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Dear Reader,

After entering into force in June 2007 and now that the three waves of registration of phase-in substances are complete, the REACH revision is high on the European agenda. While we all support that production and use of safe and sustainable chemicals becoming the norm on the EU market and a global standard, Authorisation and Restriction should be holistically reviewed. Furthermore, all potential risk management measures must be assessed from the beginning.

Saft has been manufacturing different types of industrial batteries for more than a century. Some of these industrial batteries contain silver which is as an active material. The work of the EPMF team is paramount for Saft. It allows us to always stay up to date with the latest science on precious metals and with all the European regulatory processes. This also allows our manufacturing sites to put in place adequate risk management measures.

It is important to keep in mind that it is indeed possible to handle harmful chemicals safely!

Happy reading!

Clémence Siret, EPMF Board Member, SAFT, France

REACH revision: from a perspective of the precious metals

By EPMF

EU policies and actions towards chemicals are at the core of EPMF work. The upcoming revision of REACH is not an exemption. What does the EPMF stand for? First, the EPMF supports a need to ensure a good knowledge of all the substances placed on the market. The proposal to increase data requirements on critical endpoints (carcinogenicity, neurotoxicity, immunotoxicity and endocrine disruptors) for all substances, including intermediates and lower tonnages would ensure that it reaches this goal. The identified endpoints are critical to ensure the protection of human health and environment but pragmatism is required in the prioritization process to increase these requirements and ensure that the overall system will remain manageable and targeted to what matters. Secondly, the EPMF wants to emphasize the need to have an approach suitable to the precious metals. The current Mixture Assessment Factor (MAF) proposal is not considering metals specificities. This will have an impact on precious metals business and the benefits for the environmental protection are not yet very clear. Moreover, the EPMF agrees that the evaluation of registration dossiers and substances is too complex and very often too slow. As a matter of fact, the current system very often focuses rather on administrative requirements blocking the update of critical dossiers without providing any advantage on protection of human health and environment. Regarding the REACH Risk Management Measures, the Authorisation procedure, it is too heavy and inflexible and places EU-based companies at a competitive disadvantage compared to non-EU competitors, with little advantages of the risk control of Substances of Very

High Concern (SVHC). Looking at the restriction process is often too slow to adequately protect professional users and consumers. The EPMF recommends reviewing the Authorisation and Restriction procedures in a holistic manner in the context of a Risk Management approach, which could also be extended to other legislation, e.g. Occupational Safety and Health. This fits with the proposal to integrate the Authorisation and Restriction processes and could be a significant improvement in the risk management of chemicals if risk based. The merge could also bring some efficiency and efficacy to the system, which is currently not fulfilling its objectives as current Authorisation is not efficient enough when tackling the issue of import of articles made from SVHC. However, if the Authorisation would be maintained, it is important to change the perspective and move from a substance to a use approach. Another concern raised by the current REACH revision proposal is the "Essential Use concept". This concept is currently unclear and could be extremely harmful for industry and future R&D if transposed from the Montreal Protocol to a much broader context without in depth discussions.

To conclude, the EPMF shares most of conclusions related to the REACH review and is always willing to contribute and share its practice for a better integration of the EU policies when revising the REACH.

For more details, please check the EPMF [position paper on the REACH revision](#).



Guest corner: REACH revision

By Maria Arena, Member of European Parliament

Since it was adopted in 2006, the REACH regulation has marked a significant progress in better regulating the number of chemical substances on the EU market. However, there is still much to be done in order to ensure a high level of health and environmental protection from the hazards of chemicals, and I believe the revision of REACH announced in the Chemicals Strategy for Sustainability is a step in the right direction. There are still a number of critical gaps in REACH in terms of data requirements for a number of endpoints such as endocrine disruption or immunotoxicity for example. For these issues, REACH annexes need to be updated. The extension of the generic risk assessment approach will also help to speed up the process and ensure a more protective approach. I also strongly support the introduction of new concepts such as phasing out the uses of the most hazardous substances when they are not essential. This is key to reducing overall exposure of citizens to harmful chemicals. Likewise, introducing criteria for chemicals that are safe and sustainable by design will be critical to ensure a non-toxic circular economy and a reduced risk of exposure overall. Exposure to a mix of chemicals needs to be tackled much more strongly, and I very much welcome the introduction of a mixture assessment factor in this regard. However, I am very concerned about the suggestion by the Commission to abandon the authorization process. It is not the process that is flawed, but rather the manner in which it has been implemented thus far. The authorization process need not be abandoned but rather improved to truly incentivize safe and sustainable alternatives to substances of very high concerns (SVHCs). Front running companies should be favored, particularly as the Commission intends to add several classes of chemicals to the list of SVHCs. Finally, we need stricter controls of imports. There is no sense in having strict regulation in the EU if we let products containing hazardous substances enter the EU market.

Orgalim's key messages on the REACH revision

By Timothée Tierny, Junior Adviser - Energy and Environment at Orgalim

Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering and electronics, and metal technology branches. Together they represent the EU's largest manufacturing sector, generating annual turnover of €2,126 billion, manufacturing one-third of all European exports and providing 11.33 million direct jobs.

Orgalim welcomes the revision of European Union legislation on registration, evaluation, authorisation and restriction of chemicals (REACH Regulation). Our technology industries, major downstream users and article manufacturers are fully committed to reducing the content of hazardous substances in their products to support a more circular economy.

Here are our [key messages](#) on the REACH revision:

- We call on the ECHA and the European Commission to develop better criteria for determining when authorisation and when restriction is applicable.
- Industry needs to be able to continue producing products using chemicals in a level playing field with non- EU countries. Therefore, a REACH restriction rather than authorisation is the preferred instrument to regulate chemicals.
- We urge to keep the scope of REACH Article 33 limited to Substances of Very High Concern (SVHC) and to not broaden the scope to Substances of Concern (SoC). However, if that were to be the case, we would call for a clear definition of Substances of Concern in order to ensure legal certainty and clear procedure rules.
- REACH should continue to be the main instrument for evaluating and identifying SVHCs with the goal of restricting or authorising them.
- Policymaking and decisions regarding chemicals should be risk-based not hazard-based.
- The use of a SVHC and its health impact on workers and consumers should be re-evaluated before a substance is put on the candidate list, with actual data provided by the affected industry accurately assessing the risk of a substance based on its probability of exposure and the health impact.
- Socio-economic factors should be considered earlier from the industry aspect. It should be evaluated in advance whether the consequences of a restriction or authorisation scenario are proportionate to the anticipated benefits to the environment and to health.



#PMFacts: how good do you know rhodium?

Rhodium is one of the six Platinum Group Metals (PGMs). It is also classified as a noble metal and is the rarest of the PGMs, only occurring up to one part per 200 million in the Earth's crust. Rhodium is a very special metal in terms of its performance. It does not react to oxygen easily, is resistant to corrosion and oxidation and most important acts as a fantastic catalyst. Hence, rhodium's primary use is in catalytic converters of automobiles, where it reduces the amount of nitrogen oxides (NOx) exhaust gases emitted into the atmosphere. In 2019, almost 90% of [rhodium demand](#) was from the auto-catalyst sector. In comparison of the three precious metals (rhodium, platinum and palladium) currently used in vehicle catalytic converters, rhodium has by far the highest activity for the removal of nitrogen oxides (NOx) from the exhaust. Without rhodium catalysts, the air in our cities would be much worse due to vehicle exhausts.



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