



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Back to back – MCC Brussels

17 December: Authorisation & Restriction Platform

18 December: REACH Forum

19 December: EHS & REACH Steering Committee

TABLE OF CONTENTS

EUROMETAUX CHEMICALS MANAGEMENT NEWS	1
ECHA REACH & CLP Activities: hot topics	3
ECHA Committees	3
Authorisation.....	4
Others.....	4
Nanos	4
COMMISSION REACH & CLP Activities: hot topics/issues	5
CARACAL	5
EUROMETAUX REACH, CLP & EHS Activities: hot topics	6
Resource mapping to respond to REACH / ECHA/ EHS challenges	6
Metal-specific REACH/ CLP application tools and concepts	7
Water	7
Industrial Emissions.....	7
Others.....	8
Metals Sectorial Approach	9
FURTHER OUTREACH OF REACH	9
OECD	9
COMMUNICATION.....	9

Dear All,

The end of the year is usually associated with evaluations in all kinds of formats, (actually) preparing the good resolutions that will follow one month later.

While I was reflecting how to get the most out of those review chats with the staff, I was told that there are some programmes evaluating happiness at work, the latter being a key condition for development and performance. I got intrigued (of course: a programme to be happy!) and started to search online for such tools, curious to dig up the criteria backing such an assessment. As I limited myself to the freely available tools (one can be curious but not have an unlimited budget), I ended with the following test, probably not very representative but titillating: Are you happy or actually just sad and trying to be happy? Find out here!

Please follow me ...

The test starts with the question: do you have a partner, yes or no? While clicking on yes, I see suddenly popping up in the left part of my screen a flickering question: have you already found a present to put under the Christmas tree?

I (deliberately) ignore this (valid) question and move to the next one: Is your relationship good, REALLY good? Yes or No? Well, I wonder what they mean with 'REALLY, but clicking on 'yes' is definitely more appropriate. Surprise: on the right part of my screen, a proposal for 'incredible St Valentine deals' appears, all red and blinking. Does this question actually relate to work?

Let's test the next question out: Do you wake up ready to take on the day? This must be ironic, because when I select the affirmative response, an advertisement for the Belgian trains appears. Let's just ignore this and continue, we have at least left the 'partner' field.

Upon meeting new people, are you jaded and serious, or are you warm and friendly? Do you mean always warm and friendly? I'm missing some qualifiers here. What about bad days?

How about hobbies? Anything that helps you de-stress? Yes, No? I even do not have the time to reflect: my screen gets covered with pictures of the Caribbean sea and 4 stars hotels. When I find the right spot to "click" this away (just above an incredible swimming pool with view on the beach), the next question is waiting for me:

Do you find yourself waking up, going to work, and then spending the rest of the afternoon and evening just doing the same thing, like playing a video game? Ouch, do emails count as video game? If yes, probably yes. The 'yes' click goes with an announcement for the growing industry ???... Let's focus.

Are you really good at something--maybe home decorating, painting, cooking, or woodworking? This cannot be serious, now there is a commercial for Ikea!

Do you feel too old for certain things you're still having to do, use, or deal with? Sure, but I do not get time to define which ones: the hotels with view on the Caribbean sea are here again

Do you like the way you look? Hurray, they propose three possibilities: Yes, No, I avoid mirrors or Yes, I would like to be a bit thinner though. I don't want to know what kind of pop-up I will get by clicking so click randomly and wildly to get to the next question.

Do you have someone or something to look forward to each and every day? YES!!!! But why does a box appear with 'how smart are you?' This test is beyond doubt rubbish, let's stop this!

At this instant, my results show up:

You are actually very happy! You're happy with your love life, your home life, your work, and your loved ones. You have family and friends. You have stability. And you certainly feel like you have enough time for yourself and your hobbies. Life is good !

Oh this cannot really be claptrap, right? There must be something right 😊.

Violaine Verougstraete, EHS & REACH director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

RAC-47 and SEAC-41: cobalt salts restriction conformity check

RAC discussed the conformity of the Annex XV dossier submitted by ECHA (Dossier Submitter), which proposes to restrict the placing on the market or use of cobalt sulphate, cobalt dinitrate, cobalt dichloride, cobalt carbonate, cobalt di(acetate), as substances on their own or in mixtures, unless exposures to the cobalt salts are below a defined reference level (0.01 µg Co/m³) and conditions are communicated to meet this exposure level. RAC estimated that the Annex XV dossier was conform (i.e. fitting with the legal requirements of Annex XV) and that it can proceed to the Public Consultation. However, several important aspects were raised during the 'key issues discussion', by the Rapporteurs in particular. The Dossier Submitter has received a number of recommendations to improve the dossier, most of them being very in line with the points identified by industry. These key issues will drive the input to the Public Consultation but also the next discussions in plenary (March 2019). The conformity of the Annex XV was subsequently discussed by SEAC. While agreeing on the proportionality, SEAC questioned why the restriction did not recommend cheaper risk management options and why the proportionality assessment is not based on a cost-benefits motivation. Like Eurometaux, several SEAC members expressed rather strongly that "the need for a high level of protection" does not form a solid basis to assess the relevance and proportionality of the proposal (more information: Vanessa Viegas, Rohit Mistry, Hugo Waeterschoot and Violaine Verougstraete).

RAC-47: main principles of metals classification pushed aside during the lead metal discussion

RAC-47 debated the lead metal environmental classification. ILA and Eurometaux' s written comments on all key items identified at RAC-46 (and submitted between the two RAC meetings) were distributed to RAC and recognised by ECHA. However, a majority of the RAC members clearly did not want to consider the specific guidance for metals and neglected the data richness of the dossier, which resulted in a single-entry classification proposal, neglecting the evidence for a 3-order difference in environmental hazard for the massive and powder forms and putting aside typical concepts of the metals guidance like the pH grouping and normalisation. Moreover, RAC based its opinion on a single and very sensitive ecotoxicity data point originating from a non-standard test thereby ignoring data richness of lead. In other words, RAC applied the precautionary principle instead of available evidence and guidance. It is fair to say that ECHA and some of RAC members with environmental background had a different view, more aligned with the one from industry. As a result, ECHA should present the two options to the Commission (one with and one without a split for the massive form). ILA and Eurometaux have scheduled a short debrief call on 6 December and will develop in the coming days an action plan to defend the metals guidance and a Weight of Evidence approach fully reflecting the abundant data sets on lead metal (more information: Jasim Chowdhury and Hugo Waeterschoot).

RAC-47: others

Besides cobalt soluble salts, RAC also discussed the conformity of the restriction on N, N Dimethylformamide. The Annex XV proposal was already submitted twice but failed conformity until now. The number of restrictions planned for 2019 motivated the RAC secretariat to make a presentation on what a conformity check should include. RAC agreed it should be limited to a check of the legal requirements (i.e. whether the components defined by Annex XV are present) and not become a first evaluation of the dossier. It was stated that a restriction should be possible to build with at its core the content of the relevant registration dossiers. In case information is missing or deemed inadequate, (better) information should be asked for during the Public Consultation. This is in line with the REACH Review action 10 (Frame the application of the precautionary principle). The question whether a restriction is the most efficient risk management option is not a matter of conformity and should not be used to reject a dossier. Eurometaux commented that this means as a consequence that the efficiency of the Restriction as RMO is only evaluated quite late in the process. These conclusions will be further discussed with the Eurometaux A&R platform. RAC discussed the first opinion on the restriction of 'plastic and rubber granulates containing PAHs' and concluded its discussions on the restriction of 'substances used in tattoo inks and permanent make-up'. The RAC Chair also announced that RAC will re-start developing OELs in 2019, with lead as a priority. Some Applications for Authorisation (AfA) were screened as well, with a warning that the section on Man via the Environment shall be further improved to avoid questions in the next steps of the process. A short discussion was held on a reference dose-response relationship for dermal cancer for Coal Tar Pitch High temperature after the applicants expressed concerns regarding its conservatism. Finally, RAC discussed Commission's request to re-assess the chronic M-factors for copper compounds and bring these in line with the recent RAC debate on granulate copper. A public consultation is foreseen in January and the final opinion should become available after the plenary discussion in March (more information: Violaine Verougstraete).

SEAC-41: focus on how to balance the review period for authorisation applications and recycling aspects

In addition to the cobalt salts case, Eurometaux' s interest was mainly triggered by the discussions on the setting of Review Periods for Applications for Authorisation (AfA) and by the evaluation of a Review Report (renewed application) for DEHP in

plastics. The latter raised a lot of debates on how to account for the benefits of recycling versus keeping “contaminated plastics” in circulation in the EU economy. The use of the INERIS model to demonstrate the longer-term value of recycling was acknowledged. The other AfA case that was debated related to a new chromates activity. SEAC concluded positively and produced a very detailed and balanced opinion on the setting of the appropriate Review Period. Both cases set important precedents. The DEHP recycling case illustrates indeed how in future benefits for recycling can be considered, even when the SVHC is an impurity. The chromates AfA demonstrates that new SVHC activity is possible and is not discriminated versus existing activities (more information: Hugo Waeterschoot).

Authorisation

NeRSAP 8: *the EU Network of SEA and AoA experts’ meeting organised by Eurometaux*

NeRSAP is the European network of experts in Socio-Economic Assessment and Assessment of Alternatives. It was set up more than 5 years ago by ECHA and industry (Eurometaux and Cefic), to allow regulators, consultants and industry experts to interact, discuss and learn on the socio-economic- and assessment of alternatives aspects introduced by the REACH Regulation. The modalities facilitate technical exchanges without challenging the attendance of SEAC, Commission and ECHA experts. Eurometaux was in charge of organising the 8th NeRSAP session, which was held in Antwerp back-to-back with the Substitution Workshop. It brought together more than 50 experts. Many interesting questions were discussed like for example whether a reduced risk option for a SVHC can halt the need for substitution. The metals sector was very well represented and provided contributions focused on the recycling of precious metals (by Johnson Matthey), Sustainable Substitution within the Circular Economy framework (outcome of the Eurometaux workshop), the improved exposure assessment method for calculating excess cancer risk for risk management (by eftec for the CI) and the potential of blockchain technology to support for supply chain communication by Lorenzo Zullo (more information: Hugo Waeterschoot).

Others

ENES_{3.2}: *harmonisation for better communication*

EBRC and Eurometaux participated in a meeting of the ENES 3.2 action group, which aims at consolidating the different workers exposure tools into a common framework to facilitate the communication on workplace assessment and conditions of use between registrants and downstream users. Currently, depending on the modelling tool that is used (MEASE, ART, ECETOC TRA, Stoffenmanager) to estimate the exposure at the workplace, different outputs and explanations can be generated for comparable conditions. This group, which is composed of ECHA, tools developers, RAC members and some industry experts, has identified two work packages: a) mapping of the core conditions of use of the different models and proposal for a harmonized output to include e.g. in use maps, and b) evaluation of publications on the tools’ reliability. The outcomes and next steps will be further discussed with the Eurometaux Exposure Scenarios Taskforce, which will meet on 6 December (more information: Daniel Vetter and Violaine Verougstraete).

Nanos

Nanomaterials Expert Group 12th meeting: *status update on regulatory issues and projects*

The consultation by Commission on a new nanomaterials definition is stalled, meaning that for the time being the former recommendation continues to apply. The JRC is preparing guidance for the use of the definition in regulations, to be published within the coming weeks. ECHA has also announced the setup of several Partner Expert Groups (PEG) to draft guidance (or appendices to existing guidance) to align the ECHA guidance with the upcoming revised REACH Annexes for nanomaterials (substance identification, phys-chem and environment endpoints, human health endpoints). An update was also provided on the Substance Evaluation for silver as performed by The Netherlands. The focus was on environment and addressed some key concerns like coverage of the nanoforms by the registration file and the role of the ion. The conclusions should be issued before end of the year. A tentative plan for follow-up actions was communicated as well (further evaluation of all relevant data for the different silver forms including transformation/dissolution data) but will depend on resources. An update was provided on the GRACIOUS project, referring to the Paris workshop that has been discussed during the last Nanos Taskforce meeting. The final framework will be based on the input gathered from the stakeholders. The final document is expected in 2021. It would support the application of grouping, read-across and classification of nanomaterials. Further, a status update has been provided on several projects of the NanoSafety Cluster– it remains an open question how the huge amount of generated data could support the regulatory work. The EU observatory for nanomaterials is developing fast and new studies are planned. Feedback on the webpage and activities are crucial for the success and therefore highly welcomed (more information: Christine Spirlet and Nathalie Kinga Kowalski).

REACH Nanos ECHA Workshop: *updates guidance and industry input*

Four experts kindly represented Eurometaux at the recent ECHA Nano Guidance Workshop. The workshop aimed at defining the scope/issues of the updates to include into the existing guidance on Information Requirements so as to facilitate the implementation of the new provisions for nanoforms. The report from the experts highlights a number of issues that will require some careful follow-up (e.g. size, specific surface area, surface properties, toxicokinetics, mutagenicity, bioelution and TDp, PNEC for soil and sediments). These points will be further discussed with the Eurometaux Nanos Taskforce. To note: ECHA does not expect every nanoform in a set to be tested, but one needs to clearly define the boundaries of a set (according to Annex VI, 2.4). Also, Member States are developing Test Guidelines within the so-called Malta-Projects, which is also monitored by Eurometaux (more information: Christine Spirlet, Rodger Battersby, Arne Burzlaff, Koen Oorts and Nathalie Kinga Kowalski).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

CARACAL REACH session: *REACH Review ongoing- Implementing Acts and enhanced institutional and regulatory synergies on the table*

The REACH session of CARACAL was held on 21 November. The main topic on the agenda was the REACH Review. The discussion covered aspects related to i) update of the registration dossiers for which an implementing regulation is expected to be developed (Action 1), ii) improvement of the workability and quality of the Safety Data Sheets (Action 3), iii) tracking of substances of concern in the supply chain (Action 4) and the interface between REACH and OSH legislation (Action 12). With regard to Action 1, Eurometaux believes that the experience gained by the REACH consortia is fundamental and should be taken into account in the drafting of a regulation on registration dossiers updates. Detailed follow-up comments will be prepared with the Eurometaux Data-Sharing Taskforce. The discussion on the REACH/OSH interface was also of high interest due to the “multiple fronts” on which actions will be taken: e.g. the further development of OELs by the Risk Assessment Committee and its interaction with the Advisory Committee on safety and health at work under the umbrella of DG Employment, the enhancement of the Risk Management Option Analysis (RMOA) as a tool to identify the most appropriate regulatory route to address chemical risks, the synergies to be established at national level between the REACH and OSH activities (most often conducted independently so far). The minutes of this CARACAL meeting will be circulated soon. The next meeting will be held in March 2019 (more information: Lorenzo Zullo).

CARACAL: *cobalt metal with a GCL, experts group on T25 / mechanism of action*

The CLP part of CARACAL's agenda was discussed on 22 November. The European Commission briefed the CARACAL participants on the status of the Adaptations to Technical progress (ATP) of the CLP, confirming that cobalt metal is included in ATP 14, and that the proposed classification entry in Annex VI is associated with a temporary generic concentration limit (GCL) for carcinogenicity. The Commission's inter services consultation on this ATP, which also includes TiO₂, has been launched shortly after CARACAL and will last until 10 December. A discussion should take place in the REACH Committee in December and be followed by a vote in February 2019. The need for a Specific Concentration Limit for cobalt metal will be re-evaluated at later stage after the assessment and possible review of the “T25 methodology” by an expert group that will start its activities Q1 2019. This group will also discuss “mechanisms of action considered not relevant for humans”. The EU Commission also informed CARACAL on the status of the bioelution work, explaining that Eurometaux submitted a revised package to ECVAM early November. If ECVAM supports the revised protocol, the method will go for peer-review, which might still take several months. Once the protocol is ‘on track’, the next step will be to agree on how to use the bioelution results for classification purposes. This might require the re-activation of the Bioelution Expert group, at ECHA or Commission level (still to be defined). There has been no discussion on the guidance on the (exemption from) labelling of massive metals. Eurometaux had submitted a draft note before the summer and received some comments back from a couple of Member States. The Commission explained that they are still discussing internally how to proceed with it. The next meeting will be held in March 2019 (more information: Lorenzo Zullo).

EUROMETAUX REACH, CLP & EHS Activities: hot topics

Resource mapping to respond to REACH / ECHA/ EHS challenges

Substitution Workshop 7 November 2018: *substitution within the frame of a Circular Economy*

The Eurometaux Authorisation and Restriction platform addressed the EU policy makers' request to organise sectorial workshops to "promote substitution". However, the platform decided to give it a specific touch by framing this EU policy goal in the broader perspective of recycling, Circular Economy and other EU environmental policies like climate. The workshop was well attended by regulators as well as by industry. Several cases and assessments were presented, demonstrating for example that "drop-in substitution" for metals is very rare. While substitution is acknowledged as a "drive" in the sector, the message was provided that a careful assessment for 'regrettable substitution' is needed to prevent for example that some metal fractions cannot be recycled at their end of life (e.g. use of bismuth in copper alloys). The automotive use of some metals with Substance of Very High Concern (SVHC) properties supporting green mobility, was presented as well, demonstrating how an increased use of such materials can be risk-controlled and bring major benefits for the environmental policies in the EU (e.g. reduction of exposure to particulate matter by the electrification of transport). The workshop attendees supported the metal sector's proposal to promote "Sustainable Substitution" by assessing in a stepwise approach if the replacement of a SVHC is technically and economically feasible, considering Chemicals Management, Circular Economy, and other EU Environmental and Health policy objectives holistically, including societal value and impact (more information: France Capon and Hugo Waeterschoot).

Pb Authorisation: *conference call on recent developments*

ILA and Eurometaux organised an informative call on 16 November to brief members and downstream user sectors on the status and next steps after the Candidate Listing of Pb metal. Short term emphasis was on the obligation of article producers and importers potentially to submit notifications to comply with Article 7(2) under REACH by 27 December. Most attention went on the next steps in the process, starting with the prioritisation for authorisation by MSC expected in 2019 and what industry can do about this. It is highly likely that Pb will be prioritised due to its volume, number of uses and uses in consumer applications. Moreover, the timing of this process cannot be delayed. A 3-month public consultation on the prioritisation is expected to run from September 2019, which remains nevertheless critical given in parallel it collects information relevant for the Commission to consider the appropriateness of a potential future inclusion in Annex XIV. ILA and members reconfirmed that including Pb metal in Annex XIV would not be a good and efficient risk management solution to further reduce exposure and risk and that mainly an update and implementation of an improved Binding OEL value should be strived for in the first instance. The group was reminded that the Commission would release soon its proposal for a next Annex XIV update which may or may not include the 4 Pb compounds on ECHA's 7th recommendation. All agreed that Commission's vision on those Pb compounds' best risk management option would have an impact on what could happen with Pb metal. It was therefore suggested to follow this activity closely and define a refined strategy on the 5 substances (Pb + Pb compounds) as soon as there is more clarity on this. Finally, it was reminded that downstream users may need to collect information relevant to the assessment of the best risk management measure by Commission which may include cost-benefits information (more information: Lisa Allen, Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

UVCB Taskforce meeting: *moving forward*

Inorganic UVCBs dossiers are identified as one of the priority activities in the MISA rolling action plan. Several steps have been defined to ensure registrants have compliant and complete inorganic UVCB REACH dossiers. The first task to face in this context is the refinement of the Eurometaux guidance on substance identity, to be able to share it with ECHA before end of the year. The taskforce discussed the details of this guidance (a revised version was circulated before the meeting) and identified how to best improve and report the SID part of the dossiers, and address as well ECHA's concerns on the uncertainty and variability of these substances in the overall risk assessment framework. An updated version of the document, considering the outcomes of the meeting, will be circulated to the taskforce before submission to ECHA. Regulatory feedback is expected for January/February 2019 (more information: Pablo Rodriguez Dominguez, Federica Iaccino).

Cobalt CLH Taskforce: *conference call on upcoming advocacy messages*

A status update was provided to the Cobalt CLH Taskforce on 14 November, highlighting the recent developments on the setup of an expert group for the review of the T25 methodology and the outcomes of a meeting with DG GROW and DG ENV held on 18 October. The timings and key messages for the advocacy were clarified as well: the next REACH Committee (11-12 December) will discuss the ATP-14 proposal prepared by Commission and vote in February. The contacts with the Member States at this stage should therefore mainly focus on obtaining a qualified majority for the proposal that includes the GCL and encourage them to support a thorough review of the T25 approach. Communication material has been prepared by the

CI/CoRC, including a summary of the T25 related issues and our questions in this context. Participants of the taskforce were invited again to share their bioelution results to further improve the acceptance of the consideration of bioavailability for alloys. Minutes and agreed action points were circulated to the taskforce on 23 November. The next call will be organized after the December REACH Committee (more information: Brigitte Amoruso, Ruth Danzeisen, Jenny Poulter, Hugo Waeterschoot and Violaine Verougstraete).

Metal-specific REACH/ CLP application tools and concepts

Bioelution: *Resubmission to ECVAM*

A revised validation package was submitted to ECVAM on 9 November, after 4 months of work on the requests for clarifications sent by ECVAM on the initial submission pack (February 2018). The questions from ECVAM demonstrated that they did a thorough review of the Test Submission Template- and the SOP documents in particular. The SOP for the gastric test had to be strengthened to consider the comments made by ECVAM and by some users of the protocol. It is important to note that some aspects of this SOP may be slightly different from what has been applied until now, but this evolution does not invalidate previous tests/results. ECVAM is now examining the revised documents. If they consider, based on the outcome of their assessment, that the test method is ready to enter the ECVAM Scientific Advisory Committee (ESAC) peer review, ECVAM will inform the test submitter (i.e. industry) and start organising the peer review process. This will include the establishment of an expert working group, hopefully by end Q1 2019 (more information: Adriana Oller and Violaine Verougstraete).

SPERCs: *Comments received from ECHA/Member States*

The cross-industry SPERCs Taskforce revised the SPERCs quality criteria based on the outcome of the SPERCs workshop organised back in June. The revised version of the criteria document was submitted last month for review to ECHA and the Member States. Their feedback was received on 19 November. They ask to further clarify the context in which the quality criteria should be used and propose to reduce the number of criteria to avoid overlapping and allow the quality assessment to focus on the most critical aspects of the SPERCs. Some changes might also be required in the format of the template developed by industry since a word format might be more appropriate than an excel file. The SPERCs taskforce will now work on addressing these comments. Finalising the quality criteria before the end of the year, as initially planned, is probably too optimistic. More realistically, the finalisation process will be completed in Q1 2019. (more information: Lorenzo Zullo).

Water

Workshop 6&7 November 2018: *Integrated Assessment of the 2nd River Basin Management Plans*

Eurometaux joined the discussions and debates that took place at the EU workshop entitled "Strengthening the implementation of the Water Framework Directive (WFD) in Europe: issues and options" that was organised in Brussels. The related synthesis – Putting the WFD philosophy into practice - is now available, together with the background documents (ref. important, the "Strengthening the WFD to address chemicals challenges", to be further discussed with the Water Taskforce. (more information: Annalisa Bortoluzzi).

Strategic Coordination Group (WFD): On 8 November Eurometaux participated in the CIS SCG meeting in Brussels. The main topics of interest to us were the updates on Commission's assessment of the 2nd River Basin Management Plans, on the Fitness Check of Water Legislation, importantly including the Member States' Consultation Group initiative and their document "The Future of the WFD", and the 2019-2021 CIS Work Programme (foreseen for endorsement by Water Directors on 29/11/18) (more information: Annalisa Bortoluzzi).

Industrial Emissions

12th Article 13 Forum meeting: *taking stock of the present for a better future*

The Industrial Emissions Directive Article 13 Forum met on 27 November in Brussels. The main objective of the meeting was to obtain the Forum's opinion on the proposed content of the BREF document for Food, Drink and Milk Industries, as well as to discuss the final text of the draft standard text on Environmental Management Systems. For Eurometaux, the presentation on the EIPPCB work programme and the planned Evaluation of the IED were among the most relevant parts of the meeting. The work programme did not bring any big surprises. However, untypically for the Commission, the Forum was asked for the opinion which of the planned reviews on the STM BREF and LVIC BREFs should be undertaken first and if the left horizontal BREFs are of interest to be reviewed. The Forum members gave variable feedback on their preferences but mainly agreed that a core point is to avoid an overlapping of too many reviews. All members share the reality of having only limited staff

working on all BREF reviews and would like to avoid a too high burden. Key information on the planned IED evaluation is that the Commission is first focusing on the past experience and not (yet) on the future of the IED. Two stakeholder workshops, prior and after a public- and a targeted sectors consultation are planned. The Forum also discussed the next cycle of BREF reviews that would start in 2020. The Commission took on board the plea for a workshop discussing the frame of the next BREF review cycle. The Commission asked for written responses on the preferences and planned evaluation by the end of the year. The IE Taskforce will discuss possible contributions from Eurometaux (more information: Nathalie Kinga Kowalski and Annalisa Bortoluzzi).

Others

CPW Interface: *submission position paper to Commission*

In follow-up of its response to the Public Consultation on the Chemicals Products Waste interface, Eurometaux finalised a position paper that complements the input to the consultation and shared it with DG GROW and DG ENV. The paper summarises the sector's response to the eight challenges listed in the Commission's Staff Working Document and provides additional views on some challenges, respective options, and the open questions presented in the public consultation. The Commission is now analysing the input received (more than 200 contributions) and will prepare some options to be discussed by the next Commission. In the meantime, Eurometaux will further monitor the discussions on the Waste database, the relevant CLP and Waste aspects and on the definition of substances of concern. Eurometaux was also interviewed by RPA on this issue in the context of a study they are performing for Cefic (more information: Kamila Slupek and Violaine Verougstraete)

CII Meeting: *BMW-RMOA Event*

The improvement of the interface between REACH and OSH is currently under discussion as part of the REACH Review process. Industry believes that in this context, Risk Management Option Analyses (RMOAs) represent a suitable tool to identify the most appropriate regulatory route to efficiently address chemical exposure risks. This concept has been extensively promoted by the CII, a cross industry initiative for better regulation on chemicals management, backed by more than 60 organisations. This is also in line with the recommendation put forward by the REFIT Platform Government Group that stated that "REACH Authorisation may not be necessary where OSH legislation is shown to provide an appropriate, targeted, proportionate and mandatory regulatory control of risks. This should be decided on a case-by-case basis using defined criteria. [...]". To provide a forum for discussions on this topic and to demonstrate to the Commission that Member States do take an interest in the issue, a dinner debate on RMOAs was co-organized by the German Ministry of Economy (BMW) and the CII on 21 November. The event was attended by representatives from DG GROW, DG ENV, Austria, Cyprus, Denmark, Spain, Ireland, the Netherlands, Portugal, Romania, Slovenia, the United Kingdom and of course Germany, as well as by industry representatives. Interestingly, during the discussions at CARACAL that day, several Member States had raised the point that the CII brought to their attention, namely that Commission's CARACAL paper on REACH and OSH failed to touch upon the topic of how to consider OSH in RMOAs. This was a good starting point for the discussions at the dinner debate. The BMW presented its study on when to choose Restriction rather than Authorisation. It also stated that consistency of RMOAs would be enhanced, if criteria for when to choose OSH/OELs were formulated. This was further developed by the CII contribution (by Martin Wieske, WVMetalle) and also by the presentation of EUROBAT on the importance of guidance for RMOAs. The German MSCA (BAuA) presented its approach for conducting RMOAs and choosing RMOs. Some Member States raised that there is already more guidance available within the Member States on how to conduct RMOAs. This guidance is however not available to industry and cannot help enhancing the predictability. It also appears that this guidance falls short of criteria / decision-trees that were suggested by the BMW and the CII. As next step, the CII plans to comment on the CARACAL paper presented by the Commission and to follow up with participating Member States to promote common messaging on how to add the RMOA topic to the Commission's REACH-OSH work (more information: Kai-Sebastian Melzer and Lorenzo Zullo).

CMD/CAD: *Roundtable discussion on reprotoxic substances*

EUROBAT, the Nickel Institute and Eurometaux participated on 12 November in a roundtable on the update of the Carcinogens Mutagens Directive (CMD). Commission and industry debated, under the lead of Mayer Brown and RPA, the baseline scenario and several policy options (ranging from no change to a modernisation of the OSH framework) to include reprotoxic substances in the CMD. The Joint Declaration signed by Cefic, the European Chemicals Employers Group, IndustryAll and the trade unions was also considered as a possible option by the consultants, which motivated several participants (including BusinessEurope and Eurometaux) to ask their industry partners to consult the industry more broadly before issuing such "generic" positions (and mentioning examples focusing on lead). RPA and Mayer-Brown will use the inputs received during the Roundtable in the second part of the study they are carrying out for the Commission (Study to collect recent information relevant to modernising EU Occupational Safety and Health chemicals legislation with a particular

emphasis on reprotoxic chemicals) (more information: Steven Verpaele, Kai-Sebastian Melzer, Stefan Buch and Violaine Verougstraete).

Advocacy Network call (12/11): *kick-off*

The Advocacy Network had a first call to discuss the possibilities to do capacity building at Member States' level. The EHS & REACH Steering Committee had agreed in September to reflect about possible activities to build new relationships with Member States, ideally following a systematic approach. The Advocacy Network of the Steering Committee should work on establishing new contacts and organizing meetings with Member States (e.g. 2-3 per year). The first step is however to prepare and agree on the messages an industry delegation could communicate during such meetings. It was agreed that the message(s) should remain rather generic and understandable to be attractive enough for a broad audience of authorities (environmental/ chemical/economy ministries). However, the messages should also refer to "trendy" interesting topics. The group is also identifying Member States with whom at this stage, the membership does not have connexions with and that should be approached first. Ideas welcomed! (more information: Nathalie Kinga Kowalski).

Metals Sectorial Approach

Follow-up: *submission workplans by 15 November and publication list participating substances*

In follow-up of what was agreed during the first MISA workshop on human health information requirements, the consortia submitted their workplans by the 15 November deadline -or communicated with ECHA to indicate when the workplan could be expected-. The close to 100% response rate was very much appreciated by ECHA. ECHA confirmed they would publish very soon the list of MISA substances on the ECHA website (as well their coverage by workplans). They will also report to ECHA's management, MSC and the ECHA Management Board the progress made with the first workshop and work plans. The next MISA workshop will take place on 7 February and address the environmental endpoints. To prepare for this workshop, Eurometaux and ARCHE drafted a Self-Assessment Tool (SAT-ENV) composed of three sections: the first one addresses the availability of information vs. the standard information requirements as well as possible adaptations and read-across; the second and third sections relate to the ERV/PNEC derivations and the availability/ robustness of data to derive the environmental classifications. The SAT-ENV template has been reviewed by ECHA and includes already some suggestions made by the UK. It was distributed on 28 November to the MISA community for completion by 15 January. After mid-January, Eurometaux will extract the main learnings and questions to feed into the workshop. On 6 December, it will be possible - during the call of the Environmental Classification Taskforce- to pose some clarification questions on the SAT-ENV. The Eurometaux staff remains available for any question (more information: Federica Iaccino, Hugo Waeterschoot, Lorenzo Zullo and Violaine Verougstraete).

FURTHER OUTREACH OF REACH

OECD

OECD-BIAC Joint Meeting: *6-10 November 2018*

ICMM, the Nickel Institute and Eurometaux attended the BIAC and the OECD Joint Meeting early November. Industry's input was prepared during a confcall held by ICMM on 31 October. The main learnings and key follow-up actions will be discussed during the ICMM Chemicals Management Working Group meeting in January. The aspects of relevance to the EU agenda will be presented at the next EHS & REACH Steering Committee (more information: Kai-Sebastian Melzer, Claudine Albersammer and Hugo Waeterschoot).

COMMUNICATION

Meeting with ASD: *trends in chemicals management and supply chain communication*

On 20 November Eurometaux was invited by the AeroSpace and Defence Industries Association to give a presentation at their REACH and chemical management working group meeting. The presentation aimed at presenting a high-level overview of

the evolving EU policy framework (i.e. cross sectorial policies, Circular Economy, interface discussions etc.) and how Eurometaux is adapting to it. Particular attention was given to the increased need for both top-down and bottom-up supply chain interactions/communication. This was also an opportunity to describe the Metals and Inorganics Sectorial Approach (MISA) and the fact that it includes also aspects related to improving knowledge from the supply chain (on uses, exposure, material flow etc.). The ChemChain project was also mentioned as a project that Eurometaux is monitoring with interest since new technologies, such as blockchain, could lead the creation of solid and trusted frameworks to streamline tracking and transferring of information on chemicals along the value chain. The presentation was well received even if enhancing supply chain communication did not come over as being a high priority. Some participants however recognised that it is also in their interest to share information on uses/applications especially when entering into discussions related to restrictions/authorisation and substitution debates in general (more information: Lorenzo Zullo).

Meeting with French Association of Aluminium: *Management of chemical substances after REACH?*

Eurometaux was invited by the French Association of Aluminium to make a presentation on REACH post-2018 and the upcoming trends in Chemicals Management. This was a very good opportunity to discuss the difficulties met by the surface treatment sector (chromates, lead, cobalt) but also to understand some of the specificities of the aluminium recycling (more information: Violaine Verougstraete).

CALENDAR

- 6 December: Exposure Scenarios Taskforce meeting -MCC (Brussels)
- 6 December: Data-Sharing Taskforce call
- 10-14 December: MSC-62 – ECHA (Helsinki)
- 13-14 December: ECHA Management Board-52 – ECHA (Helsinki)
- 10-14 December: STS BREF Technical Working group –(tbc)
- 17 December: Authorisation & Restriction Platform – MCC (Brussels)
- 18 December: REACH Forum - MCC (Brussels)
- 19 December: EHS 1 REACH Steering Committee- MCC (Brussels)

ACRONYMS

AfA: Application for Authorisation	MISA: Metals and Inorganics Sectorial Approach
AoA: Assessment of Alternatives	OECD: Organisation of Economic Cooperation and Development
ART: Advanced REACH Tool	OEL: Occupational Exposure Limit
ATP: Adaptation to Technical Progress	OSH: Occupational Safety Health
BIAC: Business Industry Advisory Committee	NERSAP: Network of experts in Socio-Economic Assessment and Assessment of Alternatives
BMWi: Bundesministerium für Wirtschaft und Energie	PAH: Polycyclic Aromatic Hydrocarbons
CARACAL: Competent Authorities for REACH and CLP	PNEC: Predicted No-Effect Concentration
CII: Cross Industry Initiative	RAC: Risk Assessment Committee
CIS: Common Implementation Strategy	REFIT: Regulatory Fitness & Performance Programme (EU)
CLH: Harmonised Classification and Labelling	RMO: Risk Management Option
CLP: Classification, Labelling and Packaging Regulation	RMOa: Risk Management Option analysis
CPW: Chemicals Product Waste	SAICM: Strategic Approach to International Chemicals Management
CTP-HT: Coal Tar Pitch High Temperature	SEAC: Socio-Economic Analysis Committee (ECHA)
DEHP: Di(2-ethylhexyl) phthalate	SCG: Strategic Coordination Group
ECVAM: European Centre for the Validation of Alternative Testing Methods	SID: Substance Identity
EIPPCB: European Integration Pollution Prevention Control Bureau	SOP: Standard Operating Procedure
EMS: Environmental Management Systems	SPERC: Specific Environmental Release Category
ENES: Exchange Network on Exposure Scenarios	STM: Surface Treatment of Metals and Plastics BREF
ESAC: ECVAM Scientific Advisory Committee	SVHC: Substance of very High Concern
GCL: Generic Concentration Limit	TDp: Transformation Dissolution protocol

IE: Industrial Emissions	TiO ₂ : Titanium Dioxide
JRC: Joint Research Centre	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
LVIC: Large Volume Inorganic Chemicals	WFD: Water Framework Directive
MEASE: Occupational Exposure Assessment Tool for REACH	