



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Substitution workshop 7 November

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Dear member,

If I was a regular bingo player (and not only an occasional amateur during some EM meetings), I would bet huge amounts of chocolates on the word 'group' as the absolute trend for October. Groups, in all formats (joint-, sub-, merged-, working-), groupings proliferated like mushrooms despite or thanks to the prolonged summer, for a series of reasons: to influence, to achieve, to streamline, to divide the burden or facilitate all of these motives. Your October News is full of it!

What is a group actually? It appears that a group is simply any identifiable collection of people, formal or informal. The important thing is that the group has a clear identity. The members of the group need to identify with the other members. Without identity and identifying, the group cannot collectively act.

It may be sufficient to have a bright spark to bring together people who have something in common. But setting a group and making it active requires focus – something to be achieved. A group has lots of raw capacity, as everyone will bring his/her personal power to help the group meet its objectives... provided there is a shared identity and purpose. Group power is pretty pointless without having something to aim for.

Performing grouping can be pretty straightforward and tempting: it is well known that the power of the whole is greater than the sum of the parts. Keeping it together requires strong elements and good scenarios.

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This editorial is starting to read like a "grouping" assessment framework (GAF). Probably a side effect of the enthusiasm and dynamism created by the launch of MISA last month (see below)!

Well. At least let's use the GAF to avoid the possible pitfalls of over-passionate grouping. Whilst building a matrix of knowledge and cooperation is more than fine, we should prevent the "one size fits all" or wild read-across to all elements when it comes to deliverables and guidance. The richness of the group is constituted by the originality of its elements and its power depends on the strength of each of those. But all together we can aim at the most creative scenarios... Freddie Mercury once said: "We're a very expensive group; we break a lot of rules. It's unheard of to combine opera with a rock theme, my dear". Let's embark on the MISA rhapsody!

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

MSC-61: grouping for dossier evaluation

MSC-61 debated a large group of Stilbene Fluorescent Whitening Agents (14). While the type of substances was not so important, this case was precedent-setting in how more efficiency could be created for ECHA and industry by performing a Dossier Evaluation for a large category (group). This approach was already tested for Testing Proposals, but in this case, it is industry who's taking the initiative to define the category (e.g. for cobalt). The approach used by ECHA for the DE was to focus on the proposals for amendments (PfoAs) for a master case (one substance), and to take the conclusions forward to all the substances of the category. This allowed to consolidate a 'category adaptation' including some experimental substances acting as source substances, bridging studies and updates into one single assessment. The debate demonstrated this is a difficult exercise for ECHA when industry does not clearly indicate its reasoning and the structure of the read-across in its registration file. In another interesting DE case, MSC accepted that the 2nd PNDD test could be waived because the substances (fatty acids) are of low toxicity and no effect was observed. It was therefore proposed to first request the registrants to conduct the first PNDD and the EOGRTS, and then the 2nd PNDD BUT only when some expression of toxicity could be established at the level of the limit dose in any of those 2 tests. Both cases set important precedents for the metals sector that will be explained in detail at the next session of the Evaluation Platform meeting (more information: Hugo Waeterschoot).

MSC-61: CoRAP rolling plan 2019-2022 update, this time without surprises for the metals sector

ECHA presented the draft CoRAP update, which includes in total 108 substances (20 new ones, 76 already in and 11 withdrawals). The high number of withdrawals was explained by the operational effect of the complementary Dossier Evaluation (DE) conducted upfront of each Substance Evaluation (SE). In many cases, it appears to 'remove' the potential for risk, hence the need for a SE. On the other hand, this sequential DE – SE procedure resulted in a record number of review year

postponements (38), providing support for the Commission's proposal to run DEs and SEs in parallel. ECHA has for the first time worked with 'groups of substances' for simultaneous evaluation. For the first time in many years, the update did not include any new metal or metal compound, although several metals were already on the present list like Sb compounds or CrIII. The draft CoRAP list was published mid-October and will be reviewed and adopted by MSC early 2019. Also new is that the draft decisions will not be published in April but later around June, which could coincide with the holiday period. Industry requested to have a say in the grouping and their naming. ECHA confirmed this but indicated grouping/naming are based on the registration dossiers (more information: Hugo Waeterschoot).

MSC-61: review and improving the Dossier and Substance evaluation processes

MSC took note and debated the five points of attention and associated actions aiming at improving the "evaluation processes" that have been identified by the Commission under the REACH Review programme. These points include: 1) identify and assess the reasons for the low level of compliance, 2) consider running Substance and Dossier evaluation processes in parallel to gain time, 3) apply grouping approaches that would make SE or DE processes more efficient, 4) better work-sharing by ECHA across activities with Member States, 5) improve the decision-making procedures to prevent free-rider registrants. MSC debated in particular the conditions under which substance and dossier evaluations can run in parallel as well as the outcome of the webinar and reactions from industry on the changes in the DE processes. The fact that ECHA from 1 November onwards will forward the Draft Decision (DD) to all registrants independently of the tonnage was much appreciated by industry. It was clarified that an annex of the DD would inform the registrants that the specific demands in the decision would be tonnage dependent. MSC further concluded on the updated extended format of the PACT list and the new format Dossier Evaluation List, which will be introduced before November. Industry expressed strong support for all these changes (more information: Hugo Waeterschoot).

Joint MSC-RAC workshop: mutagenicity, low doses testing and in vitro sensitisation tests

Eurometaux was invited, as the other regular stakeholders, to attend a joint MSC-RAC workshop on the fine-tuning of the testing requirements and the evaluation of selected human health endpoints under REACH and CLP. Three topics were selected for discussions in breakouts mixing RAC and MSC experts: mutagenicity (i.e. ability of newer test methods to produce results suitable for classification, labelling and risk assessment), dose selection in systemic toxicology tests (in particular low dose testing) and *in vitro* testing for skin sensitisation. The idea was to encourage a maximum of interactions between the two committees, excluding policy discussions. The issue of low dose toxicity testing was of particular interest to industry, as it has been suspected of sometimes using too low top doses, which may result in inconclusive conclusions on classification. While some experts recommended to first evaluate the extent of the issue before taking decisions (e.g. propose a change in the text of the OECD guidelines), others proposed that ECHA should pay more attention to this at the level of the compliance checks. The outcomes will be presented more in detail at the next Evaluation Platform meeting, once the conclusions and proposals for future cooperation between the two committees have been made available (more information: Violaine Verougstraete).

Others

Updated list of substances with harmonised classification and labelling now available

ECHA has updated its list of hazardous substances with harmonised classification and labelling to take account of the Commission's update in the 13th adaptation to technical progress (ATP) to the CLP Regulation. The official source for this information remains the Official Journal of the European Union.

[Commission Regulation](#) | [Table of harmonised entries](#) | [C&L Inventory](#)

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

The next CARACAL meeting will be held in Brussels on 21-22 November 2018. The preliminary draft agenda contains many items of interest. On the first day the REACH review will be discussed with particular focus on actions needed to encourage the update of the registration dossiers, improve eSDS, track SVHC in the supply chain and to improve the REACH/OSH interface. A revised version of the draft nickel guidance document aiming at clarifying the scope of the restriction (i.e. prolonged and repetitive contact) is expected to be presented (document not yet available). The EU commission will also provide an update on ongoing activities and discussion on nanomaterials: definition, information requirements in the SDS (i.e. REACH Annex II), update of the registration dossiers according to the new information requirements on nanomaterials. The second day will be fully dedicated to CLP. Discussion is scheduled for some dossiers particularly important for metals:

bioelution and labelling of metals in massive form. Consistency of REACH data requirements for mutagenicity and carcinogenicity with criteria for classification under CLP will also be debated. Eurometaux is preparing the input to be provided at the meeting. A preparatory call with the REACH Forum is scheduled on 12 November (more information: Lorenzo Zullo).

Chemicals, Product, Waste

Eurometaux replied on 29 October to the public consultation on the Chemicals, Products, Waste (CPW) interface, based on the discussions conducted with a group of volunteers from the EHS & REACH Steering and the Sustainability Committees, the extensive input submitted by Eurometaux during the 2017 targeted consultation and recent discussions/learnings on e.g. recycling and lead metal authorisation or the waste database to be set up by ECHA. The public was asked to evaluate the different options proposed by the Commission (e.g. on the definition of substances of concern, on their tracking, on the harmonisation of the classification rules for products and waste according to 5 choices: fully agree; mostly agree; mostly disagree; disagree; don't know/no opinion. There were also open questions asking for solutions but with a limited number of characters 😊). Eurometaux therefore decided to submit -in addition to the completed questionnaire- a position paper, currently being circulated for final comments (more information: Kamila Slupek, Chris Heron and Violaine Verougstraete).

EUROMETAUX REACH, CLP & EHS Activities: hot topics

Resource mapping to respond to REACH / ECHA challenges

Pb Authorisation: *face to face meeting 15.10.2018*

The recent inclusion of lead metal in the candidate list triggered the need to organise a briefing session with manufacturers and users of lead metal. This information session took place in the Metals Conference Centre on 15 October and was very well attended by a large series of users as participants of the newly-convened Lead Metal Authorisation Taskforce. ILA explained the immediate requirement to brief recipients of articles containing more than 0.1% lead metal cf. Article 33 of REACH and presented a draft advocacy strategy to prevent the substance being listed as an Annex XIV substance. The draft strategy also proposed, as a fall-back position in case Pb metal is recommended for Annex XIV listing, measures to mitigate the potential effects (e.g. by requesting Article 58 (2) being applied (recognition for existing EU-wide substance specific risk management measures) for some uses). The meeting confirmed the broad impact of a potential authorisation on a wide series of sectors far beyond the main use of lead metal (i.e. Pb battery use). There was wide recognition that improving the outdated binding EU OEL and biological limit values would be a better, more effective and less market impacting Risk Management Measure than authorisation. In complement, there was recognition that the 4 lead salts presently considered by the Commission for Risk Management could set precedent on what could happen in the future with lead metal. Eurometaux wrote in this respect a draft strategy addressing horizontal issues, while ILA will provide the users with guidance on how to respond to the upcoming prioritisation challenge of lead metal. Sectors represented in the taskforce were invited to share headline messaging with ILA by the end November, to support development of an overarching core narrative. Monthly conference calls will be held by ILA to update the taskforce on any relevant regulatory developments, and to receive progress reports on downstream sectors' own advocacy campaign activity. The first conference call will take place on 16 November (11.00 CET, tbc and details will be sent out soon (more information: Violaine Verougstraete, Lisa Allen, Steve Binks, Hugo Waeterschoot).

Evaluation Platform meeting: *16.10.2018 experience with recent information on nanos SEs and organo-metal-salts registrations*

This time, the evaluation platform was organised back-to-back with the MISA signature event resulting in a shortened meeting agenda and timing. The issues debated were nevertheless very relevant for many Consortia and focussed on the recent experience of the Zn-oxide sector faced with an extended demand by the German Substance Evaluation authorities on both the health and environmental endpoints. The level of demand was much higher than experienced in the Silver case which recently concluded with "*no further information is required to clarify the potential for risk*". Besides, the Netherlands in charge of the latter focussed exclusively on environmental concerns. It is possible the large volumes on ZnO nano form on the EU market may have contributed to this extensive request. Nevertheless, the ZnO sector felt the demand was excessive considering the potential for additional risk, given they have already used a precautionary approach based on the soluble form, and therefore extensively commented the Draft Decision proposing a smaller and more tiered programme in balance

with the potential for concern. The outcome of both cases may define what level of demand on metal nano cases can be expected depending on the volumes put on the market. The second part of the platform meeting focussed on the explanation to include in the registration dossier for organo-metal salts (and whether they behave like metals or on the contrary as organics). Cobalt shared its experience in this respect identifying what aspects are important to demonstrate. It is not unlikely that this issue may become a theme for the MISA 2 workshop on the environmental endpoints. The meeting ended with a short review of new MSC learnings (more information: Kate Belska, Noömi Lombaert and Hugo Waeterschoot).

Environmental Classification Taskforce meeting: 25.10.2018, support for the lead case and preparing for the Rapid Removal guidance discussion

ILA (Jasim Chowdhury) informed the Environmental Classification Taskforce on the worrying outcomes of the first RAC discussions on the lead metal environmental classification. The resistance of the dossier submitter and the Rapporteur to provide recognition for a split in the classification for massive and powder forms despite the data being available, their use of non-standard species and their lack of recognition for metal specific approaches are all inconsistent with previous metal cases and in particular with the recent positive experience with copper. These aspects, if supported by RAC, would set a dangerously low reference for the entire metal sector warranting a high involvement by Eurometaux and the support of other consortia. Several technical papers were forwarded to ECHA and RAC, for example on the history of metal classification entries and on how data-rich data sets on metals have been handled, complemented with Pb specific papers prepared by ILA. It is hoped that the environmental classification proposal can be improved significantly at the next RAC discussion, scheduled for 22 November. The taskforce also took note of the status and results of further modelling research in preparation of the Rapid Removal workshop on 8 February in Helsinki, a research activity sponsored and conducted by ETAP. Eurometaux had a preparatory discussion with ECHA to plan for this workshop resulting in a draft Rapid Removal Roadmap (R³M). The taskforce provided suggestions for further input which Eurometaux will now consolidate in an update for ECHA. Further issues that were debated included an update by ARCHE (Frederik Verdonck) on the planning and critical issues of the EUSES tool to be updated by ECHA in 2019, as well as a short debate on the planning of the next MISA workshop (more information: Stijn Baken and Hugo Waeterschoot).

Nanos

Nanos Taskforce meeting: *discussing annexes and actions*

The Nanos Taskforce is facing the important period of implementation of the recently adopted REACH Annex Amendments for nanomaterials. The taskforce discussed different levels of action that are needed to ensure a good legislation frame for nanomaterials in Europe. This includes the current developments at OECD level, the connected Malta-Project led by Germany, the Nanomaterials Expert Group (NMEG) meeting(s) organised back-to-back with a "guidance document experts" workshop in November, but also scientific workshops such as the NanoReg2 & Gracious H2020 project meeting on "Grouping of Nanomaterials". The taskforce agreed to: support EM's experts for the guidance document workshop with detailed comments on the amendments, follow-up of the developments during the workshop and the NMEG meeting to discuss possible needed action at higher policy levels (e.g. CARACAL), appoint experts for the technical support of the OECD/ Malta-Project work ahead and further maintain the close relationship with key industry actors like Cefic and NIA. The taskforce also agreed to gather and evaluate information for nanomaterials registration and first experiences to assure good support of members updating their dossiers for nanomaterials (more information: Christine Spirlet and Nathalie Kinga Kowalski).

Nanoform in REACH: *meeting between Eurometaux, ECHA, NIA & Cefic*

On 16 October, Eurometaux was invited by Cefic & NIA to join their meeting with ECHA. The meeting aimed at discussing the new terminology 'nanoform and set of similar nanoforms' used in the recently adopted REACH Annexes. Further it was aimed to enable an open exchange between all experts on the understandings, as a pre-exercise of the upcoming official meetings in Helsinki (NMEG meeting, guidance document workshop). The day was structured in discussions along short presentations by ECHA, Commission and the industry. The meeting clarified some understandings, e.g. that a set of nanoforms are groups to use when registering nanomaterials with different but similar forms to simplify the registration (not to equate with the grouping for hazard assessment). Besides it was not denied that grouping with non-nanomaterials when undertaking the hazard assessment (e.g. with bulk forms) can be used. In general, dossiers of substances need to be updated for nanomaterials and no separate nanomaterials dossiers created. Finally, it became clear that ECHA expects an in-depth input during the preparatory experts' workshop for the guidance document update. The Eurometaux taskforce for Nanos is already preparing for the meeting in Helsinki, 8-9.11 (more information: Nathalie Kinga Kowalski).

Water

First workshop for the Fitness Check of the Water Framework Directive: Our proposal for a joint industry presentation was accepted as one of the 4 selected ones, thus we presented the collective view of several industry associations (Cefic, Concawe, ECPA, Eurofer, Eurometaux, Euromines) at the European Commission's 1st Stakeholder workshop on the 'Evaluation of the

Water Framework Directive (WFD) and Floods Directive' on 10th October. Overall, we are promoting a positive industry message in these discussions, by emphasising our commitment to provide technical expertise and support to policymakers in achieving a good ecological and chemical status of European water, in particular within the WFD Common Implementation Strategy (CIS). Our messages and calls were on the prioritisation mechanism to be based on high quality input data and reliable EU-wide risk assessment approach (e.g. systematic consideration of bioavailability and natural backgrounds for metals); clarification on the use of non-deterioration principle and how socio-economic activities will be assessed; more emphasis and clarity on the ecological assessment (more information: Annalisa Bortoluzzi).

Working Group Chemicals meeting (16 October): the finalisation of the new guidance for implementing metals EQS was a hot topic at the last CIS WG Chemicals meeting. We advocated for bringing forward the ongoing parallel activity on the comparison of simplified bioavailability tools, to be able to give clear recommendations to Member States (MS) on the use of BioMET, rather than leaving open the possibility to use the NL PNEC PRO that has not been validated (while BioMET was). The finalisation of the guidance chapters have kept us busy in the last weeks and we look forward to the discussion during the coming sub-group meeting on 18-19 December in Paris. On the other hand, disappointingly, the agenda topic on the derivation and revision of EQS was not presented/discussed at the meeting; the only the announcement was that a new Member State lead for the Silver EQS is needed. We are closely following and trying to influence the development of this dossier with EPMF (more information: Annalisa Bortoluzzi).

UWWTD Evaluation and Fitness Check of the WFD and FD: *Workshop on pollutants of emerging concern (24 October)* An attempt to look at links between the different pieces of water legislation is brought forward, e.g. looking at emissions in and from the urban waste water treatment plants (UWWTPs). Metals are always on the table of these discussions, even if not under the spotlight as microplastics and pharmaceuticals are, as "emerging pollutant" or "pollutants of emerging concerns". Some presentations and ongoing activities deserve our attention and follow-up, in particular the "Chemicals in waste water modelling" by the JRC Ispra and the European Environmental Agency-Commission study on emissions from UWWTPs (more information: Annalisa Bortoluzzi).

Others

SPERCS quality criteria: *revised draft submitted to ECHA and Member States for review*

The SPERCS Taskforce has prepared a revised version of the SPERCS Quality Criteria. The changes aimed at focusing the quality assessment on the most critical aspects identified and discussed during the 26 June workshop: operational conditions and risk management measures that drive environmental releases. Additionally, compared to the previously version, the document now includes an introduction to explain the background of the criteria and who should and how to use them. The document has also been complemented with a template to report information about the assessor; this is intended to increase transparency and to properly document the quality assessment. The revised document was submitted to ECHA and interested Member States for their review. From a preliminary feedback it seems that more explicatory notes are needed to better explain the meaning of certain criteria. Their full set of comments is expected to be received by the middle of November. Ideally, the criteria will be finalised and published by the end of the year (more realistically Q1 2019); afterwards the quality assessment of industry SPERCS can be officially launched, according to the ENES Work Programme (more information: Frederik Verdonck and Lorenzo Zullo).

Blockchain to globally track information on chemicals along the supply chain: *the Chem-Chain project is progressing*

In May 2018, several industry associations, including Eurometaux, expressed interest in the ChemChain project proposal submitted in the framework of the European Research and Innovation Programme Horizon 2020 by a consortium composed by the Nanotechnology Industries Association (NIA), the Chemical Distribution Industry (FECC), Fieldfisher, Chemycal and Hinwise. The aim of the project was to develop a global open source blockchain infrastructure to allow companies to robustly and trustfully track chemicals and pass over information along the supply chain (with particular focus on SVHCs and nanomaterials) from chemical manufacturers to final consumers and recyclers. Chem-Chain was very well evaluated in the H2020 framework (score: 11,5/15) but did not rank sufficiently high to be selected. The evaluation was however very promising: the evaluators stated that Chem-Chain is considered to be able to "move rapidly into the industrial uptake", "addresses important aspects of current economic and ecological problems", "maximises the flow of data through the chemical supply and value chain" and is considered to be "ideally suited to build confidence". The consortium is therefore committed to bring on the project and look at other funding opportunities. A prototype is currently under construction and a real case simulation is expected to be run in Q1-Q2.2019. Key industry players and stakeholders will have the possibility to join the advisory board that is in the process of being established. Interest to join the Chem-Chain Advisory Board and/or to participate in the pilot project can be communicated to info@chemycal.com. This blockchain solution could represent a win-win solution for all actors in the supply chain allowing industry to better understand how substances are used and their flow along the entire supply chain while supporting a risk management approach. It could also facilitate the implementation of

specific EU initiatives such as the database on Candidate List substances in articles to be built by ECHA by 2021. Chem-Chain will also be presented in Antwerp to NeRSAP since blockchain could help to understand the life cycle of chemicals/products and support socio-economic analyses (more information: Lorenzo Zullo).

Metals Sectorial Approach

MISA Workshop: *first MISA workshop 02.10.2018*

The MISA workshop on information requirements for human health endpoints was held on 2 October 2018, discussing in detail the conditions to use read-across and other possible data adaptations. The workshop was very well attended and very interactive thanks to the input of the participants, including ECHA's experts. The day alternated plenary discussions and breakouts structured around the topics of read-across, mutagenicity, exposure routes and EOGRTS. Next step is now for the MISA participants to send ECHA a workplan in which they will explain/communicate what/how they will update their dossiers where relevant and by when. Eurometaux prepared a workplan template that can be used for this purpose, but it is not mandatory. Workplans should be sent to the MISA functional mailbox by 15 November. These workplans are considered by ECHA as an expression of commitment. In the hope to facilitate the definition of the work to be done, a detailed report of the workshop was prepared, reviewed by ECHA and circulated for comments to the participants. Follow-up questions were collected and submitted to ECHA, who will examine them according to their urgency (i.e. urgent would be a question for which a response is needed to be able to complete the 15 November workplan). All the material of the workshop will be posted very soon on a MISA restricted webpage of the REACH Metals Gateway and the ECHA website (more information: Hugo Waeterschoot, Lorenzo Zullo, Federica Iaccino and Violaine Verougstraete).

MISA Signature Event: 16.10.2018

The MISA signature event, formalising the commitment to the MISA programme, took place on 16 October. The setup was on purpose a bit unconventional, mimicking to some extent the Eurovision song contest festival, with MISA hubs created in Beerse, Berlin, London, Brussels and Helsinki where the consortia/associations could sign the Framework for Cooperation document by webex. This allowed to have virtual communication with ECHA's Executive Director Bjorn Hansen and Director of Risk Management Jack de Bruijn, and also with EM's President, Dirk Vandenberghe.

This signature was duly celebrated with bubbly, well deserved after two years of discussions. The list of MISA substances (about 300) will be published on the ECHA/EM websites, providing authorities and other stakeholders with a clear signal that work is ongoing for these substances. The expected improvement of the Registration dossiers as a result of MISA is expected to reduce the need for Member States' and ECHA's regulatory actions on these substances and help prevent developing methods that are not relevant for metals/inorganics (more information: Violaine Verougstraete, Hugo Waeterschoot).

FURTHER OUTREACH OF REACH/EHS

OECD

OECD Joint meeting on Chemicals Management (November 6-8): *preparing the input towards BIAC together with ICMM*

In follow-up of the agreement at the last ICMM-CMWG group, Eurometaux and ICMM jointly prepared the upcoming BIAC and OECD Joint Chemicals meeting. The Joint Meeting provides strategic direction to all chemicals management programmes of the OECD as well as agreeing on workplans of the different taskforces dealing with issues of high relevance for the metals sector (test guidelines, PRTR-BAT, Risk Reduction, Hazard and Exposure assessment, capacity-building for countries in the process of developing chemicals management regimes). Both organisations agreed to use the CARACAL preparation approach. In practice this means that based on the OECD-JM agenda an annotated agenda is prepared in a complementary way by both secretariats, as well as by the metals' vice-chair in the BIAC chemicals group (Kai-Sebastian Melzer). This annotated agenda as well as suggestions for interventions in the BIAC and OECD meetings, were subsequently debated in a call with all interested members (31 October) after having prepared a dropbox with all relevant information and meeting documents, available. A report on the outcome of the BIAC and OECD meeting conclusions will be prepared eventually, followed by a debrief call to enhance the understanding on the outcome of the debate and define follow-up action. It was further proposed to check at the next ICMM-CMWG meeting if this procedure is efficient and helps profile the sector vis-à-vis the OECD (more information: Kai-Sebastian Melzer, Claudine Albersammer and Hugo Waeterschoot).

3rd OECD BAT Expert Group meeting: The 3rd and final meeting of the OECD BAT project took place in Paris on 8-9 October. The EM's secretariat, together with Cefic's BREF Manager, joined the meeting on behalf of BIAC. VITO (OECD contractor) outlined the methodology and key findings of the draft Activity 3 report, "Methodologies and data for the effectiveness

evaluation of BAT policies”; a series of interactive sessions with presentations by various countries (China, Korea, Israel, India et al.) and by the European Commission followed. Also, the work plan for a 2nd phase of the project in 2019-21 was discussed and will be at the examination of the OECD 58th Joint Meeting (6-8 November). Three activities are proposed for the way forward: 1. Development of a guidance document providing governments with relevant steps, tools and best practices to establish BAT and translate them into emission limit values; 2. Mapping of the opportunities and challenges associated with value chain approaches to determining BAT; 3. Exchange of experience and information on determining BAT or similar concepts for selected industrial sectors and/or pollutants. Our contributions during and after the meeting were highly appreciated by the OECD secretariat (more information: Annalisa Bortoluzzi, Nathalie Kinga Kowalski).

COMMUNICATION

Alloys and Non-Toxic Environment: 03.10.2018 workshop in Helsinki

The Association of Finnish Steel and Metal Producers and the Federation of Technologies Industries of Finland organised an interesting workshop on “Refining the classification of metals and alloys to enable non-toxic society and Circular Economy” early October. The day was well attended by authorities and industry representatives. After an introduction by Kimmo Jarvinen of the Finnish Steel and Metal Producers and Bo-Erik Pers from Jernkontoret, two presentations were made by the EU authorities: Urban Boije af Gennas (DG Environment) gave a status update on policy and strategies in the non-toxic environment and Matti Vainio (ECHA) spoke about ECHA’s substitution strategy. This was followed by presentations on the classification of substances according to the CLP regulation by Elina Ekokoski of the Finnish Ministry of Social Affairs and Health and Kati Vaajasaari of the Finnish Ministry of the Environment on metal alloys in the waste stream. Adriana Oller and Violaine Verougstraete (Nipera, Eurometaux) made a joint presentation on the industry proposal to refine the classification of special mixtures under the CLP, while Ruth Danzeisen (CI) spoke about the work done to assess the applicability of the CLP T25/potency methodologies for inorganics and cobalt metal in particular. Inger Wallinder complemented the alloy talks by speaking about the application of bioelution to stainless steel. The workshop culminated with the presentation of several case studies on recycling, ecolabel, and the consequences of an inappropriate classifications for alloys. During the discussion period, the need to assess risk before considering substitution was raised and strong support for the use of bioelution in the refinement of alloys classification was expressed (more information: Adriana Oller, Ruth Danzeisen and Violaine Verougstraete).

CALENDAR

- 6 & 7 November: European workshop on the Integrated Assessment of the 2nd River Basin Management Plans (Brussels)
- 7 November: Substitution workshop- UA (Antwerp)
- 8 November: Strategic Coordination Group meeting (Water Framework Directive – Common Implementation Strategy)
- 8-9 November: NeRSAP - UA (Antwerp)
- 8-9 November: WS Implementation REACH Info Requirements for Nanomaterials (Helsinki)
- 19-20 November: Malta-Initiative, Part 2 - BMU (Berlin)
- 19-23 November: RAC-48 (A)– ECHA (Helsinki)
- 26-30 November: RAC-48 (B)– ECHA (Helsinki)
- 26-30 November: SEAC-41 – ECHA (Helsinki)
- 27 November: Art. 13 Forum meeting, DG ENV COM (Brussels)
- 29 November: Water Director meeting (decision on CIS Work Programme 2019-2021 -Vienna)
- 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

ATP: Adaptation to Technical Progress	OSH: Occupational Safety Health
BAT: Best Available Technique	PACT: Public Activities Coordination Tool
BioMET: 'User friendly' software tool, based on Biotic Ligand Models, for calculating the bioavailability of copper, nickel and zinc in different freshwaters	PfoA: Proposal for Amendment
BREF: Best available technology Reference document	PNDT: Pre Natal Development Test
CARACAL: Competent Authorities for REACH and CLP	PNEC: Predicted No-Effect Concentration
CIS: Common Implementation Strategy	PRTR: Pollutants release and Transfer Register
CLP: Classification, Labelling and Packaging Regulation	R ³ M: Rapid Removal Roadmap
CoRAP: Community Action Rolling Plan	RAC: Risk Assessment Committee
CPW: Chemicals, Product, Waste	RMM: Risk Management Measures
DD: Draft Decision	(e)SDS: (extended) Safety Data Sheet
DE: Dossier Evaluation	SE: Substance Evaluation
ENES: Exchange Network on Exposure Scenarios	SEA: Socio-Economic Assessment/Analysis
EOGRTS: Extended One-Generation Reproductive Toxicity Study	SEAC: Socio-Economic Analysis Committee (ECHA)
ETAP: Environmental Toxicology Advisory Panel	SPERC: Specific Environmental Release Category
EUSES: European Union System for the Evaluation of Substances	SVHC: Substance of very High Concern
MSC: Member States Committee (ECHA)	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
NMEG: NanoMaterials Expert Group	UWWTD: Urban Waste Water Treatment Directive
OECD: Organisation of Economic Cooperation and Development	UWWTP: Urban Waste Water Treatment Plant
OEL: Occupational Exposure Limit	WFD: Water Framework Directive