



N° 168 – December 2025



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**“You can get excited about the future. The past won’t mind”**  
*Hillary Depiano*

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## EUROPEAN METALS CHEMICALS MANAGEMENT NEWS

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## Investigation at ECHA: The REACH Affair - Episode 2

*Previous episode: The Commission has handed over to ECHA a document containing the REACH revision proposal. However, it disappeared overnight from the meeting room where it was left for analysis by Dr Sharon Mc Osh and her colleagues. Our investigator has been tasked to retrieve it (urgently) and has just been taken to the crime scene (mezzanine level in ECHA).*

*Once Dr Mc Osh was out of sight, I turned back to the persons still in the meeting room and asked them to leave, instantly cursing (for myself) the mess left by their search. How could I find any clues in all this? However, I did spot a white-grey hair next to a trace of correction fluid on one of the tables, and a grey pencil on the floor that had been chewed at its end.*

*Looking around the meeting room, I noted the nice IT system, the comfortable chairs but also how the glass walls rendered it easy to spot a document, especially if labelled confidential, for any person going up the stairs from the canteen or even standing on the upper floor.*

*I could not help wondering why such a valuable document had been left so visibly 'unattended': the REACH revision has been expected since 2022, and it was common knowledge that the proposals would create significant turmoil. Many actors of the EU scene were craving to see it: to anticipate it, to change it or even for it to have 'politically vanished'.*

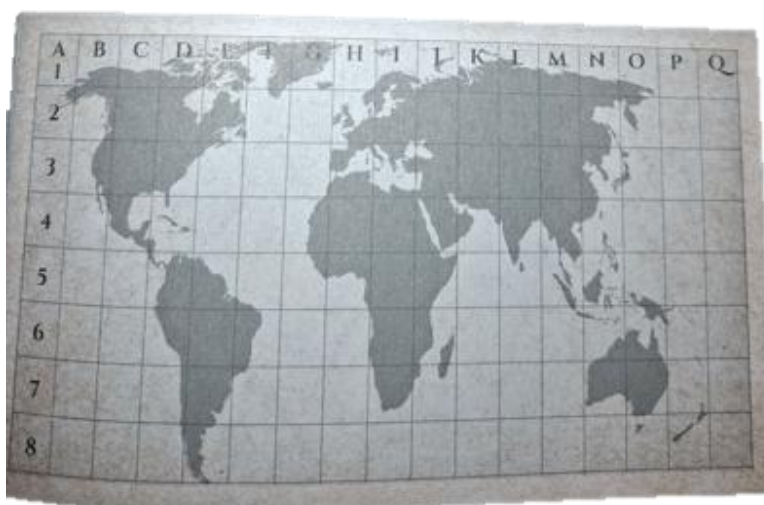
*I sighed: the list of possible suspects could be long.*

*After having cautiously collected the clues in a metal box (i.e., PFAS-free), I went back to the canteen to pick up a Fazer chocolate and draft a roadmap. With such an obvious motive for the theft (anyone not curious to see how the text fits in with the competitiveness and simplification promised by Ursula VdL can throw me a stone), I decided to start my investigation by focusing on the people present in the building the afternoon before and who might have a badge to flee via the footbridge after the crime. Either their own badge, one provided by an accomplice, or maybe a stolen one?*

*First step: ask Dr Mc Osh about the meetings that had taken place the day before. Running to her offices (D on map provided last month), I passed by the Voima room. I knew that this modern- without daylight- conference room was the place where the Risk Assessment Committee met earlier that week, bringing together the Member States representatives but also Commission, industry and NGOs.*

*Looking through the small rectangular windows, I saw someone with fair hair sitting in the front row, reading papers. I decided to go in, but surprisingly, the door resisted my entrance: the effect of a padlock with a security code. I banged on the door but to no avail.*

*Turning my head, I saw on the wall, in the place where the seating plan for the meetings usually hangs, a world map and next to it the following sequence: D5-H2-O4-H6-K6-B2-L6-C2-O2-D3-G6-O6-K4-D6-F2-O5-N4-G2-H4-M2-G4-F4-K2-F6-J2-K3-J6-N2-H3-E5-M3-O3-D2-M4-K5-D4*



*Can you help me find the 4 -digit code to enter the Voima room? Thank you*

## EU COMMISSION

### COMMISSION

#### REACH Revision:

The latest official communication by DG GROW (Hans Ingels, head of the bioeconomy, chemicals and cosmetics unit) and DG ENV (Eric Mamer, DG for Environment) hinted at a publication in Q1 2026, though informal signals suggest not to expect a proposal before Easter.

#### Commission's ECHA Basic Regulation: *comments submitted*

For those who missed the last newsletter, on December 2<sup>nd</sup> Eurometaux submitted a response to the call for feedback regarding the Proposal for the ECHA Basic Regulation. The final submission was based on members' inputs, and we also aligned with Cefic to assess whether there were some elements we could jointly reinforce (e.g. link with OSOA, ARNs and confidentiality of the data). The full submission can be found here: [Link](#) (more information: Sophia Verbrugghe and Violaine Verougstraete).

#### ENV Omnibus: *publication in December*

On 10 December, the EC published the Environmental Omnibus Package, over 100 pages, still under detailed review, but initial analysis shows a strong focus on IED-related aspects (Industrial Emissions Portal, Environmental Impact Assessment, Environmental Management Systems), with links to Battery Regulation, waste legislation, and upcoming simplifications for other frameworks such as REACH and Waste Shipment Regulation. Eurometaux has actively contributed through data collection, a position paper, and participation in key meetings, including the recent stakeholder roundtable. Outreach to policymakers is ongoing, with the first meeting held on 9 December with MEP Dimitris Tsiodras's office, and further engagements planned (more information: Andrea Pellini, Kamila Slupek, Laura Fazio and Lara Van de Merckt).

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## EU AGENCIES

### EUROPEAN CHEMICALS AGENCY (ECHA)

#### ECHA COMMITTEES

##### RAC-75: *last plenary meeting of the year*

RAC finalised the discussion on the scientific evaluation of a limit value for anthraquinone, classified as carcinogen 1B, H350. The Committee derived an exposure-risk relationship (ERR) for the cancer risk and recommended a non-cancer 8h time-weighted average (TWA) limit to protect against repeated dose adverse effects (kidney, haematological system, etc.).

A key item on the agenda was the proposed restriction on PFAS: RAC reached provisional conclusions on PFAS manufacturing, including an interesting discussion on 'IED and BREFs' as an alternative or complementary risk management option (RMO). RAC also continued its discussion on horizontal issues related to the U-PFAS restriction, as for example practicality, monitorability, effectiveness of the restriction in reducing the risk and associated derogations but also recycling that includes metals. Regarding metals recycling, RAC's opinion was that, in pyrometallurgy, high temperatures are likely to fully destroy PFAS but that this may not apply to hydrometallurgy. A default emission factor of 0.001, coming from the ECHA R18 guidance was considered applicable to PFAS in pyrometallurgical processes but was not considered conservative enough to describe PFAS emissions in hydrometallurgical processes, in which emissions may rather resemble those observed in non-hazardous waste incineration. However, RAC did not make an attempt to calculate the potential emissions related to the metals recycling. RAC should finalise and adopt its opinion at the March 2026 meeting. More learning lessons from the PFAS discussions were presented to the Risk Management Taskforce ([see below](#)).

RAC also adopted its first opinion on a new CLP hazard class, i.e., vPvB and had an interesting discussion on the statistical testing used in carcinogenicity studies (one or two-sided). An expert meeting held in The Netherlands earlier this year concluded that in carcinogenicity studies, one-sided testing is generally preferred unless there are substantive reasons to decide otherwise. In determining carcinogenicity, not only statistics are looked at: all aspects (weight of evidence) must be considered to reach a conclusion. Above all, it must be reported

transparently, and comprehensively, which considerations have been made. RAC stressed that statistical significance is not the only factor used to classify but that other elements are looked at in the assessment. RAC was also updated on the discussions held in specific groups, i.e., the RAC Restriction Working Group (and more specifically the chromates restriction) and the status of the materials (e.g., templates, checklists) developed in the context of the Drinking Water Directive.

And finally, RAC received an update on the status of the CLP Read-Across Practical Guide. This guide is important as it will be further used for group classifications. RAC will be consulted in February on the draft and regular stakeholders (including European Metals) will have the opportunity to comment (more information: Violaine Verougstraete).

#### **SEAC-69: chromates authorisation and restriction**

The flow of Authorisation for Application (AfA) cases for chromates continues but is expected to stop in 2026 due to the forthcoming restriction. ECHA will not start work on any new cases unless the applicant has paid a fee – these cases are effectively “frozen”. Furthermore, a large group of AfA cases currently moving through the REACH committee will have extended deadlines for review reports, in line with the expected timing of the restriction.

There was a second discussion on the SEAC draft opinion on the proposed restriction of certain Cr(VI) substances. This was again a very difficult discussion. Consensus was lacking on whether the proposed restriction under REACH is ‘the most appropriate risk management option’ – it appears that alternatives such as OSH legislation and IED are not ruled out. Some SEAC members would like to evaluate other options e.g., revisit Authorisation, but this is not possible due to the mandate given to ECHA by the Commission. There were further difficult discussions on Analysis of Alternatives (AoA), as what is proposed is not a “classical” restriction because the primary outcome expected is not substitution. SEAC is trying to go through the normal thought process as required by REACH to be consistent with what has been done in the past, but this cannot be done due to a lack of data in the background document from the dossier submitter. A robust AoA is not possible.

Advice from the Enforcement Forum also raises significant issues with the restriction, for example conflict with other limit values / legislations (OSH and IED) leading to very challenging enforcement. The Forum proposes a harmonisation of limit values and notes that having different levels of protection for workers (different exposure limits for different uses) has no justification (more information: Simon Cook).

#### **SEAC-69: U-PFAS restriction, all sectorial reviews are now completed**

On the universal PFAS restriction, SEAC had final discussions on electronics and semiconductors, PFAS manufacturing, and horizontal issues. For electronics and semiconductors substitution potential is generally low. On proportionality, SEAC considers that RO1 (full ban) is likely not proportionate, but cannot conclude on proportionality of RO2 and RO3 (bans with derogations) due to many uncertainties. For PFAS manufacturing, RO1 (full ban) has strategic autonomy issues. For RO2 and RO3 options (continued manufacturing with emission controls), SEAC cannot conclude on proportionality. The horizontal issues discussed by SEAC included “other impacts” (e.g., second-hand articles, spare parts, recycling, trade, R&I), practicality and monitorability. Concerns were expressed over a negative impact on overall sustainability e.g., no second-hand use, premature obsolescence of complex objects due to a lack of spare parts, constraints on recycled material streams. Site-specific PFAS management plans were considered unenforceable due to a lack of clarity from the dossier submitters on what these would look like, there were also concerns over costs including reporting requirements. The restriction dossier has evolved through the ECHA committee process as data gaps and other issues were identified. Several major difficulties persist and the dossier still 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 was explained by ECHA in a webinar on 30 October. It is important that stakeholders submit new and relevant information e.g., on alternatives (availability, feasibility, safety...), impacts of bans (closures, revenue losses, job losses...), and costs (implementation of RO3 options, reporting requirements, PFAS management plans, emissions monitoring...) (more information: Simon Cook).

#### **MSC-92: 3 days meeting**

A status update was provided to the Member States on Substance Evaluation (SEv) activities by Q4 2025, including a review of the overall process output review and the assessment of follow-up actions on proposals for Regulatory Risk Management from SEv conclusion documents. The analysis covered the period from 2012 to mid-2025. Regarding the process, a streamlined decision-making process and the overall reduction of SEv lifecycle were considered as key achievements. Regarding the health concerns to be clarified under SEv, it is interesting to note that unresolved cases stem primarily from dossier compliance issues but also from technical or contextual

limitations, cease of manufacture, considerations on added value for regulatory risk management. Also, ECHA noted that the high rate of removed concern for certain endpoints (e.g., Muta., PBT/vPvB) questions the selection criteria for CoRAP inclusion and/or the sensitivity of testing strategies. Where needed, the SEv conclusion document includes proposals for risk management, which should be considered as preliminary views from the evaluating Member State and are not legally binding. The MSC secretariat assessed these proposals and noted that CLH is by far the main proposal, followed by SVHC identification. The contribution of SEv to restriction and Occupational Exposure Limits (OELs) is more modest. Several topics for further discussion were identified (e.g., with the new CLP and 2023 endpoints, need to consider how SEv can contribute to hazards not codified in CLP and that may lead to SVHC under Art. 57(f) - 'EloC', where relevant), to be held in MSC or in RIME+. MSC discussed the long-term toxicity testing to sediment organisms and the clarifications proposed by a Member State.

N-hexane was identified as substance of very high concern, as first neurotoxic case of equivalent level of concern (ELoC). The justification for the SVHC identification was based on the harmonised classification of n-hexane as STOT RE 1 H372 (nervous system) in combination with information on the equivalent level of concern (ELoC) (e.g. type, irreversibility and delay of health effects, quality of life, societal concern and derivation of a 'safe concentration'). This sets a precedent for neurotoxicity. NGOs supported Candidate Listing as it makes communication into the supply chain mandatory and respects the right for consumers to know but suggested to use the Substitute It Now (SIN) list from ChemSec as source of information to identify more cases.

The MSC also discussed ECHA's recommendation of priority substances to be added to the REACH Authorisation List and the draft update of the Community Rolling Action Plan for substance evaluation. Regarding the 13<sup>th</sup> prioritisation list, ECHA made a pragmatic decision in terms of number of substances proposed, considering that decisions on inclusion of substances recommended in the 10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup> recommendations are still pending. Four substances are proposed, including one for ED ENV concerns. Metals' prioritisation scores were below the proposed cut-off for prioritisation.

To conclude NL made a presentation on how many mutagens are missed under REACH due to limited low tonnage information requirements, an update was provided on ongoing court cases and ECHA explained their contributions to PARC and a collaborative platform on New Approach Methodologies (NAMs) to be started in 2026. Learning lessons of this meeting will be presented at the next Registration Compliance Taskforce meeting (more information: Federica Iaccino and Violaine Verougstraete).

## ECHA OTHER ACTIVITIES

### **New: additional tasks under OSOA**

ECHA has officially announced that it has been entrusted with significant new tasks under the One Substance One Assessment (OSOA) package, strengthening its role in delivering coherent and transparent chemical safety across the EU. Executive Director Sharon McGuinness called the reforms "a significant step towards a more efficient chemical safety system in Europe", through collaboration and science-based action.

A key element is the new common EU chemicals data platform -a **one-stop-shop for chemicals data**, improving transparency and accessibility for regulators, industry, and the public- which ECHA will manage together with partner agencies including EEA, EFSA, EMA and EU-OSHA. ECHA will also develop an EU-wide monitoring and outlook framework, support early warning and risk identification, generate new data where needed, and take over tasks such as RoHS restriction work, POPs waste limit values and benefit-risk guidance for hazardous substances in medical devices.

### **ECHA - Industry: associations call and meeting in December**

The regular monthly meeting between ECHA and industry associations took place on Friday 5 December. ECHA shared updated statistics on REACH submissions, which were around 6% lower than expected, while Product and Process Oriented Research and Development (PPORD) notifications were approximately 20% above forecast. CLP notifications continue to dominate REACH-related activities, accounting for about 87% of all submissions. Regarding PPORDs, ECHA reported that around 20% of notifications trigger follow-up actions with competent authorities under Article 9(4). For expired PPORD notifications between 2014 and 2019, ECHA estimated that roughly 30% resulted in an inquiry and subsequent registration, with new substances being more likely to progress to registration. Overall, ECHA highlighted increasing regulatory interest in better understanding PPORD trends and their role in supporting innovation.

ECHA published the full support package for the microplastics restriction in the first week of December on their website: this includes reporting guidelines, an IUCLID manual and a video tutorial. The reporting system has been available since early November and is ready to receive submissions. The first reporting deadline is set for 31 May 2026 and applies to manufacturers and industrial downstream users of synthetic polymer microparticles in pellet



form, with additional user groups becoming subject to reporting obligations in 2027. Industry is encouraged to provide feedback on the support package and tutorial, noting that further guidance is available through the Commission's explanatory guide published earlier this year. ECHA also outlined its work to support small and medium-sized enterprises, explaining that the SME support strategy is structured around four pillars: listening, mapping, encompassing and engaging. Key achievements to date include the launch and testing of new digital tools, including AI-based solutions such as the SME Hub on the ECHA website, as well as a multilingual webinar on REACH registration basics, with translated transcripts and Q&A sessions available in all EU languages.

A dedicated SME focus group composed of SMEs themselves was established, holding its first meeting on 15 December, with quarterly meetings planned to go forward. The group provides direct feedback on SME needs and upcoming regulatory developments, including SME verification and the usability of ECHA tools and processes. Mapping activities will continue through exchanges of best practices with Member States, the European Commission and other EU agencies, alongside the maintenance of an inventory of national SME support tools and ongoing engagement through the network of national helpdesks.

Furthermore, on Monday 15 December, the annual hybrid meeting between ECHA and the industry associations took place. Discussions covered updates on ECHA IT tools, including REACH-IT, the Industry Portal, IUCLID, ECHA CHEM and the microplastics reporting system, as well as evaluation and screening campaigns, CRO meetings and Robust Study Summary reporting (for a detailed report on the December meeting and further information on ECHA–industry interactions, please contact Federica Iaccino).

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## EUROPEAN METALS CHEMICALS MANAGEMENT

### **Chemicals Management Steering Committee: last meeting of the year**

The CMSC meeting started with a review of the 2025 Strategic Plan, highlighting the achievements and a presentation of the proposed objectives for 2026 (including KPIs). These two elements were expected to be presented to the European Metals Board the same day, and hence the CMSC's opinion and support were essential to have. In a nutshell, 2026 will further be marked by the challenge to reconcile all the “buzz” words: competitiveness, simplification, security/defence and strategic autonomy with the legislative and geopolitical landscape. The CMSC took note of the move from the ‘substances chemicals management legislation’ to product legislations and the increasing links between Substances of Concern (SoCs), Substances of Very High Concern (SVHC), REACH-like restrictions that expand to the new ECHA tasks. Objectives and KPIs were defined along these elements.

The Environmental Omnibus was published on 10 December, and the CM staff provided a state of play and inputs of the sector to date, as well as a preliminary analysis. This was followed by a lively debate on what could be done (advocacy, technical work) and by which taskforces/groups, as overall, there seems to be a lack of concrete actions. This was followed by an interesting analysis of the outcomes of the Water Framework and Soil Directive revisions. On Water, several actions had been agreed on by the Water Taskforce but now need to be relooked, taking the Environmental Omnibus in consideration. Clear though is that water (quality, resilience, guidance on key metal specificities, appropriate conservatism of Environmental Quality Studies (EQS) and take-over by ECHA) will remain a challenging topic in 2026. Regarding soil, key now is to prepare for the implementation of the Soil Monitoring Law. The sector is involved in expert and technical groups at authorities-level and has been approached to present. It was agreed to include the soil item on the agenda of the next IED Taskforce meeting (i.e., 22 January), to ensure that companies involved in IED and permitting are well aware about the latest developments and the science developed in the soil sub-group.

Considering the contradictory messages on the REACH revision, it was proposed to the CMSC to agree on the following advocacy positions: work towards a proportionate implementation of Mixture Allocation Factor (MAF), substitution and Endocrine Disruptor (ED) endpoints if the REACH Annexes come through, promote the RMOA Guidance, use the adopted One Substance One Assessment (OSOA) initiative to push for coherence across REACH, CLP, Products law, and other regimes and further support the active combination of the necessary protection of human health and environment with competitiveness and proportionality. Several useful suggestions were made by the participants.

A state of play was given on “Advanced Materials” activities, which include a Call for Evidence and a Public Consultation for the AdMat Act announced for Q4 2026. Key messages were agreed on as well as the need to ensure consistency with the sector's messaging on other related topics e.g., Transition Pathway (TP), Circular Economy Act (CEA), Critical Raw Materials Act (CRMA), Industrial Accelerator Act (IAA), RE-Source EU. The need

for high-level advocacy on the U-PFAS restriction was evoked before updates were provided on the forthcoming ECaBaM workshop, the outcomes of a Mayer Brown conference on enhancing access to EU Courts and the Metals Academy. Draft minutes were circulated on 22 December (more information: Ailsa Lee and Violaine Verougstraete).

## CLASSIFICATION

### **Li CLH: *Li entries in 24<sup>th</sup> ATP maintained after interservice consultation***

The Taskforce met for a short call on 5 December to discuss what can still be done regarding the classification of the 3 lithium salts and the draft Adaptation to Technical Progress (ATP) that proposed unchanged entries for the three lithium salts, despite the outcomes of the Expert Round Table held in March. It was agreed to continue to highlight the regulatory consequences and impacts on competitiveness and strategic autonomy at Commission level but also to support comments that could be filed by non-EU countries for the WTO consultation (open for comments until end of January 2026). The UK HSE also asked to be updated on the recent developments and actions from industry (e.g., industry RMOA, SSD study).

The final version of the industry RMOA should become available very soon and what could be used in a Manifesto will be extracted. Finally, a status was given on the EQS and Species-Sensitive Distribution (SSD) work. The study design is being finalised with U-Ghent and ARCHE is co-monitoring with Albemarle. Testing should start beginning of 2026. The minutes were circulated to the Taskforce on Monday 8 December (more information: Violaine Verougstraete and Ailsa Lee).

## RISK MANAGEMENT

### **Risk Management Taskforce: *meeting starting with PFAS (free) croissants and closing with a yummy curry***

The meeting started with a “PFAS breakfast” to discuss and agree on the next advocacy steps to raise the sector’s concerns about the outcomes of the U-PFAS restriction process. We are concerned that conclusions on important PFAS uses / sectors of use may not be drawn at all, or that the conclusions that are drawn are not robust (i.e., not based on a rigorous cost / benefit assessment) or not applicable (e.g., for the 8 additional sectors that have been included in the restriction but were not assessed). The group agreed that the secretariat would prepare a draft high-level letter addressed to the Commission highlighting these messages, but also that a meeting could be organised with the Commission officers in charge to discuss possible ways forward that could alleviate the impact on our sector. Recharge is also drafting a high-level letter that will be co-signed by several industry sectors.

Still on the PFAS topic, the learning lessons from the December RAC and SEAC discussions were presented to the taskforce, with interesting discussions on how other RMOs could or not be envisaged and what can be expected from the SEAC Public Consultation expected to start after the March meetings.

Eurometaux and EPMF participated in the OECD Working Party on Risk Management meeting end of September and reported on the opportunities for synergies on risk management topics, going beyond the EU. This was followed by a first sketch of the next NeRSAP meeting scheduled for June 2026, and a discussion on the chromates restriction.

The Taskforce also discussed the possibilities to proceed with the update of the Eurometaux RMOA guidance, building on the useful documents delivered by eftec in September (i.e., a structure and content mapping document and a document containing the overarching principles, and also taking into account a possible delay or postponement of the REACH revision. Finally, the 2026 objectives were agreed on, including further working towards improvement of risk management by continuing to advocate for the OSOA working group, strengthening the push for high quality RMOAs and advocating for ex-post evaluation of regulatory efficiency of different risk management measures; but also anticipating ECHA’s new risk management tasks (RoHS, ELV, OSOA database) and monitoring what is happening on substitution (with/without REACH Revision, Helsinki Chemicals Forum, OECD...). European Metals will further participate in the organising committee of the NeRSAP events. The consideration of footprint in risk management was proposed as new topic to explore. The draft minutes were circulated on 23 December (more information: France Capon, Klaus Kamps, Simon Cook, Sophie Verbrugghe and Violaine Verougstraete).

## WATER

### **Water Framework Directive: *are we looking at an “inception” of reviews?***

The review of the Water Framework Directive, which took ten years to complete, was finalised in trilogue at the start of autumn 2025. The text still needs to be formally voted on early 2026 before its final publication in the EU Official Journal. However, both the [REsourceEU](#) communication and the [Environment Omnibus](#) state that the EU

Commission intends to review and revise the Water Framework Directive in Q2 of 2026. The EU Commission also plans to conduct a stress test on the effective implementation of the recently agreed exemptions to the non-deterioration principle in 2026, although these new exemptions have not yet been implemented... Additionally, the Commission intends to prepare guidance in Q1 of 2026 to clarify various issues raised by stakeholders, particularly those relating to permitting. While the timing of this review of a recently revised directive can be questioned, the work and messages of Eurometaux/ European Metals and its sector partners have clearly reached the highest level of the Commission. The hurdles of permitting linked to the Water Framework Directive have been recognised, and a strong position has been taken; how this will be delivered remains to be seen.

A roadmap detailing how the EU Commission will organise the announced actions is expected at the end of January this year. It is still unclear how it will be incorporated into the current legislative process of the WFD. Stay tuned... (more information: Lara Van de Merckt).

## SOIL

### Soil Monitoring Law: Update

The Soil Monitoring Law officially entered into force on 16 December (see [publication](#) in the EU Official Journal). The next three years will be dedicated to transposing it into national legislation (more information: Lara Van de Merckt).

## INDUSTRIAL EMISSIONS

### IED Taskforce: meeting in January

The next meeting of the Industrial Emissions Taskforce will take place on 22 January 2025 from 10:30 to 13:00. The agenda will include -amongst others- updates on the progress of the MIN and LAN BREFs, a briefing on the recently published Environmental Omnibus, and an overview of the ongoing work within the Soil sub-group. This session will be an important opportunity to align on key developments and next steps across these areas (more information: Eleonora Tosi and Andrea Pellini).

### BREF GUIDANCE

The Commission has been reviewing the draft Guidance, based on the comments received and the discussions that took place at the last IED Article 13 Forum meeting. All comments were thoroughly assessed, and the majority has been accepted, either completely or in part. The detailed assessment of these comments can be accessed via Excel file on [CIRCABC](#). The updated [version of the Guidance](#) is also available on CIRCABC.

The Commission has launched a commenting period which will last until the next meeting of the IED Article 13 Forum which is scheduled for early March 2026.

Next steps: Eurometaux Secretariat will draft preliminary comments to the updated version of the BREF Guidance, these comments will be circulated among the IE Taskforce members asking for feedback (more information: Eleonora Tosi and Andrea Pellini).

### PBG BREF

The Commission started the drawing up of the BAT reference document (BREF) for the Production of batteries in gigafactories (PBG BREF).

During the revision of the IED in 2024 it was decided to draw up a new BREF concerning this newly added activity, which is specified in point 2.7 of Annex I to the amended IED, namely “2.7 Manufacture of batteries, other than exclusively assembling, with a production capacity of 15.000 tonnes of battery cells (cathode, anode, electrolyte, separator, capsule) or more per year”, to address the key environmental issues associated with batteries production processes.

On 16th December 2025, the European Bureau for Research on Industrial Transformation and Emissions (EU-BRITE) officially started the process of drawing up a BREF for the PBG BREF. As described in the communication sent to the IED Article 13 Forum Members, the first step of this process is the setting up the Technical Working Group (TWG), which consists of experts from Member States, EU industrial associations and environmental NGOs. Afterwards, the TWG will be invited to provide information, feedback and views on the main aspect of the BREF (e.g., the scope, the number of existing plants, the potential Key Environmental Issues etc.).

Next steps: Eurometaux Secretariat will follow this BREF. If you wish to be involved in the process please send an email to [Andrea Pellini](#) or [Eleonora Tosi](#) by 16th January 2026.



### **MIN BREF: some key updates regarding the ongoing work**

On 9-10 December 2025, EU-BRITE held the workshop on the finalisation of the draft questionnaire, with over 50 TWG members attending the online meeting. The questionnaire has undergone significant improvements based on the comments received from the Technical Working Group (TWG).

According to the author of the MIN BREF, the questionnaire will be finalised and tested by volunteering plant operators by February 2026.

In parallel, the sub-group on Chemicals has been working since March 2025 and has compiled a list of 80 substances used in the sector. During the recent workshop, some TWG delegations requested additional work before the data collection phase to confirm which chemicals should be included as KEIs, in line with the conclusions of the kick-off meeting. To address this, a written procedure will be followed.

Moreover, EU-BRITE presented the tentative timeline for the next steps of the drawing up process of the MIN BREF:

1. TWG to propose operators for testing the final version of the questionnaire (mid-January 2026)
2. EU-BRITE to issue the 3<sup>rd</sup> draft questionnaire for testing (2<sup>nd</sup> half January 2026)
3. Questionnaire testing period (2<sup>nd</sup> half February 2026)
4. EU-BRITE to issue the final questionnaire to TWG and distribution to the participating plants through the Member States' representatives (1<sup>st</sup> half March 2026)
5. Submission of filled-in and quality checked questionnaires in BATIS (1<sup>st</sup> half June 2026)

The first draft of the MIN BREF is expected in early 2027 (more information: Eleonora Tosi and Andrea Pellini).

### **LAN BREF**

As the year just started, the LAN TWG is entering a crucial stage in the development of the LAN BREF. The identification of well-performing landfills remains a priority. These sites will play a key role in the data collection process through a dedicated questionnaire. Proposals for well-performing landfills should be submitted by 30 January 2026 to ensure timely progress. Work is also advancing on the development of the first draft questionnaire (Q1), which is based on the conclusions agreed during the Kick-off Meeting. The first draft will be shared via BATIS in February 2026. Looking ahead, a workshop on monitoring diffuse methane emissions is planned for the second quarter of 2026. Members are invited to share suggestions on topics to cover, relevant literature, potential speakers, and preferred formats for interaction. before 13 February 2026.

A tentative timeline for 2026 and early 2027 will be presented during the Taskforce meeting on 22 January, including the key milestones (more information: Andrea Pellini).

## **HUMAN HEALTH**

### **Trends in (Metals) OEL Setting: well-attended co-hosted workshop**

On 8-9 December 2025, [Wirtschaftsvereinigung Metalle](#), International Copper Association Europe and Eurometaux (European Metals Association) organised a workshop on the Trends in (Metals) Occupational Exposure Limit Values (OELV) setting in the EU. About 60 participants joined to discuss and gain knowledge on the regulatory landscape, at national and EU level, focusing on the science behind the OEL derivation. Several metal cases at the different stages of the OEL process were presented, highlighting the learnings and possible precedents in the scientific process. This was followed by a lively panel discussion on how to best approach the science, data and process. Several questions were raised going beyond the pure science aspects, e.g., regarding the socio-economic and policy contexts. These elements, as well as practical implementation, will therefore be addressed in follow-up workshops (more information: Yamini Gopalapillai, Martin Wiekse and Violaine Verougstraete).

## **MEED**

### **MEED coordination call: agreements on way forward**

A call was held with the MEED sponsors and MEED team to decide on the fate of the mesocosm study, taking stock from the learnings of the feasibility study and the overall regulatory context. It was agreed to put the study on hold until there is more clarity on the regulatory triggers to better inform the study objectives and regulatory requirements. The group discussed possible alternatives to support the MEED outcomes and the MEED team committed to have a look at available metal mixture mesocosm studies and how they could be of use for the MEED project. A first analysis and proposed way forward was circulated to the sponsors on 23 December for their feedback. The sponsors were also provided with a status on the budget and reports/publications. Key in 2026 will be to collectively design the promotion and communication of all the useful work done in MEED and how the outcomes could be used in regulatory discussions. The Eurometaux webinar on 16 December gave us a first opportunity to highlight some MEED results ([see below](#)), but also a

meeting with the EEA and ECHA (staff involved in the future WFD activities) is planned for 19 January, with a focus on the mixture effects (but only the scientific effects) (more information: MEED team).

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## OUTREACH

### OTHERS

#### **Metals in the Twin Transition: concluding our 2025 webinar series**

Eurometaux concluded its 2025 webinar series with “Metals in the Twin Transition”, a discussion focused on the environmental implications of Europe’s growing demand for critical and strategic metals in the context of the EU’s Zero Pollution objectives.

Speakers shared complementary perspectives on emissions, exposure, and future outlooks. The European Environment Agency outlined current trends in metal emissions and exposure across Europe and highlighted remaining data challenges. Building on this, the ARCHE team presented key results from the Metals Environmental Exposure Data (MEED) projects, with a focus on regional exposure assessment and the scientific approach followed to address combined toxicity. The webinar also discussed the outcomes of a study carried out by TNO, estimating changes in concentrations in receiving aquatic environments to evaluate the potential impact of increased demand for key metals for the twin transition by 2030.

The webinar underlined the importance of robust data and science-based approaches to inform policy discussions at the intersection of environmental protection and the twin transition.

If you missed it, you can watch the recording here: [Webinar: Metals in the twin transition](#) (more information: Violaine Verougstraete, Lara Van de Merck and Diana Dobre).

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## KAMILA’S SUSTAINABLE CORNER

#### **Joint industry letter on Substances of Concern: official Commission response**

The European Commission provided an official reply to a joint industry letter on Substances of Concern (SoCs) co-signed by 35 industry associations, including Eurometaux.

The letter, sent in September, called for (i) the need for a harmonised and workable approach to Substances of Concern, (ii) the removal of the SoC concept across EU legislation, (iii) streamlining the information requirements regarding substances under REACH, rather than dispersing them across multiple frameworks.

#### **Commission’s official response focused on:**

- 1) Consistency of definitions** – The Commission confirmed that SoC definitions are consistent across major files. The definition in the ESPR (Ecodesign for Sustainable Products Regulation) and the Packaging and Packaging Waste Regulation (PPWR) is identical, while the Batteries Regulation uses highly similar wording.
- 2) Sustainability reporting and EU Taxonomy** – EFRAG is assessing SoC-related issues within the simplification exercise of the European Sustainability Reporting Standards under the CSRD. In parallel, chemical-related criteria will be reviewed in the broader EU Taxonomy review.
- 3) Targeted and flexible information requirements** – The Commission underlined that the ESPR is not intended to duplicate chemical safety legislation such as REACH or RoHS. Flexibility is built into the framework through exemptions, thresholds and phased implementation. Substances affecting reuse and recycling will be defined on a product-specific basis and may remain undefined if no such substances are identified. Stakeholders will be consulted during the preparation of delegated acts.
- 4) Practicability and proportionality aspects** – Measures on SoC will be introduced through product-specific delegated acts, each supported by an impact assessment.
- 5) Avoidance of duplication and administrative burden** – The Commission acknowledged that ESPR information requirements may, in some cases, allow to comply with obligations under Article 33 of REACH. Increased use of product-specific granularity is also being considered in the context of the REACH revision.
- 6) Dialogue with stakeholders** – The Commission committed to continue the dialogue with stakeholders on the Substances of Concern (more information: Kamila Slupek).

## 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).

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## CALENDAR

**Please find below a list of the meetings already planned for 2026 (ECHA, Commission & European Metals).**

**For meetings at European Metals:** 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](#)

- [20/01: Environment Taskforce](#)
- [22/01: Industrial Emissions Taskforce](#)
- [27-28/01: ECaBaM 4<sup>th</sup> Workshop](#)
- 26-28/01: RAC-76 CLH WG
- 27-28/01: CARACAL-56
- 03-05/02: RAC-76 AfA WG
- 09-13/02: MSC-93 – TENT
- [19/02: MeClas Steering Committee Technical Meeting](#)
- 23-24/02: RAC-76 REST WG
- [25/02: Chemicals Management Steering Committee](#)
- [26/02: Risk Management Taskforce](#)
- 02-06/03: RAC-76 Plenary
- 02-06/03: SEAC-70
- 09-13/03: SEAC-70
- 11-12/03: RAC-76 DWD WG
- 10/03: RAC-76 (II optional - remote)
- [16-18/03: Chemicals Management Spring Week \(RF - SF\)](#)
- 15-16/04: Helsinki Chemicals Forum
- 27-29/04: RAC-77 CLH WG
- [04-07/05: Metals Academy 5](#)
- 05-06/05: RAC-77 DWD WG
- 07-08/05: RAC-77 AfA WG
- 26-27/05: RAC-77 REST WG
- 01-05/06: RAC-77 Plenary
- 01-05/06: SEAC-71
- 08-12/06: SEAC-71
- 08-12/06: MSC-94 – TENT
- 09/06: RAC-77 (II optional - remote)

- [18/06 \(AM\): Risk Management Taskforce](#)
- [18/06 \(PM\): Chemicals Management Steering Committee](#)
- 29/06-01/07: RAC-78 CLH WG
- 02-03/07: RAC-78 AfA WG
- 01-02/09: RAC-78 REST WG
- 07-11/09: RAC-78 Plenary
- 07-11/09: SEAC-72
- 14-18/09: SEAC-72
- 15/09: RAC-78 (II optional - remote)
- [16/09: Chemicals Management Steering Committee](#)
- 17-18/09: RAC-78 DWD WG
- [21-23/09: Chemicals Management Autumn Week \(SF - RF\)](#)
- 05-07/10: RAC-79 AfA WG
- 05-09/10: MSC-95 – TENT
- [08/10: Risk Management Taskforce](#)
- 26-28/10: RAC-79 CLH WG
- 09-10/11: RAC-79 DWD WG
- 16-17/11: RAC-79 REST WG
- 30/11-04/12: RAC-79 Plenary
- 30/11-04/12: SEAC-73
- 07-11/12: SEAC-73
- 08/12: RAC-79 (II optional - remote)
- 07-11/12: MSC-96 – TENT
- [16/12\(PM\): Risk Management Taskforce](#)
- [17/12 \(AM\): Chemicals Management Steering Committee](#)

**Note:** The 16<sup>th</sup> Helsinki Chemicals Forum (HCF) will be held at the Helsinki Expo and Convention Centre in April 2026 at the same time as ChemBio Finland, the event for the chemistry and biotechnology professionals in the Nordic Countries and Baltic regions.

The HCF brings together international authorities, politicians, academics, NGOs, journalists, industry and experts in chemicals safety management. Eurometaux/European Metals is part of the Programming Committee and Advisory Board.

The first panel of the event will be about aligning battery and recycling regulations to maximise the reuse of critical materials. More information and tickets can be found [here](#).

