanges Eurometaux and ILiA had with the OEL ECHA team in August, a call will take place on 11 September, involving the toxicologists of Li companies and the ECHA OEL and exposure assessment experts to discuss the information to be submitted to ECHA by the deadline of these three calls for evidence, i.e. 29 September (more information: Roland Chavasse and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

REACH advocacy: preparation of input with examples from the sector and concrete examples

The REACH revision is in the making with a proposal for REACH 2.0 expected by the end of the year. Eurometaux has provided several comments and proposals during the drafting stage to ensure members' concerns are heard and the revision delivers on its objectives to simplify and improve efficiency. On 11 July, Eurometaux met with EVP Séjourné's cabinet, who made a clear request for input to be delivered by the end of August. Rather than high-level position papers, they requested concrete examples of issues that REACH is causing for the NFM industry and how they could be addressed. Delivering on this request within such a short timeline (during the summer holidays!) was no easy feat. But our amazing members rose up to the challenge! The 9 high-level requests that were previously identified among the members were distilled down to 3 key priorities, focusing on the issues where metal specificities result in unique challenges for our industry.

On the 29th of August a letter was delivered to the Commission highlighting these priorities, illustrated with concrete examples from industry and accompanied by proposed amendments to resolve the issues (more information: Sophia Verbrugghe, France Capon and Violaine Verougstraete).

CLASSIFICATION

Downstream consequences of the environmental classification of metals: note and tool on transport finalised and available

In the July edition we informed you that we were developing -with the active support of the members and ARCHE Consulting- a joint note and a user-friendly Excel tool to support companies with the entry into force of the environmental classification of Pb metal (01.09.2025).

A classification under CLP has immediate consequences on the CLP classification of complex inorganic materials (CIMs) like e.g., alloys and other materials containing Pb. It may also have downstream consequences on the classification of these materials under the waste, transport and Seveso regimes. The note has been prepared to support companies producing, using and recycling CIMs. It was circulated on 12 August and has been posted on the [REACH Metals Gateway](#).

The Excel tool was developed by ARCHE Consulting for the ADR classification (European Agreement concerning the International Carriage of Dangerous Goods by Road). The self-classification under the ADR regime depends on the availability of data. Depending on whether Transformation Dissolution data is available or not to the consignor, one can distinguish two scenarios: a testing approach (when data on the transported materials is available) and a non-testing approach in case this data is not available. The latter approach requires some calculations, performed more easily by the tool, which is freely available. The tool and the approach will be included in the MeClas tool and also in the practical guide (toolkit) that will accompany the updated MERAG classification fact sheet (ARCHE/ICMM/EM project). A huge thank you to all those who have spent time and energy on this project (more information: Dagobert Heijerick, Lara Van de Merckt and Violaine Verougstraete).

RISK MANAGEMENT

EFTEC project: structuring the RMOA guidance

EFTEC has made significant progress over summer on the RMOA project and presented very well-advanced drafts on the deliverables agreed with them, namely a structure for a revised RMOA guidance, including a content mapping, a description of new content to be added, and other recommendations for future revisions, as well as a document explaining the overarching methodology and principles.

Both deliverables were discussed in calls beginning and end of August and should be finalised in the coming weeks. They add to the robustness of the guidance and hopefully will increase its acceptance and use (more information: France Capon and Violaine Verougstraete).

KAMILA'S SUSTAINABLE CORNER

Preparing for the EU Circular Economy Act

On the 1st of August, the European Commission published the long-awaited call for evidence and Public Consultation on the EU Circular Economy Act (CEA). They will run in parallel until Tuesday 6th of November.

The CEA aims to increase circularity in the single market, addressing the existing barriers and ensuring a sufficient and cost-effective supply of high-quality, verifiable secondary raw materials.

The interventions foreseen in the CEA can be structured around two main pillars. The first considers targeted measures on e-waste – to improve and increase collection and recycling and generate market demand for the secondary critical raw materials they contain. The second considers interventions to foster the single market for waste. Among those we see the : i) reform of end of waste criteria; ii) the simplification, digitalisation and extension of extended producer responsibility (EPR) schemes; iii) setting mandatory, targeted criteria for public procurement of circular goods, services and works to stimulate EU demand.

Eurometaux will prepare answers to both consultations taking into account its well-established positions and also embracing various co-related initiatives that the European Commission have put forward to us over the last months (more information: Kamila Slupek).

COMMUNICATION

Metals Academy: looking towards the 5th edition

The Metals Academy Organising Committee met twice over the summer to first conclude on the successful Metals Academy 4 held in May 2025 and mostly to discuss and start planning the Metals Academy 5, which will be held in Jodoigne from 04 to 07 May 2026.

We are currently drafting the first version of the program that will be circulated by e-mail to the membership mid-September; and to gauge interest amongst the membership, we will also include a link to pre-register.

The organisation is running smoothly, and the Academy will be held in the same location (La Grande Abbaye de la Ramée in Jodoigne).

The members of the Organising Committee are also working on a more refined version of the draft programme, which will include speakers & precise timings and will of course be circulated in due time.

We thank all those who have contributed to the success of the Metals Academy and are much looking forward to organising this 5th edition, hoping that the proposed programme will entice many participants to attend (more information: Ailsa Lee and Violaine Verougstraete).

CALENDAR

PLEASE JOIN US IN SEPTEMBER 2025

- **05: Endocrine Disruptor Training Course**
- **11: Water Taskforce**
- **19: Industrial Emissions Taskforce**
- **23: B2B : Risk Management Taskforce & Chemicals Management Steering Committee**
- **30/09 – 01/10: Chemicals Management Autumn Week**

And please find below a non-exhaustive list of all the meetings 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](#)

- 01/09: RAC-74 REST WG
- 03-04/09: RAC-74 DWD WG
- 05/09: [Endocrine Disruptor training course](#)
- 11/09: [Water Taskforce](#)
- 08-12/09: RAC-74 Plenary
- 08-12/09: SEAC-68 (I)
- 11-12/09: NeRSAP
- 15-19/09: SEAC-68 (II)
- 19/09: [Industrial Emissions Taskforce](#)
- 23/09 (am): [Risk Management Taskforce](#)
- 23/09 (pm): [Chemicals Management Steering Committee](#)
- 25-26/09: ECHA MB-79
- 29/09-01/10: [Chemicals Management Autumn Week](#)
- 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
- 05-06/11: CARACAL-56
- 11-12/11: RAC-75 DWD WG (Helsinki)
- 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

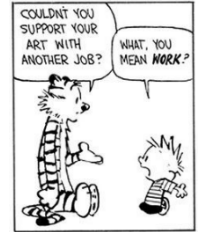
Follow the logo and check out our Metals Gateway website.



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)

BACK TO WORK SHUFFLE



I: In the words below:

Can you recreate the 10 hidden topics/meetings/miscellaneous/events that await us at work in September & onwards (in “blocks” of 2 to 8 words)?

DIRECTIVE - OF - EXPECTING - UNDER - TOWARDS – WEEK - SAFE - OF - OMNIBUS – ASSOCIATION –
REVISED - SUSTAINABLE - ENVIRONMENT - ECODSIGN - REACH – REGULATION - CHEMICALS - CALL - AND
- 2.0 – NEW - DESIGN - ENVIRONMENTAL - COMMITTEE - NEW – EVIDENCE - ADVOCACY - CONCERN -
REVISION - RISK - THE - ASSESSMENT – MANAGEMENT - BY – AUTUMN – WATER – THE – CLASSIFICATION –
THE – FOR – METALS - COMMISSION - SUBSTANCES - DRINKING

II: And to smooth the way these few “work related” quotes. Can you reunite them with their authors?

1.	“The difference between ‘try’ and ‘triumph’ is just a little <i>umph!</i> ”	Oscar Wilde
2.	“I love deadlines. I like the whooshing sound they make as they fly by.”	African proverb
3.	“Hard work never killed anybody, but why take a chance?”	Groucho Marx
4.	“If you think you are too small to make a difference, you haven’t spent a night with a mosquito.”	Andy Stanley
5.	“The best way to appreciate your job is to imagine yourself without one.”	Douglas Adams
6.	“No man goes before his time—unless the boss leaves early.”	Marvin Phillips
7.	“Leaders who don’t listen will eventually be surrounded by people who have nothing to say.”	Edgar Bergen

Answers on the next page..... 😊

I: The back to work shuffle

1. EXPECTING THE REACH REVISION 2.0
2. NEW ASSOCIATION
3. REVISED DRINKING WATER DIRECTIVE
4. ENVIRONMENT OMNIBUS CALL FOR EVIDENCE
5. ADVOCACY TOWARDS THE COMMISSION
6. SUBSTANCES OF CONCERN UNDER THE NEW ECODESIGN REGULATION
7. CHEMICALS MANAGEMENT AUTUMN WEEK
8. SAFE AND SUSTAINABLE BY DESIGN
9. ENVIRONMENTAL CLASSIFICATION OF METALS
10. RISK ASSESSMENT COMMITTEE

II: Quotes & their authors

1. "The difference between 'try' and 'triumph' is just a little *umph!*" — Marvin Phillips
2. "I love deadlines. I like the whooshing sound they make as they fly by." — Douglas Adams
3. "Hard work never killed anybody, but why take a chance?" — Edgar Bergen
4. "If you think you are too small to make a difference, you haven't spent a night with a mosquito." — African proverb
5. "The best way to appreciate your job is to imagine yourself without one." — Oscar Wilde
6. "No man goes before his time—unless the boss leaves early." — Groucho Marx
7. "Leaders who don't listen will eventually be surrounded by people who have nothing to say." — Andy Stanley