



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Back to Back – MCC (Brussels)

15 October: Pb REACH Authorisation Taskforce meeting

16 October: Evaluation Platform & MISA Signature Event

17 October: Nanos Taskforce meeting

TABLE OF CONTENTS

EUROMETAUX CHEMICALS MANAGEMENT NEWS	1
ECHA REACH & CLP Activities: hot topics	2
ECHA Committees	2
Others	3
EUROMETAUX REACH, CLP & EHS Activities: hot topics	4
Resource mapping to respond to REACH / ECHA challenges.....	4
Metal-specific REACH application tools and concepts.....	5
FURTHER OUTREACH OF REACH.....	5
Nanomaterials.....	5
Conferences & Workshops	6
CALENDAR.....	7
ACRONYMS.....	8

Dear REACH Forum member,

Now that we have all started travelling again, passing through airports and various hotels, I thought I could devote this editorial to something light and superficial, but now and then an essential. Share with you an itinerant's ode to this nightly object that can be gorgeous or totally missing, either guaranteeing you a divine rest or a stiff neck in the morning...namely the pillow! The "headrest", with its wonderful combination of textures and forms on which to pose your brain, tired after its long day.



One of your first glances when entering the hotel room is for the aforementioned. It may be waiting for you on its own on a single bed or be part of a stunning group of congeners, sometimes hidden in a cupboard.

Poking its surface, you will immediately sense either an exceptional -but rare- fusion (anticipation of a difficult rupture), a simple sympathy or a profound disappointment.



After this first contact, the story may continue without any trouble or to the contrary degenerate into a complicated epic. You may try to exchange it, fill it with the bathroom towels if it is too miserable, punch it wildly if it proves to be too airy, shake it if it is irregular and explore it from all angles.

And still, it may be too warm, too small, too big, too weak or too coarse. You had naïve expectations! That it would marry your physiognomy and give a respite to your -now exhausted- mind but it resists bringing you this much needed rest for your soul. The tale may turn into rage, the cushion ending up on the floor while you stubbornly plunge into the mattress.



Ultimately, you will end up by achieving a kind of peace agreement, overwhelmed by fatigue, dreaming of feathers and softness during what remains of the night, confirming herewith the saying that "the pillow validates that the superfluous is a very necessary thing for who has the sense of progress".

Good night & good travels!



Violaine Verougstraete, EHS director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

RAC-46: Environmental classification of lead: *explorative but challenging debate with the risk of putting the clock back in time.*

RAC debated the dossier submitted by Denmark, which proposes an environmental classification for lead metal. Industry is very concerned by the Danish proposal, as it refuses to consider separate classification entries for the massive and powder forms, although the evidence to support these is available in the registration dossier. Moreover, the Dossier Submitter did not apply typical data selection and handling rules for data-rich substances like e.g. focusing on standard species or applying statistical treatment of data. Finally, Denmark did not provide RAC with a transparent dossier listing all existing data on lead metal. Instead, Denmark uses the lowest values, often coming from non-standard species tested under suboptimal conditions. This is most surprising, given the recent RAC discussions on copper granulates showed progress on these points. ILA was well prepared for the meeting, submitting an additional information paper applying all the learnings from the copper granulates case to the lead case, making a plea for robustness and consistency. Consistency would require focussing on standard species, apply normalisation to make use of all available data, and considering Transformation Dissolution data on both forms (powder and massive), in line with the metals CLP guidance. The RAC debate was disappointing in that in general RAC members did not strongly insist for consistency and alignment with the metals guidance. To the contrary, the Dossier Submitter raised additional elements, like challenging the value of BLM models for normalisation. On the other hand, the RAC secretariat raised the concerns they had and insisted on a fair review making use of all data, considering two entries and working on the consistency with previous metal dossiers. The RAC chair postponed the discussion on RAC's opinion to the

next RAC and requested further evidence on the consistency issue (see below) (more information: Jasim Chowdhury and Hugo Waeterschoot).

RAC Environmental classification of lead: *need to cooperate to prepare a comparative table.*

The RAC discussion on the lead metal environmental classification demonstrates the need for coherence and consistency between the present discussion and previous metal cases. Clarifications were requested with regard to the basis and motivation for existing split classification entries for powder and massive and if feasible on the conditions for statistical data treatment and normalisation (when conducted). The RAC chair invited Eurometaux to submit a comparative analysis of the experience with metals like zinc, cadmium, nickel, copper compounds and others, as for some of the older cases the documentation and knowledge may not be available to ECHA. Eurometaux asked the concerned metals for their support at the recent risk assessment and classification taskforce meetings (26-27 September), indicating that the adoption of the lead case as proposed by the Danish Rapporteur may challenge any metals environmental classification. A first document to be reviewed by the involved metals and ARCHE was circulated on Friday 28 September by the secretariat. Eurometaux needs to send this information to the RAC secretariat by early October to help them to ensure a consistent approach, making use of all data and respecting the metals CLP guidance (more information: Violaine Verougstraete and Hugo Waeterschoot).

SEAC-40: *waiting for the upcoming restrictions "wave"*

SEAC made good progress with the Restriction on tattoo inks. The latter includes "no-effect thresholds" for many metals like Ni, Cu and Zn. In particular, the debate on the copper pigment exceeding the recommended value but still deemed essential, may become interesting. SEAC and RAC expect several larger restrictions to appear soon including one on cobalt salts (draft expected for November). SEAC and RAC estimated the recently proposed restriction on plastic and rubber granulates containing PAHs as being conform, which was then followed by a discussion on "key issues". While this version is focussed on the health aspects of the use of rubber granulates, ECHA announced they are preparing a study for Commission to investigate the relevance of a restriction driven by the environmental concerns (referring to PAHs, Zn and others). Also, ECHA announced they are investigating the relevance of proposing a restriction on lead in shot for non-wetland use. At the SEAC meeting, Commission made a remarkable statement on the "paper on longer review periods", a paper industry is banking for a long while. Under the pressure of some countries, Commission had to add a disclaimer in this policy paper, stating that the potential for updates on Assessment of Alternatives during the granted period could be required. Several authorisation opinions like the HAPOC one (chromates) received comments from the applicants in respect to the Review Timings. All were rejected by SEAC based on significant deficiencies in the dossier (more information: Hugo Waeterschoot).

ECHAs Management Board (MB 52, 20-21 Sept.): *Bjorn Hansen appointed as Executive Director and Sharon McGuinness reconfirmed as chair of the MB*

Cefic and Eurometaux prepared the 51st ECHA Management Board meeting by reviewing the extensive briefing material and defined suggestions for potential interventions by Peter Smith (Cefic) on industry's behalf. The MB confirmed Bjorn Hansen in his position as Executive Director of ECHA (after his probation period) and prolonged the chairmanship of Sharon McGuinness as chair of the MB for a second term. Agenda items that raised industry's attention included the review of the policy on Conflicts of Interest stating that "*interests declared in the Public Sector can never constitute a conflict of interest*", a conclusion that is not supported by industry asking the same independence rules for RAC/SEAC members as for any other participating parties. The 2019-2022 ECHA strategy document focussed extensively on the new tasks for ECHA like the substances in articles/waste database (c.f. request of the Waste Framework Directive), the searchable database on Poison Centres. The MB also took note on the progress of the REACH Review including the preparatory activities for the upcoming CARACAL meeting in November which focus on improving the workability and quality of the e-SDS, tracking the substances of concern in the supply chain, early socio-economic information for possible regulatory measures (RMOa assessment phase) and the interplay between Authorisation and Restrictions. The 2018 ECHA budget overview confirmed that ECHA's income for the 2018 registration deadline was mainly supported by ORs acting for high volume applications from Chinese and Indian manufacturers (more information: Hugo Waeterschoot).

Others

ENES Coordination Group meeting: *preparing next steps*

The ENES Coordination Group composed of industry representatives, ECHA and Member States representatives, coordinates and monitors the series of (24) actions agreed in the context of the ENES work programme until 2020, which aims at supporting and improving the way each actor in the supply chain (registrant-distributor-formulator-end user) can process data to generate appropriate safe use information for substances and mixtures, and convey that information further in the supply chain. The group met on 7 September to discuss a method developed by the Resin Technical Platform to generate safe information on mixtures but also to prepare the content and organisation of the next ENES meeting, which should take place on 5 December in Vienna. Finally, the group debated the process and timetable for preparing the next ENES Implementation

Plan. One of the resulting actions was to write to the ECHA Forum's Working Group managing the Forum's joint initiative with ECHA's Accredited Stakeholder Organisations on improving the quality of safety data sheets (SDS) to explain the ongoing work under the ENES Work Programme until 2020 to ensure synergies and avoid overlapping actions (more information: Violaine Verougstraete).

EUROMETAUX REACH, CLP & EHS Activities: hot topics

Resource mapping to respond to REACH / ECHA challenges

Authorisation & Restriction Platform 18 September: *most interesting discussions on the "impurity in substances"*

The A&R platform was organised alongside a workshop on the RMM of impurities in substances and mixtures. The workshop was set up to evaluate and respond to the CARACAL paper on RMM of Substances in Substances (SIS) and Substances in Mixtures concluding on an "asymmetry" *that needed to be resolved by requiring authorisation for all SIS that contain an Annex XIV substance (option 1) or after listing the impurity as well as the parent substance on Annex XIV (option 2)*. A legal study independently conducted by REACHLaw concluded this *asymmetry does not exist hence no need to cover for it*. The A&R platform reviewed some indicative examples for the metals sector to estimate the impact of the CARACAL paper, concluding the need to challenge the policy recommendation. A position of the metals industry, as well as the outline of a workplan have been discussed, stating from a concept paper presented by Eurometaux. This would require clear communication messages and targeted advocacy. The A&R platform further agreed to elaborate an Eurometaux view and strategy on the risk management of impurities/minor constituents' concept. Besides the workshop on impurities, the A&R platform reviewed the planning and next steps on the Pb and Pb compounds prioritisation status towards Authorisation. The outcome of this debate will be presented and debated in detail at the Pb Authorisation Taskforce meeting on 15 October (more information: France Capon, Klaus Kamps or Hugo Waeterschoot).

REACH Forum meeting 19.09: *everything is in place to enter the MISA phase and to approach post-2018 challenges*

The REACH Forum meeting held on 19 September started with an online information session during which ECHA explained the revised procedures for dossier evaluation that will be adopted from 2019, with the objective to further improve quality and compliance of the dossiers while reinforcing roles and obligations of all registrants. From then on, all registrants will receive the (draft) decision rather than only the Lead Registrant, thereby better sharing the responsibility. Implementing a Compliance Check (CC) strategy based on the grouping of substances would help in considering a better use of existing information and read-across evidence when defining the potential need for additional information needs (testing). Both suggestions are therefore in line with Eurometaux's view to improve the DE system and align it with the SE system.

The restructuring of the Eurometaux EHS & REACH activities to form an integrated department dealing with chemicals management was further discussed, including the access of consortia to the Eurometaux membership as 'associate member' and the consequences on the fees, current structure and distribution lists. Eurometaux's Executive Committee/General Assembly will be further consulted on the 18th of October and the discussion is expected to be finalised at the next REACH Forum/EHS & REACH Steering Committee meetings in December.

The Metals and Inorganics Sectorial Approach (MISA) was discussed at length so as to ensure that everything is ready for its operative launch: from its coverage, to the governance, the logistics of the upcoming signature event, the first workshop on "*How to improve REACH registration dossiers on Human Health information requirements*", the communication between ECHA and the consortia following the workshops (dedicated blog and work plans) and with the external world via the REACH Metals Gateway website and other communication channels (ECHA and media).

The meeting was also dedicated to important classification issues. On cobalt the establishment of a new EU expert group on the T25 methodology is currently at stake and the industry is working to develop a rationale for supporting the proposal of a split of the concentration limits between powder and massive form. On lead, the Forum was updated both on the status of the environmental classification proposed by Denmark and how the sector proposes to deal with the impacts of the candidate listing and the potential inclusion in Annex XIV (REACH Authorisation).

Among other topics, the REACH Review implementation was also covered; the focus for the coming weeks will be on defining an industry position on three areas of action that will be discussed at the November CARACAL meeting: i) the tracking of substances of concern in the supply chain, ii) the collection of socio-economic information to support the identification of regulatory measures and iii) the interplay Authorisation and Restriction. The next REACH Forum will be held on 18 December 2018 (more information: Lorenzo Zullo).

EHS & REACH Steering Committee: *steering discussions*

The EHS and REACH Steering Committee met back-to-back with the REACH Forum, on 21 September to (continue to) discuss key aspects like the post-2018 restructuring but also the link with the Sustainability Committee on issues like the Chemicals/Products/Waste interface and with ICMM to define the best possible synergies without duplication of chemicals management activities. A high-level status update was provided on Industrial Emissions, the Water REFIT, the ongoing classification challenges and MISA. Very helpful input was provided by the participants, reflected in a series of actions and further organisational questions to address in the coming weeks, so as to ensure a smooth and streamlined transition to the 2019 EHS/REACH activities (more information: Violaine Verougstraete).

EHS Autumn Week: *Risk Assessment & Classification Taskforce meetings*

The science meetings of this autumn EHS week were once again coloured by a variety of topics and lively presentations, all aiming at progressing with metals' knowledge and implementation of appropriate risk assessment and classification approaches. The engagement of the audience and of the speakers, the quality of the provided information, the dynamics and exchanges during the discussions make these meetings real highlights of the year, creating strong multi-metallic bridges. A MeClas training was embedded in the meetings, to allow for working hands on with one of the key tools developed by the sector...before moving on to a social event that will remain for long in some memories. We would thus like to thank all the participants for their presence and great input, the talented speakers who made precious time available and last but not least our incredible chairs (more information: Federica Iaccino, Hugo Waeterschoot and Violaine Verougstraete).

Metal-specific REACH application tools and concepts

EHS Week – MeClas Training: *from demonstration to hands on*

A training on the new version of the Metals Classification tool (www.meclas.eu) was organised on 26 September for members who were interested, to demonstrate the features of the tool from input to output. The MeClas tool allows for classifying complex inorganic materials like ores and concentrates, complex intermediates, alloys or UVCBs under CLP and GHS, recognising the specific properties and assessment techniques for inorganics, using the most updated information available on toxicity references and self-classifications. The demonstration of the tool, which also provided a status update on the latest developments and next steps, was followed by a hands-on exercise, where participants were invited to define the CLP classification of an inorganic slag. The learnings of the session will be used to update the training package and the development of a webinar/video version for the further outreach of MeClas (more information: Frederik Verdonck, Hugo Waeterschoot and Violaine Verougstraete).

FURTHER OUTREACH OF REACH

HAZBREF project workshop in Berlin, 25th September

Following our previous note in July, the HAZBREF project partners met on the 25th September in Berlin to discuss the report of the Work Package 3 (WP3) "Policy Improvements". The HAZBREF projects aim to develop a concept on how to tackle hazardous industrial chemicals in the IED BREFs. The WP3 analyse the interface between different regulatory frameworks, such as REACH, Circular Economy (CE) and the Water Framework Directive (WFD), regarding the use of hazardous substances in industrial installations. Eurometaux observed that several permitting authorities seem frustrated with their own ministries, not allowing local permitting requirements beyond the ones defined by the BAT Conclusions. On the other hand, the Commission questioned the urgency of the project, pointing out the missing analysis proving that hazardous substances are not sufficiently met by the IED BREFs. Furthermore, it became clear that most stakeholders would like to avoid a list of hazardous substances always being considered, but rather develop a guidance on how to better make use of existing knowledge in e.g. REACH. Overall, the exchange with the different stakeholders showed that it will be important to follow the project to assure that the outcomes won't suffer from a lack of expertise in such important regulatory frameworks such as REACH, CE or WFD. The report is open for comments until the 16th October. Eurometaux is currently working on the document, aiming to submit an answer to the project leaders (more information: Annalisa Bortoluzzi & Nathalie Kinga Kowalski).

Nanomaterials

NanoReg2 Gracious Scientific Workshop on the Grouping of Nanomaterials and back-to-back strategic meeting of the BIAC group

On September 12-14th, two important events for the international Nano policy development took place: The Scientific Workshop on Grouping of Nanomaterials but also the meeting of the BIAC Nanotechnology expert group. The workshop was

held at the OECD premises but organised by the NanoReg2 and Gracious H2020 projects. The workshop aimed to discuss grouping approach of nanomaterials on a technical level because while the framework for grouping and read-across is becoming a bit more concrete, there are still many unknowns. A case by case scenario is rather to be expected, leaving it unclear how justification can fulfil authorities' expectations. Further internal evaluation of Nano grouping concepts will build on the outcome of the workshop during the next Nanos Taskforce meeting (17th October).

The BIAC group discussed the upcoming challenges of the OECD WPMN work agenda. Facing not only the European Malta project package but also some additional Task Groups and Guidance Documents under process, it will be important to allocate resources and expert knowledge effectively. The taskforce will need to discuss the further strategic work within the BIAC group and who could support the work with expertise (more information: Nathalie Kinga Kowalski).

Conferences & Workshops

Eurotox meeting: T25 and bridging tox and ecotox

Eurotox, which is the federation of national societies of toxicology in Europe, held its annual congress in Brussels from the 2nd to the 5th of September 2018. The metals sector presented posters and gave two communications. Ruth Danzeisen (Cobalt Institute/CoRC) presented the outcomes of work carried out by industry and Gradient on the suitability of the CLP 'T25 potency method' for inhalation carcinogens. This analysis was done in the context of the cobalt metal classification and the impacting specific concentration limit. Erik Smolders (KUL) and Violaine Verougstraete (Eurometaux) made a joint presentation on "risk assessment" and the strong links between toxicology and ecotoxicology. Typically, one expects differences between assessments targeting the protection of human health and those protecting the ecosystem, related among others to different regulatory traditions, various schools or different levels of protection or complexity. These differences may result in separate work on the assessment of a common substance. For metals, the risk assessment approaches are based on equal principles and share more in common than what might be expected at first glance. This was illustrated by showing the parallel steps taken in an environmental risk assessment of zinc, derivation of a workplace exposure limit for nickel and the assessment of man exposed to Cd via the environment. The three examples also showed how the uncertainty is accounted for, e.g. by taking worst-case assumptions and applying assessment factors and how (eco)toxicologists commonly strive at reducing the uncertainty by generating more data or more refined tools (more information: Ruth Danzeisen, Erik Smolders and Violaine Verougstraete).

Conference Bratislava (4-6 September): an opportunity for REACH companies and MSCAs of the Visegrad countries

The metals sector participated very actively in the annual conference on REACH set up by the local REACH authorities in Slovakia, on 3-4 September. Eurometaux presented *how Consortia get prepared for the next phases after registration*, while the Nickel Institute complemented this with a presentation on *the MISA project objectives*. Attention for the RMM phase was triggered by France Capon's presentation on *Risk management of impurities in substances*. Finally, Eurometaux explained the importance of the debate on the *interface between REACH and the Circular economy and how the sector is working on this*. The conference allowed the metals' sector to present its main REACH policy issues to an industry and regulatory public we usually cannot reach. On 6 September, Eurometaux and ARCHE provided a morning training session on the Downstream User tools that the sector developed to facilitate the implementation of REACH at the downstream user level for metals. The learnings of this session allow the sector to update this package for broader distribution (more information: France Capon, Frederik Verdonck and Hugo Waeterschoot)

Conference Vilnius REACH MSCA (20 September): focus on the substitution of chemicals

Like many countries, the Lithuania's MSCAs organised an information and briefing session for industry on the need to substitute Substances of Very High Concern. Eurometaux, as well as Cefic, were invited to present some background, learnings and their views on the theme. In this respect, Eurometaux provided a presentation on "the need for continuous business attention for the theme of substitution" given the regulatory and market pressure on companies to substitute SVHCs. Such business attention should prevent that substitution coming as a surprise to manufacturers. Also to be noted is that authorities should not neglect the consequences and the value of metals within the Circular Economy and new technologies. The presentation was concluded with the 6 key steps to be well prepared for, if an authorisation application would be required for a metal (including the strategic importance of the AfA, the need to clarify intermediate status of the uses, ...) (more information: Hugo Waeterschoot).

Chemical Watch Enforcement Summit (Brussels 24-25 Sept): several industry sectors asking for more and efficient enforcement on REACH

Chemical Watch organises regional (EU, USA, Asia) summits. The yearly Enforcement Summit on REACH and CLP took place in Brussels on September 24-25. This Summit focuses on Enforcement by the national Member States as well as the coordination of the Enforcement activities by the Enforcement Forum at ECHA level. The meeting was well attended including several ECHA and national Enforcement officers indicating how, in their country, the enforcement on REACH was organised and implemented, some with very practical cases (As2O3 in the glass sector in Italy) others more generically and strategically,

like the UK. The focus of the Reach Enforcement Programmes on Intermediates, UVCBs and impurities was highlighted too. For the first time the Summit also focussed attention to the Enforcement of REACH and Safety obligations on Internet sales. Several industry sectors participated actively in the panels, giving presentations of their experience and chairing sessions. In this respect Euroalliages presented *the need for more harmonisation of the enforcement of REACH at the EU borders*, while Eurometaux presented its *programme with ECHA to clarify the Intermediate status of uses of metals and inorganics to streamline interpretation to reduce the need for enforcement*. Eurometaux further chaired the session on practical cases from Member States on Enforcement (more information: Nadia Vinck and Hugo Waeterschoot).

Chromic Workshop: recovering metals from slags

Eurometaux was invited to attend a stakeholders' meeting of the Chromic project. The latter aims at developing new processes to recover chromium, vanadium, molybdenum and niobium from industrial waste. A range of chemical and physical methods will be developed, tested and validated to extract valuable and critical metals from stainless steel and ferrochrome slags with the potential for replication to other industrial value chains across Europe. The final goal is to create a "Circular Economy" for the metals mentioned above, one where all resources are kept at the highest possible level of functionality and value at all times. Chromic is an EU funded 'inclusive project'. It involves partners like European citizens and key stakeholders in devising the new approaches and providing their views on various aspects of the Circular Economy like: Human health, Ecosystem quality, Resources, Climate change, Economics. The aim of the 18 September workshop was to assemble stakeholders from the research, industry and environmental fields, as well as civil society organisations and invite them to talk about the key challenges faced by the European metal industry, and how it can sustainably transition towards a Circular Economy. Typically, the questions addressed a) the major decision points for the different stakeholders to adopt (or not) industrial activities in metal recovery and possible drivers, b) possible developments considered as important in the field of recovering metals and valorisation of the matrix material, c) in the long run, and within the project's perspectives, what are the most important impacts that new technologies -such as the ones Chromic proposes- can have in the area where the workshop is held? More information on the project can be found on <http://www.chromic.eu/> (more information: Koen Oorts and Violaine Verougstraete).

CALENDAR

- **2 October:** MISA Workshop – MCC (Brussels)
- **8-12 October:** MSC-61 – ECHA (Helsinki)
- **11-12 October:** MSC-RAC workshop – ECHA (Helsinki)
- **15 October (pm):** meeting of the Lead REACH Authorisation Task Force (meeting fully booked)
- **16 October:** Evaluation Platform – MCC (Brussels) & MISA Signature Event
- **17 October:** Nanos Taskforce – MCC (Brussels)
- **6-7 November:** NMEG12 – ECHA (Helsinki)
- **7 (PM) November:** NeRSAP/Substitution Workshop – UA (Antwerp)
- **8(PM)-9(AM) November:** NeRSAP Workshop – UA (Antwerp)
- **8-9 November:** WS Implementation REACH Info Requirements for Nanomaterials – ECHA (Helsinki)
- **19-23 November:** RAC-48 (A)– ECHA (Helsinki)
- **26-30 November:** RAC-48 (B)– ECHA (Helsinki)
- **26-30 November:** SEAC-41 – ECHA (Helsinki)
- **10-14 December:** MSC-62 – ECHA (Helsinki)
- **13-14 December:** ECHA Management Board-52 – ECHA (Helsinki)
- **17 December:** Authorisation & Restriction Platform – MCC (Brussels)
- **18 December:** REACH Forum - MCC (Brussels)
- **19 December :** EHS & REACH Steering Committee -MCC (Brussels)

ACRONYMS

AfA: Application for Authorisation	MISA: Metals & Inorganics Sectorial Approach
BAT: Best Available Techniques	OECD: Organisation of Economic Cooperation and Development
BIAC: Business and Industry Advisory Committee (OECD)	OR: Only Representative
BLM: Biotic Ligand Model	PAH: Polycyclic aromatic hydrocarbons
BREF: Best available technology Reference document	RAC: Risk Assessment Committee
CARACAL: Competent Authorities for REACH and CLP	REFIT: Regulatory Fitness & Performance Programme (EU)
CE: Circular Economy	RMM: Risk Management Measures
CLP: Classification, Labelling and Packaging Regulation	RMOa: Risk Management Option analysis
DE: Dossier Evaluation	eSDS: Extended Safety Data Sheets
DU: Downstream User	SE: Substance Evaluation
ENES: Exchange Network on Exposure Scenarios	SEAC: Socio-Economic Analysis Committee (ECHA)
GHS: Globally Harmonized System for classification	SIS: Substances in Substances
HAZBREF: Hazardous industrial chemicals in the IED BREFs	SVHC: Substance of very High Concern
IED: Industrial Emissions Directive	TDp: Transformation Dissolution protocol
MB: Management Board	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MeClas: Metals Classification Tool	WFD: Water Framework Directive