

EUROMETAUX CHEMICALS MANAGEMENT NEWS



The meeting of two personalities is like the contact of two chemical substances: if there is any reaction, both are transformed.
Carl Gustav Jung

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Dear All,

The ramp-up of activities during the last days of August appeared to hint towards a busy September, and I believe we can now all agree that these last weeks have fulfilled this prediction. I fear I am not the only one with a clogged-up brain, which I picture today as a maze of small and large corridors, permanently traversed by topics frantically jumping up and down with the hope of getting into the “addressed” shelter. To get noticed, they won’t hesitate a second to dress up: as ghosts in the early hours of the morning, as subtle anxiety before entering a call, as an auto-designed (unrealistic) series of action points, or disguised as cynical while you are networking at a party. And -disappointedly- also as interferences during the writing of this editorial.

Hence, promoting myself instantly as brain surgeon, I have decided to put out in the open some of these little monsters to assess how they stand the daylight. Help me to assess this!

- *First one (dressed in the EM colours): an evolving association needs to work on its ‘value proposal and demonstrate its added value’: where to start? Maybe by clarifying that I am referring here to “value” (i.e., the worth of something) and not “values” (although it seems obvious that values should support value). How to express it? Is it objective, quantifiable? It appears that in some marketing-oriented theories, there is a strong tendency to make “value” a completely subjectively defined concept. For some, product value will equal customer value and it will be the individual needs of the customer that define the value of the product (meaning that similar products can have a different value for different customers even though they may have to pay the same price for the products). And some will claim that the value creation of a product is dependent on the products’ participation in the customers’ own value creation. Value is in these latter theories created jointly (co-produced value) between deliverer and customer.*
- *Second one (wearing an EU flag): simplification equals deregulation. As highlighted this week by a CM week participant, this is the first time in years that there has been some recognition for overregulation, to be solved by omnibuses (in passing, a strange choice of analogy, as such trains take ages to arrive at their destination) that may align deadlines, cut duplicative steps, reduce burden. This changes the dynamics in the discussions we need in order to reach common ground with other stakeholders that view bringing in competitiveness as lowering protection. There is a lot of whining at this moment, whilst cooperation has never been such an acute and urgent need. And claims on all sides that arguments should be objective and quantifiable. The polarised dramas we are in and these frantic requests for ‘facts’ do not allow for taking a step back and also seeing the opportunities we have.*
- *Third one (PFAS-look but not only): forcing technical work forward against a chorus of doubts on the feasibility of the outcomes. Motivation here is not the issue, but even the most ambitious project needs some foundation and supporters to make it happen.*

The monsters have ceased to spring in all directions. They are watching me, sitting on top of my screen, waiting.

Can procedures help here? I ask them. Procedures and recognition to provide transparency, fairness, more certainty, Will these allow co-creation and ambition?

Oh no!

A smile and they suddenly left the scene.

Back in the maze?

I will let you know by the end of the month!



Violaine Verougstraete

EU COMMISSION

COMMISSION

REACH Revision: negative opinion of the RSB puts at stake REACH 2.0 timeline

The Regulatory Scrutiny Board (RSB) has issued, on 26 September, a negative opinion on the impact assessment for the REACH 2.0 proposal worked out over the last months. Commission had expected to table its proposal by end 2025 but this timing now becomes uncertain. In a conference organised by HEAL and ChemTrust on 29 September, Commission explained that DG ENV and DG GROW went for a comprehensive approach with the impact assessment by looking at issues with simplification, modernisation and enforcement surrounding REACH. We will further monitor and inform the members about the intelligence we will be able to gather in the coming weeks (more information: Sophie Verbrugghe and Violaine Verougstraete).

Omnibus Chemicals: Stop-the-clock approved at Council

Member States have approved the Council's position on the Commission's proposals to simplify some of the CLP EU rules to boost EU's competitiveness. This proposal ('Stop-the-clock' mechanism) postpones to 1 January 2028 the date of entry into application of the revised CLP Regulation. The proposal also amends the timelines for relabelling, mandatory formatting requirements, advertisements, distance sales and labelling of fuel pumps (more information: Violaine Verougstraete).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-74: Restrictions Working Group meeting

The Working Group had only one item on its agenda, i.e., the restriction on the uses of chromates VI, a dossier prepared by ECHA on request of the Commission. Interestingly, the dossier includes several options combining limit values for worker exposure with limit values for emissions into the environment, for 6 different use categories. RAC agreed that the Cr(VI) dose-response relationships established in 2013 -ahead of the authorisation cases- can be taken forward for the risk assessment and that the data published more recently does not justify revising the lung cancer dose-response relationship.

RAC evoked the hazard of Cr(VI) to the environment, questioned whether it is indeed of limited concern (due to its quick reduction to Cr(III)) and debated how to consider this in the scope of this restriction focusing on CrVI.

The data (sources) for the exposure assessment also led to interesting discussions. The Rapporteurs agreed that the exposure estimates proposed for workplace exposure reflect the variety of workplaces but noted some uncertainties, also regarding their conservatism. For the general population, RAC noted some shortcomings of the monitoring datasets regarding their representativeness and reliability. These shortcomings directly affect the risk characterisation. They also noted that the risks for some uses were not characterised like e.g., process-generated Cr(VI), intermediates. This led RAC to conclude that the risk of use of Cr(VI) substances cannot be controlled, because the mode of action is non-threshold but that the presented risk values do not reflect the full knowledge base for the use of Cr(VI) substances. The need for an EU-wide action on CrVI was supported but it was recommended to further discuss the consequences of such an action for those companies whose uses have already been approved under the authorisation system. The next discussion on the dossier will take place mid-November (more information: Violaine Verougstraete).

RAC-74: Plenary meeting

RAC made further progress with its evaluation of the PFAS restriction. Regarding the sector-specific assessments, RAC reached provisional conclusions for electronics and semiconductors and started to discuss PFAS manufacturing. RAC also discussed horizontal issues such as concentration limits, above which PFAS could be restricted, analysis of alternative and analytical methods. Regarding the timeline, in December, RAC will discuss PFAS manufacturing and continue to debate horizontal issues; whilst SEAC will discuss electronics and semiconductors, PFAS manufacturing and horizontal issues as well.

The tentative plan for March 2026 is to finalise and adopt the RAC opinion and to discuss and agree on SEAC's draft opinion. This will allow ECHA to launch the second Public Consultation after the RAC/SEAC plenary meetings in March. The learnings of the RAC and SEAC PFAS sessions were communicated to the Risk management Taskforce (see below).

Other items of interest at the RAC plenary meeting included the workplan announcing the discussion of an ED CLH proposal Q1 2026 and the lithium salts OEL second part of 2026 (tbc); and the update provided by ECHA on the legal court cases. They expect that the TiO₂ ruling will impact further cases, and RAC discussed possible options for strengthening justifications in CLH opinion. This discussion was partly held in closed session (more information: Violaine Verougstraete).

RAC-74: Drinking Water Directive Working Group (DW WG) meeting

The meeting took place on 3 and 4 September. It focused, again, on the review and comments regarding the different checklists (e.g. the ones on nanoforms and electrochemical tests) and the opinion templates ECHA is developing to help and streamline the RAC opinions when it comes to the applications to the EU positive lists. Some of the action points laid out in previous meetings were also briefly discussed, including the omission of low-level PFAS constituents (below 0.02% w/w), testing and quality standards (including the lack of a legal mandate for laboratory accreditation), access to relevant EN standards for RAC members and the request for full study reports. The meeting also addressed how the process would be organised, e.g. the appointment of Rapporteurs and the roles of the RAC Drinking Water Working Group experts, as well as the concept of A-listing cases (i.e. fast-tracking straightforward cases for adoption without plenary debate), and the expected heavy workload from new substance applications (projected to start in January 2027). The meeting also provided an overview of ECHA's overall progress in anticipation of the start of the process (e.g. guidance documents, checklists). The meeting concluded with a plan for the next physical meeting and an agreement that ECHA will consider a proposal to train RAC members in some DWD-specific areas (e.g. material science and migration test analysis). The next RAC DW WG meeting is taking place on the 11th and 12th of November and was just announced to be remote (more information: Lara Van de Merckt).

SEAC-68: chromates authorisation and restriction

The flow of Authorisation for Application (AfA) cases for chromates continues and is expected to continue until late-2026. The backlog of cases is clearing slowly. There were some useful learnings for Eurometaux, for example that: Cr(III) is considered available but not fully proven in all uses and industry sectors as an alternative to Cr(VI). There was a discussion on the first SEAC draft opinion on the proposed restriction of certain Cr(VI) substances. SEAC agreed that action is required on an EU-wide basis and that the proposed restriction under REACH is the most appropriate risk management option (alternatives such as Occupational Safety Health (OSH) legislation and Industrial Emissions Directive (IED) were ruled out). However, what is proposed is not a "classical" restriction because compliance is based on different emission limit values (ELVs - workplace, air, water), so companies impacted have two very different options through which they can comply: i) engineering controls to reduce worker exposure and / or emissions to air and water; substitution of Cr(VI) with an alternative (but this is not seen as the main goal). The discussion in SEAC was difficult because the usual concepts of "alternatives" and "substitution potential" have no clear meaning in the context of the restriction and are not helpful. More discussion is also needed in SEAC on the restriction options proposed by the dossier submitter, and also alternative scenarios that were not included in the dossier. Three alternatives were outlined by the rapporteurs, all of which seek to build on 10 years of experience from Cr(VI) AfA cases (more information: Simon Cook).

SEAC-68: U-PFAS restriction, further sectorial reviews were covered

On the universal PFAS restriction SEAC had final discussions on two use sectors (lubricants and energy) and first discussions on semiconductors (costs only), PFAS manufacturing, and horizontal issues. For lubricants, new data was included from a 2025 OECD report, but granularity on uses is still not possible beyond distinction between consumer and professional / industrial. There is high substitution potential for consumer uses, and low potential for professional / industrial uses. SEAC concluded that Restriction Option (RO)1 (full ban) is likely not proportionate but cannot conclude on the proportionality of RO2 (ban with derogations) due to uncertainties.

With respect to the energy sector (including batteries and fuel cells) this is the "worst sector" with respect to data gaps according to the Rapporteurs. Substitution potential is generally low (but varies by sub-use). For RO1 (full ban), SEAC agrees with the dossier submitter that RO1 is likely not proportionate. For RO2 and RO3 (bans with different use-specific derogations), SEAC is unable to conclude on proportionality due to lack of data / limitations

in the assessment / no cost and benefits provided in the background document. On derogations, SEAC gave some qualitative info on some RO2 options, but cannot provide any conclusions at all on RO3.

For semiconductors, SEAC cannot conclude on costs so will not be able to conclude on proportionality. For PFAS manufacturing, there was an introductory discussion which revealed that PFAS “processing” is out of scope of the restriction. This is the step between PFAS manufacturing and use of PFAS to make an article – emissions from these steps may be missed. The discussion on horizontal aspects included a potential problem around enforcement – only a very small number of the PFAS substances in scope can currently be quantified with analytical methods.

The restriction dossier has evolved through the ECHA committee process as data gaps and other issues were identified. Eight new sectors of use have been added but will not receive a full assessment by SEAC due to time constraints. Still, the dossier does not contain the data needed for SEAC to do its work. The final opportunity for stakeholders to provide input is the SEAC Public Consultation which will start in Q1 2026 when the SEAC draft opinion is available. How the PC will be conducted is to be explained by ECHA in a webinar on 30 October (more information: Simon Cook).

ECHA OTHER ACTIVITIES

ECHA Management Board: *comments on RAC/SEAC*

ECHA's Management Board came together during the second half of September to discuss the ECHA work programming for 2026-2027, the Executive Director's report, the Report from the Management Board sub-group Strategy, Planning and Implementation but also a document on the workability of the RAC and SEAC Committees, considering among other the list of additional tasks. The meeting of the Management Board was prepared by industry representatives during a call set up by Cefic and AISE (representatives at the ECHA Management Board and the SPI sub-group). Eurometaux prepared some comments on the RAC/SEAC workability document (more information: Violaine Verougstraete).

ECHA OEL: *exchange with industry before the call for evidence (CfE)*

ECHA launched at the end of June a 90-day call for evidence for the definition of an OEL for three Li compounds. The call intended 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 a request from Eurometaux and ILiA, a sub-group of the Li Taskforce had an exchange with the ECHA OEL team in September to highlight the information available to industry and prepare the submission to the CfE. ECHA made a helpful presentation on the OEL process and provided useful guidance for the data to be submitted. The notes of this exchange were circulated to the Li Taskforce.

This submission included a note on the uses of the three Li compounds in scope, a note on the hurdles to provide EU exposure/emission data, an explanatory note on the iRMOA, and a note on the toxicology/effects accompanied by the scientific references. A big thanks to all who contributed! (more information: Roland Chavasse, Francesco Gattiglio and Violaine Verougstraete).

ECHA-Industry: *Updates and Registration under REACH - statistics of submissions*

ECHA opened the meeting with the usual report on updates and registration submissions, confirming a general trend of a decrease in submissions compared to the forecast and a constant high number of classification notifications (+152% compared to last year). It was communicated that the new EC inventory list numbers (the "A-numbers") are expected to be dispatched late in October. Industry raised specific points of attention to improve REACH IT communications and allow companies to screen quicker the numerous messages they receive by improving the mail subject structure. While discussing REACH IT, ECHA shared that improvements were being made to follow up on industry requests made during the June meeting, i.e., avoiding duplicate communications to the joint submission when lead registrant (LR) submits an update dossier and ensuring retention of updates rationales communicated to the joint submission, also when a Technical Completeness Check (TCC) occurred on the LR dossier.

Following up on the June meetings, ECHA proposed to set up 'focus groups' with industry to follow up on IUCLID beta testing and dissemination on ECHA CHEM. The first meeting for the ECHA CHEM focus group is set for 7 October. ECHA CHEM dissemination system was blocked over summer and was not displaying submitted data between mid-May and mid-September, causing difficulties for lead registrants who rely on up-to-date information: while this should be fully solved, industry proposed to always ensure timely communication on such issues, e.g., by displaying a banner. ECHA CHEM now also includes information on “First set of regulatory process and

obligation lists” and a full explanation on how to navigate this is available via the ECHA [webinar](#) published on 23 September. Next meeting will be on 24 October (more information: Federica Iaccino).

NeRSAP 13, Helsinki 11 & 12 September: development (needs) towards the future of risk management of chemicals

NeRSAP - the Network of REACH Socio-Economic and Alternative Practitioners - held its 13th meeting in Helsinki on 11 and 12 September. The network consists of experts from the EU (ECHA and Commission) and national regulatory community, industry, NGOs and risk management consultants, discussing and acting under Chatham House rules to enhance knowledge and experience with SEA and alternatives/substitution related aspects.

The theme this year was forward-looking with respect to how risk management of chemicals may evolve and what subsequent development needs there might be. Three topics were discussed: i) economic valuation of human health and environmental impacts; ii) SEA and AoA under existing and new regulatory processes; and iii) SEA and AoA under the Biocidal Products Regulation. The meeting was hosted by ECHA, and included productive discussions on the new tasks to be taken on by ECHA’s scientific committees RAC and SEAC over the next few years.

The sessions contributed to a better understanding of how risk management of chemicals is likely to change in future, what challenges may arise, and also how complementary and important methodologies such as valuation of impacts are evolving in parallel.

In addition to generating or brainstorming new ideas or concepts, NeRSAP also acts as a briefing forum where Commission and ECHA can reach out to a wide range of consultants and industry sectors involved in SEA and assessments of alternatives. The slides used and summary conclusions will be posted on ECHA’s NeRSAP webpage [here](#) (more information: Violaine Verougstraete and Simon Cook).

EUROMETAUX CHEMICALS MANAGEMENT

CMSC and CM WEEK

Chemicals Management Steering Committee: autumn meeting

The 3rd Steering Committee meeting started with an overview of Eurometaux’s state of play and a status update on the 2025 projects of the department (MEED, MERAG, the Metals Toolbox) before diving into an estimation of the resources- and budget needs to tackle the 2026 challenges.

Kamila Slupek (EM) provided an update on the (first) Environmental Omnibus, which is a European Commission legislative [proposal](#) to simplify environmental legislation and reduce administrative burden. Eurometaux has developed a Position Paper submitted to the Call for Evidence and is now working on an Annex to illustrate more concretely the problems industry faces. Input from members is crucial to complete this Annex. Simon Cook updated the members on the revised Safe & Sustainable by Design (SSbD) approach, which has addressed several of the shortcomings included in the initial version but not all, compromising its applicability. It remains a voluntary innovation approach, but it is unlikely to disappear and is referred to in different forums, rendering its monitoring relevant. The Committee discussed briefly the REACH Revision and the possible advocacy strategy, but its design depends on the timeline followed by the Commission. As soon as the timings are clear, the REACH 2.0 Advocacy Taskforce will meet to discuss further priorities and advocacy actions.

Exemplifying well the Eurometaux cross-departments activities, Carmine Carinci (Trade) provided an update on the Corporate Sustainability Reporting Directive (CSRD) and the links with chemicals management. He reported on a workshop with [EFRA](#) that took on the work to simplify and streamline the European Sustainability Reporting Standards (ESRS), which companies should apply in respect to reporting their operations on pollutants for air, water, soil, Substances of Concern (SoCs) and Substances of Very High Concern (SVHCs). Members agreed to continue to advocate for sustainability being more than hazard only; ii) Violaine presented the environmental classification of metals and complex inorganic materials in CLP, ADR (European Agreement concerning the International Carriage of Dangerous Goods by Road), Seveso and Waste. The Entry Into Force (EIF) of the Pb metal environment classification in September has triggered questions regarding the classifications of alloys/CIMs under CLP but also waste and transport, which has been addressed by drafting a guidance note over the summer. The tool and technical aspects will be further presented at the Science Forum (more below).

The meeting ended with an overview of the main events to come before the end of this year (see our Calendar) and Ailsa gave an update on the Metals Academy (more information under Communication). The draft minutes were

rapidly sent out to the Steering Committee, on the 26th September (more information: Violaine Verougstraete and Ailsa Lee).

Chemicals Management Autumn Week: Regulatory Forum

The first day of the Regulatory Forum was once again brilliantly chaired by Brian Abrams (Vale) and Lisa Allen (ILA). Opening with the new Industrial Emissions Directive (IED 2.0), Lighea Speziale (Seeds Consulting) presented the impact to be expected on the BREF procedure and content. We then turned to the intersection of sustainable finance and chemicals management, with Laura Fazio Bellacchio and Carmine Carinci (Eurometaux) presenting the latest on the EU Taxonomy and CSRD, including insights from their EFRAG workshop held on the 22nd of September to be submitted to the ongoing call for evidence.

After the break, Amaya János (Cefic) outlined the implications of the Packaging and Packaging Waste Regulation (PPWR) for recyclability, Substances of Concern, and safe use. The day closed with Marta Gurin (CEWEP), who illustrated the practical challenges of aligning CLP and Waste legislation, using copper residues as a case study to show the regulatory uncertainty created by divergent classification systems.

The second day of the Regulatory Forum opened with an update from Violaine Verougstraete (Eurometaux) on the progress of the REACH revision. She explained the implications of the negative RSB (Regulatory Scrutiny Board) opinion, the advocacy efforts of Eurometaux and its members and a SWOT analysis of further delays.

We were then graced with the presence of Vita Jukne (European Commission, Cabinet Roswall) who shared the Commission's vision for the "Environment Omnibus" initiative, aimed at simplifying EU environmental legislation while maintaining ambition. It was emphasised that the large number of citizen responses to the call for evidence could not be ignored. Despite the large number of comments that need to be processed, the target for the proposal remains 2025.

After the break, Lara Van de Merckt (Eurometaux) took us for a dip into EU water policy, she shared an overview of the Water Framework Directive, the Water Resilience Strategy and the Revised Drinking Water Directive and what challenges either of them may bring for the industry. Those interested in a deep dive on the drinking water topic were invited to join the workshop on 2 October.

Last but certainly not least, Florian Anderhuber introduced Euromines' strategic approach to simplifying EU environmental legislation, highlighting the need for simplification in permitting procedures and the importance of coherence across overlapping frameworks. He urged the audience to identify alignment opportunities and leverage the current momentum. To this aim, a permitting experience survey has been issued by Euromines which will be further distributed to the members (more information: Sophia Verbrugghe and Andrea Pellini).

Chemicals Management Autumn Week: Science Forum

As were the Regulatory Forum meetings, the Science Forum half days were very well attended both in person and online. A big thank you to the speakers, the excellent chairs who helped to run these science days successfully and of course all our members who participated actively in the discussions.

Federica Iaccino (ARCHE Consulting) kicked off the Science Forum by providing the participants with an update on the activities associated with the Commission Roadmap towards phasing out animal testing for chemical safety assessment (expected in Q1 2026) and the set-up of an EU Strategy Test Method Development and Validation. The latter was set following the observation that there is a need to accelerate the availability of regulatory accepted test methods for safety assessment of chemicals, as new substances and materials are developed faster than the development and validation of test methods for establishing their safety. Also the development of test methods, their validation and regulatory implementation are not sufficiently aligned with regulatory and societal needs and there is insufficient coordination, prioritisation and a lack of financial mechanisms for validation of such methods. Yamini Gopalapillai (ICA) gave an overview of the discussions held at the most recent Ecotoxicity Technical Advisory Panel (ETAP) meeting attended by a panel of experts in environmental science who engage with commodity scientists to support the development of regulatory policy directed towards research on environmental impacts of metals. Challenging and relevant topics were discussed including Endocrine Disruptors (developing AOPs and AOP networks, threshold and applicability of ED *in vitro* assays for metals), multi-ion toxicity, ecosystem services and a scanning of what's at the horizon.

Building further on the ED topic, Claudine Albersammer (ICMM) gave a re-cap/update on the work on EDs from an international perspective, followed by Jelle Mertens (EPMF) & Emilia Hoste (IZA) who presented the outcomes of a training course on ED, held early September. Diana Dobre (Eurometaux) concluded the first day with an update on the Metals Toolbox (more below in [Tools](#)).

On Day 2, Martin Wieske (WVMetalle) started the discussions with his traditional and essential OEL Walk, providing a full update on the activities of the Working Party Chemicals, the Carcinogens, Mutagens & Reprotoxic Substances Directive (CMRD) waves, and other developments under OSH, concluding with an insight into what to expect in 2026-2027.

Dagobert Heijerick (ARCHE Consulting) presented the consequences of environmental classifications on complex inorganic materials and explained the guidance note and ADR tool that were prepared over summer to support companies producing, using and recycling Pb-containing Complex Inorganic Materials (CIMs). Several next steps were identified.

Still on classification, Rodger Battersby (EBRC) gave a presentation on the recent developments for PSLTs, including the learnings from the TiO₂ court case and from the talc RAC opinion.

Lígia da Silva Lima (ARCHE Consulting) concluded the CM week by giving an overview of the ongoing work on human health non-cancer characterisation factors of metals to be used in USEtox. She started by recapping the essentials of USEtox, before explaining the project that aims at getting more representative characterisation factors by assessing the main exposure pathways per metal and doing a comparison with the REACH Human via environment assessments for these metals, performing a data gap and sensitivity analysis regarding the USEtox input and REACH data. The minutes of the meeting will be circulated asap (more information: Violaine Verougstraete and Lara Van de Merckt).

RISK MANAGEMENT

Risk Management Taskforce meeting: PFAS, chromates, substitution, RMOA...and REACH

The Taskforce started with a status update on the REACH Revision, and a reminder of the proposals made by the sector to Commission on the risk management aspects. The possible changes in the timeline of the REACH revision (the meeting was held before the opinion of the RSB was known) and ideas for further advocacy and cooperation with other industry sectors were debated.

The generic learnings from the RAC and SEAC September discussions on the U-PFAS restriction were presented as well as the updated timeline, including the 2nd Public Consultation (PC) on the SEAC opinion. ECHA will organise a webinar on 30 October to explain its purpose and the group identified several questions for clarifications, in particular on the 8 additional sectors that will not be assessed in-depth by the Committees but be included in the Restriction.

This was followed by an update on the chromates restriction and its most striking aspects discussed in the RAC Working Group and SEAC meetings ([see above](#)). Simon Cook (Eurometaux) next gave some reflections on the Applications for Authorisation (AfAs), and the impact of the restriction on some industry behaviours.

The Eurometaux Industry RMOA guidance has been thoroughly analysed by eftec over the summer, who delivered a robust structure for a revised RMOA guidance, including a content mapping and a note containing the overarching methodology and principles. This was presented at NeRSAP ([see above](#)). The next step will be to update the guidance, but the modalities are still to be discussed.

Finally, an update was provided on the substitution study and the 18 September workshop on substitution centres. The minutes of the meeting were circulated on the 29th September (more information: France Capon, Klaus Kamps, Simon Cook and Violaine Verougstraete).

WATER

Water Taskforce: autumn meeting

The autumn Water Taskforce meeting took place on 11 September and welcomed its new co-chair Sergej Osipov from Atlantic Copper. The main points of presentations and discussion focused on the Water Framework Directive (WFD), its review and the future.

We also covered the advocacy actions that were done as well as planning for the next steps. ICA also presented their specific case of the EU-Wide Environmental Quality Standards (EQS) derivation dossier that is happening at the moment, which will most likely take precedent for the next metals (that are also river basins specific pollutants) that would undergo the same harmonisation exercise by the Commission in the next year(s).

The current Environment Omnibus, a legislative proposal aimed at simplifying environmental law and reducing administrative burden across the EU, was also discussed, as a section on the Water policies was added to the EM position. Finally, a brief overview of the Water Resilience Strategy was given.

Next important meetings in terms of water policy include:

- The Working Group Chemicals, 27th of October
- The Strategic Coordination Group Meeting, 4th of November

- The first Water Resilience Forum 8th of December

Water Framework Directive review: agreement found in trilogue

On 23 September, the EU co-legislators reached an agreement on the revision of the Water Framework Directive. The final text has not been officially released yet, but what was presented at the Water Taskforce meeting was quite accurate. Meaning:

- **Substances:** Silver is now a priority substance (PS). Nickel EQS for surface water has been halved due to an assessment factor. Lead has now moved from priority substance to priority hazardous substance (PHS). An additional EQS has also been introduced for 'sum PFAS' (25 of which are covered by this grouping).
- **Legislative procedure:** The ordinary legislative procedure (OLP) is being used for prioritisation instead of delegated acts (as was initially proposed).
- **Technical work:** the prioritisation process is moving from the Joint Research Centre (JRC) to ECHA.
- **Article 16:** is reinstated with some amendments relating to the phasing out of PHS (to be done 'where appropriate').
- **Extended Producer Responsibility (EPR):** The Commission is to conduct an impact assessment within the next three years on the possibility of introducing an EPR scheme for the Water Framework Directive.
- **River Basin Specific Pollutants (RBSPs):** The EQS for RBSPs will be harmonised to create EU-wide EQSs. They will move from the ecological status definition to the chemical status definition, and bioavailability models may be used when deriving the EQSs for RBSPs.
- **Article 4.7 (of the WFD):** Article 4.7, which sets out exemptions to the non-deterioration principle, is amended to allow deterioration over a period of one to three years, depending on the chemicals or ecological status, as well as the relocation of pollution to other river basins under specific conditions.

In addition, further criteria (e.g., endocrine disruptors and antimicrobial resistance) will be considered when substances are risk assessed, regarding the prioritisation process, watch lists and effect-based monitoring approaches being developed by the JRC.

The agreed text still needs to be voted on by the ENVI Committee and the European Parliament, as well as at Council of the EU level (COREPER). We expect official adoption in Q1 2026. The deadline for transposition into national law is the end of December 2027 (more information: Lara Van de Merckt).

INDUSTRIAL EMISSIONS

Revised IED: update on the question & answer document

On 30 September 2025, Eurometaux submitted its feedback on the Questions and Answers (Q&A) document related to the revised IED (Industrial Emissions Directive, 2024/1785). The Q&A, still in draft form, collected answers to questions received over the past months and aimed to support Member States in transposing the directive by 1 July 2026, as well as provide general guidance to stakeholders involved in its implementation.

The main feedback provided by Eurometaux concerns emission levels. In particular, Eurometaux stressed that when defining the Emission Limit Values (ELVs) based on BAT-AEL (Best Available Techniques-Associated Emission Level) ranges, several aspects should be taken into account including e.g., the location and its surroundings and not necessarily the lowest achievable levels. ELV setting (low or high) should be based on assessed risk in the receiving environment.

On pollutants not covered by BAT-AELs, Eurometaux stressed that setting permit ELVs should not be automatic for all potential substances. Instead, ELVs and monitoring obligations should result from a structured risk assessment, recognising that BATs and BAT-AELs are designed precisely to identify the substances of greatest relevance at EU level.

Additional feedback relates to environmental performance levels and benchmarks. Eurometaux highlighted that where BAT-AEPLs (BAT-Associated Environmental Performance Levels) are not derived, BAT Conclusions should not include indicative benchmarks by default but only if those parameters are identified as Key Environmental Issues in the relevant BREF process (more information: Sebastiano Fornasari and Andrea Pellini).

Landfill BREF: status update and preparing for Seville

On 17 July 2025, EU-BRITE circulated the Background Paper (BP) for the Kick-off Meeting (KoM) of the Landfill BREF (LAN BREF).

On 11 September 2025, the Eurometaux Taskforce on the LAN BREF met online to review the BP and prepare for the KoM. The agenda included:

- Introduction and provisional timetable of the LAN BREF process
- Preparation of the KoM (based on the BP)

- Chemical frontloading phase

Following the discussion, Eurometaux drafted a short position paper as feedback to the KoM agenda. The key points are:

- The approach to Key Environmental Issues (KEIs) should first be discussed at the KoM, prior to identifying individual KEIs, and differentiated according to landfill waste input.
- The structure of the BREF should also be addressed at the KoM, particularly the proposed distinction between landfills for waste with low vs. substantial biodegradable content, and the structuring of sub-categories, to ensure clarity and prevent legal uncertainty.

The KoM will take place on 6–9 October 2025, in hybrid format (JRC premises in Seville, Spain, and online). Eurometaux will participate in person (more information: Lorenzo Ceccherini and Andrea Pellini).

Next events

INCITE – Eurometaux Secretariat will attend online events organised by Cefic “How can INCITE support innovation in the chemical industry” and by the Swedish Metals and Minerals “One year with INCITE – keep up the pace” to learn more in-depth about the actions and outcomes of the INCITE project (more information: Eleonora Tosi and Andrea Pellini).

Industrial Emissions Alliance: meeting hosted by Eurometaux

On 19 September 2025, Eurometaux hosted the plenary meeting of the Industrial Emissions Alliance. A central focus of the meeting was the status of active BREFs, including the LAN BREF, whose -as mentioned above- Kick-off-Meeting is scheduled to take place in Seville from 6 to 9 October 2025.

Participants also exchanged updates on parallel workshops linked to the INCITE initiative, which aims to streamline permitting and compliance processes through technical dialogue and sectoral coordination. A significant portion of the discussion was dedicated to the ENV Omnibus initiative, particularly its implications for the metals industry in terms of reducing the administrative burden (more information: Andrea Pellini).

MEED

Sponsors Meeting: coordination meeting outcomes

On 15 September, MEED sponsors gathered to review the progress with the program and agree on next steps. The discussion focused on three main areas: the budget and financing outlook, the mesocosm pre-feasibility work, and ongoing publications. The minutes – including several actions- were circulated on 25 September (more information: Violaine Verougstraete and Diana Dobre).

TOOLS

Metals Toolbox: time for a comeback

The [Metals Toolbox](#) website was refreshed over the summer with new inputs from members and is now ready for wider promotion. An update was presented during Chemicals Management Week, along with a call for ideas on how to increase its visibility. We are now extending this invitation more broadly – please share your suggestions for promoting the Toolbox and any further updates you consider necessary at dobre@eurometaux.be.

Originally developed as a one-stop hub, the Metals Toolbox brings together tools and guidance to support the consistent use of concepts such as essentiality and bioavailability, while facilitating compliance with key regulatory frameworks (EU, OECD, US). With an international scope and it being developed in collaboration with the metal’s community, the Toolbox remains a valuable resource – provided it stays up to date and is widely used (more information: Diana Dobre).

Welding use map: posted on ECHA webpages

Associated with the guidance on “Welding and REACH: Legal Obligations and Good Practices” finalised in February, EBRC had also prepared a use map to facilitate the communication of risk management measures to users of welding consumables. This use map and associated documents were submitted to ECHA end of February and were reviewed by the relevant ECHA team. The welding use map is now available here:

<https://echa.europa.eu/csr-es-roadmap/use-maps/use-maps-library>

A huge thanks to Jutta Schade, Dennis Döhlich and Daniel Vetter (EBRC) for these very nice pieces of work, facilitating a complex assessment and its understanding (more information: Daniel Vetter and Violaine Verougstraete).

Endocrine Disruptors: training course with Charles River

A training course was organised on 5 September by EPMF, IZA and Eurometaux. Charles River gave presentations regarding ED in regulatory frameworks, *in vitro* ED testing and *in vivo* ED testing before discussing possible metal 'issues'. Key take aways were presented during the Science Forum meeting. Some key issues identified during the training course will be further discussed in other forums like the Environment Taskforce or ETAP (see above & below). The presentations were circulated.

A revised version of the simplified guidance on EDs has also been circulated recently -feedback welcome! (more information: Emilia Hoste, Jelle Mertens, Diana Dobre and Violaine Verougstraete).

OUTREACH

OECD

OECD IUCLID User Group Expert Panel: meeting 24-25 September

During the annual meeting of the IUCLID Expert Panel Group, regulators, Member States, and industry representatives presented and exchanged updates on technical developments of the IUCLID tool, its use across OECD members—including reports from Turkey, the US EPA, and Australia—as well as project conclusions, recommendations, and perspectives on future developments. ECHA and EFSA highlighted how the IUCLID database underpins data dissemination systems such as ECHA CHEM and OpenFoodTox.

The project on “Data validation across jurisdictions,” developed with the support of Eurometaux on dicopper oxide registered under REACH, BPR, and PPP was concluded and main learnings were shared with the group: this project shared insights into IUCLID data analysis and offered recommendations to ensure that scope and context are clearly communicated before dissemination, particularly when getting ready for the upcoming framework of One Substance One Assessment (OSOA).

Looking ahead, ECHA introduced potential new functionalities for IUCLID currently under consideration, including the integration of an automatic Risk Characterisation Ratio calculation that could be applied, for example, in the context of the Drinking Water Directive. In parallel, new OECD Harmonised Templates (OHTs) are being developed and refined to align with upcoming OECD Test Guidelines, with publication foreseen in the April 2026 IUCLID version. A separate project has also been launched to design templates for reporting non-guideline research data (OHTR), with the first pilot expected to be available between April and May 2026 (more information: Federica Iaccino).

OECD Guidance on the grouping of chemicals: declassified

Over the last two years, the sector has been contributing to the update of the second edition of the OECD Guidance on Grouping of Chemicals. In particular, we have been re-writing the chapter on metals and contributing to the section on inorganic UVCBs. The content of the metals chapter is fully in line with the approach we are promoting for read-across and grouping, i.e., bringing different lines of evidence together, including metal release data ('bioelution' and Transformation Dissolution data). Examples were included to illustrate our approaches. After quite some iterations (and a lot of patience of the OECD drafting group, coordinated by Ester Carregal Romero) the third edition has been approved by written procedure by the Working Party on Hazard Assessment. The amended document has been sent to the Chemicals and Biotechnology Committee (CBC) for approval and declassification by 23 October 2025. A big thanks to all contributors!! (more information: Violaine Verougstraete).

ETAP: annual meeting (& 30th anniversary)

This year's annual ETAP (Ecotoxicity Technical Advisory Panel) meeting took place in Reykjavik, Iceland.

The meeting covered various topics, the first of which was Endocrine Disruption (ED). Discussions centred on the potential development of Adverse Outcome Pathways (AOPs) and AOP Networks for metals. The session also considered the use of histopathology endpoints in aquatic endocrine studies and the applicability of *in vivo* ED tests to metals, including the definition of thresholds of adversity. A second session was dedicated to multi-ion toxicity (MIT), where key insights were shared on how major ions in water influence metal toxicity — the next level of bioavailability assessment. The difficulty of separating 'metal effects' from 'ion effects' in laboratory and field tests was discussed.

Finally, the meeting addressed ecosystem services, reviewing the challenges posed by chemical pollution and exploring how to transition from traditional risk assessment to an ecosystem services-based approach. While this research is still in its budding stages, the rationale is there to take it to the next level in the future. The meeting

concluded with a horizon scanning session that covered the potential and challenges of AI in metal risk assessment and the reliability of advanced monitoring tools (biosensors). In addition, the need to account for essentially in metal risk assessment, especially in Lifecycle Assessment (LCA) tools, was discussed, as was the importance of the nutritional and energy status of species tested in ecotoxicology studies.

The meeting concluded with a breakout session to plan the next steps for the ETAP group in terms of efforts and scientific work, including peer-reviewed articles on ED (practical *in vitro/in vivo* solutions for metals and AOPs where relevant), as well as EQS conservatisms. Further work on the USEtox tool for metals, as well as multi-ion toxicity issues, was also proposed.

In addition to the very interesting and intense scientific sessions, we had the opportunity to visit Reykjavik and enjoy a culinary tour, which took us on a unique journey featuring horse meat and 400-year-old fermented shark, washed down with a taste of "black death". Great dinners, laughter and solidarity among an international group of scientists made for a wonderful experience, both to live and witness.

Thank you, 'ETAPers', for this great (my first) edition! (more information: Lara Van de Merckt).

KAMILA'S SUSTAINABLE CORNER

Joint industry letter: on SoC in the EU legislation

Early September, 35 industry associations sent a joint letter on Substances of Concern (SoC) to the high-level European Commission officials. The letter addressed SoC in various EU legislations, like ESPR, CSRD, PPWR, EU Taxonomy, and Batteries. Eurometaux has co-signed this letter.

The letter called for:

- need for a harmonised and workable approach towards Substances of Concern;
- deletion of the SoC concept across legislation, not only in the ESPR;
- streamlining the information requirements regarding substances under REACH, rather than dispersed across multiple frameworks.

(more information: Kamila Slupek).

COMMUNICATION

Metals Academy: first draft programme sent

For the Metals Academy 5, to be held from Monday 4th to Thursday 7th May 2026, the first draft programme, stipulating the topics, but not yet the speakers (some of whom still need to be confirmed) was sent to all Eurometaux members on 19 September. The programme was sent along with some general information and a request for pre-registration in order to assess interest amongst our members. Another more detailed programme will be sent out to all in the coming weeks.

We hope this 5th edition will prove to be as successful as all the previous ones and satisfy all those who participate. Please let us know if you have any questions (more information: Ailsa Lee and Violaine Verougstraete).

Site visit: Umicore & Aurubis

On 16 September, Commissioner Roswall and Mr Luis Planas Herrera were invited to visit the Umicore and Aurubis processing and recycling plants in Olen. The very informative and well organised tours of the copper recycling and germanium production allowed to raise and exchange on several chemical management issues, namely on water and REACH. A big thank you to Aurubis and Olen who helped to illustrate the strengths but also the challenges faced by these sectors, in a very credible way (more information on the chemicals management aspects: Violaine Verougstraete)

Site visit: Treibacher

In preparation for the upcoming Kick-off Meeting on the LAN BREF (see dedicated article), the Eurometaux team conducted a site visit to Treibacher Industries in Austria, including an inspection of their associated landfill facility. The visit provided valuable insights into the operational realities and environmental management practices of the

company, particularly in the context of industrial emissions and permitting challenges (more information: Andrea Pellini).

CALENDAR

Please find below a list of all the meetings planned until end 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](#)

- 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
- 27/10: Working Group Chemicals
- 27-29/10: RAC-75 CLH WG
- 04/11: Strategic Coordination Group Meeting
- ~~05-06/11: CARACAL-56~~ Postponed to 28-29/01/2026
- 06/11: IE Alliance Plenary (Euromines)
- 11-12/11: RAC-75 DWD WG (Helsinki)
- 13/11: Registration Compliance Taskforce
- 17-18/11: RAC-75 REST WG
- 01-05/12: RAC-75 Plenary
- 01-05/12: SEAC-69 (I)
- 08/12: Water Resilience Forum
- 08-09/12: Trends in (Metals) OEL setting
- 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)