



## EUROMETAUX CHEMICALS MANAGEMENT NEWS



Chemicals Management Steering Committee 17 Dec.

Back to Back

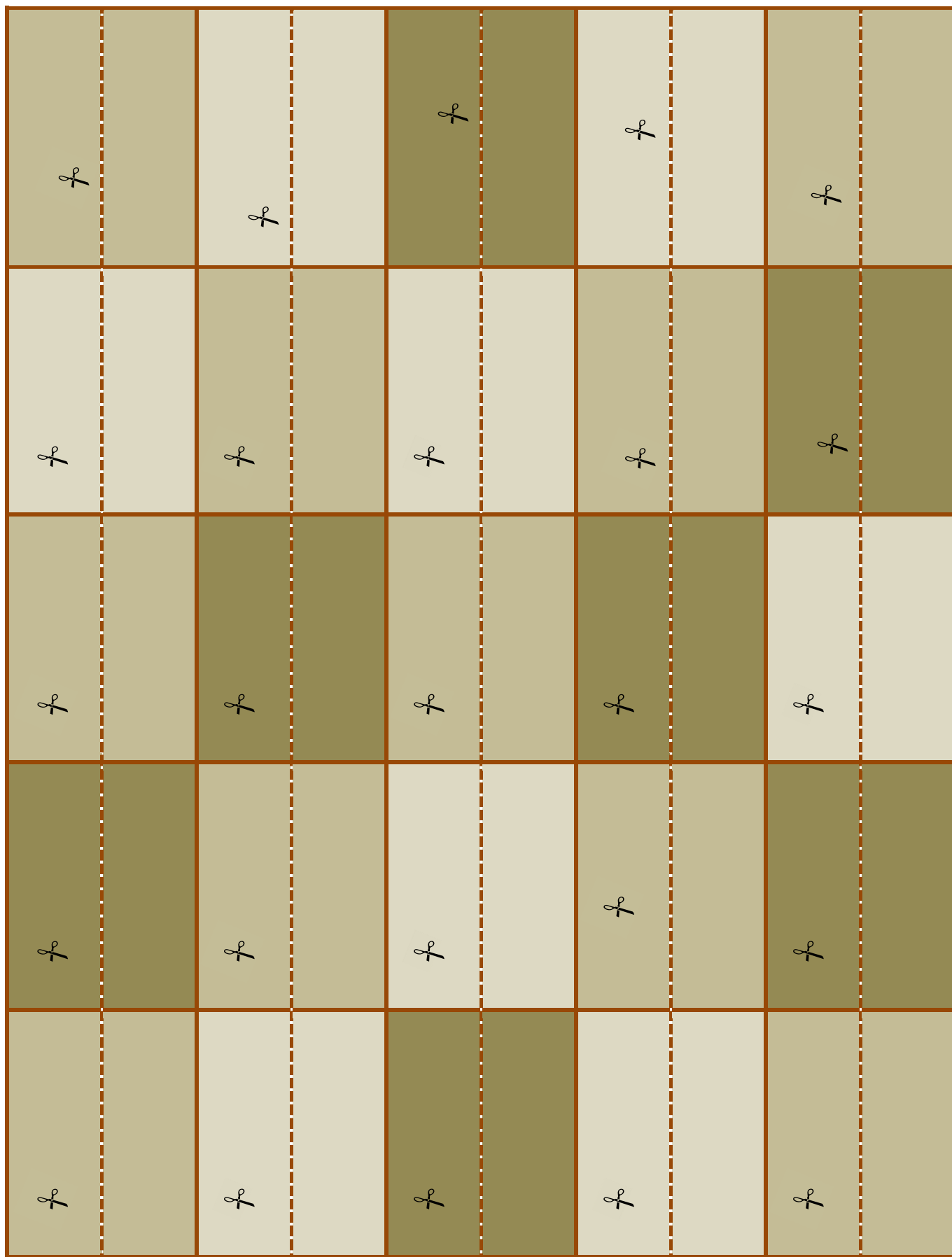
Risk Management Taskforce 18 Dec.

### TABLE OF CONTENTS

EUROMETAUX CHEMICALS MANAGEMENT NEWS .....	1
ECHA REACH & CLP Activities.....	4
ECHA Committees .....	4
Nanos .....	5
ECHA others.....	5
COMMISSION REACH & CLP Activities: hot topics/issues .....	6
CARACAL.....	6
EUROMETAUX CHEMICALS MANAGEMENT activities.....	7
Resource mapping to respond to Chemicals Management challenges .....	7
Metal-specific REACH application tools and concept .....	8
Metals Sectorial Approach .....	8
Classification .....	9
Water.....	10
Industrial Emissions .....	10
RoHS .....	10
FURTHER OUTREACH OF REACH .....	11
COMMUNICATION .....	11
CALENDAR.....	11
ACRONYMS .....	12



Make your own advent/December calendar: cut out this page and glue it with the last one



Violaine Verougstraete, Chemicals Management director Eurometaux

# ECHA REACH & CLP Activities

## ECHA Committees

### **RAC-51 A: restrictions on 5 cobalt salts**

Several metal dossiers and other items of relevance for the sector have been discussed during the November RAC week. For the cobalt salts restriction, the main discussion revolved around wording on RAC's recommendation to implement a Binding OELV for cobalt and cobalt compounds. At the last meeting, RAC members had indeed agreed that the restriction is currently the "most appropriate EU-wide measure", however that a BOEL is recommended to cover exposures to cobalt and all cobalt compounds. The scope of the BOEL and how to best reflect the balance -or sequence- between those two risk management options was debated at this meeting. The Rapporteurs will revise the opinion, which will go for written consultation and approval of the RAC members in the coming weeks. RAC's workplan for 2020 does not include a BOEL development activity for cobalt and cobalt compounds but it was confirmed that the value agreed on by RAC could be used as a health-based value (starting point for the OEL derivation). The outcome of an industry survey was used by RAC as a demonstration that there are very low incidences of sensitisation at current exposure levels (this was in-line with Member States responses to the Public Consultation). Interestingly, RAC agreed that uncertainties were reduced considerably in the hazard assessment due to the introduction of the "breakpoint approach", and that although there are remaining uncertainties in the exposure section, those were 'acceptable' when comparing between restriction cases (more information: Vanessa Viegas, Sylvia Jacobi and Violaine Verougstraete).

### **RAC-51 A: a first discussion on the lead OEL and BLV**

On Pb, ECHA developed a background scientific report and a suggestion for a health-based biological limit value and OEL applicable to Pb and Pb-compounds. RAC holds its first more in depth discussion while the Public Consultation is still running until 16 December. The Rapporteurs presented their "key issues" to focus the future debate in RAC. The Rapporteurs proposed to take neurotoxicity as the most sensitive endpoint on which to establish a biomonitoring limit and a complementary workplace air value. However, the issue of clastogenicity in workers and potential carcinogenicity concerns was also raised. The main reasons for proposing a blood-Pb value are that the internal lead levels are critical for the adverse health effects and that the correlation between air levels to Pb-B is uncertain. RAC will also reflect on some options to address developmental neurotoxicity in newborns and protection of women of childbearing potential. All these aspects as well as the outcome of the Public Consultation will be further discussed in March (more information: Steve Binks and Violaine Verougstraete).

### **RAC-51 A: sensitizers in textiles and microplastics restriction cases setting precedents!**

RAC also discussed two large restriction dossiers that may set methodological precedents. The first one, addressing "skin sensitizers" focuses on substances with a harmonised classification as skin sensitizer 1/1A/1B and an additional list of substances of concern for sensitisation (24 disperse dyes). The proposal now states that '*clothing and related accessories; textile, leather, fur and hide articles other than clothing which come into contact with the human skin under normal or reasonably foreseeable conditions of use to an extent similar to clothing and footwear shall not be placed on the market for the general public if they contain the substances in any individual part in a concentration  $\geq$  concentration limits*'. Of relevance for our sector are the defined elicitation thresholds for cobalt and nickel and the resulting limit values for nickel and cobalt in textiles and leather. The second one, the 'microplastics' restriction dossier, continues to trigger a lot of attention, as illustrated by the more than 400 comments received during the Public Consultation. RAC agreed to make the "responses to comments document" available to stakeholders in January. The starting point of the restriction remains that there is a need to limit exposure in order to prevent microplastics from building up in ecosystems, environmental stock and food webs. From a pure regulatory perspective, this case does not fit with the classical scenario of a REACH restriction, which aims at addressing a demonstrated EU wide risk. Microplastics may rather represent a future threat as they can be very persistent in the environment, impossible to remove and thus contribute to a long term irreversible "exposure risk". Most of the debate focussed on the exemptions of the scope like for microplastics that biodegrade rapidly. Aspects like concentration limits, releases from unintentional vs. intentional uses and possible risk management measures were also debated. Eurometaux will further closely monitor the case as it stretches the scope of restrictions towards future potential risks due to accumulation (more information: Violaine Verougstraete and Hugo Waeterschoot).

### **RAC-51A: some changes**

RAC will change the format/process of its formal minutes, agreeing during its meeting on the content and using a template summarising briefly the process, the main discussions held at RAC (as bullet points), action points and a reference to stakeholder interventions. This should alleviate the workload of the RAC secretariat. Finally, it was confirmed that the ECHA move will be done by 7 January and a reception was held to thank 4 leaving RAC members. Among them, Marja Pronk, who was already very active and constructive on the metal dossiers in Arona during the TCNES discussions: we wish her the very best! (more information: Violaine Verougstraete).

### **SEAC-45: Review of a long series of applications for authorisation (AfAs)**

The first week of the SEAC meetings discussed a massive amount of Applications for Authorisation. The agenda of the second week (3-5 December) focuses on restrictions and the outcomes of these discussions will be reported in the December News. The debates held the first week turned out to be very relevant for the sector. Some of the learning lessons picked up during the rather dark Helsinki days are reported here: a best-ever AfA, which was submitted for uses of low volumes of octylphenol ethoxylates in the pharmaceutical sector - with no emissions- was not granted the 15 years applied for but only 12 years. This confirmed that the CARACAL paper that was outlining conditions for extended Review Periods (> 12years) will in practice never be applied (at least in the current frame). A second learning related to series of applications for uses that were initially covered by the large CTAC consortium but that remains blocked at the level of the REACH Committee. Downstream users applied for their specific uses, for legal safety reasons, challenging herewith the relevance of large upstream applications. A third learning related to the first Coal Tar Pitch application cases. The uses applied for covered formulation for various uses and clay disks for shooting ranges. While it is expected that the first one may "pass easily" and even be granted with 12 years, it is uncertain how far uses would be covered given the AfA only briefly described them (more information: Hugo Waeterschoot).

## **Nanos**

### **Information requirements: ECHA held a webinar on 12 November**

The updated REACH Annexes that include specific information requirements for the nanoforms of substances will apply from 1 January 2020 onwards. The updated Annexes include new concepts like 'nanoform' or "a set of similar nanoforms" but also define specific characterisation parameters for the nanoforms of substances. The first part of the ECHA webinar explained what a nanoform is and how to build a set of similar nanoforms. It also explained how to fulfil data requirements for the characterisation of nanoforms. The second part highlighted the new IUCLID fields for reporting the characterisation parameters of nanoforms and gave some practical examples. The presentation can be found here <https://echa.europa.eu/nl/-/revised-reach-information-requirements-for-nanoforms-are-you-ready->. The outcomes were discussed in the Evaluation Taskforce on 14 November (see below) (more information: Hugo Waeterschoot).

### **Information requirements: Appendix for nanoforms available**

ECHA announced that it has developed a new Appendix for nanoforms applicable to the Guidance on Registration and Substance Identification. It should align ECHA's guidance with the amended annexes of REACH regulation that will enter into force in January. The new guidance document (available here: [https://echa.europa.eu/documents/10162/13655/how\\_to\\_register\\_nano\\_en.pdf/f8c046ec-f60b-4349-492b-e915fd9e3ca0](https://echa.europa.eu/documents/10162/13655/how_to_register_nano_en.pdf/f8c046ec-f60b-4349-492b-e915fd9e3ca0)) explains the term *nanoform*, provides advice on how to build and justify sets of nanoforms, and explains what characterization information needs to be reported. "ECHA updated the Appendix for nanoforms applicable to the Guidance on QSARs and Grouping of Chemicals to reflect the advice of the new guidance document. ECHA states that the update also clarifies the differences between creating a set of nanoforms and read-across for justifying the use of hazard data between different (sets of) nanoforms of a substance. ECHA will keep updating the existing guidance for human health and environmental information requirements during 2020. To support potential registrants in meeting the new information requirements, an updated overview of available test guidelines and other recognized methods and standards is available on the European Union Observatory for Nanomaterials (EUON)".

## **ECHA others**

### **ECHA Forum-34: Eurometaux's participation & presentation**

Eurometaux participated in the ECHA Forum-34. A presentation was given focused on the topic of self-classifications, and how the lack of enforcement on classification and labelling hampers the regulatory process. This happens particularly in cases in which industry has agreed on conclusions from hazard assessment that result in a self-classification, following the compilation of a REACH registration dossier. Free-riders who may not be impacted by REACH but still commercialise the same or very similar substances have been identified, yet they simply choose to ignore conclusions from joint registrants or have not performed a thorough hazard assessment because they are not happy with the conclusions. Compliant companies find themselves unable to influence competitors or customers, who tend to prefer sourcing non-classified substances. Enforcement authorities should be the ones in charge of clarifying these situations and levelling the playing field. During the Forum, it was announced that REF 9 will evolve around Authorisation with a particular focus on ensuring that Operational Conditions (OCs) and Risk Management Measures (RMMs) are adequately implemented by Authorisation holders. A cooperation with OSH authorities, and customs in relation to imports is expected for this. Quality of Safety Data Sheets will also be examined. The target will be substances with sunset dates for 2015 or later. In addition, a pilot project will be set up

looking at bridging principles under CLP for classification provisions for cleaning and detergent products. Specific industries provided input on topics of concern, such as the aerospace, textiles, petroleum or plastics industries. In addition, Cefic summarised its plan for improvement of the quality of REACH dossiers and DUCC gave a briefing on activities within the supply chain in order to raise awareness (more information: Jaime Sales and Caroline Braibant).

#### **ENES-12: a useful meeting on communication in the supply chain**

The 12<sup>th</sup> meeting of the ENES (Exchange Network on Exposure Scenarios) was held on 21 November 2019, in Brussels. The event managed to meet its targets, i.e. provide registrants and downstream users with information about approaches that can make supply chain communication more structured and efficient and how these fit in the REACH Review objectives/activities. The organisation of the 1-day meeting, alternating plenary sessions, panels and a 'market place' format, allowed to discuss more in depth topics such as "steps to make REACH exposure scenarios work" and "looking ahead to risk management". Eurometaux and the International Lead Association introduced and moderated the discussion on the latter theme, by making presentations on the materials flow analysis as a tool to better understand the use pattern of a substance and on how communication in the supply chain changes when regulatory risk management is emerging. A panel bringing together representatives from ECHA, Member States, industry and consultancy discussed the question: "What is more efficient: Wait and see or getting prepared in advance; what are the early warnings?", concluding that as the risk management phase requires time and resources, anticipation and reactivity are key! Eurometaux would like to warmly thank all the panel members for their insights and sharing of experience! A big thanks also to Sofiana for her help with logistics. All presentations of ENES 12 will be posted here: <https://echa.europa.eu/nl/-/twelfth-meeting-of-the-exchange-network-on-exposure-scenarios-enes12> (more information: Lisa Allen and Violaine Verougstraete).

---

## COMMISSION REACH & CLP Activities: hot topics/issues

### CARACAL

#### **CARACAL-32 day 1: lots of debate on metals including lead and copper environmental classification, outcome Rapid Removal workshop and progress with bioelution**

The 32<sup>nd</sup> CARACAL meeting was held on 6-7 November 2019. The first day was devoted to CLP. The Commission informed the participants that the 15<sup>th</sup> ATP was close to be submitted as a formal proposal to the Commission interservice consultation. Sweden questioned again the entries for granulated copper, arguing that three classification entries were not in line with the CLP metals guidance. The copper case is special due to the specific definition of copper-active substances under the Biocides Product Regulation. In reply to the Commission who stressed the 'equal value' of CLP and BPR to support the proposed entries, Sweden announced its intention to submit a proposal for a harmonised classification for copper in all forms, for all endpoints by 2020.

In relation to the lead environmental classification entry, Eurometaux presented the outcomes of the snail study coordinated by ILA and announced at the September CARACAL meeting. Eurometaux highlighted the need to re-evaluate the classification proposed by RAC, to consider this new scientific evidence and to apply the key principles of the ECHA metals environmental classification guidance (i.e. the split of the classification entry for the powder and massive forms and the classification by pH band). This was supported by several countries like Italy, Greece and Poland. The Commission asked the Member States to submit comments and proposals on the way forward by 5 December.

ECHA reported on the Rapid Removal issue, providing the CARACAL members with a copy of the 11 June workshop report. ECHA recommended CARACAL to consider removing the "placeholder" for guidance on the concept that is currently included in the CLP Guidance. During its intervention, Eurometaux stressed that whilst no agreement on the use of Rapid Removal for classification could be found at the June workshop, the science is quite robust and the remaining questions (i.e. on the irreversibility of the removal and the non-applicability of the scheme to persistent organic substances) could be addressed. Eurometaux reminded CARACAL that the general principle of rapid degradation, as foreseen by the UN GHS and the CLP shall apply to both organics and inorganics and that consequently, a placeholder allowing to apply the concept should remain. This was supported by Italy and Greece but contested by the Scandinavian countries (without detailed argumentation). Member States preferred to stick to the outcomes of the June workshop, which concluded that "the concept and the model presented was not yet suitable for hazard assessment under CLP".

Finally, on bioelution, the Commission informed the participants that ECVAM would submit a proposal for the gastric bioelution test by mid-November.

### **CARACAL-32 (6-7 November): day two: focus on generic REACH issues**

The second day of CARACAL was dedicated to REACH. ECHA provided an overview of the MISA interim report, expressing general appreciation for the work but raising also some questions on metals not covered by the programme and the difference in quality of the workplans developed by the various consortia. Actions to enlarge the coverage of MISA and to continuously improve the quality of its outcome will be conducted in cooperation between ECHA and Eurometaux. Other important topics discussed at the meeting included: i) the revision of the completeness check of the registration dossiers, ii) the setup of new CARACAL subgroups on endocrine disruptors and on the revision of REACH Annexes VI-XI and iii) improvement of the restriction procedure. Detailed notes from CARACAL 32 have been circulated to the CARACAL taskforce (more information: Hugo Waeterschoot, Violaine Verougstraete, Lorenzo Zullo).

### **First Forum on Endocrine Disruptors (ED): work ahead**

The first Forum on ED, organized by the EU Commission, brought together around 200 participants, with speakers from Member States, ECHA and Commission. There was clear support for the WHO definition of EDs, the OECD 150 testing framework and the scientific ED criteria recently adopted under the BPR and the PPPR. The audience also supported the principle 'one substance, one assessment', meaning that an ED under the BPR would also be an ED in other legislations. While it is clear that regulatory actions will be taken, different views exist on the type of action to launch within each policy domain (biocides, pesticides, chemicals, toys, cosmetics and food contact materials). A remaining key discussion point is the hazard vs risk assessment approach and what it implies when it comes to regulatory tools (ban, definition of thresholds, exposure considerations). As part of the fitness check a stakeholder consultation will be launched soon. A draft position will be discussed with the environmental and human health taskforces. Eurometaux will also participate in the CARACAL subgroups that Commission is setting up on EDs (more information: Stijn Baken and Lorenzo Zullo).

### **REACH Committee: more uses authorised for chromates and initial discussion on the Implementing Regulation on duties to update the registration dossiers**

The last REACH Committee meeting was held on 19-21 November 2019. Favourable opinions were issued on the applications for authorisation for the use of several substances including: chromium trioxide, dichromium tris(chromate), pentazinc chromate octahydroxide, strontium chromate. The committee supported the restriction for "lead stabilisers in PVC" and discussed the dossier "lead in gunshot in wetlands". Another important dossier for discussion was the upcoming Commission Implementing Regulation, which intends to clarify the obligations to update the registration dossiers. The topic was tabled for initial discussion and the final vote is expected to take place in February or March 2020. In parallel, the Committee is also debating the future revision of REACH Annexes VI-XI (more information: Hugo Waeterschoot, Violaine Verougstraete, Lorenzo Zullo).

---

## **EUROMETAUX CHEMICALS MANAGEMENT activities**

### **Resource mapping to respond to Chemicals Management challenges**

#### **Evaluation Taskforce meeting on 14 November: workshop on nano-registrations, increasing the understanding of the upcoming requirements**

The Evaluation Taskforce held a specific session on 14 November to help consortia addressing the challenges associated with the upcoming nano-registration deadline. The Eurometaux session complemented the ECHA webinar of 12 November, which focused primarily on the nano characterisation aspects as part of the substance identification. The key learnings from this session could be summarised as follows: 1) registrants should check and motivate in the registration dossier whether the lower end of the tail of the particle distribution of fine materials fits (or not) with the nanomaterials definition independently of the intention to produce the nano part, 2) in case of a nano tail, the volume of the bulk material is accounted for to define the registration requirements 3) the registration of nanoforms must be part of the existing substance file (limiting the possibilities for opt-outs) and can only be conducted in IUCLID 6.4 and 4) the relevance of some of the tests required in case the material fits the nano definition is questionable (especially the dispersion stability test). It was agreed to debrief on the experience of ZnO when they will have delivered on the testing requirements, and of TiO<sub>2</sub> once their draft decision will have been published so as to refine the registration related needs for the metals sector (more information: Kate Belska, Noömi Lombaert, Koen Oorts and Hugo Waeterschoot).

#### **Evaluation Taskforce meeting on 14 November: regulatory overview and experience exchange**

The rest of the Evaluation Taskforce agenda was dedicated to the more traditional 'Evaluation' themes. The Taskforce was informed that the proposed update of the CoRAP ('20-'22) will not include new metals, while some existing entries for metals are postponed for a year (e.g. CeO<sub>2</sub>, Carbon Black, ..). This is mainly due to the slow progress of parallel Dossier Evaluations

checking standard information requirements. Still, 2020 will be a very busy year with the publication of the draft decisions on Sb and compounds and on TiO<sub>2</sub>. ECHA presented a plan to improve the speed of the Substance Evaluation process, which is currently taking about 5 years. The plan appears however to be low in ambition compared with the accelerated activity on Compliance Checks probably because ECHA controls the latter while substance evaluations are completely in the hand of Member States. The Taskforce was further informed of ECHA's plans to extend the automated technical/manual completeness checks in April 2020 (including of the CSRs). This may constitute a further challenge to sequential updates as promoted under the MISA programme, in particular when CHESAR is not used for the update. Eurometaux will further raise this point with ECHA (more information: Kate Belska, Noömi Lombaert, Violaine Verougstraete and Hugo Waeterschoot)

### **Environmental Taskforce: a high level of activity**

The CARACAL discussion on the lead environmental classification and ECHA's report on the Rapid Removal workshop required the mobilization and input of the Environmental Taskforce. Papers were prepared and used in communication with Member States/Commission, all stressing the importance to review the lead classification in view of new relevant evidence and stressing the need to apply the metals classification guidance. Arguments to keep the 'Rapid Removal' placeholder in the CLP guidance were collected and written out. The Taskforce advocacy activities with Member States resulted in supportive statements expressed during the November CARACAL meeting. The Taskforce chairs also progressed with a counterion paper that MISA consortia could further use to support their read-across justification (action point agreed at MISA 2). The paper, which initially addressed the water compartment, was extended to cover also the soil and sediments compartment and will become available before end of the year (more information: Stijn Baken, Jelle Mertens and Hugo Waeterschoot)

## **Metal-specific REACH application tools and concept**

### **Metals Environmental Quality Standards: Guidance on implementing EQS endorsed**

The Water Directors have endorsed the Guidance on implementing Metals Environmental Quality Standards (EQS) on 26 November. Eurometaux, like the other members of the Working Group Chemicals and of the Strategic Coordination Group (SCG), received the final draft proposal from the Commission only a week before the Water Directors meeting. The Commission had previously postponed several times the communication of the final draft. Still it did not want to postpone the endorsement date. Eurometaux sent comments on the draft as some of the "editorial" changes made by the Commission in the final version created room for wrong interpretations. The Eurometaux core group will discuss how to proceed further, as these comments were not considered in the endorsed version, which can be found on the platform CIRCA-BC (more information: Nathalie Kinga Kowalski).

### **Milestone: ECVAM submits gastric fluid bioelution protocol to OECD**

On November 15, 2019, the European Centre for the Validation of Alternative Methods (ECVAM) submitted a Standard Project Submission Form to the OECD Working Group of the National Coordinators of the Test Guidelines Programme for consideration as a test guideline or guidance note. This was the culmination of years of efforts by the metals' industry to achieve a validated protocol. Validation of this protocol is the first step towards implementing changes to the current approach to alloy classification and move from content-based to bioavailability-based classification. The submission includes the test itself and its application to 1) grouping and read across and 2) alloy classification. Support from DG Environment and ECVAM, together with the expertise/persistence of the sector (and Nipera and ECTX in particular) were instrumental in getting us to this point. Next April we will find out if this protocol is included in the OECD workplan for 2020. In the meantime, outreach to OECD representatives is underway (more information: Adriana Oller and Violaine Verougstraete).

## **Metals Sectorial Approach**

### **MISA 3 Workshop: How to prepare the REACH inorganic UVCB Dossiers, from SID to Risk Assessment demonstrating safe use**

The MISA 3 workshop focused on the inorganic UVCBs dossiers and the associated technical, scientific and compliance challenges. Over the last years, industry has developed an ad hoc risk assessment strategy to evaluate and document as accurately as possible the links between "SID- uses – assessment - risk management - safe uses". The strategy is described in an industry guide. The 5 November workshop was built around a specific UVCB case, allowing on the one hand industry to explain the risk assessment approach they propose and on the other hand, ECHA to outline their expectations with regard to completeness and transparency of the assessment. The different steps of the approach, from SID to the characterisation of combined risk were discussed one by one, so as to ensure a good understanding from all participants and the identification of possible gaps. Participants were from industry, Member States and ECHA. The workshop allowed to identify where industry and ECHA agree and where further actions are needed to be able to move to successful dossiers updates. A report of the workshop has been prepared and will be circulated soon to the participants for their comments. What remains to be discussed with ECHA is the 'formatting issue' in IUCLID, i.e. the granularity of the data on the constituents to report in the UVCB dossier.



This issue was not discussed during the workshop, as it still requires some further work to find the correct balance between pragmatism and legal requirements. Further exchanges between ECHA and Eurometaux have taken place since the workshop and the consortia will be informed asap about the agreed way forward (more information: Federica Iaccino).

### **MISA next activities: UVCBs, exposure and exchanges on the workplans**

The next MISA activity will focus on exposure assessment. A workshop should take place in April in Helsinki (date to be confirmed asap). Several discussions have taken place with ECHA to define the scope of the workshop and design the Self-Assessment Tool (SAT) that the MISA participants will be asked to complete beforehand, so as to identify key questions/concerns to be addressed. It has also been agreed with ECHA to organise a stock-taking workshop on the MISA 1 and 2 activities on 13 February, in Brussels, to discuss remaining issues with the human health and environment information requirements. The MISA community will be updated more in detail on these activities and on the outcomes of the CARACAL discussions on MISA (more information: Hugo Waeterschoot and Violaine Verougstraete).

## Classification

### **14<sup>th</sup> ATP: under scrutiny**

As a reminder, the 14<sup>th</sup> ATP to the CLP includes two classification entries of interest for the sector: TiO<sub>2</sub> and cobalt metal. After the CARACAL meeting of 18 September, Commission adopted the ATP and sent it for a 2 months scrutiny period to the Council and The European parliament. On 11 November, the Council decided not to object to the measure. At the request of the EU Parliament, the scrutiny period has been extended with two additional months. In the ENVI Committee both the ECR and Green groups have been pushing for an objection, related to the TiO<sub>2</sub> classification. However, on December 3 the ENVI Committee rejected the Motion for a Resolution on the objection regarding titanium dioxide. We can thus expect the 14<sup>th</sup> ATP to be published in the OJ in February with entry into force 18 months later. Also to note is that cobalt metal has been added to the "Substitute It Now"-list (the SIN-List) as a consequence of its classification (more information: Adam McCarthy, Ruth Danzeisen, Hugo Waeterschoot, Lorenzo Zullo and Violaine Verougstraete).

### **Classification Mapping tool: an additional way to assess the impact of CLH**

The hazard classification of substances could be subject to revision, following proposals for harmonised classification or as a consequence of hazardous properties that might emerge during updates or evaluation processes. The impacts for the industry of substance reclassification are usually not limited to the requirements established by the CLP regulation (i.e. labelling and safety data sheets). Other direct and indirect consequences may occur through a broad range of 'downstream' legislations impacting the entire supply chain. Eurometaux has worked over the past two years in designing and developing a practical tool to support the identification of links between hazardous classifications, legislative provisions and industry impacts. Eurometaux is pleased to announce that the tool, which was initially available in the form of excel file, is now available online. The Classification Mapping Tool contains information on approximately 60 EU directives/regulations, covering the following areas: general measures, workers, consumers, environment and transport. The tool is intended to be used as screening tool and it is not supposed to replace a more detailed expert assessment of the legislative requirements. This new online version allows users to suggest new legislations (including legislations in specific Member States or outside the EU) that Eurometaux could include in the tool, or to provide additional information that could be associated to the various legislations (e.g. more details on impacts). The overall idea is to have a 'living' tool that will further improve and expand in a cooperative way, thanks to its users. Access to the tool is via the REACH Metals Gateway or directly via the following link: [cmt.chemycal.com](http://cmt.chemycal.com). To login, you can use your REACH Metals Gateway login credentials (more information: Lorenzo Zullo).



## Water

### **Water Taskforce meeting: 18 November**

The Water Taskforce met for a second time this year to discuss the current advocacy issues and have an outlook on future challenges in 2020. Firstly, after the finalization and publication of the Metals EQS implementation Guidance, industry will continue its advocacy programme towards the EU Member States, to provide the EU water authorities with technical information and support for future metal compliance assessment. On the short term, a workshop in this respect is planned with the Luxembourg authorities. Further, the Green Deal will define a new, stronger focus of the Commission on the Water activities, with water reuse, anti-microbial resistance (AMR) and hazardous substances as special attention points. In view of this, the Joint Research Centre (JRC) is preparing a final proposal for new substances on the Watch List, where copper oxides are listed among others. The year 2020 will also be important for the work with the European Environment Agency (EEA): a meeting between experts of the Water Taskforce and the EEA team working on the inventory of diffuse emissions is planned for February 2020 to discuss possible collaborations on the topic (more information: Nathalie Kinga Kowalski).

## Industrial Emissions

### **Industrial Emissions Taskforce meeting: 27 November**

End of November, the Industrial Emissions Taskforce met to discuss action points for 2020. The Ambient Air Quality Directives (AAQDs) and ongoing REFIT exercise of the Industrial Emissions Directive (IED) that have just been closed, in addition to the expected Green Deal will define future regulation on industrial emissions. In parallel, the Commission is preparing the second cycle of reviews on the Best-Available-Techniques (BAT) Reference Documents (BREFs). The Large Volume Inorganic Chemicals (LVIC) and Surface Treatment of Metals and Plastics (STM) BREF reviews are still ahead. Despite the fact that the Non-Ferrous metals (NFM) BREF document reached its final half year of implementation period, it appears that in some Member States the full implementation will not be completed by June 2020, which causes some uncertainties for our members. Moreover, the OECD is working on three additional projects of BAT guidelines. Eurometaux and Cefic are the only industrial stakeholders involved in that process (more information: Nathalie Kinga Kowalski).

### **Air Quality Advocacy**

In the view of the Ambient Air Quality Directives (AAQDs) REFIT, the Commission's Clean Air Outlook and other related, high profile air quality discussions, the Industrial Emissions Taskforce identified the need to better understand the technical background of the (health) data calculations and the significance for the NFM sector. For this reason, the Industrial Emissions Taskforce, with the approval of the Steering Committee, asked ARCHE Consulting to evaluate the WHO Air Quality Guidelines and their interlinks with the Commission's Air Quality Standards. This analysis will be made available by end of the year. In addition, Eurometaux is collaborating with the organizers of the Conference on Emissions Monitoring, which will take place next year 13-15 May in Kraków (Poland). This is an opportunity to show the improvements made by the NFM sector but also to highlight the anticipated challenges if air quality standards in Europe will be reduced. To make it a success, Eurometaux asks the members to provide examples on actions taken to reduce emissions to the environment (more information: Nathalie Kinga Kowalski).

## RoHS

### **ROHS Industry Coordination Meeting: *cross-industry effort to build a common position on the RoHS Review***

The RoHS Industry Coordination is a group of industry associations representing companies involved at different stages of the electronic and electrical equipment (EEE) supply chain, including producers, importers, and users of substances, spare parts, EEE product manufacturers and recyclers. On 18 November, the group met in Brussels to discuss the industry contribution to several consultations related to the RoHS Directive, including the methodology for establishing a substance inventory under RoHS, the set of substances shortlisted for possible restrictions and the overall RoHS review. The RoHS review was the most interesting topic for Eurometaux as it represents an opportunity to better exploit the work done under REACH and CLP and, specifically, to support the identification of substances of potential concern under RoHS as part of the ECHA's Integrated Regulatory Strategy. Despite there is a common perception that the current RoHS processes should be made more coherent and scientifically robust, industry's position on how to improve the situation varies along the supply chain. Manufacturers of substances overall consider it ideal to develop and integrate RoHS restriction directly under REACH. On the other side, at downstream level, EEE manufacturers would feel more confident to continue operating under the RoHS legislative framework, mainly due to its international recognition and, possibly, due also to their limited familiarity with REACH. A possible point of contact between these diverging views was to ask for more transparency and predictability during "RoHS" processes by mirroring - or creating synergies with - the restriction procedures under REACH. The RoHS Industry Coordination is currently working to finalise a joint paper to be used as input to the RoHS review consultation which ends on 6 December 2019 (more information: Caroline Braibant, Lorenzo Zullo)

## FURTHER OUTREACH OF REACH

### **Eurometaux headed Chemicals Forum panel on data exchange in Shanghai**

The Helsinki Chemicals Forum went for the first time to Asia, the most important and growing trading partner of the EU. In a session coordinated by CIRS and the Chinese government, some of the most relevant and successful panels of the last Helsinki Forum event (May 2019) were 'repeated', including the debate on *chemicals data sharing*. Hugo Waeterschoot was asked by Geert Dancet to chair this panel, which included speakers from ECHA (Erwin Annys), OECD (Bob Diderich), the Only Registrants Organisation (Dieter Drohmann), the Scientific community (SETAC Asian president) and industry. Emphasis was put on the relevance of the OECD MAD scheme as a basis for chemicals management data exchange, and the importance of data quality and availability under relevant economic terms was highlighted. The UN SAICM pushes many countries in SE-Asia to develop chemicals management systems. While they are all somewhat different with regard to status and content, most of them use EU REACH as a reference for effects data needs. It can therefore be expected that data exchange needs will increase significantly in the years to come, an area where the OECD could probably play an important role to facilitate harmony and international acceptance. The session was recorded and will be made available on <https://helsinkichemicalsforum.messukeskus.com> (more information: Hugo Waeterschoot).

---

## COMMUNICATION

### **Chemical Watch: *courses on metals (eco) toxicology soon!***

Chemical Watch is not only a well-known online global news provider, which delivers detailed regulatory news on chemical management to a broad readership of industry, policy makers and other stakeholders. It also offers e-learning module-based courses focusing on a variety of issues, including introductory courses on toxicology. Chemical Watch has offered to set up a training course on metals' toxicity, motivated by the observation that the toxicity and management of metals remains highly relevant in view of their (increasing) uses in transport, energy, housing, healthcare, food and technology. 'Drafted' by the sector and 'edited' in a user-friendly format by Chemical Watch, this online course has been an opportunity to further update and communicate the sector's scientific knowledge on the behaviour of metals, as well as the specific approaches and tools that have been developed (e.g. MERAG, HERAG, bioavailability tools). The modules of the course cover the following topics: natural background and essentiality, bioavailability, data handling (quality, relevance, aggregation), inhalation toxicology, genotoxicity/carcinogenicity, assessment of man via the environment and the role of materials flow and diffuse source assessments to determine regional and continental risk. The target audience for this course includes regulatory authorities in charge of evaluating metals in different chemicals management systems (hazard identification, exposure assessment, risk assessment, risk management), professionals in the field of environmental science, particularly those working with decision-makers in the public or private sectors, industry persons in charge with environmental regulations related to metals, including new recruits needing training on metals science, R&D experts and anyone interested in metals toxicology. It is possible to register and book a place to have instant access when the course releases by following the link: <https://events.chemicalwatch.com/73622/metals-and-inorganic-metal-compounds-in-toxicology-and-ecotoxicology> Industry has also been 'granted' with a number of 'accesses'. Please do contact us as well if you would like to provide authorities with an access to the course (more information: Kai-Sebastian Melzer, Claudine Albersammer, Marnix Vangheluwe and Violaine Verougstraete)

---

## CALENDAR

Please note that the dates for the already planned 2020 meetings will be included in the next Chemicals News.

- 2-6 December: RAC-51 (B) – ECHA (Helsinki)
- 9-13 December: MSC-67 – ECHA (Helsinki)
- 18 December: Risk Management Taskforce – MCC (Brussels)
- 17 December: Chemicals Management Steering Committee – MCC (Brussels)
- 16-17 December: MB-56 – ECHA (Helsinki)

## ACRONYMS

AAQDs: Ambient Air Quality Directives	IED: Industrial Emissions Directive
AfA: Application for Authorisation	IUCLID: International Uniform Chemicals Information Database
AMR: Antimicrobial Resistance	JRC: Joint Research Centre
ATP: Adaptation to Technical Progress	LVIC: Large Volume Inorganic Chemicals
BAT: Best Available Techniques	MAD: Mutual Acceptance of Data
BPR: Biocidal Products Regulation (EU 528/2012)	MERAG: Metals Environmental Risk Assessment Guide
BREF: BAT Reference Documents	MISA/ metals and Inorganics Sectorial Approach
CARACAL: Competent Authorities for REACH and CLP	OC: Operational Conditions
CLH: Harmonised Classification and Labelling process	OECD: Organisation for Economic Co-operation and Development
CLP: Classification, Labelling and Packaging Regulation	OEL V: Occupational Exposure Limit Value
CoRAP: Community Action Rolling Plan	OSH: Occupational Safety Health
CSR: Chemical Safety Report	PPPR: Plant Production Products Regulation
CTAC: Chromium Trioxide Authorisation Consortium	RAC: Risk Assessment Committee
DUCC: Downstream User of Chemicals Co-ordination	REF: REACH Enforcement Forum project
ECHA: European Chemicals Agency	REFIT: Regulatory Fitness & Performance Programme (EU)
ECR: European Conservatives and Reformists Group in the EU Parliament	RMM: Risk Management Measures
ECVAM: European Centre for the Validation of Alternative Testing Methods	RoHS: Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (Directive 2002/96/EC)
ED: Endocrine Disruptors	SAT: Self-Assessment Tool
EEA: European Environment Agency	SEAC: Socio-Economic Analysis Committee (ECHA)
EEE: Electrical & Electronic Equipment	SCG: Strategic Coordination Group
ENES: Exchange Network on Exposure Scenarios	SIN: Substitute it Now
EQS: Environmental Quality Standards	SID: Substance Identity
EUON: European Observatory for Nanomaterials	STM: Surface Treatment of Metals
GHS: Globally Harmonized System	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
HERAG: Health Risk Assessment Guidance for metals	WHO: World health Organisation

Make your own advent/December calendar: cut out this page and glue it with the first one

<p>Write a compliment to yourself: you deserve it!</p>	<p>Dose free sunshine for a rainy December day</p>	<p>Stop running after something you will never get and use your energy for your own stability</p>	<p>★ Find one Christmas present</p> <p>★</p>	<p>Imagine a worst-case situation at work and realise you are too conservative</p>
<p>Bring a coffee to a colleague not expecting it</p>	<p>Make a joke during a Eurometaux call</p>	<p>★ Find a second Christmas present</p> <p>★</p>	<p>Wear something of an improbable colour</p>	<p>Decorate your office with something Christmas-sy</p>
<p>Invent a story starting with ...once upon a time a Commission head of unit...</p>	<p>Offer yourself a pair of socks</p>	<p>Take a bit of time for your boss</p>	<p>Sleep 10 minutes longer</p>	<p>★ Find a third Christmas present</p> <p>★</p>
<p>Read five Eurometaux emails in a row</p>	<p>Find a fourth Christmas present (= getting ready)</p> <p>★ ★</p>	<p>Plan a trip to Helsinki (MISA 4 workshop)</p>	<p>Write out your own Green Deal</p>	<p>Take 3 minutes to enjoy the meeting you are in</p>
<p>Try out the moonwalk in t elevator</p>	<p>Plan a drink at the Jardin de Nicolas or equivalent for 2020</p>	<p>Make a paper Christmas tree for your colleagues</p>	<p>Cook something new</p>	<p>MERRY HAPPY 25</p>