




EUROMETAUX CHEMICALS MANAGEMENT NEWS



CHEMS ON THE BEACH

TABLE OF CONTENTS

ECHA REACH & CLP Activities: hot topics	2
ECHA CLP	2
ECHA Others	2
COMMISSION Chemicals Management activities:.....	3
CARACAL	3
EUROMETAUX CHEMICALS MANAGEMENT Activities	3
Resource mapping to respond to Chemicals Management challenges	3
Metal-specific REACH application tools and concepts	4
Metals Sectorial Approach	4
Classification	5
Industrial Emissions	5
FURTHER OUTREACH	5
RIVM	5
ICMM	6
COMMUNICATION	6
CALENDAR	6
ACRONYMS	7
CHEMS ON THE BEACH 	7

Dear All,

Some weeks ago, I received an article from a friend with a rather intriguing title: 'topless meetings become a trend'. As her email arrived at quite a busy moment, I could not manage to give it more than a glance, promising myself to come back to it during the summer period. From what I had seen, it would fit perfectly in a short reflection on how meetings could be better run or even related to a more high-level trend like 'digital sobriety' and IT consumers' behaviours. The paper started conveniently with a quote in which I could not do anything else than recognize myself: 'a mobile phone is like a praline: it is looking at you and you eat it, even if you do not really feel like it'.

And then it happened. Life reminded this friend, and all of us that it is breakable. That it is 'a fragile thing', this dust on our wings, that gives us the power to fly. It's a fragile thing, this life that we live, that gives us the power to die' (klr). So delicate and fragile that actually, everything else fades into the background.

Or maybe not completely... When someone leaves us, he reminds us that tomorrow is not to be taken for granted. The loss and the sadness harshly increase our consciousness, making us aware that we have a present and that we need to cherish it. We can aim at building and keeping a feeling of permanence through our actions, our activities, our projects ...But we should never forget that this is an illusion, so easily undermined by change and death. An additional reason for actively making the most of the current moment and taking pleasure in it...

All this brought back the memory of the paper. Topless meetings, which 'only' means meeting without high-tech tools (laptops, phones etc.), and does not refer to any new type of "fashion" or business suits. Meeting topless as a way to remain attentive to what is happening in your environment and in particular to the people talking to you or with whom you are sitting.

Everyone has almost certainly already been distracted by someone's phone moving over the table due to repeated vibrations, and all of us have had that moment where their attention to the speaker's slides starts to wane (...enough so to open outlook). Most of us notice -while presenting- the number of peeps the audience surrender to their phones. Multi-tasking on one side, multi-distracting on the other. Same at home where 'Mr Connection' became a permanent invitee.

Sign of the times? Yes, definitely! Pressure is high and immediate replies are a must. But life is passing by and we may not see it go by because our attention is elsewhere.

We won't be able to change the way things are working, but creating topless moments in a staff meeting, with your kids, with friends...a way to better enjoy the time (left) and respect the fragility of life? Why not give it a try?

Violaine Verougstraete, Chemicals Management director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA CLP

Ongoing Public Consultation on Annex XV: **tellurium and tellurium dioxide**

Please note the ongoing Public Consultation on the Annex XV submitted by The Netherlands for tellurium and tellurium dioxide, proposing to include a classification for reproductive toxicity (1B, for development and fertility) in Annex VI of the CLP. The consultation can be found here: <https://echa.europa.eu/harmonised-classification-and-labelling-consultation/-/substance-rev/23402/term>. Please note that initially the Netherlands had also announced a harmonised classification for germ cell mutagenicity, but the Annex XV concludes that only negative results were obtained in *in vitro* assays with tellurium (or with the read-across substance tellurium dioxide) and that no *in vivo* or epidemiological data are available. None of the criteria for classification for germ cell mutagenicity are fulfilled and therefore no classification as a germ cell mutagen is proposed for tellurium. Interesting aspects to monitor in the tellurium dossiers are the read-across and the possible effect of tellurium on the synthesis of cholesterol and sexual hormones. The consortium is actively preparing possible contributions to the Public Consultation (more information: Kerstin Heitmann).

ECHA Others

Guest corner: **Eurometaux invited to contribute**

ECHA has launched a new feature on their website, i.e. the "Guest corner" where they invite stakeholders to contribute on topics related to chemicals and their effects on everyday life. The target audience is the general public and texts can deal with any topic related to chemicals and their effect on the average citizen's everyday life. Authors are clearly identified and ECHA does not intend to edit or proofread the texts but reserves the right to choose which to publish. Eurometaux was invited to contribute and submitted a contribution on 'metal alloys in your daily life: how are we making sure they're safe'? You can find

it here: https://chemicalsinourlife.echa.europa.eu/guest-corner/-/asset_publisher/vcrOSplq1ebF/blog/metals-alloys-in-your-life-how-are-we-making-sure-they-re-saf-1 A big thanks to Ailsa and Chris who made it possible to explain bioavailability and alloys in an understandable way (more information: Violaine Verougstraete).

COMMISSION Chemicals Management activities:

CARACAL

Follow-up to CARACAL 30: *focus on dossier updates, revision of REACH Annexes and Pb environmental classification case*

The CARACAL30 meeting held on 1-2 July required some follow-up actions. Eurometaux expressed concerns on the draft provisions for the upcoming Implementing Regulation on the need to update the registration dossiers as it does not seem to take into account the complex reality of the joint submissions and the interconnection between the various elements in the registration dossier. Among others, Eurometaux requested Commission to give more time to update the dossiers. This is necessary to make the provisions implementable. Eurometaux's concerns were shared by the other industry associations' representing registrants (Cefic, FuelsEurope) and first actions were agreed on during a conference call held on 9 July. The Commission's proposal to update REACH Annexes VI-XI will be analysed in the coming weeks as comments can be sent before end of August. The topic is particularly important as it might impact the information to be submitted for REACH Registration and Evaluation purposes. Eurometaux is planning to request a seat in the CARACAL sub-group that will soon be established.

Written comments on the Pb environmental classification have been submitted in response to Sweden and Denmark's oral intervention. The comments drafted with ILA aimed at both stressing that the available data do confirm that Pb ecotoxicity and dissolution depend on the pH level and to reiterate the appropriateness of having separate classification entries for lead metal massive and powder (more information: Lorenzo Zullo).

EUROMETAUX CHEMICALS MANAGEMENT Activities

Resource mapping to respond to Chemicals Management challenges

Environment Taskforce meeting: *preparing for more advocacy activities on two challenging issues*

The Environmental Taskforce held a webinar session on 3 July to discuss the outcomes and possible next steps following ECHA's Rapid Removal workshop (held on 11 June) and the debate on the lead metal environmental classification in CARACAL. On these two topics, critical for the metals sector, the Member States' positions seem to be driven by an unnecessary level of precaution. On the Rapid Removal concept, which would help to refine the environmental classification of metals when exposure is demonstrated to decrease quickly, the Member States claim that this could declassify some unwanted organic substances. The Taskforce therefore proposed to ask for a short legal opinion to check if and how the scope of the guidance on Rapid Removal could be strictly restricted to metals (as it is already the case for the Transformation Dissolution protocol). Briefing and advocacy at Commission, ECHA and Member States' level will be required in autumn to ensure that policy makers do not block the application of the concept for metals due to a potential misuse by other sectors. The Taskforce also took note of the lack of support coming from Member States concerning a split classification of lead metal according to the physical form (massive/ powder) as done for other metals so far. The proposal to classify both forms as the soluble ion clearly deviates from the ECHA CLP guidance and does not consider the factual evidence on lead metal that supports this split). Given the impact and precedent-setting, the Taskforce recommended to launch advocacy to encourage the Member States to follow the guidance. A call has been organised in follow-up (see below) (more information: Stijn Baken, Jelle Mertens and Hugo Waeterschoot).

Waste Framework Directive Conference Call 26/7: *workshop conclusions*

The Chemicals-Articles-Waste Cross-Industry informal platform, which was set up earlier this year to bring together the different industry sectors dealing with the 'ECHA waste database', organised on 17 June an internal workshop to understand what data should be included in this database to reach the Circular Economy target, agree on the level of the usefulness of the data transferred to ECHA and also exchange on the current practices in recycling sectors to handle SVHCs.

The draft conclusions were:

- Any approach must respect the waste management perspective;
- Information must be based on what is required by the waste management industry and must not exceed these requirements;

- Useful information is helpful for improved recycling and more circular economy;
 - Information on SVHCs in the waste streams likely to be the most useful approach;
 - This could be extended in the future to other substances relevant for high quality recycling of specific waste streams.
- There was also the idea to send a letter of “very high concern” to ECHA and the Commission to briefly highlight the main concerns, but above all underline the willingness for cooperation in preparing a database that could be practical and not burdensome for those who need to provide input. Unfortunately, it was abandoned as many of the organisations and especially the recycling sectors decided not to endorse the letter. Instead, an informal communication was sent to the Commission presenting the above draft conclusions with a note that the industries will meet in September to achieve broader consensus (more information: Kamila Slupek and Violaine Verougstraete).

Metal-specific REACH application tools and concepts

SPERCs: *approaching the quality review*

Following the green light received from ECHA on the proposed quality criteria, the cross industry SPERCs taskforce is now setting up the quality review phase. A phone conference will be held on the **20th of August**. The different industry sectors will present their intentions/plans to review their respective SPERCs and will discuss a common approach to ensure a proper synchronisation with potential parallel Member States review activities (more information: Frederik Verdonck, Lorenzo Zullo).

Multi-Metallic Database: *from complicated excel files to a user-friendly online database*

The current Multi-Metallic Database as developed by Eurometaux a couple of years ago to facilitate the exchange of information on UVCBs is based on multiple excel files that contain (eco)toxicological relevant information for several metals and metal compounds. However, this data set, which contains approximately 300 data fields for each substance, is not easy to consult and keep up to date. Eurometaux is therefore evaluating the possibility to convert it into a user-friendly online database. Various functionalities are currently being investigated: search engine, comparison of data between substances belonging to the same metal family, alerts in case of updates and the possibility for the data owner to update individually their data. More detailed information will be presented and discussed at the 29th of August meeting (industry meeting to prepare the MISA 3 workshop on UVCBs) (more information: Federica Iaccino and Lorenzo Zullo).

Metals Sectorial Approach

For the 3rd MISA Workshop: *industry guide on the risk assessment of inorganic UVCB under REACH*

The Guidance document and its annexes have been revised to form a comprehensive set of documents for industry to fully assess inorganic UVCBs. It is important to note that the goal of this document is to summarise/explain the inorganic UVCB specific methodology and reporting, from substance identity to risk characterisation. It has been maintained as much as possible as inorganic UVCB-specific and thus as concise as feasible, moving all practical examples on the inorganic UVCB production, SID specific documentation, IUCLID Reporting guidelines, etc. to the annexes. The guidance was circulated for comments and will be further refined. All input will be processed and discussed during the industry meeting that will be held in Brussels on 29 August (more information: Federica Iaccino).

MISA workplan support: *several Commodities asking for Eurometaux’s support*

Metal sectors who joined the MISA project after its formal launch (October 2018) are asked to provide Eurometaux with their SATs for both the environmental and human health information requirements. They also have the possibility to ask Eurometaux for clarifications on issues related to the workshops, workplans or for a discussion on the submitted SATs. Eurometaux has already reviewed and discussed some of these SATs and this exercise proved to be very relevant and helpful. On the one hand it allows the submitting sector to receive an independent opinion on the way they handled the available standard information and/or interpreted waiver or read-across justification, and on the other hand it highlights issues for Eurometaux that we may have to follow up. One such new issue is how to deal with doping or coated metals given ECHA’s strategy on how to assess them has evolved quite extensively over time. In this respect Eurometaux will investigate how widespread the issue is for the metals sector and what would be a cost-effective and efficient approach to deal with it under different scenarios of toxicity (main material versus doping/coating). Any first reactions on the relevancy of this subject are most welcomed. A second follow-up issue in support of consortia is the development of a short motivation on the counter ion toxicity that consortia could use in their next updates of the Environmental sections of the Registration dossiers. Jelle Mertens and Bill Stubblefield coordinated this activity resulting in a recommendation for the aquatic test endpoints. Comments received suggested an extension of this to soil and sediment tests, which we will progress on in the weeks to come with ARCHE’s help (more information: Violaine Verougstraete and Hugo Waeterschoot)

Classification

Pb Environmental Classification: *conference call 29/07*

A call was held on 29 July to provide a status update and discuss possible advocacy activities on the lead metal environmental classification. The EU Commission is indeed preparing the entry in Annex VI of the CLP for lead metal (15th ATP) and the proposal will be further discussed at CARACAL mid-September. At this stage the proposed ATP entry matches with the RAC opinion issued end of 2018. Industry disagrees with the RAC opinion on 3 key points, which may also set precedents for other metals: a) there is no split entry according to the physical form (massive/powder) despite the fact that the conditions outlined in the ECHA CLP Guidance for such a split are fulfilled, b) the available data was incorrectly handled (i.e. no split of the ecotoxicity reference values (ERVs) according to pH of TD/p testing, resulting in a worst case comparison of the lowest chronic ERV with the highest concentration of the dissolved Pb ion) and c) use of a non-standard species tested in a non-standard protocol for the derivation of the ERV. The participants on the call discussed how to raise awareness and trigger a reaction of Member States at the next CARACAL meeting, which will be the first one under the Delegated Act Procedure. The International Lead Association has set up a survey (see <https://www.surveymonkey.co.uk/r/SP2RVYW>) to gather information on potential **socio-economic impacts**, should the harmonised environmental classification for lead metal in massive form be introduced. This kind of information is very important to draw the authorities' attention in case the arguments on 'deviation from the ECHA guidance' and 'non-consideration of data in the registration dossier' do not work. The survey will remain open until 16 August 2019. In follow-up of the call, a set of slides explaining the changes in the CLP ATP adoption process and a three-pager explaining the issues -that can be used in contacts with the Member States- were circulated with the minutes (more information: Steve Binks, Lisa Allen, Hugo Waeterschoot, Lorenzo Zullo and Violaine Verougstraete).

Industrial Emissions

Industrial Emissions Evaluation: *IEA exchange and Conference Call 6th August*

On the 1st of July Eurometaux finally received the information that the Targeted Questionnaire is available and should be answered by the 6th of September. Due to this delay some of the work must be carried out during the summer break, however, the taskforce has already started evaluating the questions. Eurometaux participated in an Industrial Emissions Alliance meeting mid-July, where the different associations exchanged on their first draft answers but the interpretation and understanding of the questions were also highly discussed. The meeting showed that depending on the reading different answers are given, though the overall messages behind are the same. The alliance decided to continue the close exchange on question interpretation and on the draft answers to ensure that there is a common understanding of the questionnaire and possible shared positions are achieved. Eurometaux is continuing to exchange internally within departments where relevant and preparing for a conference call of the taskforce regarding the IED Targeted Questionnaire, on the 6th August in the morning. The taskforce will discuss the most critical questions and further development of the draft answer (more information: Nathalie Kinga Kowalski).

FURTHER OUTREACH

RIVM

ISES 2nd European Exposure Science Strategy Workshop: *the role of exposure in a risk-controlled environment (strategy)*

This second workshop of ISES Europe (International Society of Exposure Science, European branch) was held at the RIVM's premises in Bilthoven, The Netherlands. The aims of the workshop were to discuss and finalise all the steps and key actions for creating a *European Exposure Science Strategy* by 2020 with an implementation roadmap and goals for 2020-2030. Eurometaux was invited to give a presentation on the possible implementation and institutionalisation of the strategy. Eurometaux provided an overview on the trends and challenges the sector is confronted with, i.e. in particular the expectation that a 2050 Europe should be decarbonised, circular and toxic-free and the role of exposure (control) in this context. Controlling risks requires a good understanding of where exposures occur and can possibly be minimised, and of the stress or-hazard relationships. The sector is still confronted with some data and knowledge gaps, for example when it comes to the article stage or combined exposure. And even though several metals have developed good practices in exposure monitoring, the sector is still struggling with the appreciation of some basic concepts and is impacted by the lack of common framework and terminology, which both directly affect the acceptance of data and tools. The presentation concluded by proposing some examples and projects taking place in the sector (more information: Violaine Verougstraete).

ICMM

ICMM: toolbox kick-off call

At the last Chemicals Management Working Group, it was proposed to create a 'toolbox' that could be used to facilitate the discussions with authorities involved in chemicals management of metals and the required capacity-building. The aim would be to gather all information on metals and other inorganics' specificities in one place, to make them accessible and place them in a structure that is easily understood by target audiences. A first call with interested CMWG members was held on 25 July. The call made us realise that there is already a significant amount of material available, from APEC presentations to tools on exposure. Agreed actions include a mapping of existing tools & guidelines as well as the identification of possible adaptations to be done to ensure they form a coherent ensemble, the development of a platform for the toolbox and a stakeholders' mapping. Regular follow-up calls will be organised (more information: Veronique Steukers, Kai-Sebastian Melzer and Violaine Verougstraete).

COMMUNICATION

Summer meetings

Due to work in progress at the Metal Conference Centre, **until further notice** all meetings will take place (unless specified otherwise) at our new address: Avenue de Tervueren 168 – 1150 Brussels. Please consult our meeting calendar here below for more details about these summer meetings (more information: Ailsa Lee, Sofiana Dokou).

CALENDAR

- 06 August: Industrial Emissions TF Conference Call
- 29 August: MISA UVCB Workshop – Preparatory Meeting - **Avenue de Tervueren 168/Ground Floor** (Brussels)
- 30 August: Human Health Taskforce – **Avenue de Tervueren 168/Ground Floor** (Brussels)
- 5 September: CM Steering Committee – **Avenue de Tervueren 168/Ground Floor** (Brussels)
- 5-6 September: Eurometaux contributions to the REACH workshop organised by the Visegrad countries (Bratislava) <http://reachconference.eu/en/conference/>
- 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 – **Tbd** (Brussels)
- 17-20 September: Smitheries and Foundries BREF Kick-off-Meeting – JRC/ EIPPCB (Seville)
- 23-26 September: Chemicals Management Autumn Week – **Tbd** (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)
- 22-23 October: WFD Working Group Chemicals (TBD, Brussels)
- 5 November: MISA UVCB Workshop (TBC; Brussels)
- 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)
- 12 December: 2nd stakeholder workshop Industrial Emissions Directive Evaluation (TBC; Brussels)
- 16 December: Risk Management Taskforce – MCC (Brussels)
- 17 December: Chemicals Management Steering Committee – MCC (Brussels)
- 16-17 December: MB-56 – ECHA (Helsinki)

ACRONYMS

APEC: Asia-Pacific Economic Cooperation	RAC: Risk Assessment Committee
ATP: Adaptation to Technical Progress	RIVM: National Institute of Public Health and the Environment (The Netherlands)
CARACAL: Competent Authorities for REACH and CLP	SAT: Self-Assessment Template
CLP: Classification, Labelling and Packaging Regulation	SID: Substance Identity
CMWG: Chemicals Management Working Group	SPERC: Specific Environmental Release Category
ERV: Ecotoxicity Reference Value	SVHC: Substance of Very High Concern
ICMM : International Council on Mining and Metals	TD/p: Transformation Dissolution Protocol
IEA: Industrial Emissions Alliance	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MISA: Metals And Inorganics Sectorial Approach	

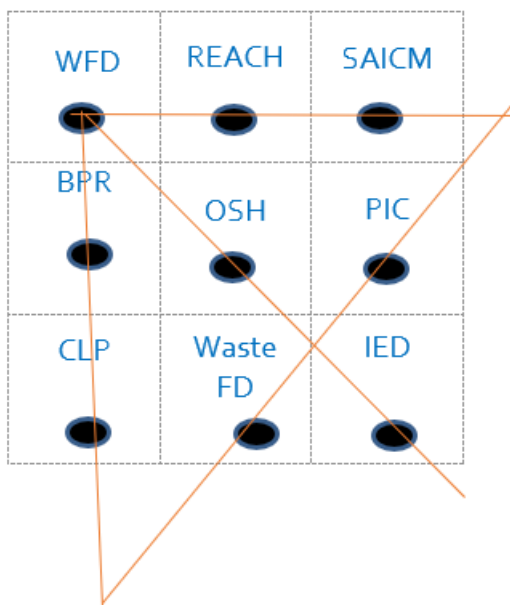


To start: *answers from previous games (CM News N°90)*

Regulator Sudoku:

1-9-4-3
3-7-5-2
2-6-8-1

Connect **all 9** policy dots with **4** straight connecting lines



Please find your way through the MAZE, from EHS & REACH until you arrive at Chemicals Management

