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**“The edifice of science not only requires material, but also a plan.
Without the material, the plan alone is but a castle in the air-a mere possibility;
whilst the material without a plan is but useless matter”.**

Dmitri Mendeleev

EUROPEAN METALS

HEALTH, ENVIRONMENT & CHEMICALS NEWS

What the HEC?!

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Dear All,

For those among you who have never entered the Brussels European Parliament, using the backdoor gate before 8 am is a good moment to pass security and even to sneak in a bike battery (forbidden elsewhere). It is a new dawn, a new day, the security guards exchanging on the evening before and are feeling good.

And you are then in time to see the beginning of the play: progressively, the (impressive) building becomes a town in the town, with (noisy) cafeterias, shops and a post office, piles of sandwiches and a florilegia of people: young assistants walking hastily with their eyes on their phones, MEPs in suits and/or heels, groups of tourists escaping their guided tour to try and open doors, workers for the escalators and for the...lifts, students, catering staff in black and white and the guards again... rescuing those who got lost (as the escalator workers covered the info maps with stickers).

A mix of languages and dynamics is filling the halls and the salons, managing to extract you from the surrounding city. And if you find it, there is even a library that is so quiet, you could easily fall into a meditative contemplation of your PC screen.

Now, events in the EP are about advocacy, which is described as “any action that speaks in favour of, recommends, argues for a cause, supports or defends, or pleads on behalf of others”. Another definition refers to “series of actions taken to change the “what is” into a “what should be”, considering that this “what should be” is a more decent and a more just society”. And if you are in ‘EP city’ on a weekday, not as a tourist, it is usually because you have a good idea of how the “what should be” looks like.

And ideally, you have an appointment with one of the EP stars to explain it. Stars who will listen to you, in the best case with sympathy, and then move on to the next sector or issue, filling long days by sitting or standing in salons and hemicycles. I sometimes wonder how precise their recording is, if in the evening their memory does not look like a mish mash of commonalities from which they must excerpt what may need further thought or the ultimate achievement: an amendment!! An emotional tie or a bottle of San Pellegrino (that some will now forever associate with lithium), undoubtedly helps in the prioritisation.

Advocating for the ‘what should be’ often calls for common sense to improve the ‘what it is’ situation. Someone said that “Common sense is the most widely shared commodity in the world, for every man is convinced that he is well supplied with it.” (Descartes). But in addition, it is not always obvious how “common” it still is in the current system; adding a factor of variability to the sense. Then, you will also need a bit (!) of luck, a lot of iterations, an ambitious interlocutor not scared of standing against the tide if he decides to take up your cause.

All this frames the advocacy work, which most often is sobering.

I got a (valid) request from a staff member to provide her with examples of how and where we had influence and successes, as a source of inspiration to design today’s strategies. I went back to these moments when we felt we managed to approach a ‘more just’ application of the legislation by a modification of the wording, a reference to metals, a read report or cited publication, a difference in calculations, up to a decision put on hold... small and big changes that we celebrated as immense victories! They all have histories, partly strategic- partly improvised, including more or less surprising actions we set up to differentiate ourselves from the ‘common pattern’. Some have timelines evoking ‘Back to the future’ rather than a short campaign. Isolating the deliverable from the way to get to it may ruin the story though. We won’t be the stars or prince charming riding on our horses towards a warm sunset with the revised Regulation at hand, but we will have worked on creating a piece of the landscape they are crossing, hopefully a ‘more just’ one.

Violaine Verougstraete

COMMISSION

ZERO POLLUTION AMBITION

ZeroPM workshop: 8-10 September

The [ZeroPM workshop](#) took place in Brussels early September, sharing the work performed under the EU Horizon 2020 research project dedicated to supporting the Green Deal ambition of achieving zero pollution from persistent and mobile substances (PMT). ZeroPM involves ca. 15 institutes across Europe and aims at establishing an evidence-based multilevel framework to minimise the use, emissions and pollution of persistent and mobile substances, protecting European water resources and avoiding risks to human health. The project was structured around three strategies: prevention: by identifying safer alternatives, supporting policy change and enabling market transition away from harmful persistent and mobile substances; prioritisation: by grouping and ranking substances and substance groups on the global chemical market and characterising their impacts on health and the environment; removal: by assessing how legacy pollution can be remediated. The teams involved explored whether grouping substances based on specific molecular substructures, combined with NAMs for exposure assessment and toxicity testing, can support more targeted prioritisation and risk assessment and help identify where exposure reduction may be needed. Results presented at the Workshop were predominantly hazard oriented. A [database](#) of alternatives to persistent, mobile and toxic (PMT) substances, and to per- and polyfluoroalkyl substances (PFAS) was shared as a tentative to collect available alternatives to existing PMT chemicals, based on their use, chemical function, the end-use function and the function service, but still without a check of the toxicological properties of the alternative substances (more information: [Federica Iaccino](#), and a short presentation will be given at the Risk Management Taskforce on 08 October (AM)).

Zero Pollution Stakeholder Platform: 1st meeting of the revamped Platform

The 9th meeting and first of the revamped Zero Pollution Stakeholder Platform (ZPSP) took place in Brussels on 22 September 2026. The meeting marked an important milestone for the EU's Zero Pollution agenda, as the Commission announced that all actions foreseen under the 2021 Zero Pollution Action Plan have now been completed, shifting the focus from policy development to implementation and delivery of results on the ground. A key topic of discussion was the outcome of the mid-term review of the Zero Pollution Action Plan, which highlighted the need to strengthen the link between environmental protection and competitiveness.

Another major item on the agenda was a preview of the forthcoming 3rd Zero Pollution Monitoring and Outlook Report, prepared by the European Environment Agency (EEA) and the Joint Research Centre (JRC). The assessment shows that the European Union is making good progress in some areas, notably in reducing the health impacts of air pollution and lowering the use and risks associated with chemical pesticides. However, several 2030 targets remain off track, particularly those related to nutrient losses, waste generation, transport noise and microplastic pollution. Considerable attention was devoted to PFAS, which continue to be a priority area under the EU Chemicals Industry Action Plan. The meeting presented ongoing work on a new PFAS monitoring framework, aimed at consolidating environmental occurrence data across Europe. A dedicated PFAS chapter will be included in future Zero Pollution Monitoring and Outlook reports, while a dedicated PFAS information portal is expected to be launched by the end of 2026.

Longer-term plans include the development of a comprehensive monitoring platform covering additional environmental media such as soil, surface waters and drinking water (more information: [Andrea Pellini](#) and [Eleonora Tosi](#)).

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-78: Plenary sessions

The September RAC session started with a speech of ECHA's Executive Director on the ECHA Basic Regulation and the new tasks. She explained that ECHA has been asking for this Regulation as the Agency has been embedded within REACH since 2007 but without any revision of REACH since then. This Regulation should provide more governance and freedom for resources (financial and human), including for the ECHA Committees. It should create a structure, allowing for more flexibility and agility to address the new tasks. These 'new tasks' are taken as an opportunity to look at opinion-making and streamlining of the work, as ECHA will not (be able to) increase the

number of experts in the Committees. The challenge is to ensure that expertise is present. In response, RAC members highlighted the struggles they face when they must combine the increasing RAC work with other tasks requested by their Competent Authority. Simply increasing efficiency won't solve it. Dr McGuinness explained that this has also been picked up by the ECHA Management Board and will be further discussed with the Member States.

Next on the agenda was the discussion on the Li Occupational Exposure Limit (OEL). The Rapporteurs did present their assessment of ECHA's background report, which they have complemented with an output of the PARC project. This document, prepared by ANSES and that is not yet publicly available, includes some references about possible neurodevelopmental effects of Li compounds in animals. European Metals asked to have access to this document to ensure the Li expert could well prepare for the next and last discussion in December. Also at this stage, the proposal of the Rapporteurs is not to derive an 8-hour Time Weighted Average (TWA) value, but instead to establish only short-term exposure limits (STELs) that cannot be exceeded. In reaching this preliminary position, RAC reviewed all relevant health endpoints, including developmental and fertility effects, kidney effects, thyroid effects, and other potential health outcomes, and derived starting effect levels from the available human and animal data. As the lowest effect levels were identified for local effects, the Rapporteurs proposed focusing on these endpoints. However, it appears that relying solely on STELs may create challenges for the broader OEL process and for enforcement. This will also be further debated at the next RAC meeting.

Another important discussion that week was about glyphosate. RAC was asked by the Commission under Article 77(3) to assess whether the results of a study published by the Ramazzini Institute - the Global Glyphosate Study (GGS) would change RAC's previous assessment of carcinogenicity. RAC did an in-depth analysis of the GGS and confirmed its previous conclusion as no classification for carcinogenicity.

New was an update from DG Employment on the OEL work, the status of the CMRD waves and scientific work on PSLTs, combined exposure, biomonitoring.

Coming back to streamlining and efficiency, the ECHA staff made two interesting presentations, one of the RAC opinion template to propose improvements that would enhance the regulatory quality and clarity of output for use by the stakeholders (this is also pushed by some court cases), the other one reporting the findings of an AI screening of the CLH reports and RAC opinions on the use of read-across and the justifications. The analysis showed increasing trends in the usage of alternative methods in the CLH framework but also that there are opportunities for improving the clarity of the use and description of read-across.

RAC also presented several CLH cases, concluding amongst others to an ED classification Category 1 for propyl 4-hydroxybenzoate (paraben) and finalising its discussion on spearmint oil. The relevant learnings will be taken forward to the Taskforces (more information: [Violaine Verougstraete](#)).

RAC DWD-78: Working Group

The Risk Assessment Committee (RAC) Drinking Water Directive (DWD) Working Group (WG) took place online on 17–18 September.

After the usual introductions and a discussion of the action points from the last meeting, where it was announced that ECHA is planning to launch an open call for experts to support ECHA and the Rapporteurs in this new task, the ECHA secretariat announced that two important documents had been endorsed by the RAC on 11 November: the document on the fast-tracking process for the DWD RAC opinion, also known as 'A-listing', and the second document on the DWD process. Both documents should be uploaded to [this page](#) soon.

Following consultation rounds, the ECHA guidance documents (mostly volumes I and II) were updated and can be found [here](#).

Then, the ECHA secretariat took us through the main changes that have been implemented. An update on the Notification of Intention (NoI) and the related application dates for 2027 were presented. Up to 128 applications are expected in 2027, including 17 new metallic entries and 76 renewals of organic entries. The official starting date for applications will be 4 January 2027 (not 31 December 2026 as mentioned in the legal text).

After a session dedicated to conflicts of interest (which, of course, was not for the STOs), we moved on to the mock cases, with a final discussion on mock case 1 – metallic composition. Here, roughness (Rz) of the test pieces and corrosion rates according to Rz were discussed in detail, especially in light of the recent update to the EN standards for migration tests for metallic compositions. While there was no indication of the Rz of the test pieces in the previous version of the standards, the new version provides a range of 4–10 µm. The discussion was more positive than at the last meeting and it was agreed, informally, that migration test results would be assessed according to the EN standard in force at the time of the test. The ECHA secretariat also provided a more detailed explanation of how maximum tolerable concentrations at the tap (MTCtap) are derived according to the guidance and legal text for elements (in this case zinc) that do not have a parametric value in the DWD, but do have a specific migration limit (SML) value from food contact materials, and how this cannot be changed at the whim of those assessing the

case because they saw a different value in other legislation. We then discussed the second mock case for metallic composition in depth, which took up most of the remaining time. The meeting ended with a presentation of mock case 1 for inorganic composition, which sparked a great deal of discussion.

It will be discussed in detail at the next RAC DWD WG meeting, which will take place in person on 9 and 10 November (more information: [Lara Van de Merckt](#)).

SEAC-72: Plenary session

The agenda for SEAC 72 was short so the meeting was virtual with no in-person participation. For chromates, the flow of authorisation cases has all but stopped due to the forthcoming restriction, with only one new Application for Authorisation (AfA) case remaining to be finalised. With respect to the restriction, a short update on the status of the SEAC Public Consultation (PC) was given – for information only. A total of 206 responses has been received, mainly from industry. There is also input from other actors e.g., on the parallel ongoing process for chromates under workplace legislation (Occupational Safety & Health). The SEAC Rapporteurs are working through the PC responses – many of which are considered to have limited supporting evidence.

A significant part of the meeting was dedicated to ECHA's new tasks. With the increasing workload, the ECHA Management Board is invested in SEAC continuing to deliver on its broadening mandate, hence changes are being made to open up access to the pool of experts. A call for additional Member State experts is already open to allow MSs to increase their representation from 2 to up to 4 SEAC members. A call for external experts will be started in October. The existing cap on the number of co-opted SEAC members (5) will be dropped in the new ECHA basic regulation. SEAC-72 included induction sessions on ECHA's future role in the Toys Safety Regulation (TSR) and the Directive on Restriction of Hazardous Substances (RoHS) in electrical and electronic equipment (EEE) (more information: [Simon Cook](#)).

ECHA Management Board: cross-industry preparation

On 18 September, European Metals participated in the call set up by Cefic to prepare the ECHA Management Board meeting taking place on 24 September. These calls are very useful as they allow to discuss some of the meeting documents (that cannot be circulated) and to prepare possible industry interventions, which will be relayed by Marco Mensink (Cefic, representative in the plenary MB meetings) or Alexis Van Maercke (Detergents Europe, representative in the Subgroup Strategy, Planning and Implementation).

Topics of interest for this meeting included a Commission update on the ECHA Basic Regulation, the relevant points in the Environmental Omnibus and Zero Pollution Platform, ECHA's programming document for the coming period and the Executive Director's report (more information: [Violaine Verougstraete](#)).

EUROPEAN METALS HEALTH, ENVIRONMENT & CHEMICALS

HEC Steering Committee: 3rd meeting under the new HEC banner

The first meeting of the Steering Committee under the new "HEC" banner kicked off with the key discussion on the department's functioning and resources for 2027. Building on the inputs the Committee provided on a tour of the 2026-2027 horizon, at this meeting the staff presented the updated list of the technical advocacy and key generic issues expected for next year, also bringing in the outcomes of a discussion with the OECD EHS department. Budget estimates for the department's work, covering the representation tasks in ECHA/OECD/Commission, the associated travels and meetings and the crucial consultants' support were discussed with the Committee.

We next focused on the Green Deal & Zero Pollution aspects, starting with an update on the Environmental Omnibus state of play and advocacy activities and the selection of European Metals as member of the revamped Zero Pollution Stakeholder Platform (see under [Commission](#)). On REACH, the staff presented the summer activities aiming at getting more intel on how the Commission plan to move forward and the liaison activities with Cefic. A presentation was made on the Packaging & Packaging Waste Regulation (PPWR) that entered into force on 12 August 2026, raising practical questions and concerns for the companies. As part of its implementation, Commission/ECHA are preparing a report on the presence of Substances of Concern (SoCs) in packaging and a first list of SoCs was circulated recently, including several metals but also mistakes. This important topic was also discussed during the Regulatory Forum (see below). SoCs are also popping in the End-of-Life Vehicles Regulation, and a list can also be expected.

An interesting perspective from the value chain was presented regarding the Drinking Water Directive (DWD) implementation. European Metals attends the ECHA meetings as regular stakeholder and proposes to set up an

EM-EUPL Platform to help applicants who need to meet the Article 11 requirements by submitting a DWD Application for their metallic/inorganic substances.

The meeting concluded by looking forward to the upcoming (9-10/11) ECaBaM 5th Workshop and the Metals Academy. The draft minutes were circulated to the Steering Committee on 30 September (more information: [Violaine Verougstraete](#) and [Ailsa Lee](#)).

HEC Autumn Week

Science Forum: *from horizon scanning to practical implementation*

The Science Forum kicked off the HEC Autumn week on 21 September, combining presentations on emerging issues with discussions on how to organise industry's work on the scientific, technical and implementation aspects. Multi-metallic science panels like ETAP (Ecotoxicity Technical Advisory Panel) and HeTAP (its human health counterpart) play an important role in the latter by providing forums for scientific exchanges and learnings, including external experts. The Commission presented its roadmap on New Approach Methodologies (NAMs), complemented by a very interesting presentation by ARCHE on the current applications of NAMs in metal assessments but also the upcoming opportunities and future directions. Aaron Stoler (Exponent) provided a refreshing view on biodiversity, making a plea to add the consideration of functional traits diversity and not only species diversity, questioning the completeness of the current ecotoxicological testing standards to assess biodiversity.

A session was devoted to the Endocrine Disrupting (new) endpoint with a state of play on international activities, the learnings from the June ECHA Stakeholder Workshop, Eurotox and the first RAC cases, but also where some metals stand today with their assessments. The run of MeClas for the endpoint was also illustrated.

And not to forget: the traditional Occupational Exposure Limit (OEL) tour by Martin Wieske, starting from the key outcomes of the last OEL Workshop organised by ICA-WVM and EM before diving into the ongoing and future activities of the Working Party Chemicals.

A huge thank you to the chairs and all the speakers of this edition of the HEC Forum, which managed to reach its target, i.e., identifying what's on the horizon and thus requires further work in the Taskforces. Meeting minutes will be circulated soon. They will be detailed for capacity-building purposes: so if you missed the Science Forum, have a look (more information: [Lara Van de Merckt](#), [Ailsa Lee](#) and [Violaine Verougstraete](#)).

Regulatory Forum: *many topics to keep the sector busy*

The Regulatory Forum proved once again that there is no shortage of regulatory topics to keep our industry busy. Over two half-days, participants explored ECHA's Notification of studies mechanism under the Common Data Platform on Chemicals (CDPC), the data challenges and opportunities linked to the Ecodesign for Sustainable Products Regulation (ESPR) and Digital Product Passports (DPPs), evolving trends in Classification, Labelling & Packaging Regulation (CLP), and the role of recyclability assessment methodologies in supporting circular material flows. Discussions also turned to some of the broader issues shaping the regulatory landscape, including permitting challenges across Europe, effective approaches to public affairs and advocacy, practical experiences with the implementation of the Packaging and Packaging Waste Regulation (PPWR), and the growing importance of biodiversity in business and policy decision-making.

The sessions combined technical expertise with practical perspectives, resulting in lively exchanges and valuable takeaways for participants. A huge thank you to our amazing chairs, Lisa Allen and Brian Abrams, and to all our excellent speakers whose expertise turned a packed agenda into a forum that was as insightful as it was enjoyable. We were also delighted to welcome Ruth Danzeisen, who will be taking over from Lisa as the new co-chair of the Regulatory Forum! (more information: [Sophia Verbrugghe](#) and [Andrea Pellini](#)).

REGISTRATION

EU Russian Sanctions and REACH Consortia: *practical uncertainty remains*

The EU sanctions list and the Commission's consolidated FAQs on Russian sanctions were updated in June, but several practical questions remain unresolved for REACH registrants and REACH Consortia.

In September, industry representatives met with the Commission and ECHA to explain how REACH Consortia operate and to highlight the challenges created by Article 5n, including bank de-risking practices and uncertainty around the role of Only Representatives (ORs). Further clarification is needed to ensure that REACH obligations can continue to be fulfilled in a legally sound and workable way and EM will participate in a couple of follow up meetings, with ECHA and ECHA and Commission. The Registration Compliance Taskforce will be further updated at the upcoming meeting on 24 November (for more information: [Violaine Verougstraete](#) and [Federica Iaccino](#)).

INDUSTRIAL EMISSIONS

BreW: NFM BREF Workshop

Back-to-back with the Regulatory Forum, this Workshop was organised to discuss the upcoming review of the Non-Ferrous Metals Best available technology Reference document (NFM BREF) in the context of the revised Industrial Emissions Directive (IED) and the significant changes expected in future BREF reviews. Presentations provided an overview of the evolving regulatory framework, highlighting how the revised IED is reshaping the information exchange process, expanding the role of external actors such as ECHA, the European Environment Agency (EEA) and INCITE, and placing emphasis on areas such as chemicals management, water emissions, environmental performance, innovation and industrial transformation.

The workshop also examined the practical implications of the new BREF Guidance, including the early front-loading phase, the identification of Key Environmental Issues (KEIs), the collection and assessment of technical and environmental data, and the expected organisation of the NFM review process within European Metals.

In addition, experience gained from other ongoing BREF reviews was presented to illustrate how recent developments are already influencing discussions on BAT conclusions, chemicals, PFAS, indirect emissions to water, emerging techniques and the interface between the IED and other European policy frameworks (more information: [Andrea Pellini](#) and [Eleonora Tosi](#)).

Informal Workshop: IS BREF TWG on chemicals

On Friday 11th of September, the Informal Exchange on the Chemical frontloading in the Iron & Steel (IS) BREF was held online. The event brought together over 70 participants, who engaged in constructive exchange and discussion. The purpose of this informal exchange was to discuss the feedback provided by the Technical Working Group (TWG) on the list of potentially relevant substances initially identified by ECHA, as well as on additional ones proposed by the TWG.

The additional information obtained during the event will be used in drafting the Background Paper for the TWG Kick-off Meeting (KoM). European Metals Secretariat will attend the Kick-off Meeting which is planned for 14-18 December 2026 (more information: [Andrea Pellini](#) and [Eleonora Tosi](#)).

Status update on LAN BREF: 2nd draft questionnaire available

On Friday 31 July 2026, EU-BRITE informed the TWG members that the second draft questionnaire of the Landfill (LAN) BREF is available through the BEST tool. EU-BRITE allocated one month for comments on this second draft, excluding the one-month summer holiday period. The deadline to provide feedback was 30 September 2026. In this context, the European Metals Secretariat with the support of the established EM LAN BREF subgroup provided aggregated feedback by the deadline (more information: [Andrea Pellini](#) and [Eleonora Tosi](#)).

LVIC BREF: mark your calendar!

In the context of the Large Volume Inorganic Chemicals (LVIC) BREF, a series of workshops have been organised, aiming at a transparent, inclusive and technically robust preparation of Draft 1 (D1). During the last workshop, a session will be dedicated to the production of H₂SO₄. The 3rd session is planned for 10-13 November 2026 and will be held remotely. European Metals will attend the meeting. The workshops will focus on a pre-selected set of key environmental issues (KEIs) or potential environmental issues (‘candidate’ KEIs), among those identified during the TWG kick-off meeting (more information: [Andrea Pellini](#) and [Eleonora Tosi](#)).

WATER

Water initiative & WFD targeted review?

As you may have heard, in her State of the EU speech the Commission President announced an upcoming ‘Water Initiative’, which seems to focus on water scarcity rather than quality. Is this a way of giving the water resilience strategy some legal weight? We do not know. Currently, the Commission is investigating the scope of the initiative and reviewing existing projects to avoid duplication. In relation to the Water Resilience Strategy (WRS), note that a report on possible methodologies to set water efficiency targets (the WRS is setting a 10% reduction overall) per sector has recently been prepared and will be published later this month.

As for the targeted review of the Water Framework Directive (WFD), the impact assessment is said to have been carried out over the summer, although the results are not known or shared, and the review, if it is going to happen, is delayed. The chances of it reaching the finish line are getting slimmer and slimmer... (more information: [Lara Van de Merckt](#)).

Drinking Water Directive (DWD) sub-group: *meeting*

The 8th of September marked the revival of the EM DWD subgroup!

The mandate of the new group was the first thing we set. The Drinking Water Directive subgroup will operate under the Water Taskforce. It will mostly manage DWD Article 11 implementation, which covers the European Positive Lists (EURLs) process. But the subgroup will also be used to monitor and act on future directive updates.

Next, we provided a reminder of the background information and looked at the recast Drinking Water Directive and its new EU hygiene requirement conformity system (with starting compositions listed in EU Positive Lists to be authorised for use in the manufacturing of products, followed by product certification). The transition conditions for starting compositions that were accepted nationally between 2021 and 2026 were also reviewed, with these compositions being permitted for use in products until 2032 provided they comply with the new lead limit of 5 µg/L. For EM and its members, the most important part of this new system is the EURLs process, which was discussed in more detail at the meeting.

The meeting then gave the floor to participants with experience of test dossiers used to train RAC members this year. Industry faces major challenges with this new process, ranging from data availability and costs to IUCLID literacy and the availability of accredited labs to conduct the necessary migration tests (in this case, there is only one lab, and the tests take six months...). It was also pointed out that acceptance of compositions, alloys, etc. from the previous national system (e.g., the 4 Member States Initiative (MSI) List) does not mean that they will receive a positive opinion from the new system, far from it. In light of this, we discussed how the metal and inorganic sectors can best tackle these challenges.

We ended the meeting by compiling a list of all upcoming relevant activities organised by EM for the remainder of 2026 (more information: [Lara Van de Merckt](#)).

TOOLS

CHESAR Platform Transition: *industry priorities to be shared with ECHA*

Following discussions with ECHA in June and subsequent exchanges with Cefic and Concawe, European Metals is helping to coordinate an industry exercise to identify key priorities for the further development of the CHESAR Platform. ECHA is expected to launch the new CHESAR Platform with the April 2027 IUCLID update, after which CHESAR 3.9 will no longer be supported nor linked to new IUCLID developments.

While the new Platform is expected to become available also in server/desktop version, important functionalities currently used by industry, such as Assessment Entities and Specific Environmental Release Categories (SpERCs), are not yet included.

European Metals has stressed to ECHA the importance of these functionalities, particularly for the assessment of different substance forms, and is working with Cefic and Concawe to gather user priorities. The aim of the current efforts is to provide ECHA with a coordinated industry message to support prioritisation and funding of future CHESAR developments. More will be shared with the Registration Compliance Taskforce at the 24 November meeting (more information: [Federica Iaccino](#) and [Violaine Verougstraete](#)).

MEED

MEED sponsors: *to meet in November for the final workshop of the year*

As the current five-year sponsorship term approaches its end, MEED sponsors will meet in Brussels on 23 November 2026 to take stock of the progress made and to discuss the next steps for the MEED program.

The meeting will provide an opportunity to review the latest scientific progress and publications across the MEED program, and to discuss the regulatory implementation of MEED outcomes and the next steps for their communication.

The meeting will be held back-to-back with the Registration Compliance Taskforce meeting (24 November), with an informal cost-sharing sponsors' dinner planned for the evening of 23 November (more information: [Diana Dobre](#) and [Violaine Verougstraete](#)).

THE SUSTAINABILITY CORNER

Public Consultation: *on the green listing of certain non-hazardous waste*

European Metals has submitted its [answer to the public consultation on the draft Delegated Act \(DA\) and Annex on the green listing of certain non-hazardous waste](#). The proposed measure – published in the context of the Waste Shipment Regulation (WSR) – aims at including, among others, certain non-hazardous wastes containing non-

ferrous metals in the list of green listed waste streams set out in Annex IIIB of the WSR. Green listed wastes can be shipped through simpler procedures solely subject to general information requirements.

European Metals Recommendations

Overall, European Metals welcomes the proposed approach as a satisfactory first step towards strengthening the Union's internal market for secondary materials. However, further steps will be necessary to maximise the benefit of the efficient circulation of metals-rich waste across the EU:

- **Waste shipments to EU pre-consented facilities** – Shipments of hazardous waste containing non-ferrous metals to EU pre-consented facilities are still subject to the Prior Informed Consent (PIC), facing significant delays. Of note, pre-consented facilities are already vetted to provide the specialised, environmentally sound treatment hazardous waste requires. Therefore, European Metals recommends the establishment of simplified procedures for shipments of metal-rich wastes to EU pre-consented facilities.
- **BEU07** – The draft DA and Annex introduce BEU07 in Annex IIIB, covering “*waste consisting mainly of aluminium, steel, or both, derived from building, construction and demolition activities*”. However, these activities also generate other recyclable metal waste streams, such as copper pipes and cables. European Metals therefore recommends expanding BEU07 to explicitly include additional non-hazardous metal waste streams from these activities.
- **BEU09** – Similarly, the new entry BEU09 in Annex IIIB includes, among others, “*waste components of electrical and electronic equipment boards that do not display any of the hazardous properties listed in Annex III to Directive 2008/98/EC [Waste Framework Directive] ...*”. The requirement to “*not display any of the hazardous properties...*” still risks fragmented implementation across Member States. European Metals therefore recommends ensuring a harmonised interpretation of this requirement and providing further guidance on the waste streams and fractions concretely covered by BEU09.
- **EU49** – The draft Annex also introduces entry EU49, which will replace Basel entry Y49, and will cover “*waste electrical and electronic equipment, not covered by A1181 or BEU09*”. This waste would not be covered by the green listing procedure. To avoid **uncertainty regarding the respective scopes of BEU09 and EU49**, European Metals recommends providing further guidance on which waste will be concretely covered by entry EU49.

Next steps: The consultation period concluded on 15 September 2026. The adoption of the final DA and Annex is currently planned for Q4 2026 (more information: [Enrico Macciotta](#) and [Laura Fazio Bellacchio](#)).

OUTREACH

OECD

OECD: Working Party on Risk Management

The annual meeting of the OECD Working Party on Risk Management took place in Paris on 29 and 30 September. As in last year's meeting, the risk management of PFAS received considerable attention as there is an increasing number of activities on banning/phasing out PFAS in many EU and non-EU countries. Generally, there is the recognition that the issue is complex due to the number of substances and uses. Most actors are using a targeted/phased approach e.g., starting with aqueous firefighting foams (AFFF); focusing on Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic acid (PFOA); excluding fluoropolymers from the scope. This is different to the EU universal PFAS restriction that attempts to deal with (nearly) all substances, uses, and lifecycle stages in one.

One significant new development is in Canada where the government launched the PFAS Roundtable in December 2025 to foster engagement and collaboration and allow partners and stakeholders to provide and receive information. Representatives from the European Commission were interested in this and the phased approach that has been ongoing in Canada for several years (of which Commission is not aware). Participating countries agreed to continue learning from each other, and to support the work of the OECD global PFAS group which has relevant ongoing activities on identification and remediation of PFAS contaminated sites, and on dissemination of information on analytical methods.

Under the topic of “Substances in articles and chemical emissions at the waste stage: Improving effective risk management” European Metals and EPMF presented some learnings from the metals perspective, focussing on electronic waste (WEEE) and circularity. The presentation stressed the importance of collecting quality data on exposure and emissions in the waste phase, facilitated by coherence between different legislations and supply chain collaboration. The messages were in line with the contribution from ECHA on the waste stage, which

highlighted that release estimation for hazardous chemicals at the waste stage is the first and main challenge for risk assessment and appropriate risk management.

There was a first topical discussion on criteria for setting time limited derogations in a regulation, where EM and EPMF also put forward the only presentation. This was generally well received, suggestions were made to broaden the approach beyond technical / economic feasibility and availability of alternatives, to include suitable socio-economic criteria. This will in the first instance be discussed directly with UK.

There were other useful updates and learnings from the meeting: risk management of essential oils (natural substances with mainly DIY consumer uses); progress with the well-supported OECD proposal on key considerations on setting limit values for restricted chemicals; OECD survey on improving public engagement during chemicals risk management decision making; two important OECD projects on valuation of health and environmental impacts of chemicals (SWACHE – Surveys on Willingness-to-Pay to Avoid Negative Chemicals-Related Health Impacts, and SACRE – valuation of environmental endpoints) (more information: [Simon Cook](#)).

OTHERS

ETAP: 2026 edition in Denver

The 2026 edition of the Ecotoxicology Technical Advisory Panel (ETAP) took place on 1–3 September 2026 in Denver, USA (and online).

I can only comment on this year's ETAP presentations, but I hear that the side events in Denver were great. From ball games to a mine visit, I'm sorry to have missed all the in-person fun this year. The presentations were very interesting, though, as they were last year.

Day one started with an in-depth presentation on NAMs for metals, which are developing rapidly but still raise questions about whether the results from NAM approaches would be sufficient to inform regulatory decisions.

The meeting then moved on to soils, looking at the new soil monitoring law and its implementation, and how metal essentiality and deficiency can be considered in risk assessments. Depending on soil types and physical and chemical conditions, it was suggested that essentiality triggers and deficiency values could potentially overlap. The idea of deriving a deficiency SSD was explored and will be discussed further. The final presentation of the day (very late here in Europe) examined how to advance environmental risk assessment by quantifying marine microbial sensitivity thresholds. In other words, it examined how microbial communities could be used as an early-warning indicator of environmental stress. It was concluded that more ecologically relevant and measurable endpoints are needed to evaluate soil and aquatic health, particularly given the current poor understanding of microbial baselines. The key question left is whether shifts in microbial diversity and abundance can serve as a reliable indicator of overall ecosystem function.

On day two of the ETAP conference, we dived straight into the topic of black mass: the curiosity that is left behind



BLACK MASS

after lithium-ion batteries are shredded. Black mass is expected to increase tremendously within the next decades. As this recycling process is purely mechanical, the underlying chemical forms remain intact, resulting in a variable mixture of graphite, metal oxides and electrolyte residues, depending on the type of batteries that were shredded.

In terms of environmental risks, it is not the powder itself that is the main issue, but rather what actually dissolves in water. When liquid is added, a quick initial wash releases soluble lithium salts and electrolyte residues, followed by a much slower release of metals driven by environmental factors such as pH and water chemistry. Evaluating ecotoxicity requires tracking these specific chemical transformations rather than simply counting total metal content. Ultimately, the exposure risks associated with handling, transporting and processing raise a provocative question: instead of grinding everything into a complex powder, should batteries not be designed from the start for easier disassembly and a longer lifespan? But that's my own take on this.

The meeting finished with a discussion of potential emerging issues, ranging from biomining to the CO₂ footprint of acid mine drainage (AMD), which may be substantially overlooked by the LCA wizard when it comes to CO₂ release, as well as metals and microplastics mixtures. The in-person participants then continued with some breakout sessions and finished the afternoon with an experimental mine visit.

Looking forward to attending in person next year! 😊 (more information: [Lara Van de Merckt](#)).

COMMUNICATION

Maison de la Métallurgie et de l'Industrie de Liège/House of Metallurgy & Industry of Liège: nice and instructive visit

The HEC, EPMF & i2a teams enjoyed a joint instructive morning at the [MMIL](#) with a guided tour given by Prof. Dr Eric Pirard in the heart of a place that has witnessed intense industrial activity for years. In a real old factory dating back to 1845, this museum introduces its visitors to the important steel and industrial heritage of this part of Belgium.

But interestingly, the museum focuses on the metals story as a whole, covering the past, the present and the future. This story – via interactive material - is told from both a scientific point of view, but also via the technical aspects; demonstrating that metals have always been an important part of our society and are today even more of utmost importance!

The Museum aims to instruct but also capture the attention of the younger generations, enabling them to grasp the multiple opportunities that working in our industry can provide them with. The MMIL that has a repair café and can also host events, is really worthwhile visiting for any person working in our sector or not (more information: HEC, EPMF & i2a Teams).



Metals Academy: update for 6th edition in 2027

The Organising Committee met on 30 September to further discuss the strategy and programme for the new edition planned for May 2027.

Along with the development of a full programme, a “one-pager agenda” will be worked on asap to give a better idea of what the Metals Academy is, what it plans to reveal in its next edition and why it is an important learning opportunity for the new generation entering the metals sector and/or those who wish to broaden their perspectives and update their knowledge.

This one-pager will be distributed as much and as soon as possible at various EM meetings and a reminder will also be sent to all EM members to manifest their interest in joining the Metals Academy 6 by [pre-registering](#) (more information: [Violaine Verougstraete](#) and [Ailsa Lee](#)).

GENERAL INFORMATION & ACRONYMS

Follow the logo and check out our Metals Gateway website.



This website is a one stop information source for regulators & risk assessors dealing with metals/metal compounds and is tailored to the specific needs of the [metals](#) industry sector.

A continuously updated list of acronyms is available under the [Reach Metals Gateway](#) (RMG).

CALENDAR

**Please find below a list of the meetings planned for Q4 2026
(ECHA, Commission & European Metals).**

For meetings at European Metals: most of our meetings will now be held as hybrid meetings, and **our members will be informed ahead of the meetings** (links to join will be sent ahead of the meetings).

- 05-09/10: MSC-95 – TENT
 - [08/10: Risk Management Taskforce](#)
 - 21-22/10: ECHA DWD STO Workshop
 - [22/10: MeClas Steering Committee](#)
 - 26-28/10: RAC-79 CLH WG
 - 09-10/11: RAC-79 DWD WG
 - [09-10/11: ECaBaM 5 Workshop](#)
 - 16-17/11: RAC-79 REST WG
 - [19/11: LCA Platform](#)
 - 17-20/11: SEAC-73
 - 18-19/11: CARACAL 59 (provisional)
 - [23/11: MEED Workshop \(Sponsors only\)](#)
 - [24/11: Registration Compliance Taskforce](#)
 - 24-25/11: SEAC-73
 - 30/11-04/12: RAC-79 Plenary
 - [01/12: Water Taskforce](#)
 - 08/12: RAC-79 (II optional - remote)
 - 07-11/12: MSC-96 – TENT
 - ~~08/12: EM DWD Application Training Workshop & EM DWD subgroup~~ – **New date to be set**
 - [10/12 \(PM\): Health, Environment & Chemicals \(HEC\) Steering Committee](#)
 - [16/12\(PM\): Risk Management Taskforce](#)
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