

From: DE WOLF Watze <Watze.DEWOLF@echa.europa.eu>
Subject: RE: revised shortened non ferrous metals examples on SCC
Date: 16 Mar 2012 11:10:16 GMT+01:00
To: Violaine Verougstraete <verougstraete@eurometaux.be>
Cc: Hugo Waeterschoot <waeterschoot@eurometaux.be>, KNIGHT Derek <Derek.KNIGHT@echa.europa.eu>, MALM Jukka <Jukka.MALM@echa.europa.eu>

Dear Violaine,

Thank you for your e-mail of 29 January 2012 with the shortened 'non-ferrous metals examples on SCC'. At the meeting with industry on intermediates on 26 August 2011, industry offered to try to find clear examples of SCCs to illustrate the three general issues that they had expressed concern about: i.e. clear cases where (a) it is justified to take into account known hazardous properties in designing SCCs (without using a risk assessment to justify SCCs), (b) LEV is legitimately part of the SCCs scenario & (c) PPE is used as a routine precaution (i.e. but is not part of the SCC justification). In addition in your e-mail you indicated that the information is also intended to illustrate a physical form associated with a low emission potential.

Our experts have examined the information & we conclude that unfortunately we still do not have clear self-evident examples of SCCs for the three circumstances that industry raised with us. Nevertheless we are very grateful to you for your work and help.

Finally we want to remind you of the general principle, also re-iterated at the August meeting, that industry are responsible for designing & implementing SCCs for manufacture & use of on-site and transported isolated chemical intermediates that are registered using the provisions of Article 17 & 18 of the REACH Regulation. The principles of SCCs are given in paragraphs 3 and 4 of the respective articles, and the ECHA guidance gives more detailed help for companies.

Best regards,

Watze de Wolf

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From: Violaine Verougstraete [mailto:verougstraete@eurometaux.be]
Sent: Sunday, January 29, 2012 11:19 AM
To: KNIGHT Derek; DE WOLF Watze; MALM Jukka
Cc: Hugo Waeterschoot; Violaine Verougstraete
Subject: revised shortened non ferrous metals examples on SCC

Dear Watze, Derek and Jukka,

We hope you are all having a nice weekend.

Please find attached the revised, **shortened** "non-ferrous metals examples on SCC", where we have tried to highlight and illustrate the four key non-ferrous metal specificities that have an impact on the design of the rigorous containment and worker's/environment protection, namely

- the existence of hazard knowledge and its use for the design of the containment
- a physical form associated with a low emission potential
- LEV being considered as rigorous containment
- use of PPE

Annex 1, also in attachment, includes, the examples as we submitted them in October. A fifth example has been added to illustrate the massive aspect of the intermediate. A reference to the relevant example in Annex is included in the short document.

We sincerely hope you will find those pages interesting and clarifying! We would be more than pleased to be able to further discuss this with you.

Please do not hesitate to contact us if anything is unclear,

Thanks in advance for the reading

Hugo and Violaine