



EUROMETAUX CHEMICALS MANAGEMENT NEWS



UVCB Platform call 17 January 2020

More details below in [the following link](#)

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Dear All,

Writing a paper to communicate the outcomes of a study or an experiment requires an author to discuss the "results" he/she has observed. This 'discussion' is usually the last section of a manuscript and arduous to draft as it is a balancing exercise, summarising for the readers -in fine- what was planned (and what was not), what was done (and what was not), what was found, and what the results mean. What doesn't help is that it is often put together as a last endeavour (conclusion and thank you words don't count here), after having exhausted significant energy and patience in explaining as clearly as possible the purpose of the paper and the materials and methods that were used. Typically, this is where tiredness encourages (even the best of us) to use (a bit!) of (slightly modified) copy-paste and to write faster. Getting to the end is the urge, refinements will derive from the reviewers' requests. In my view, one of the most challenging bits of the discussion is the generalisability (or external validity) of the study results. Generalisability describes the extent to which research findings can be applied to settings other than that in which they were originally tested. In other words, a study is considered as externally valid if it describes the true state of affairs outside its own setting. Generalisability refers to the confidence one can have in extending the results from a sample to the population from which the sample was drawn and relates to sampling theory. It can be evaluated by examining the size and representativeness of the study sample: a large enough randomly selected sample should optimise generalisability...

This is the exact moment when my daughter hesitates between tickling me wildly to keep me from explaining further or bursting into tears! The proximity of the Christmas tree and two full cups of tea certainly don't favour the first possibility, but from experience, she knows that expressing frustration and puppy eyes will not prevent her mother from talking. She thus opts for uttering: "Guess what Mum?" It's obvious that I want my results to be valid after so many hours of work and days lost on Excel sheets, painstakingly analysing all the details of a sample that was so hard to put together. Why the hell am I doing this otherwise? Understandable, whispers an angel (= a Christmas decoration) in my ear. Heaven knows we all want the good things to be generalisable, the learnings to be applicable. Who are you to suggest her efforts might be vain because the size of the study population is insufficient or due to limitations on the representativity?

"Should you not change the topic or propose a cookie?" suggests the dog, anticipating that the discussion might in some way delay his dinner.

There are of course limits to generalisability as being a guaranty for credible evidence. In an attempt to lighten the atmosphere, I tell my daughter about the systematic review published by BMJ on "the effectiveness of parachutes in preventing injury when jumping from a plane". At the time of the review there were no randomised controlled trials from which such conclusions could be drawn, but still one would not have hesitated to wear a parachute if he had to jump out of a plane. Interestingly, now such a trial is available: volunteers were randomly assigned to jump from a plane with and without a parachute. But bizarrely, volunteers could only be found to jump out of a small plane whilst it was on the ground. The authors of the study (available here: <https://www.bmj.com/content/363/bmj.k5094>) warned that their finding "no trauma is experienced from jumping out of a plane without a parachute" may not apply to planes flying at 40,000 feet! They thus suggest cautious extrapolation.

Posing the question whether an effect that has been observed - positive or negative- may therefore be extended, repeated, inferred is thus a critical question in the reasoning. And it requires a good equilibrium between enthusiasm about its own results and humility about the unknown.

Whether I manage to convince my scientific writer "in spe"? Let's see what reviewers will say...

In the meantime, peace has returned in the room: the dog is sleeping, the lights of the tree glow, the teacups are empty, and I can without any risk generalise my wishes to you for a happy, joyful and optimal 2020!

Violaine Verougstraete, Chemicals Management director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

SEAC

SEAC-45: SEAC almost concluding on the cobalt salts' restriction case

SEAC has effectively concluded its opinion on the Co-salts' restriction case. It confirmed like RAC that an EU-wide worker exposure limit is required but was more explicit than RAC that such a value should preferably be through an OEL covering all Co-substances rather than an 8h TWA on the 5 salts as is currently being proposed. They justify this mainly based on enforceability grounds. SEAC further stated that while a value of 1 µg inhalable may scientifically be proposed (by RAC) given it also protects for non-cancer endpoints, its proportionality cannot be proven, which challenges the basis paradigm of a restriction (i.e. that the benefits of the proposed restriction should outweigh the costs). The SEAC conclusion is conditional

on RAC agreeing on their conclusion which is currently being circulated for written agreement. SEAC further invites industry to provide them with relevant information during the second Public Consultation that would help SEAC further support an OEL as an alternative more efficient risk management measure. The second Public Consultation is expected to run in March for a 60-day period, but again early input is required (for more information contact: Rohit Mistry and Hugo Waeterschoot).

SEAC-45: a focus on 2 large scale restrictions that could include important precedents, also for the metals sector

SEAC also debated 2 major restriction proposals. The first one proposes a generic restriction of skin sensitisers in textiles. It is one of the most proportionate measures taken by an EU REACH restriction and refers to some sensitising metals that may be present in textile accessories (Ni, Co, Cr). This case demonstrates again -like the restriction of CrVI in leather goods- that "limiting consumer exposure to sensitisers" is usually very effective and proportional from a cost benefit perspective, which may encourage regulators to further look for comparable cases in the years to come. The second restriction relates to the banning of microplastics in a series of uses. The SEAC debate focused on what should be exempted from the ban (e.g. medical applications, microplastics that rapidly degrade, ...). This restriction case is also remarkable as it defines "*the lack of ability to clean persistent microplastics from the environment*" as a risk to be managed under an EU-wide restriction, despite the fact that a toxic mode of action could not be demonstrated. This also challenges the way that "cost efficiency can be demonstrated, hence proportionality", given the lack of an actual effect. SEAC suggested to follow the approach used for PBTs, i.e. "the cost per kg emission prevented", which turned out to consider "lower than 500 €/kg" as a kind of limit for affordable restrictions (more information: Hugo Waeterschoot).

MSC

MSC-67: the updated CoRAP adopted 3 months sooner than expected, but no sign of the 10th priority list to recommend chemicals for authorisation

MSC adopted the "CoRAP 2020-2022 update" surprisingly fast, resulting in the CoRAP being published by ECHA on 13 December instead of mid-March 2020. The low number of new chemical entries was certainly one of the main reasons. MSC expressed concerns on the large number of postponements "attributed to running Compliance Checks" but actually resulting from slower progress and lack of resources at the MSCAs level. CeO₂ and Carbon Black are among the substances for which it was proposed to postpone the Substance Evaluation by one year. For the same reasons, MSC did not debate final decision proposals on Substance Evaluations whilst 5 or 6 were expected. ECHA's secretariat stimulated a debate to improve the situation in the future, promoting among others the COMBO process as applied to antimony and its compounds as a pilot case. However, given Substance Evaluations are conducted by the Member States, ECHA's impact remains limited. On the other hand, even though we had hoped to see the table at the meeting, ECHA has not progressed with its proposal for a 10th prioritisation table. This table lists chemicals that score the highest and this time may include lead metal, cadmium metal and oxide. It seems that this information was made available to the Member States, but it was not shared with the stakeholders, on the demand of some of the Member States. We will therefore need to wait until the February meeting of the MSC to know what metals could be included in this important list (more information: Hugo Waeterschoot).

Management Board

MB-56: discussions on long-term budget, reorganisation of the MB and future additional activities

ECHA's long-term budgeting is becoming an increasing challenge now that registration fees are drying up (those remaining mostly come from outside the EU), and also taking into account that the EU asked all agencies to further reduce their budget and that the multi-year budgeting of the EU is still pending as well. The MB explored recommendations for a longer-term budget security plan based upon different scenarios like a multi-year stabilisation fund, or different fees for EU vs. non-EU, or an annual subscription, etc. Cefic representing the industry made it clear that a subscription-based fee is not an option to consider given it would further increase the costs for EU companies. The Executive Director was mandated to come forward with a more concrete planning later this year. The MB further debated a complete reorganisation of its working groups to align better with today's challenges and ECHA's new structure. Five MB subgroups are proposed. Industry raised a specific interest to join one of those subgroups, on strategic planning and priorities. It is at this moment still unclear if industry's request will be granted (more information: Hugo Waeterschoot).

MB-56: several suggestions for expanding ECHA's activities

During the MB meeting, Joost Korte, Director general of DG Employ gave a keynote speech on the collaborative approach on OELs development. His main message was that "the present cooperation and split in responsibilities works well and is efficient". This was complemented by Stella Jones (ECHA), presenting ECHA's experience so far and what RAC is currently doing about the OEL issue. The MB agreed to continue the activity along the signed declaration between ECHA and DG Employ, which refers to cadmium and its inorganic compounds and asbestos for 2020. A second novel area of (long-term) expansion of ECHA's activities relates to the potential role of ECHA on the Drinking Water Directive. The MB was informed,

debated and agreed in principle with a role for ECHA in coming up with an (updated) positive list of all substances that are allowed to come into contact with drinking water (> 1500), in first instance based on national lists. RAC would be solicited for an opinion, based upon proposals made by ECHA's staff. ECHA would further summarise industry's comments / submissions. The Commission would then make decisions based on RAC's opinions. While this activity would follow the full "ECHA process", industry noted that there is no appeal procedure given RAC is preparing opinions. The MB debated the workload of this activity, stressing potential impacts on RAC (more information: Hugo Waeterschoot).

Others

CLP Annex VIII: notification of mixtures including alloys

A consortium kindly proposed to share the reply they got from ECHA to a query concerning the scope of Article 45 of CLP. Industry asked ECHA to confirm whether their interpretation was correct, based on the European product categorisation system (EuPCS): A practical guide

(https://poisoncentres.echa.europa.eu/documents/22284544/22295820/eupcs_support_manual_en.pdf/273a4f57-cbb7-913d-4c99-2e76f784cbb6, version 1.2 / May 2019). Their interpretation was that products (mixtures) that are categorised as having only a PC7 code (base metals and alloys) under REACH are not within the scope of Article 45 of CLP. ECHA replied that the obligation to make a notification within the scope of Article 45 according to Annex VIII of the CLP Regulation lies with mixtures that are hazardous to human health and/or those possessing physical hazards. Mixtures out of scope are clearly defined in the Guidance on Annex VIII (section 3.3). See also: <https://echa.europa.eu/guidance-documents/guidance-on-clp>. ECHA agreed that Table 19 in the EuPCS manual is not clear and is misleading with the citation referring to REACH PC7 base metals and alloys being out of scope for the harmonised submission of information according to Annex VIII. Whilst base metals, which are primarily substances, are out of scope, alloys are mixtures under CLP and therefore subject to full compliance with Annex VIII (more information: Violaine Verougstraete).

Technical completeness check: extension to include the Chemical Safety Reports

ECHA's completeness check will be extended from April onwards and will also cover chemical safety reports (CSRs), so as to ensure they contain all the elements required under REACH. This will be done in support of ECHA's regulatory strategy that foresees requests under evaluation to mainly be used for obtaining hazard information. ECHA expects that by extending the completeness check to the CSRs, they will enable better prioritisation of substances for regulatory action by authorities, enhance the dissemination of use information and improve the starting point for appropriate supply chain communication. ECHA will also strengthen computerised completeness checks on use information, in particular, when the service life description of an article is expected but has been left out of the registration dossier. Further changes are also foreseen for the endpoints related to mutagenicity, reproductive toxicity and degradation. This revised completeness check will be launched with the release of a new version of IUCLID in April 2020 and apply to both new registrations and updates of existing ones. An ECHA webinar explaining the changes in the completeness check will be organised on 29 January 2020 (more information: Lorenzo Zullo).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

REACH dossier updates: Commission publishes draft Implementing Regulation and launches Public Consultation

On the 18th of December the European Commission, after almost one year of discussion with stakeholders, published a draft Implementing Regulation to clarify the duties placed on REACH registrants to update their registrations dossiers. Specifically, the Implementing Regulation defines the time given to the registrants for updating the registration dossiers depending on the type of update that includes: changes in registrants' identity, substance composition, tonnage bands, as well as new uses and evidence of risk. Despite the fact that the timing has been slightly extended compared to the initial proposal (from 1-6 months to 3-12 months), Eurometaux still considers that the challenge to comply with the proposal in case of joint submissions remains. Eurometaux is planning to reiterate its request for more pragmatism to ensure a balanced workload for REACH consortia while preserving correctness and reliability of the information contained in the registration dossiers. The Registration TF has been consulted and, based on its feedback, EM will prepare a response to the Public Consultation. An exchange with other industry sectors for possible concerted actions is planned in the first half of January. The draft Implementing Regulation has also been submitted to WTO for a 60-day consultation. The vote in the REACH Committee is expected in March 2020 (for more information: Caroline Braibant, France Capon, Lorenzo Zullo).

EUROMETAUX CHEMICALS MANAGEMENT Activities

Resource mapping to respond to Chemicals Management challenges

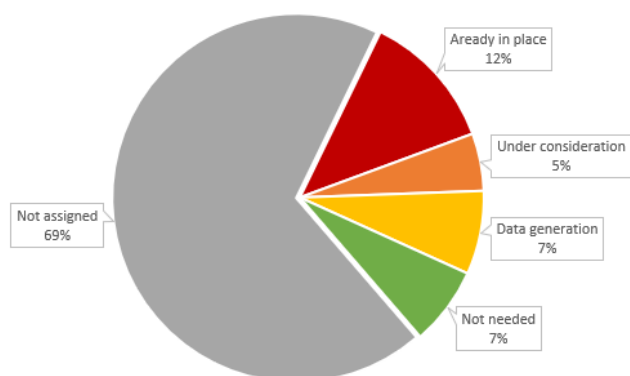
Chemicals Management Steering Committee meeting: *last meeting of 2019*

The Steering Committee met for its last meeting of the year on 17 December and held a brainstorming on what is known to date about EU Commission's Green Deal. The participants' "first reactions" to the Zero-Pollution related proposals were collected and will be used to prepare a possible position/action plan for circulation. Horizontal work across the EM Committees (Energy and Climate Change, Trade, Sustainability and Chemicals Management) will be crucial to be able to make integrated and holistic proposals to regulators. Directly related to the Zero-Pollution ambition, Air Quality policy and industrial emissions were also debated by the Committee with a focus on possible actions. The Committee was updated on ECHA's database on Substances of Concern in articles as such or in complex objects (Products) (SCIP) under the Waste Framework Directive (Art. 9) and the upcoming Implementing Regulation on Dossiers Update, as both issues will require further data generation and submission. Jos Mossink (ECHA) provided a presentation on ECHA's mapping of the chemicals' universe. In a nutshell, ECHA has looked at over 21.000 registered substances and prepared a "snapshot" based on the information included in their database, grouping the substances in different groups: not yet assigned, risk management under consideration, data generation, risk management ongoing and currently no further actions proposed. Jos Mossink compared the outcomes of this exercise with the work that's ongoing under the sectorial approach MISA. Eurometaux explained that they had set up a SurveyMonkey to allow consortia to identify where they see possible mistakes or inconsistencies. Finally, the Steering Committee received an update on the advocacy work towards the European Parliament that will take place in Strasbourg mid-January and on the Metals Academy. Projects that were discussed included the setup of a bioelution repository and the draft of a diffuse emissions paper. The minutes have been circulated to the members of the Committee early January (more information: Violaine Verougstraete).

Metals and inorganics in the ECHA mapping of the chemicals' universe

The European Chemicals Agency (ECHA) has published a list of over 21.000 REACH registered substances mapped in its 'chemical universe'. The substances have been divided into five different pools depending on whether regulatory actions are i) "already in place", ii) "under consideration" or iii) "not needed". An additional pool is dedicated to substances for which "additional scientific data are required". There is also a group of substances that have "not been assigned to any of the other pools" which ECHA aims to assign by the end of 2020.

The intention of this mapping is to support national authorities as well as ECHA and the Commission to focus on substances of (potential) concern and identify appropriate regulatory actions, thereby achieving the objectives of REACH and contributing to the 2020 Sustainable Development.



Important to note is that the chemical universe does not indicate whether a substance's use is safe or not. Also to be noted, the assignment to a pool is not permanent – substances will move from one pool to another over time when new information becomes available or priorities change. The publishing of the mapping provides additional transparency on the work done by authorities and the progress made in regulating chemicals.

This chart provides a preliminary snapshot of how metals and inorganics are distributed across the pools; the big pool of not-assigned substances shows the "potentially variable" regulatory landscape for our sector and the importance to continue monitoring it very closely. A detailed report with the list of substances was circulated by Eurometaux in December. To be

noted that the assignment in pools is largely calculated by algorithms and is based on a snapshot of REACH/CLP/biocides/pesticides/persistent organic pollutants data from August 2019. ECHA does not exclude that there may be flaws. Eurometaux has asked ECHA to set up a mechanism to be able to provide feedback on possible mistakes and questions; this was agreed upon. A SurveyMonkey to collect your reactions is available here: <https://www.surveymonkey.com/r/SWDWYH> (more information: Violaine Verougstraete).

Risk Management Taskforce meeting: *learnings on restriction cases, the EU CleaR project and recent legal cases, upcoming challenges and planning for 2020.*

The last session of the Risk Management Taskforce of 18 December, debated a more than full agenda of activities. Learnings from the most important ongoing restriction cases (see MSC report here above) were a main headline of the session focussing on those that involve metals (Co-salts and skin sensitisers), but also on restrictions without metals being directly concerned but nonetheless setting important precedents for the sector (like the microplastics restriction case). In complement two

external speakers from RIVM presented the outcome of the CleaR project aimed at developing a framework for Dossier Submitters to underpin how to deal with recycling in restrictions driven by the potential conflict between the EU's Circular Economy and Non-Toxic Environment policies. While restriction cases dominated the agenda of the Taskforce in 2019 it is expected that this will soon change towards authorisation related activities with ECHA expected to launch its 10th priority list for substances for authorisation as well as the Commission coming up soon with an Annex XIV update suggestion (list of Chemicals requiring an authorisation). The Taskforce concluded that Pb metal and probably also Cd and Cd oxide may be selected in 2020 raising a high level of concern given their widespread use or occurrence in uses or the recycling stream. The Risk Management Taskforce was most interested in a legal assessment summary of some authorisation court cases presented by REACH Law complemented by an update by ECHA on its intermediates' guidance project, a key issue for defining the scope of authorisation requirements. This all allowed to design the headlines of the Taskforce 2020 programme focusing on the authorisations' listings, an improved industry RMOa guidance to reflect the intertwined challenges between REACH and the Circular Economy. An unknown issue remains the impact the EU Green Deal would have on the risk management activities of the metals sector (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

Metals Sectorial Approach

Follow-up Workshop 5 November: *iUVCB Reporting Strategy in IUCLID and setting up of the Platform*

Following the MISA *iUVCB* workshop of 5 November, Eurometaux and ECHA deeply discussed IUCLID reporting strategies, starting from the agreement that the risk assessment methodology is based on *iUVCB* constituents' assessment (as presented during the workshop). The focus of these further exchanges was to investigate whether it would be possible to identify a key set of constituents' hazard data to be reported in IUCLID that would fulfil Article 10 requirements, whilst keeping the reporting workable and complete enough to understand the followed approach (e.g. by reporting specific robust study summaries rather than only DNEL/PNEC summaries). The debate headed to how to define the lead assessment entities (AE) per route of exposure, so as to focus the reporting on those specific hazard data. Two possible approaches are discussed: identifying the worst-case AE per route of exposure accounting for its concentration in the *iUVCB* and its (eco)toxic hazard (i.e. concentration in the *iUVCB* divided by DNEL or PNEC) OR identifying the worst-case AE per route of exposure starting from risk assessment conclusions (i.e. constituents' Risk Characterisation Ratios (RCRs) comparison). To ensure full understanding of the consequences of the two approaches, workout examples have been produced and submitted to ECHA before the Christmas break and will be further discussed in January. In the meantime, Eurometaux has been working on the setting up of the *iUVCB* Platform, whose goal will be to ensure harmonisation and alignment of the *iUVCB* dossiers, to ensure consistent and coherent updates and refinements. Early January full information on the Platform including timing will be shared. A call will take place on 17 January (for more information: Federica Iaccino and Violaine Verougstraete).

Taking-stock workshop: *foreseen on Thursday 13 February*

This taking-stock workshop will take place in the Metals Conference Centre in Brussels, with as aim to evaluate the progress made with the updates on MISA 1 and 2 activities and identify and address remaining issues or uncertainties that require collective discussion. This will be a workshop where we hope for a collective exchange and the possibility to define solutions, but the exact format will depend on the needs/number of items to be discussed. In preparation for this workshop, consortia who wish to attend will be requested to have started the work announced in the MISA 1 and 2 workplans (for HH and ENV endpoints respectively). A short SurveyMonkey will be launched soon to identify remaining difficulties with the ENV/HH information requirements and/or updates to define the items to be debated (more information: Ailsa Lee and Violaine Verougstraete).

MISA 4 workshop on exposure: *will take place in Helsinki (tentative dates are 23-24 April)*

The exact timing still needs to be confirmed with ECHA but what is clear already is that the aim of the MISA 4 workshop will be improving the quality/reliability of the exposure data in the registration dossiers (workplace and environment, local and regional, measured and modelled) so as to have complete/compliant and up-to-date registration dossiers. A Self-Assessment Tool (SAT-EXP) is currently being prepared and will be circulated soon to the MISA community (more information: Hugo Waeterschoot and Violaine Verougstraete).

Water

EU Water Innovation Conference: *Commission concluded on the Water Directives' Evaluation*

Just before Christmas (11/12/2019) the Commission published the official so-called Commission staff working document on the Fitness Check of the Water Framework Directive, Groundwater Directive, Environmental Quality Standards Directive and Floods Directive. In a nutshell the Commission concluded that the Directive is largely fit for purpose. The Commission argue that that the Directives suffer from a lack of ambition in the implementation measures, lack of targeted investments and insufficient integration with other sectorial policies (agriculture, energy or transport). The achievement of the good status of

all these bodies is taking more time than anticipated, but this shall not discredit any efforts that have been made. Now, most important will be to put the conclusions in context with the new Green Deal and its Zero-Pollution ambitions (more information: Nathalie Kinga Kowalski).

Industrial Emissions

Industrial Emissions Taskforce Conference Call: 13 December 2019

The week before Christmas the Commission and their contractors for the IED Evaluation (represented by Ricardo) invited all interested stakeholders to a final workshop on the evaluation process of the IED. Several of Eurometaux members participated alongside Eurometaux, supporting the position given during the consultation last summer. Most alarming were the discussions on linking regulation on Industrial Emission's pollutants together with the GHG emissions. It will be important to understand the milestones of the Green Deal in relation to the future of the IED. Before the meeting Ricardo shared a shortened background document on which it is still possible to comment by 17th January. The taskforce will discuss the possibilities to share some important information with the Commission in the coming days. Such deliveries could be on economic costs through IED, achievements in emission reductions (water) or energy use or baseline reports done by the NFM sector (more information: Nathalie Kinga Kowalski).

FURTHER OUTREACH OF REACH

OECD

Working Party on Manufactured Nanomaterials: OECD – Paris 16-18 December 2019

During this WPMN meeting, a summary was presented on the development of guidance document (GD) and test guidelines (TG) for manufactured nanomaterials. Most of this work is performed in 3 collaborating H2020 projects: Gov4nano (<https://www.gov4nano.eu>, led by RIVM, the Netherlands), RiskGONE (<https://riskgone.eu>, led by NILU, Norway) and NANORIGO (<https://nanorigo.eu>, led by Aarhus University, Denmark). The focus of these projects is on risk governance. There is a further strong collaboration between these projects and the OECD and Malta Initiative (<https://www.nanosafetycluster.eu/international-cooperation/the-malta-initiative/>).

The status of the following new TG/GD was discussed:

- Guidance Document on Determination of solubility and dissolution rate of nanomaterials in water and relevant synthetic biological media (lead by Denmark and Germany). This work includes both a 24-h static test and a dynamic flow through tests. The focus is on biological media. The University of Vienna (Frank von der Kammer) is working on a separate test protocol for dissolution rate of manufactured nanomaterials in environmental media, which was not discussed during this meeting.
- Test Guideline on particle size and size distribution of Manufactured Nanomaterials (lead by JRC, based on standard BET technology)
- Test Guideline on Determination of the Dustiness of Manufactured Nanomaterials (lead by France). Methodologies are developed for both spherical and fiber-like particles, with focus on the use of the results in exposure assessment. There is a possibility to share the metal industry's experience on the use of measured dustiness data in exposure and risk assessments.
- Test Guideline on particle size and size distribution of Manufactured Nanomaterials (lead by Germany).
- Guidance Document on assessing the apparent accumulation potential for nanomaterials (lead by Spain). The goal is to stay as close as possible to the standard OECD 305 TG on bioaccumulation in fish.

Draft TG or GD documents are expected to become available in 2020 or 2021 (more information: Koen Oorts and Christine Spirlet).

UN GHS Meeting: Geneva – 2 December 2019: review of sections 9 and 10 of the GHS purple book

ICMM, attending the UN GHS Subcommittee meetings, had noted, ahead of the meeting, the recommendation by the UN Secretariat that the Sub-Committee should revise some sections of the UN GHS text, to determine which of OECD test method references should be modified and identify what needs updating or could be deleted in sections of the UN GHS Annexes 9 (endpoint guidance) and 10. This has led to a discussion over the actual value of both annexes that are seen as very outdated and whether these should be made into guidelines (that would be reported outside of the purple book). But both annexes are very relevant and important for the metals sector at EU and worldwide level: Annex 9.7 describes the metals classification scheme for the environmental endpoint including how to use the Transformation Dissolution protocol for classification purposes; Annex 10 describes the Transformation Protocol itself and its conditions. ICMM is already tasked with leading an update of these two Annexes. ICMM and Eurometaux would like to suggest using this opportunity to highlight the

need for updating both annexes and to make some suggestions to the UN Secretariat and countries, so as to maintain these annexes as they are important to ensure legal clarity on how to conduct the environmental assessment of metals. This will be further discussed at the ICMM Chemicals Management Working Group meeting at the end of February. (more information: Claudine Albersammer, Benjamin Davies, Violaine Verougstraete and Hugo Waeterschoot).

COMMUNICATION

New Chemicals Management Department Manager: Noam El Mrabet started on 2 January 2020



Hi there,

First of all, allow me to wish you a happy new year! My name is Noam and I am starting 2020 on a high note as I have just joined the Chemicals Management team of Eurometaux!

I'm coming from Interel, a public affairs consultancy where I have been advising companies from the chemicals, electronics and high-tech manufacturing sectors. I was also an active member of the Environment Committee of the American Chamber of Commerce to the EU where I would give monthly updates on Product Policy.

Maybe we already know each other, but if not, you should know that I have a keen (some would say strange...) interest in EU procedures, especially the arcane world of comitology. I contributed to the *Handbook on Secondary Legislation*, wrote several articles on the topic and even gave a few trainings to professionals from the EU bubble.

My email address is noam@eurometaux.be and my phone number is +32 2 775 63 84 or +32 488 777 288. Please don't hesitate to reach out if you want to have a chat or coffee! I look forward to working with you all.

Best wishes,

Noam

CALENDAR

So that you can already plan ahead for 2020 and "save the necessary dates", we have tried to include as many meetings as possible in this 2020 calendar. Please note that all the dates for the ECHA meetings in Helsinki are tentative.

- 14-15 January: CARACAL-33 (Brussels)
- 17 January: UVCB platform call
- 27 January: Sustainable Resources Management Working group: topic slags morning – MCC (Brussels)
- 22-23 January: WFD – CIS: WG Chemicals – (To be defined)
- 23 January: special session of the Risk Management TF meeting on RM advocacy and communication – MCC (Brussels)
- 3-7 February: MSC-68 – ECHA (Helsinki)
- 6 February: EEA – EM meeting – (To be defined)
- 13 February: MISA taking-stock workshop – MCC (Brussels)
- 20-21 February: WFD – CIS: SCG & Art. 21 – (To be defined)
- 3 March: Risk Management TF meeting – MCC (Brussels)
- 9-13 and 16-20 March: SEAC-46 – ECHA (Helsinki)
- 9-13 and 16-20 March: RAC-52 – ECHA (Helsinki)
- 19-20 March: WFD – CIS: WG Chemicals – (To be defined)
- 24-25 March: WFD – CIS: WG DIS – (To be defined)
- 23-26 March: Chemicals Management Spring Week – MCC (Brussels)
- 26-27 March: MB-57 – ECHA (Helsinki)
- 20-24 April: MSC-69 – ECHA (Helsinki)
- 23-24 April: MISA 4 workshop (tbc) -ECHA (Helsinki)
- 22-23 April: WFD – CIS: WG Groundwater – (Zagreb, Croatia)
- 12 May: Risk Management TF meeting – MCC (Brussels)
- 13-14 May: WFD – CIS: SCG & Art. 21 – (To be defined)
- 19 May: Evaluation Taskforce – MCC (Brussels)
- 1-5 June: SEAC-47 – ECHA (Helsinki)
- 2-5 June: RAC-53 – ECHA (Helsinki)

- 8-12 June: SEAC-47 – ECHA (Helsinki)
- 8-12 June: RAC-53 – ECHA (Helsinki)
- 8-12 June: MSC-70 – ECHA (Helsinki)
- 12 June: IED Stakeholders Workshop – (To be defined)
- 15-16 June: WFD – CIS: Water & Marine Directors meeting – (Zagreb, Croatia)
- 17 June: Chemicals Management Steering Committee – MCC (Brussels)
- 17-18 June: MB-58 – ECHA (Helsinki)
- 2 September: Risk Management TF meeting – MCC (Brussels)
- 4 September: Chemicals Management Steering Committee – MCC (Brussels)
- 7-11 September: SEAC-48 – ECHA (Helsinki)
- 7-11 September: RAC-54 – ECHA (Helsinki)
- 14-18 September: SEAC-48 – ECHA (Helsinki)
- 14-18 September: RAC-54 – ECHA (Helsinki)
- 21-24 September: Chemicals Management Autumn Week – MCC (Brussels)
- 23-24 September: WFD – CIS: SCG & Art. 21 – (To be defined)
- 24-25 September: MB-59 – ECHA (Helsinki)
- 6-7 October: WFD – CIS: WG DIS – (To be defined)
- 12-16 October: MSC-71 – ECHA (Helsinki)
- 20-21 October: WFD – CIS: WG Chemicals – (To be defined)
- 21 October: Evaluation Taskforce – MCC (Brussels)
- 12-13 November: WFD – CIS: SCG & Art. 21 – (To be defined)
- 30 November-4 December: SEAC-49 – ECHA (Helsinki)
- 30 November-4 December: RAC-55 – ECHA (Helsinki)
- 4 December: Chemicals Management Steering Committee – MCC (Brussels)
- 7-11 December: SEAC-49 – ECHA (Helsinki)
- 7-11 December: RAC-55 – ECHA (Helsinki)
- 7-11 December: MSC-72 – ECHA (Helsinki)

ACRONYMS

BET: Brunauer-Emmett-Teller (isotherm)	NFM: Non-Ferrous Metals
CARACAL: Competent Authorities for REACH and CLP	OECD: Organisation of Economic Cooperation and Development
CLP: Classification, Labelling and Packaging Regulation	OEL: Occupational Exposure Limit
CMWG: Chemicals Management Working Group	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CoRAP: Community Action Rolling Plan	PNEC: Predicted No-Effect Concentration
CSR: Chemical Safety Report	RAC: Risk Assessment Committee
DNEL: Derived No-Effect Level	RCR: Risk Characterisation Ratio
EuPCS: European Product Categorisation System	RM: Risk Management
GD: Guidance Document	RMOa: Risk Management Option analysis
GHG: Green House Gas	SAT-EXP: Self-Assessment Tool-Exposure
GHS: Globally Harmonised System	SCIP: Substances of Concern in articles as such or in complex objects (Products)
IED: Industrial Emissions Directive	SEAC: Socio-Economic Analysis Committee (ECHA)
IUCLID: International Uniform Chemicals Information Database	TG: Test Guideline
JRC: Joint Research Centre	
MISA: Metals and Inorganics Sectorial Approach	(i)UVCB: (inorganic)Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MSC: Member States Committee (ECHA)	WPMN: Working Party of Manufactured Nanomaterials (OECD)
MSCA: Member States Competent Authorities	WTO: World Trade Organisation