



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Evaluation Taskforce Meeting: **18** June
Chemicals Management Steering Committee: 20 June

TABLE OF CONTENTS

EUROMETAUX CHEMICALS MANAGEMENT NEWS	1
ECHA REACH & CLP Activities: hot topics	2
ECHA Committees.....	2
Data-Sharing.....	3
COMMISSION REACH & CLP Activities: hot topics/issues	4
CARACAL.....	4
EUROMETAUX CHEMICALS MANAGEMENT Activities	4
Resource mapping to respond to Chemicals Management challenges.....	4
Metal-specific REACH application tools and concepts	5
Metals and Inorganics Sectorial Approach.....	5
Water	6
Industrial Emissions	6
Nanos	7
FURTHER OUTREACH OF REACH	7
COMMUNICATION.....	8
CALENDAR	12
ACRONYMS.....	12

Dear All,

What I love with voting days in Belgium is that we all have to come out of our houses to stand in queues with people living in the same area but whom we hardly know. Add a pinch of sun and the typical lack of parking spots that encourage us to massively walk to voting locations, with children, dogs, a shopping list for after the vote, a book to read while waiting or even electoral tracts in case we have not yet made up our mind. A lovely start to the Sunday.

Waiting to proceed with our -in the best case well informed- choices, we may look around and contemplate if the lady in front of us is not the one who serves at the bakery? Or in the shop behind the corner? Would she already know what to vote? More to the point, for whom would she vote? And that young guy over there who's doing an online voting test on his phone? And that older man moving with the queue but sitting on a plastic chair?

A bit later on, when the persons waiting start to get annoyed by the time it is taking and thus slightly agitated, there is always someone -not necessarily the old man- who says that a voting right is not a given, but a responsibility some have had to fight for. True!

How we foster this responsibility is another story. When some hours later, the extreme-right wing results tint what was a pleasant Sunday in dark colours, one cannot avoid wondering how much reflexion, knowledge and understanding of politics goes into our votes and how much our convictions are driven by fears, personalities or events at a local scale.

At the end of this Sunday, it can be a bit of a challenge to keep one's head up and repeat convincingly to the children (no age limit) that now is the time when it is even more crucial to fight for longer-term perspectives, ideals and the possibility to marvel about human-beings. That education, engagement and culture are not vain words.

That tomorrow, we will still have to live all together, with some beautiful moments but also frictions, that we need to make the best of it and other Sun-days. Including a friendly chat with that lady in the shop maybe?

Building on that "all-togetherness" but more directly focusing on chemicals management, I would like to invite you to read the speech Guy Thiran, Eurometaux's Director General, gave last week during the dinner at the Helsinki Chemicals Forum. You will find his communication, which had as theme 'the view of Eurometaux/the EU metals industry on the role of chemicals in the circular economy', at the end of this news.

Wishing you an excellent tomorrow,

Violaine Verougstraete, Chemicals Management director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

MSC-64: a series of metals debated for testing proposals, Compliance Checks and Substance Evaluation, with important consequences on metals information needs

MSC-64 was heavily charged with metal discussions on each of the evaluation process steps, some of them setting potential important precedents. The Substance Evaluation decision by Germany on ZnO nanoforms was debated by MSC members, with a focus on the proposals for amendments submitted on the environmental requests. Unlike for the silver case, Germany requested, and the MSC agreed, to include the Dispersion Stability test in addition to the TDp screening test and confirmatory long-term ecotoxicity testing, even though its relevance was contested by industry and originally also by ECHA. Despite the existence of relevant science, the countries still don't believe that the soluble form of metals is the most ecotoxic one. A case that got less attention at MSC, given that it was handled under the written procedure, was a ferro-Mn-slag (UVCB) for which industry asked, and got the permission, to conduct longer-term toxicity testing. While there was recognition that this was deviating from the usual approach for inorganic UVCBs, MSC agreed because it was demanded by the sector. However, the sector will have to prove the representativity of the outcome in respect to the variable nature of the UVCB. The fact that this type of materials has uses beyond pure industrial ones was not used as an argument in this decision. The third metal case concerned a group of tetraammine platinum compounds. Quite unusually ECHA confirmed the validity of the read-across. What was novel in this case was the debate on the storage and analysis of gonadal tissue from the Comet test. Once adopted this could become a new standard requirement. As MSC were not able to agree on the conditions, the decision was suspended

to the next meeting. And lastly ... there was a debate on a fibrous titanium compound, whereby MSC recognised the critical importance of the form to be tested resulting in a tiered demand: first clarifying the different fibre type forms before conducting the long-term health tests. Unusually, the registrant was granted the right to debate and conclude with the evaluating MSCA (France) on the form selected for the testing programme. Most important was also the deletion of the request for sediment toxicity testing given metals are more toxic in water and there is ongoing work on long-term toxicity aquatic testing. Maintaining this request would have challenged the Kp derivation approach presently used by most less data-rich metal files. The learnings and consequences of these different cases will be debated at the upcoming Evaluation Taskforce (more information: Hugo Waeterschoot).

MSC-64: Equivalent Level of Concern discussion (ELOC): *the start of a difficult discussion*

Later this year, ECHA and Commission will revise the progress made with the SVHC roadmap to 2020. In this respect, MSC reviewed ECHA's slide deck that proposes to extend the selection of substances for SVHC identification based on the ELOC criterion in REACH. While not focusing on already clarified ELOC criteria (Endocrine Disruptors (ED), respiratory sensitisers and Specific Target Organ Toxicity-Repeated (STOT-RE)) the proposal tried to somewhat "align" the multiple initiatives from Member States on new criteria like "Very Mobile and Persistent" or "very very persistent" substances. Industry pre-discussed the proposal, judging it at this stage as "*too unclear and leaving it too much open for interpretation and lacking the emphasis on "very serious irreversible effects" equivalent to increased mortality due to CMR*". Indeed, the proposal included suggestions like "occurrence in groundwater and impact on system functions of ecosystems" which would broaden the SVHC scope too much. After Member States raised their comments (although often in favour), industry was able to raise its concerns. Cefic and Eurometaux agreed to consider further written follow-up on this in preparation of the next CARACAL meeting (more information: Hugo Waeterschoot).

MSC-64: registrants' volume by use information not recognised by ECHA in its proposal for the 9th priority list

The Public Consultation on the 9th priority list for potential authorisable substances closed recently and MSC debated ECHA's recommendations to change... or better still... to not change the proposal. Especially on the seven Pb compounds "*quoted to be all used in Pb stabilisers*". Industry submitted information on the expected decrease in volumes due to the agreed restriction, furthermore confirming that 2 of them did not even possess any active registration, so should be eliminated from the proposal. However, none of these comments resulted in a change of the selection. Moreover, one of them, Lead oxide sulphate, is not used as a stabiliser but was nevertheless withheld based on "its inter-substitutability as a compound used in PVC stabilisers", despite the fact that its low scoring would not warrant such a selection. In addition, the clarifications on the Volume by Use information on DOTE/MOTE were not granted either. Industry reiterated these concerns when MSC debated ECHA's proposals and will be vigilant they are maintained in the minutes. Moreover, Eurometaux will suggest that the Risk Management Taskforce follow this up in writing to ECHA given this challenges the efforts makes to update the information (more information: Hugo Waeterschoot)

Data-Sharing

REACH IT and updates: *industry IT meeting at ECHA on 16-17.05.2019*

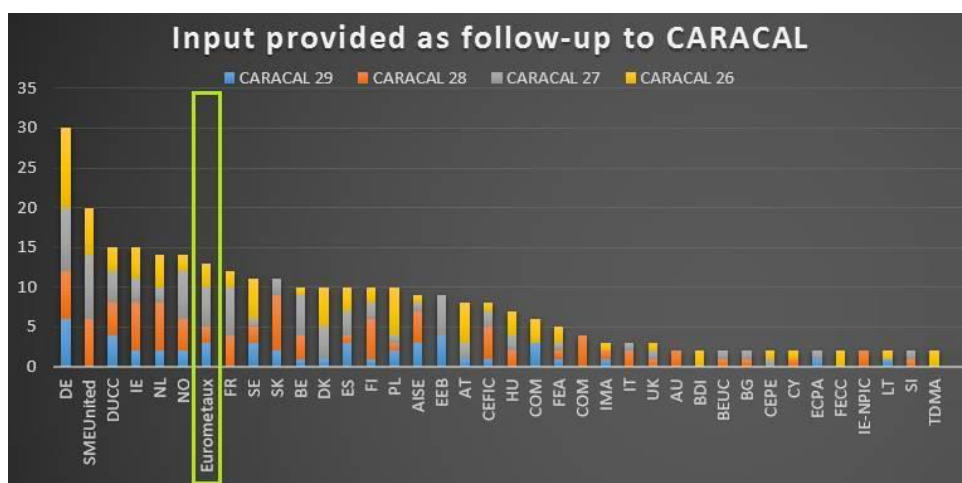
The meeting focused on updates currently ongoing in IUCLID 6.4 and REACH IT. Besides the exchange on new and upcoming functionalities, ECHA also welcomed comments and proposals from industry to further improve the tools. The main message on the updates is that after the 2016 IUCLID release, any new updates should not entail major work as all IUCLID versions are compatible and work on the same validation rules. However, ECHA will investigate whether some administrative information update (e.g. tonnage band, Legal Entity details,...) might be seen as changes that could lead to 'lighter' completeness checks. Several aspects related to Joint Submissions were discussed and analysed to e.g. identify the most efficient way for ensuring fair ways to acknowledge members working on updates versus members deciding not to participate. Under the Better Regulation programme, the "update without undue delay" is currently under definition, but any compliance check that is received applies to information as submitted when the decision arrived, i.e. further change in tonnage band for instance would in principle be neglected. Notes will be circulated to the Registration maintenance taskforce (more information: Federica Iaccino).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

CARACAL 30: taking stock of the stakeholders' engagement and getting ready for the next meeting

As explained in the March News, Eurometaux has now asked the European Commission if it is possible to be allocated an independent seat in CARACAL. Until now, Eurometaux participated in CARACAL as a member of the REACH Alliance. Over the course of time, the issues addressed by CARACAL triggered diverging and variable interests among the members of the Alliance, resulting in different needs and their willingness to attend the CARACAL discussions and provide input. Eurometaux, together with IMA, also took over the task to regularly inform our inorganic partners and coordinate the activities of the REACH Alliance on CARACAL related matters. However, considering the need to better focus our resources on a broad range of metal-specific activities and the lack of active support in coordinative roles by the partners of the REACH Alliance (other than IMA), Eurometaux took the decision to leave the Alliance. To support our request, we have analysed the level of stakeholders' engagement by counting the amount of contributions provided during the past meetings. As showed in the below graph, Eurometaux is among the most active stakeholders.



Whilst waiting for an official response from the European Commission we are preparing for the next meeting (CARACAL 30) that will be held on 1-2 July. The preliminary draft agenda includes the following topics of particular interest for Eurometaux: i) Nanomaterials and REACH, ii) Implementing Regulation on dossier updates, iii) REACH Evaluation Joint Action Plan, iv) how to deal with changes in authorisations (volume increase), and v) bioelution (more information: Lorenzo Zullo).

EUROMETAUX CHEMICALS MANAGEMENT Activities

Resource mapping to respond to Chemicals Management challenges

Risk Management Taskforce (RMTF): a call to progress on the 10 recommendations paper to improve chemicals risk management under REACH

The newly formed RMTF held its first meeting by webinar on 21 May. One objective was to progress with the papers that aim at raising policy awareness to improve the relevancy and efficacy of the risk management requirements and processes under REACH. The paper was significantly revised, based on both the outcomes of the A&R platform workshop held in March and ensuing suggestions for communication and advocacy. Overall, the participants provided support for these changes. A last round of comments is continued until 6 June. This timing allows to present the paper and the draft advocacy objectives to the Chemicals Management Steering Committee who will meet on 20 June. The paper on the 10 recommendations is complemented by an advocacy paper that focuses on the principles, the audience and who should be engaged within the sector to deliver on the advocacy. It was agreed to use this paper, not only to request changes in line with the objectives of the REFIT (regulatory fitness of all chemical legislation (excluding REACH)) and the REACH Review for more efficiency and efficacy, but also for internal industry communication and general awareness-raising for the need to improve the relevancy of the risk management phase in the EU. The webinar participants agreed to solicit comments and agreement from the Steering Committee in June and to use the summer to define the details of the advocacy package, for internal approval at the September meeting (17 September). Deliverables should include a wide set of actions and means of communication timed for the period Q4 2019 and Q1 and 2 in 2020, coinciding with the policy debate and conclusion setting on changes needed as a result of the REACH Review/REFIT (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

Discussion on the Pb OEL with ECHA: *meeting 24/05*

ILA and Eurometaux met the team in ECHA -who is responsible for drafting the document on the derivation of an OEL for lead and its compounds- for an exchange on the lead science/available information. ILA had prepared a thorough presentation that considered the metrics of exposure, the toxicology, special considerations needed when deriving workplace limits for lead and ongoing studies. The atmosphere of the meeting was very constructive and allowed to identify several follow-up actions to ensure that ECHA would possess all the useful information. ECHA's report should become available after summer with a Public Consultation in October-November and a first plenary discussion in RAC end of November. RAC will have 2 meetings to agree on an opinion that will be forwarded to DG EMPL to follow the normal approval process, involving the Advisory Committee for Safety and Health (ACSH) and an impact assessment. The Commission will ultimately need to establish what is technically feasible in terms of reducing employee exposure, as well as the likely challenges and costs to industry where sectors would need to introduce additional exposure management measures. To be able to do so, a baseline for the current employee blood lead and occupational air lead levels in Europe needs to be established. A consortium of consultants, comprising COWI, RPA, FoBiG, and EPRD, has been contracted to collect information on current contexts and implemented practices, including the use of voluntary values used and the risk management measures that are needed and used to ensure compliance. The possible implications for other sectors and changes at the workplace that introducing such measures could imply will also be addressed. Questionnaires are being circulated by ILA/lead consortium and Eurometaux (more information: Steve Binks, Cris Williams and Violaine Verougstraete).

Metal-specific REACH application tools and concepts

Bioelution: *follow-up with ECVAM*

End of April 2019, ECVAM had indicated that, based on the additional information and clarifications provided in February, they consider industry's submission on the gastric protocol as complete. They have decided to proceed with the peer review of the method by the EURL ECVAM Scientific Advisory Committee (ESAC). This advisory committee is composed of experts in the field and was constituted by ECVAM along the first months of 2019. The experts met for a face-to-face meeting on 2-3 May and industry was invited to join for a webinar -for part of their meeting- to discuss with the reviewers and reply to questions. In follow-up, industry submitted their notes of the discussions associated with a workplan for all identified actions. Some of those actions relate directly to the protocol (i.e. the SOP), others relate to the data that are generated and how they are interpreted/used (e.g. reference material etc.) and finally, some require further searches/testing. ESAC will meet again face-to-face after the summer, meaning that the deadline to deliver on these actions is mid-September (more information: Adriana Oller and Violaine Verougstraete).

Metals and Inorganics Sectorial Approach

MISA: *KPIs and newcomers*

Most consortia have shared their workplans with ECHA in follow-up of the MISA 2 workshop on environmental requirements. This is thus a good timing to take stock of the first two MISA activities and review the rolling plan of MISA priorities, now one year old. ECHA and Eurometaux met between Brussels and Helsinki (i.e. Rotterdam) to discuss how the next MISA activities could be organised but also how to establish KPIs that could be communicated to the external world, anxious to see some further work done on the metals' registrations. It should be kept in mind that ECHA is strongly requested to significantly increase the number of compliance checks and this also requires full transparency on the MISA's achievements, both from industry and ECHA's sides to avoid MISA participants being perceived as using a 'hiding strategy'. This means for example that newcomers in MISA (e.g. joining in 2019) are asked to deliver on the commitments outlined in the Framework for Cooperation, including on the first two MISA activities (human health and environmental information requirements). In practice, they are invited to complete the self-assessment tools developed for the two first MISA priorities and to send them to Eurometaux. The detailed reports of the workshops are shared with them with the possibility for them to ask Eurometaux for a webinar/call to go through the conclusions, as they also have to submit workplans to ECHA. The next MISA activities will be on Rapid Removal (discussion with RAC experts and ECHA on 11 June) and UVCBs -for which workplans are drafted- and on exposure aspects. The MISA consortia will be contacted very soon with more details (more information: Federica Iaccino, Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

MISA-UVCB: *informal meeting with ECHA, 17.05.2019*

Federica Iaccino met Jos Mossink and Pawel Figiel (SID) to discuss the advancements of the inorganic UVCBs' work under MISA. ECHA and Eurometaux exchanged on the ongoing activities regarding the UVCBs assessment, the internal guide under refinement and the SID chapter already shared in December 2018. Some proposed refinements in the guide and general feedback from a regulatory perspective were discussed to allow moving towards a third successful workshop in October 2019. A semblance of a Self-Assessment Tool will be developed to allow a consistent assessment of UVCB dossiers prior to the

meeting and ease workplan preparations afterwards. Based on the latest exchange, Eurometaux's UVCB dedicated team will share the updated guidance internally before the summer (more information: Federica Iaccino).

Water

Strategic Coordination Group (SCG) Meeting: *latest developments*

The SCG met on 15 May to inform on the latest developments of the water evaluation process but also to discuss some further projects like the strategic approach to pharmaceuticals and Common Agricultural Policy (CAP) strategic plans. Commission's contractor Woods gave a presentation on their findings. While they still see some room for improvement, they acknowledge that the Water Framework Directive (WFD) fostered the approach to manage water beyond borders. It was also pointed out that the quantification of benefits European-wide is rather difficult to assess and may be done by selecting appropriate case studies. The final draft on their findings will be shared before the 3rd and final stakeholders' workshop which will take place on 3 June. The Voluntary Groundwater Watch list was updated with 11 substances, mostly pharmaceuticals and some PFAS substances. The workshop on exemptions was cancelled because of the limited number of Member States coming forward with examples. But the Commission is willing to host such a workshop back-to-back with the planned SCG meeting in November if Member States were to come up with some input (more information: Chris Cooper and Nathalie Kinga Kowalski).

BLM Training with Italian authorities: *BioMET in Rome*

A full day workshop on the risk assessment of metals in surface waters and use of Biotic Ligand Model (BLM) simplified tools was held last 21st May in Rome at the Italian Institute for Environmental Protection and Research (ISPRA). This workshop took place in the context of capacity building of Member States' activity, one of the three priorities for Eurometaux's Water taskforce in 2019. Eurometaux's secretariat organised the training with full support of ECI, IZA, NI and WCA and in collaboration with the experts of the Italian National Research Council – Water Research Institute (CNR – IRSA) and ISPRA. About 20 people from the Italian Regional Agencies for Environmental Protection (ARPA) joined the training (10 in person), besides 6 people from the ISPRA and 3 from the CNR-IRSA. Presentations on the EU Common Implementation Strategy guidances on derivation and implementation of metals' Environmental Quality Standards (EQSs) and the Italian National Guideline on biota monitoring and BLM were provided in the morning, together with detailed explanations of the tiered approach for using bioavailability corrections and considering natural background concentrations. Bioavailability and BLM tools, especially BioMET, were presented before the hands-on demonstration in the afternoon. The workshop was much appreciated and fully satisfactory to the Italian authorities (more information: Annalisa Bortoluzzi and Nathalie Kinga Kowalski).

Industrial Emissions

7th EFCA International Symposium on Ultrafine Particles - Air Quality and Climate: *scientific networking*

The symposium, hosted in Brussels, mid-May, by the Karlsruhe Institute of Technology, was mostly attended by scientists from international universities and institutes. Unfortunately, participation of European authorities was very limited due to the fact that "the Commission is not yet working on ultrafine particle standards". The scientific community, on the other hand, has a huge interest to have these integrated in the air quality policy programmes. It was agreed that, even if often reported in that way by the media, ultrafine particles are not (automatically) "more toxic" than other particles. Still, it is important to distinguish their qualitative differences (e.g. causing different diseases than bigger particles etc.). The lack of link between air quality policy with climate changes was also pointed out. Eurometaux used the workshop as an opportunity to exchange with scientists working on the monitoring of air quality and elaborating possibilities to distinguish pollutants' origins (more information: Nathalie Kinga Kowalski).

Industrial Emissions Directive Evaluation Workshop: *Brussels, 22 May*

On 22 May, the Commission invited all interested stakeholders to the first stakeholder workshop on the IED Evaluation. The workshop was opened with a high policy level overview by the DG ENV Director-General Daniel Calleja who pointed out the importance of this Directive, not only for a safe environment but also for a competitive Europe. His speech was followed by presentations by the EIPPCB, EEA, OECD and mainly the contractor Ricardo. Reflecting on the presentations and short Q&A, it became clear that the Commission is optimistic about the IED's success, but sees missing links with the Circular Economy policy, the need to embed the carbon transition into the IED in the future, and to better integrate 'Equipment suppliers' in the BREF review discussions. 'Hazardous substances' were not mentioned. EEA's presentation showed their dissatisfaction with the quality of the data they receive (e.g. E-PRTR reporting), but it stressed the positive impacts of the IED on the decrease of air and water emissions (despite some misunderstandings of the Sevilla process). Most of the Member States, except for Germany, did not engage much in the discussions. Germany had some criticism on the organisational aspects of the Sevilla process but also sees the need to integrate Water policy better in the IED practice. The timeline for the evaluation is rather tight: a general public consultation will be launched on 27 May for 12 weeks, followed by a targeted stakeholder questionnaire

during the first half of June. Parallel interviews with both stakeholders addressed or not addressed by the specific questionnaire will be held. All these activities should last until the end of September– this is referred to as the “summer period”. The Industrial Emissions Alliance agreed to continue exchanging when the consultations have been launched, in order to remain aligned when possible and also make sure we all have the same understanding of the questionnaire (more information: Nathalie Kinga Kowalski).

HAZBREF: stakeholders’ meeting and status of project

Eurometaux participated in the HAZBREF Interim Stakeholder Meeting, organized in Tallinn on 21-22 May. HAZBREF or the “Management of hazardous chemicals under the Industrial Emissions Directive (IED)” is a 2 million Euros project that should end in October next year. The project aims at increasing the knowledge base of the industrial sources and the reduction measures of hazardous chemicals, by analysing the use of hazardous substances in industrial sectors. The starting point of the project is the observation that whilst IED is the main instrument at an EU level to control industrial releases -in particular through the publication of BREFs- the BREFs published so far do not contain comprehensive information on specific hazardous substances in industry. This makes management difficult for both industry and the authorities. The project leaders, involving the Swedish EPA (SYKE), the [Estonian Environmental Research Centre \(EKUK\)](#), the [Institute for Ecology of Industrial Area \(IETU\)](#) and the German Environmental Agency (UBA), therefore aim at bridging the gap by using existing information from other EU regulatory frameworks, such as REACH and the Water Framework Directive. The project also aims at enhanced institutional capacity by having better exchange and use of existing information on hazardous substances between these regulatory frameworks’ representatives. HAZBREF also promotes the circular economy by reducing obstacles for the recycling of waste. The Stakeholders’ meeting brought together participants from industry, IED and REACH authorities, ECHA and representatives of the civil society who were provided with a status report on the different work packages and participated in breakout sessions to exchange experience and views. Important topics at stake are the definition of substances of concern, the interaction between different legislations, BATs for the management of hazardous chemicals and the possible links with the Circular Economy. The case of the textile industry/BREF was used to support several of the discussions but the next one could be metal surface treatment. Detailed notes and the presentations will be circulated to the IE Taskforce (more information: Nathalie Kinga Kowalski and Violaine Verougstraete).

Nanos

Guidance on Registration and Guidance on substance identification: update

Eurometaux recently received a revised draft for the update of the ECHA Guidance documents on registration and substance identification for nanomaterials. The document includes a new section “Nanoforms, sets and joint submission”, which is based on a diagram which was submitted by Eurometaux as part of our comments. The Partner Expert Group (PEG), in which Eurometaux is represented by Tony Jones, now has the possibility to comment on this section before the draft is sent for consultation to MSC, RAC and the Forum within the next two months (more information: Tony Jones and Nathalie Kinga Kowalski).

FURTHER OUTREACH OF REACH

Helsinki Chemicals Forum (May 23-24): Eurometaux and its members engaged in the panel debates and keynote at dinner

Last year, the REACH Forum had decided to support Geert Dancet’s request to engage in the Helsinki Chemicals Forum, provided its agenda included more issues of direct relevance for our sector who could thus have some influence on the content of the event. Both conditions were fulfilled, with most importantly Guy Thiran being invited to give a lecture during this event’s dinner that brings together 200 participants (industry, senior ECHA staff and some government representatives). Two critical panels were dedicated to themes of high relevance to the metals sector: *the role of RMOAs* in which France Capon (from EPMF) acted as the panel member representing industry and one on *the use of registration data for international data exchange and scientific development* chaired by Hugo Waeterschoot. Overall, the metals’ participants concluded that the HCF allows for more in-depth discussions and recommendations on REACH-related issues for which there is usually no time in classical conferences. The Forum is also a non-commercial, government sponsored event allowing key note speakers from OECD, UN and other non-EU countries to attend and thus providing interesting network opportunities. The conclusions will be presented to the Chemicals Management Steering Group on 20 June (more information: France Capon and Hugo Waeterschoot).

European Risk Forum: high-level conference on “Shaping the Innovation Union through Better Regulation”

On the 24th of May Eurometaux attended the High-Level Conference “Shaping the Innovation Union through Better Regulation”, organised by the European Risk Forum in collaboration with the Romanian Presidency of the Council of the

European Union. The conference was composed of two main panels. The first panel was dedicated to examples from regulated industries and aimed at presenting some good principles and practices that have strengthened the interface between regulation and innovation whilst ensuring high-levels of protection. Nathalie Moll, Director General of EFPIA, explained how for orphan Medical Products, being a very niche area, incentives are fundamental to allow research to proceed. Hans-Jürgen Klockner, Director of the German Chemical Industry Association (VCI) and chair of the CEFIC group on nanotechnologies, emphasised the need for regulations to be developed based on real science/facts and encouraged researchers to give open access to the outcome of the studies. Ronald Welge, Senior Legal Counsel in Sustainability at Nestlé, described the elements that, in his view, support innovation: free circulation in the EU market, legislative harmonisation or, even though it is not a preferred option, mutual recognition. Rick Clayton, Technical Director at Animal Health Europe, explained how legislation should be a supportive instrument for innovation and emphasised that the establishment of centralised procedures and harmonised labelling requirements would support market access. The second panel "Making the reform happen" presented EU institutions' perspective on Better Regulation Strategies. Robert Schröder, Member of the Cabinet of Commissioner Carlos Moedas (European Commission) talked about the crucial role of impact assessments and consultations to support any legislative proposal (currently conducted only on one third of the proposals). Alexia Maniaki-Griva, Head of the Ex-Ante Impact Assessment Unit (European Parliament) explained the difficulties encountered by policy makers when science leads to multiple opinions. She also stated that the identification of right decisions might change over time depending on how science evolves, giving as an example the tests methods that are now capable of detecting small concentration of pollutants in water. Professor Reinhard Hüttel, Chairman, European Council of Academies of Applied Sciences, believes that, to avoid losing public support, standards shall not be lowered to accommodate innovation. Kim Wager, from the UK government, identified two main challenges: difficulties for regulators to keep the pace of innovation and to remain within clear boundaries. In the conclusive remarks, Veronique Steukers, from the Nickel Institute underlined the importance of looking at the problems holistically and across policies, making reference, as an example, to the importance of certain raw materials that are strategic for batteries and electric mobility (more information: Lorenzo Zullo).

SETAC Europe 29th Annual Meeting: *One Environment. One Health. Sustainable Societies.*

The SETAC Europe Annual Meeting in 2019 in Helsinki is currently the number one meeting place where scientists from various disciplines and sectors (Academia, Business, Government and NGOs) will find new opportunities to present, to debate and disseminate the most recent scientific knowledge, developments and applications for:

- Reducing and regulating the use of chemicals in the environment,
- Remediating soil, air and water pollution,
- Proposing the use of more sustainable chemicals.

Eurometaux provided a presentation in the special SETAC session on "Socio-economic analysis in chemicals regulation and policy making: Current challenges and the way forward", zooming in on the importance and added value to complement the effects- and exposure assessment with SEA and AOA information, so as to define the need for and choose best risk management options. This was illustrated with existing examples. Key is the integration of chemical management, circular economy and climate changes objectives. A short presentation was also made on how to handle variability and the potential uncertainties in the assessment of inorganic UVCBs during a UVCB session bringing regulators, industry (petrochemicals, essential oils, inorganics) and academics together (more information: Violaine Verougstraete & Hugo Waeterschoot).

COMMUNICATION

International Zinc Conference Europe: *duet in Plovdiv*

On 17 May, Eurometaux was invited to provide -in a "dynamic duet format" with IZA- a presentation on market access and regulations during the 3rd International Zinc Conference – Europe. The presentation started with a short heads-up on "why bother about regulations", highlighted some regulatory trends in the EU that may directly affect market access and license to operate, and mentioned some tools that can help supporting the regulatory discussions. The key challenge in the coming years is to communicate and be heard that meeting a decarbonized, circular AND non-toxic Europe at the same time may not be achievable without any trade-offs and that it is urgent to discuss those with all stakeholders (more information: Frank Van Assche and Violaine Verougstraete).

Helsinki Chemicals Forum: *speech Guy Thiran, Director Eurometaux*

"Ladies and Gentlemen, good evening ...

I'm certain you, like me, are familiar with the phrase "Once upon a time...".

It was in the stories we heard as children.

And it is in the stories WE tell our children and grandchildren.

This phrase also works very well for metals.

And for metals, we can even say "once upon a long time ago and forever".

Let me briefly share some little points in time with you to properly paint this picture:

We start 50 000 years ago where Neanderthals used black manganese dioxide as a cosmetic

Then we jump to more recent times with the Bronze Age 5000 years ago.

More recent? Picture Napoleon the third's court. He gave his most important guests aluminium cutlery, not silver as you might imagine. Why? Although aluminium was more abundant than silver, it was very difficult to reduce it from the oxide. It made it more valuable than gold at that time.

Now, today, metals are an essential, central part of our everyday existence. Just look around you: from the cars we drive, the phones and computers we use to our renewable energy generation and so much more.

The final point in time is the future. The "forever" I mentioned at the start.

In this future, we ALL face the same challenge; industry, policymakers, civil society.

We need to do more and better with less! We need to optimize our use of limited resources in the face of ever-increasing demand while ensuring the right risk management.

Not an easy challenge but one that CAN be met if industry, policymakers and civil society ALL act together consistently. And this is fully in line with the spirit of the Helsinki Chemicals Forum ...

I recognise that every industry and material represented here in the room have their own best answers to the challenge.

But, Ladies and Gentlemen, before I move on to explain how metals is playing its part to meet this challenge, allow me one word of reasoned caution.

Whether you represent Finnish industry or policymakers, or those at a European or global level, whether you are an SME or a large industry. Compromise is required on all sides if we want to properly and concretely balance what I call the "big three":

1. ensuring safe use
2. transitioning towards a low carbon economy
3. achieving real circularity.

So, this said, let me now move on to metals and the actions my industry has been taking.

I'm going to give you some essential background about metals, and then I will move to safe use and outline how this safe use relies on having robust data. Robust data properly used in a "non-siloed" policy environment.

Essential background 1: the growing demand I mentioned before.

Our use of non-ferrous metals will steeply increase as we transition towards a low carbon economy. And more than any other material.

In 2017, the World Bank forecast stated that by 2050

- 200 % more metals needed for the world's solar panels
- 300 % more metals needed for wind turbines
- 1000 % more metals needed for energy storage

These are big numbers.

Then aligned with this, the OECD 2019 Raw Materials Outlook forecast an approximate increase of 270% in global demand of metals by 2060. This is also a really big number!

Essential background 2:

Contrasting with these big numbers for growth in demand, Europe's share of global mining is low. Across the full range of metals, less than 2%! Consequently, we are strongly dependent on imports of primary materials from third countries to feed the European metals value chains.

Equally, we have to be effective in how we recycle end-of-life materials, what we term secondary resources. For metals, recycling is common sense: recycled metals have an identical quality to primary metals – no price difference on the market. So, unsurprisingly perhaps, our industry has continuously focused on optimizing the resources loop for metals and maximizing their recycling rates. It was obvious in light of the lack of primary resources in Europe. But also because of significant lower energy required to produce metals from secondary sources vs primary sources.

Today, around 50% of Europe's copper and aluminium is already supplied from recycled sources. And, for some other metals, it even approaches 100 %.

In practical terms, I want you to imagine all the metal ever produced human history. Of this, still in use today is 75% of all the aluminium and over 90% of the gold.

Recycling is fully integrated in the European metals industry business model. This lead, for example, to 99 % of available lead car batteries being effectively recycled. But, we have still room for improvement for what we term "specialty metals". Those you find in electronics and renewable technologies. Their recycling rates are much lower, in the range of 30%. That means that for every 1 ton of E-waste properly recycled in Europe, two tons are not.

With this in mind, you won't be surprised to hear that today, our companies are facing a real bottleneck in terms of circularity. We struggle to access the right amount of secondary materials because of a lack of collection combined with a less than level playing field. Significant amounts of secondary resources that we could be recycling are leaving Europe. And often for lower quality recycling processes.

As I mentioned before, we will only be able to solve this with the **right partnership** between industry, policymakers and civil society. So that's the essential background on metals.

Let me now move on to safe use.

Metal production, use and recycling is intrinsically linked to risks and environmental impacts. Common with all other materials, metals have hazardous properties that need to be properly managed.

For us, properly managing risks has to take a **whole lifecycle approach**. From extraction through to recycling at end of life. Within this lifetime use approach, we see **four essential pillars to address legitimate concerns regarding safe use**:

Pillar 1 of 4: the right knowledge, the right data

Let me take you back almost 20 years ago – to 2000. Then, I was told by the European Industry Commissioner, one of the 2 parents of REACH, that REACH -still at its infancy stage- would not apply to metals! Fortunately, we kept our options open - as at that time we had already embarked in data generation in follow-up of the EU risk assessments. We judged that REACH would become a fundamental pillar of future access to European markets for metals, metal compounds and metal alloys. So, our industry decided to **invest** a lot, but always in a constructive way, to make REACH a solid basis for the future uses of metals.

We also compiled learnings and state-of-the art science in guidance documents for metals assessment methodologies. And we got an immediate payback for these investments when our companies registered under REACH.

Despite all these efforts, however, we are still struggling with data.

Some of our metals have very extensive databases - we call them data-rich. Having a wealth of data demands to apply specific, sometimes complex approaches when interpreting it. And this is sometimes overlooked, as it is easier to go for a single, conservative data point. In contrast, some metals are still data-poor. We need to take the steps to generate more information there.

Pillar 2 of 4: proper understanding of use and the value chain

Like many industries, we invest in materials flows to better understand the lifecycle of our materials. Primarily, to identify where exposure and risks may occur. These may be linked to the produced metal and also to low-level impurities that may be hazardous. Here, cooperation between suppliers and users across the value chain is a must to have a comprehensive view of potential risks. And by the way, this is also necessary to optimize value chain cooperation towards circularity.

Pillar 3 of 4: understanding exposure and its impacts

As we all know, to best minimise and manage risk, we need to control exposure. This means we have to understand how human beings and the environment are exposed - and how much to a substance along the lifecycle. We measure, estimate and of course need to follow-up effectively.

The fourth and final pillar: considering costs and benefits

Let's be clear – it's not a simple exercise to properly estimate value of benefits and costs to the community of the use of certain chemicals. It has to be multi-dimensional and multi-expertise. Not only integrating a concern for hazard, but also the possible function of the chemical in other policy areas and relative to other targets.

Let me take lead as an example. Lead is a hazardous substance that is used as a carrier metal to recover and recycle everything from silver to tellurium from your phones or computers. A balance needs to be made between costs of allowing well-managed risks associated with lead with benefits for society to recycle part of its essential materials.

Similarly, reaching the EU's decarbonization targets means using some hazardous metals, for example in batteries. Although hazardous, these metals are – and will remain – essential enablers of decarbonization. Candidate listing, authorization and substitution may be a bad answer when one looks at the broader picture!

Therefore, we need integrated policy processes to ensure low-carbon and circular economy goals are taken into account when deciding upon risk management measures for these substances

Today, we still have some **important questions that need to be resolved**.

The Metals and Inorganics Sectorial Approach (**MISA**) is a partnership between ECHA and the Metals & inorganics Industry that was contracted last year. It is a good example of cooperation among stakeholders to enhance information and data quality and also address long-pending issues that hamper efficient risk management of metals.

Allied with this, our industry launched an ongoing initiative two years ago, looking forward to 2050 and anticipating environmental and societal impacts, called **Metals with Ambition**.

It is ambitious because we want to balance 4 essential areas that, - if we can remove the current conflicting overlaps between them - means we can realize society's future aspirations and needs

- Progressing towards Europe's 2050 climate goals
- Maximising recycling rates in a circular economy
- Reducing all metals exposure to safe levels
- Sourcing all raw materials ethically and sustainably

Now, I have taken 10 minutes of your time so far to give you the essential background about metals and their safe use. And also, to outline how this safe use relies on having robust data and concepts, properly used in a non-siloed policy environment.

With your dinner in mind, let me take just one more minute of your time to conclude with a trio of expectations

Firstly, as a society, we need to take our responsibility:

A responsibility that exceeds the short-term interest or the communication buzz. We cannot realistically claim and genuinely believe that we will have

- a decarbonized society
- AND a truly circular economy
- AND a non-toxic society

within 30 years **without the need for trade-offs**.

That's simply a myth.

Instead, we need to identify and discuss these unavoidable, necessary trade-offs all together.

We need to do this while carefully avoiding:

- competition between policies - instead favouring integration
- competition between materials or actors – instead favouring consistent action all together
- media-friendly shortcuts in reasonings or statements not followed by actions

Using hazardous materials to reach decarbonization does not go without efficiently identifying and managing the risks associated with their use.

Secondly, as industry and regulators, we need to spend more efforts on exposure management. It is critical in achieving a true Circular Economy.

In our view, this is an area where REACH still spends less resources than on hazards.

Finally, all together, we need to work on making long-term objectives closer. And to do so, we need to best handle what we have in front of us:

- a huge amount of materials widely used
- to sort and use as resources as much as we can,
- without impacting an environment that is now very fragile,
- and ensuring a coherence across the globe.

Ladies and gentlemen, Thank you for your attention - and bon appétit"

CALENDAR

- 3-7 June: RAC-49 (A) – ECHA (Helsinki)
- 10-14 June: RAC-49 (B) – ECHA (Helsinki)
- 10-14 June: SEAC-43 – ECHA (Helsinki)
- 11 June: Rapid Removal workshop - ECHA (Helsinki)
- 18 June: Evaluation Platform –MCC (Brussels)
- 19-20 June: MB-54 – ECHA (Helsinki)
- 20 June: Chemicals Management Steering Committee – MCC (Brussels)
- 25-28 June: MSC- 65 (B)– ECHA (Helsinki)
- 30 August: Human Health Taskforce – MCC (Brussels)
- 5 September: Chemicals Management Steering Committee – MCC (Brussels)
- 09-13 September: RAC-50 (A) – ECHA (Helsinki)
- 09-13 September: SEAC-44 – ECHA (Helsinki)
- 16-20 September: RAC-50 (B) – ECHA (Helsinki)
- 17 September: Risk Management Taskforce – MCC (Brussels)
- 23-26 September: Chemicals Management Autumn Week – MCC (Brussels)
- 24-25 September: WFD CIS Strategic Coordination Group (TBC; Brussels)
- 26-27: NeRSAP 8 – FRAM (Gothenburg, Sweden)
- 26-27 December: MB-55 – ECHA (Helsinki)
- 21-25 October: MSC-66 – ECHA (Helsinki)
- 12-13 November: WFD CIS Strategic Coordination Group (TBC; Brussels)
- 14 November: Evaluation Platform –MCC (Brussels)
- 25-29 November: RAC-51 (A) – ECHA (Helsinki)
- 25-29 November: SEAC-45 – ECHA (Helsinki)
- 2-6 December: RAC-51 (B) – ECHA (Helsinki)
- 9-13 December: MSC-67 – ECHA (Helsinki)
- 16 December: Risk Management Taskforce – MCC (Brussels)
- 17 December: Chemicals Management Steering Committee – MCC (Brussels)
- 16-17 December: MB-56 – ECHA (Helsinki)

ACRONYMS

ACSH: Advisory Committee for Safety and Health	IUCLID: International Uniform Chemicals Information Database
AoA: Assessment of Alternatives	MISA: Metals and Inorganics Sectorial Approach
BAT: Best Available Technique	MOTE: 2-ethylhexyl 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-oxoethyl]thio]-4- octyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate
BioMet: User friendly' software tool, based on Biotic Ligand Models, for calculating the bioavailability of copper, nickel and zinc in different freshwaters	MSC: Member States Committee (ECHA)
BLM: Biotic Ligand Model	MSCA:-Member States Competent Authorities
BREF: Best available technology Reference document	OECD: Organisation of Economic Cooperation and Development
CAP: Common Agricultural Policy	OEL: Occupational Exposure Limit
CARACAL: Competent Authorities for REACH and CLP	PEG: Partner Expert Group
CIS: Common Implementation Strategy	PFA: Proposals for Amendments
CNR – IRSA: Italian National Research Council – Water Research Institute	PVC: Polyvinyl Chloride
COMET: Comet assay (single-cell gel electrophoresis)	RAC: Risk Assessment Committee
DOTe: Dioctyltin bis(2-ethylhexyl mercaptoacetate)	REACH IT: REACH Information Technology system
ECVAM: European Centre for the Validation of Alternative Testing Methods	REFIT: Regulatory Fitness & Performance Programme (EU)
ED: Endocrine Disruptor	RM: Risk Management

EEA: European Environment Agency	RMOa: Risk Management Option analysis
EFCA: European Federation of Clean Air and Environmental Protection Associations	SCG: Strategic Coordination Group
EIPPCB: European Integrated Pollution Prevention & Control Bureau	SEA: Socio-Economic Analysis
ELoC: Equivalent Level of Concern	SETAC: Society of Environmental Toxicology and Chemistry
ESAC: ECVAM Scientific Advisory Committee	SID: Substance Identity
HAZBREF: Hazardous industrial chemicals in the IED BREFs	SOP: Standard Operating Procedure
HCF: Helsinki Chemicals Forum	SVHC: Substance of very High Concern
IED: Industrial Emissions Directive	TDp: Transformation Dissolution protocol
ISPRA: Italian Institute for Environmental Protection and Research	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
KPI: Key Performance Indicators	WFD: Water Framework Directive