

EUROMETAUX CHEMICALS MANAGEMENT NEWS



Nanos Taskforce and Evaluation platform 8-9 May

TABLE OF CONTENTS

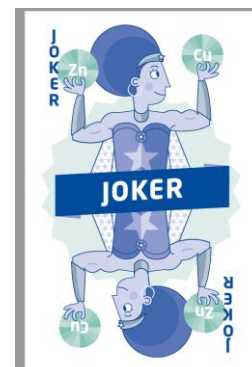
ECHA REACH & CLP Activities: hot topics	3
ECHA Committees	3
UVCBs	3
COMMISSION REACH & CLP Activities: hot topics/issues	3
CARACAL	3
EUROMETAUX REACH & CLP Activities: hot topics/issues	4
Resource mapping to respond to REACH / ECHA challenges	4
Authorisation	5
Metals Sectorial Approach	6
FURTHER OUTREACH OF REACH	7
OTHERS	7
COMMUNICATION	7
CALENDAR	8
ACRONYMS	8

"Communication is a two-way process where the message sent by the sender should be interpreted in the same terms by the recipient". There is an abundance of guidelines to support this rather straightforward objective, putting the accent on the righteous characteristics of an effective communication: clarity of purpose (i.e. the reason for the sender and the listener), completeness (i.e. supported by facts and observations, planned and organised), conciseness, feedback (timely and personal)), empathy (sensitivity to the listener's needs and emotions), modify the message according to the audience (i.e. avoiding jargon). Whilst each of these points leaves some room for qualitative interpretation (and thus variable compliance), the 'conciseness' aspect often falls in a quantitative 'trap'. I'm referring here to the holy number of words or the limit to 'what this template can contain'. My first confrontation with the sacred number goes back in time as the combination of my nice name and surname exceeded the possibilities of all transport/theatre/swimming pool subscriptions where your details need to be displayed. On most of them, I was left with a masculinised first name, making my interlocutor's eyebrows raise during inspections. Actually, I found a series of reasonable explanations for this: there was a societal norm of having max 20 characters and my parents, once more, did not want to follow the rule. Or the person supposed to type the names on my subscriptions could only count up to 20 or even, this was an opportunity provided by the administration to change identity (briefly).

The first "word count" on abstracts was set up by the organising committee of a conference held on a heavenly island, when they became overwhelmed by expressions of interest from potential invited speakers, thus leaving no paying participants left. They had to select those who would get free cocktails and this was the solution they found: 'convince us in 200 words that you should be a speaker'. The trick worked and was taken over by other organisers of events (including in less sunny places). It even got a "glossy label of fairness": putting all candidates in the race to recognition at the same level. From there, the "word count" slowly contaminated all communication areas to finally convince most of us that conciseness equals effectiveness, which can sometimes be questionable.

This plea having already reached 471 words, I'm tempted to propose two solutions here:

- It will be made available soon by Lara, our EHS trainee! Go with the odds!*



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ECHA REACH & CLP Activities: hot topics

ECHA Committees

MSC-59: focus on the scoring table to prepare for the next Authorisation priority list

MSC-59 was unusually short given all scheduled substances and dossier evaluations were able to be agreed upon in written procedures in advance of the meeting. This included the Substance Evaluation on tin sulfate conducted by France, concluding that the requested tests should be conducted with an alternative source substance to prevent local effects, and thus was an excellent learning case for other metals. While written procedures boost efficiency for ECHA and the Member States, it prevents industry from learning from these cases given stakeholders have no insight in them. The MSC chair recognised this concern and installed a pre-MSD discussion with stakeholders during which we were informed on the outcome and reasoning. Eurometaux expressed appreciation for this opportunity. The most relevant agenda point for the metals sector related to the review and discussion on the scoring table to determine the best candidates for the next priority suggestions for Authorisation. The two recently added cadmium compounds and cadmium metal and oxide scored highly, as well as some remaining lead compounds, which make them vulnerable for selection in June by MSC. Eurometaux questioned why the scoring of newly added substances was accelerated by a year, therefore preventing registrants to update their file on time especially now the last deadline prevented many from doing so (more information: Hugo Waeterschoot).

UVCBs

UVCBs: SID and intermediates update

We are glad to report that one of the UVCB inquiries updated at the beginning of 2018, was successfully submitted to ECHA. The ECHA SID experts involved in evaluating the inquiry judged that the registrant used a good template to report such complex substance information, allowing the regulators to understand the identity and the criticalities in deriving the most appropriate name. They also advised to reproduce that template when dealing with substances originating from recovery/refining processes. In a nutshell, the inquiry was built in a way to describe a manufacturing process in detail, explain the source of variability, clarify the origin and variability of source materials and provide a typical set of data to balance the 'unknown' side of the UVCB. The Intermediates Taskforce will soon exchange on this and on other aspects of UVCB Registration Updates (more information: Federica Iaccino).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

CARACAL 26: follow-up on Cobalt, post-2018 and study on authorisation. A lot of work still ahead of us.

As follow-up to the 26th CARACAL meeting, Eurometaux submitted written comments on three main topics: "cobalt classification", "post-2018" and on the "study on authorisation". On "cobalt" the impacts of the proposed classification (CMR 1B – all routes) and Specific Concentration Limit (SCL 0,01%) were reiterated indicating how downstream user legislation would not be sufficient to mitigate them. Particular focus was dedicated to final slags which, despite the demonstrated safe use, might end up disposed of in landfill instead of being considered as a valuable resource, and on the unnecessary burden for industry in relation to the Medical Devices Regulation (i.e. labelling and justification of the presence of cobalt in case of dermal and tissue contact). Concerns were also raised regarding the appropriateness of the methodology used to establish the SCL. On "post-2018", Eurometaux asked the Commission to clarify the legal basis to introduce a cut-off date that will terminate the phase-in status under REACH that might trigger the need to update registration dossiers for substances that benefited from reduced data requirements in the registration dossiers (ref. REACH Annex III criteria); for this purpose it was also requested to properly consider the time needed by REACH consortia to plan actions and budget for dossier updates. On the outcome of the study on REACH Authorisation, Eurometaux recognised that the Authorisation scheme induces substitution but highlighted that the study could not draw conclusions on the performance (efficiency and effectiveness) of the Authorisation scheme compared to other possible regulatory routes; it was suggested to enhance the importance of RMOs and the need to broaden their scope by considering additional policy dimensions, such as the circular economy. Additional comments were also submitted on TiO₂ by TDMA and on the Nickel guidance by the Nickel institute/NiPERA (more information: Lorenzo Zullo).

CARACAL subgroup on TiO₂: intense discussions on 23 April

As follow-up to the 26th CARACAL meeting, Commission has invited Member States and stakeholders to participate in an expert meeting, aiming at collecting their views on both the proposed classification of TiO₂ as Carcino Cat 2 and more broadly,

on how to address the hazards of Poorly Soluble Low Toxicity particles (PSLTs) under CLP. The meeting, attended by 17 Member States and several industry associations, was structured along the following questions: Is particle toxicity an intrinsic property of a substance? Can we use CLP to classify particle effects? What is the appropriate entry in Annex VI for TiO₂ (should the entry be for example limited to the respirable form and/or can notes be added to clarify what is actually classified)? A key question posed by industry, but also by several Member States, is what EU actually wants to achieve by classifying TiO₂ under CLP? If the concern is related to dust at the workplace, a dust limit may indeed more effectively address it. The debate moved to the PSLTs in the afternoon, but the emerging feeling was that there is still a lot of work to be done on terminology and testing before being able to envisage "group entries" for classification of PSLTs. Interesting to note in this perspective is the announcement by ANSES that they are working on a definition of PSLTs along definite criteria, the news that ECETOC will update its report TR122 on Poorly Soluble Particles/Lung overload and the development of an adverse outcome pathway for TiO₂ by industry. DG Grow and Environment will now review points raised during the meeting and consult with other DGs and the REACH Committee (July) (more information: David Lockley and Violaine Verougstraete).

EUROMETAUX REACH & CLP Activities: hot topics/issues

Resource mapping to respond to REACH / ECHA challenges

SpERCs: *the cross-industry taskforce will meet ECHA and Member States before the summer*

As part of the 2018-2020 ENES work-programme, the SpERCs Taskforce, in cooperation with ECHA and Member States (MS) is expected to develop a set of quality criteria that could be used to support industry and third parties to review the SpERCs in order to increase their quality, as well as buy-in by authorities and REACH registrants. While discussing these criteria, it emerged that there is a misalignment between industry and ECHA on the final purpose of the SpERCs. The main issue is that industry has been considering the SpERCs as a tool to support REACH registrants to conduct a more accurate risk assessment while ECHA is looking beyond that and believes that the SpERCs should be integrated in the full "REACH communication machine", linked to the use maps and easily transferrable to SDSs without losing information on the assumptions on which the SpERCs were built. According to ECHA, the information reported in the SpERCs' factsheets should therefore be sufficiently accurate and complete to be used directly for communication purposes along the supply chain. Considering the extra work and rethinking that might be required as consequence of such interpretation, a face to face meeting with ECHA and MS representatives will be organised before the summer break with the objective to align ECHA/MSs/industry understanding and to discuss a possible way forward. A preparatory SpERCs taskforce web-conference will be organised in May (more information: Frederik Verdonck and Lorenzo Zullo).

Classification of cobalt metal: *the socio-economic impact assessment on final slags may play a crucial role but needs further input from companies*

The Commission as well as the Member States need a solid incentive to potentially postpone the application of the Specific Concentration Limit on the Co-metal classification as a Carcinogen cat 1B, while ordering a review of the method in defining the potency assessment for metals. One of those arguments is the impact the SCL would have on the use of final slags from the sector. A first phase of the study launched by the final slags taskforce concluded that a representative pilot case on metal recycling proved the slags would not be useable anymore in construction materials so the impact would be very serious for any company involved and even society would bear a significant cost given they pay for the substitute, a natural aggregate. The pilot case allowed to build a spreadsheet-based model that would allow other companies to check the impact this would have on their sites. Indeed, the impacts need to be broad and spread EU-wide before the Commission will act. Eurometaux aims at proving this in the second phase of the project by circulating a data collection sheet in April and receiving several submissions. However, some major players are still lacking and efforts are ongoing to also ensure their contributions that would recognise the problem and therefore kick off a search for a review of the carcinogenicity potency model. The spreadsheet will be turned into a web-based model linked to MeClas in a third phase of the project to allow an estimation of the socio-economic impact of any relevant change in the classification of slags (more information: Michel Vander Straeten or Hugo Waeterschoot).

CLP: *updated environmental classification proposal on copper biocide form makes scientific progress industry says*

Copper granules in a biocide form of copper for which a classification proposal is presently under review by RAC. The first opinion presented by the Rapporteur on the case was debated by RAC earlier this year but failed in concluding on critical issues like the use of standard versus all data (including non-standard tests), normalisation for bioavailability, typical assessment approaches for data rich substances and others. The RAC rapporteur recently released a second opinion, including replies to some of the concerns raised at the meeting, which was studied by the sector. Eurometaux and the copper sector concluded that important progress was made in respect to a balanced recognition of approaches for data rich substances and focussing

on standard species, but that other aspects still remain challenging. The proposal will be debated and concluded by RAC on 5 June certainly setting a milestone for further metal cases (more information: Stijn Baken or Hugo Waeterschoot).

Coal Tar Pitch: *metals user sector met with ECHA on clarifying uncertainties related to authorisation duties*

In follow-up of a letter received from ECHA, Eurometaux organised a workshop with users of Coal Tar Pitch High Temperature in the metal sector aiming to clarify outstanding questions and uncertainties on the relevance to prepare Applications for Authorisation under REACH. ECHA helped in replying to the questions posed by industry, most of them still relating to the definition of the intermediate status for their uses. In turn, ECHA asked industry to provide rough estimates of how many applications could be expected. The conclusion was that there would be several AfAs but not many for the use of the CTP-HT in the metals sector, because several uses are in line with the intermediate use definition. In other cases, CTP-HT will be substituted by alternatives. Among the alternatives considered by the users, one presents the specificity that even if it is not listed on Annex XIV, it may have comparable hazard properties to CTP-HT. This means that whilst it is legally feasible to substitute towards this alternative -it is compliant with REACH- one may wonder whether this can be recommended. It should be noted that the Carcinogens Mutagens Directive (CMD) will apply equally to the substitute to guarantee proper risk management practices (more information: Violaine Verougstraete and Hugo Waeterschoot).

Exposure Scenarios: *meeting 27 April*

The Exposure Scenario Taskforce discussed the latest developments on the ongoing activities within the taskforce and agreed on how to best improve them, while meeting further regulatory expectations. The Mass Flow Analysis (MFA) exercise outcomes were debated with the aim to develop good practices for future reporting in the dossiers and for further discussion with ECHA, who recognizes its importance in demonstrating that industry knows where their substances go and where there may be exposures/releases. The taskforce shared preliminary developments of Use Maps for e.g. alloying activities and defined how to best progress, as these will become important tools when all relevant information on uses are correctly reported and linked to the appropriate SpERCs. The status of the SpERCs' activities ongoing at ENES was reported. The aim of the cross-industry activities on SpERCs (performed under Eurometaux's chairmanship) is to define quality criteria to be used as a basis for the SpERCs quality check: ECHA clarified the importance of achieving high transparency in SpERCs/Exposure conditions' reporting and some metals SpERC factsheets have already been updated accordingly. Next to the SpERCs' factsheets, specific Chesar factsheets were developed to allow their direct upload and use in Chesar, e.g. for the new SpERCs developed on wide dispersive use Chesar factsheets were developed (SpERCs factsheets are available at: <https://www.arche-consulting.be/tools/spercs-tool-for-metals-2/>). The use of Chesar to automate exposure scenarios and the chemical safety reports generation was presented. Advantages of using Chesar were streamlined also when dealing with more complex cases, where e.g. assessment entities are used in IUCLID 6. A live demonstration of MEASE 2.0 was provided, giving the participants the possibility to appreciate how the tool works in practice (more information: Federica Iaccino, Violaine Verougstraete and Lorenzo Zullo).

Authorisation

Authorisation & Restriction platform: *legal study on the interpretation of CARACAL on substances (impurities or minor constituents) in substances/mixtures*

End of 2017, CARACAL published a paper on how Member States would like to assess substances in substances or mixtures, this resulted from a debate of the Member States in closed session. The paper includes some surprising interpretations, like the need for symmetry to ensure that impurities/minor constituents in substances are treated equally to their use in mixtures. This is especially important for UVCB-containing minor materials that would become, as a whole, authorisable if the minor constituent or impurity (in case of a mono or multi-constituents), was to be listed on Annex XIV. Eurometaux contests this and remains convinced that the UVCBs should be listed on the Annex XIV first and the minor constituent should have a functional use. The A&R platform proposed to ask for a legal opinion on this case to promote a better understanding so an appropriate communication and advocacy plan can be developed. A Terms of Reference was drafted and offers solicited by the 10th of May (more information: France Capon and Hugo Waeterschoot).

Nanos

Policy Conference: *"a future-proof approach to Nanomaterials"*

The Dutch Ministry of Infrastructure and Water Management invited the Nanomaterials stakeholders for a follow-up of the ended projects NANoREG and ProSafe 17-18 April to Rotterdam. Based on the ProSafe project's White Paper (please note: the White Paper proposes recommendations for policy makers and regulators to solve or work around the problems and limitations identified during the project) the meeting aimed to induce (new) projects and alliances between all kinds of stakeholders to further work on the regulation of Nanomaterials. This resulted in 11 different initiatives which were discussed

on the second day, in small working groups of interested parties. Eurometaux considered five projects as most interesting or important to follow: creating access to zero-effect data initiated by NIA, a EU-MS+ platform to strengthen coordination and collaboration (proposal by Sweden), improving REACH information requirements based on the position of some Member States that the (new) REACH Annexes for NM are not suitable for long-time use, a NanoSafetyCluster (NSC) regulatory sub-group to coordinate and ensure research relevance (which could grow beyond the NSC) and a process to support legal definitions (Nanomaterials, Nano Forms, Grouping) to achieve a less abstract but pragmatic legal text (mostly supported by industry). The degree of involvement by Eurometaux will be discussed at the following taskforce meeting. Overall the policy conference was very much welcomed and appreciated by all stakeholders and it is planned to continue with this concept. Finally the Dutch Ministry is providing a page where actions can be followed up in the future:

https://rivm.nl/en/About_RIVM/Mission_and_strategy/International_Affairs/International_Projects/Completed/ProSafe/Policy_Conference_17_18_April_2018 (more information: Nathalie Kinga Kowalski).

Metals Sectorial Approach

MISA: follow-up of REACH Forum discussions and progressing to more concrete actions

At its last meeting (21 March), the REACH Forum had made a number of suggestions on how to further improve the MISA generic rolling plan and the 'charter' or 'memorandum of understanding', this document outlining more concretely both ECHA's and industry's engagement in MISA. These suggestions, along with further comments from ECHA -and in particular the ECHA's lawyers- were considered in an updated generic rolling plan and 'charter' that were distributed end of April to the MISA Steering Committee for a last check before their finalisation and circulation. The generic rolling plan, which compiles the priorities agreed upon by the sector on both tracks (track 1: improvement of the quality of the registration dossiers, track 2: resolving a selected number of outstanding technical challenges specific to the metal/inorganic sectors cooperatively with ECHA) will be made publicly available, so to maintain transparency vs. stakeholders but also trigger the interest of Member States and Commission to participate in track 2 debates. The REACH Forum agreed to share with ECHA their consortia action plans, bilaterally. These action plans would provide a clear signal of engagement at consortium level and more precise indications on the deliverables (e.g. timing for updates, work to be done). The Forum expressed the concern that if only a small part of the sector participates in MISA, it may be wrongly perceived by the external world, making those who accomplish the effort in the spotlight and thus becoming identifiable, while others would remain "under the radar". The Forum acknowledged that all MISA actors should make further efforts to contact the rest of the metal compounds/inorganics but that this needs to be a shared responsibility between ECHA and industry. Finally the Forum asked to have some communication material prepared. All these constructive proposals allow us to now move on with the preparation of the next steps: the organisation of the 'memorandum of understanding-signing event and the first workshop on read-across and weight of evidence, which should take place end of August. A more precise timeline and agendas will be circulated soon (more information: Hugo Waeterschoot, Lorenzo Zullo and Violaine Verougstraete).

Post-2018: chemical management trends and restructuring

Two items related to Chemicals Management were on the agenda of the Eurometaux Executive Committee for its meeting on 26 April. A first presentation allowed to provide an update on the most recent development in chemicals policy and how the sector is preparing its responses to the different components of a "Non-Toxic Environment" thinking of, e.g. the REACH and CLP REFIT, the Chemicals/Waste/Products Interface, the SAICM 2020 objectives and the United Nations Sustainable Development Goals. The presentation highlighted that to defend our risk-controlled approach, the metals sector will have to address several aspects 'of concern' for the policy maker. It will have to ensure and demonstrate a state-of the art knowledge of our materials, work out materials flow analyses to identify where possible exposures may occur, propose a constructed response to the push for substitution and ensure cooperation through the supply chain. These challenges and the need to have exchange forums with the authorities to promote our metal specificities require a thought-through advocacy, but also justify the setup of the MISA. The Executive Committee endorsed the proposed Advocacy/Communication Plan and the cooperation with ECHA on the Sectorial Approach. The second presentation highlighted the need to design the appropriate 'Chemicals Management' structure in Eurometaux so as to catch the opportunities that are appearing with the chemicals policy trends and their challenges, while providing the most adequate responses and ensuring the best support, on a sustainable basis. This also requires a reflection on resources. A small group of volunteers has started to reflect on how to best adapt the EHS and REACH structures after the 2018 Registration deadline. The Executive Committee approved the key principles identified by the support group and work will continue to select the most adequate means to formally merge the REACH and EHS activities in one coherent department (more information: Violaine Verougstraete).

FURTHER OUTREACH OF REACH

OTHERS

ECMA Catalysts Intermediates: *draft guidance on metals used in catalysts and precursor material presented to ECHA*

The Eurometaux intermediates programme aims at clarifying and streamlining the interpretation on the intermediate status and boundary with article status, for complex inorganic materials and uses a critical issue for substances on the candidate list. This exercise involves multiple interactions with ECHA based on a draft guidance developed by Industry. ECMA (the European Catalyst Manufacturers) recently developed a draft industry guidance on the intermediate status of catalysts and their precursors for discussion with ECHA. The guidance was reviewed in March and the discussion with ECHA took place on 24 April. ECHA reacted favourably to the guidance proposed but first wanted some further clarification, especially on the use part of the catalyst, before agreeing. The guidance once adopted will help the sector to ensure a common view on the intermediate status of metal compounds used in catalysts and their precursor materials while providing ECHA and enforcing authorities with a reference for a harmonised view (more information: Brett Pinker and Hugo Waeterschoot).

Brexit: *workshop on how to address key challenges for the European metals industry*

Significant outstanding questions remain regarding the future EU-UK trading relationship and market access for non-ferrous metals. There are also remaining uncertainties whether European and UK companies will continue to operate on a level playing field in the areas of environmental, climate protection and non-tariff barriers. Eurometaux, under the lead of the Trade department, organised a workshop on 16 April, aiming at having detailed exchanges with two members of the European Commission's Brexit negotiating team, and key representatives from the UK and Belgian governments as well as the Confederation of British Industries (CBI). Breakout sessions allowed participants to formulate a prioritised set of political recommendations to negotiators for trade, environment, and energy/climate change issues. It was concluded that a united industry position on these issues, together with strengthened links with key EU and UK stakeholders, will allow industry to best cope with the effects of Brexit. A report of the workshop has been circulated to the participants and the recommendations developed during the Workshop will be incorporated in a Eurometaux position paper on Brexit, to be used as basis for future discussions (more information: Elena Vyboldina, Cillian O'Donoghue, Chris Heron and Violaine Verougstraete).

COMMUNICATION

International Zinc Conference - Europe: *duet on chemicals policy*

Eurometaux was kindly invited to make a presentation on trends, challenges and opportunities in environmental Regulatory Affairs at the recent International Zinc Conference – Europe, held in Stockholm on 23-24 April. The presentation, given in 'duet' with IZA-Europe, highlighted the tendencies we see in chemicals management, like the drift to 'close the loop' and obtain control over the lifecycle of a substance -including at the articles' stage- but also the globalisation of objectives like reducing the overall 'hazardousness'. The change in the REACH activities after the 2018 Registration deadline and the need to maintain and optimise data quality/risk management were brought up as well as the need to further invest in communication to ensure that authorities better understand what is already ongoing, what remains to be done and how our specificities fit in this context. Some emphasis was put on the management of impurities in our materials as increasingly, REACH and CLP authorities focus their attention on the hazard generated by these minor constituents and propose to regulate them via classifications, potential authorisations or occupational exposure limits. The presentation ended by concluding that the current chemicals management context also provides important opportunities in allowing metals to be profiled, rewarding the investments made in both the scientific and knowledge aspects of our processes, quite characteristic for our sector. For each item of the presentation, both the multi-metallic and the zinc perspectives were presented to the audience, illustrating that crucial complementarity of the work achieved by Eurometaux and commodities (more information: Frank Van Assche and Violaine Verougstraete)

CALENDAR

- 8 May: Evaluation Platform – MCC (Brussels)
- 9 May: Nanos Taskforce – MCC (Brussels)
- 4-8 June: RAC-45 – ECHA (Helsinki)
- 4-5 June: EUSES Workshop – (Brussels)
- 11-15 June: MSC-60 – ECHA (Helsinki)
- 11-15 June: SEAC-39 – ECHA (Helsinki)
- 20-21 June: Management Board-50 – ECHA (Helsinki)
- 27 June: Authorisation & Restriction Platform – MCC (Brussels)
- 28 June: REACH Forum – MCC (Brussels)
- 10-14 September: RAC-46 – ECHA (Helsinki)
- 10-14 September: SEAC-40 – ECHA (Helsinki)
- 18 September: Authorisation & Restriction Platform – MCC (Brussels)
- 19 September: REACH Forum – MCC (Brussels)
- 27-28 September: Management Board-51 – ECHA (Helsinki)
- 8-12 October: MSC-61 – ECHA (Helsinki)
- 16 October: Evaluation Platform – MCC (Brussels)
- 17 October: Nanos Taskforce – MCC (Brussels)
- 28 October-31 October: RAC-47 – ECHA (Helsinki)
- 19-23 November: RAC-48 (A)– ECHA (Helsinki)
- 26-30 November: RAC-48 (B)– ECHA (Helsinki)
- 26-30 November: SEAC-41 – ECHA (Helsinki)
- 10-14 December: MSC-62 – ECHA (Helsinki)
- 13-14 December: ECHA Management Board-52 – ECHA (Helsinki)
- 17 December: Authorisation & Restriction Platform – MCC (Brussels)
- 18 December: REACH Forum - MCC (Brussels)

ACRONYMS

AfA: Application for Authorisation	MISA: Metals And Inorganics Sectorial Approach
CARACAL: Competent Authorities for REACH and CLP	MSC: Member States Committee (ECHA)
CBI: Confederation of British Industries	NM: Nanomaterials
CLP: Classification, Labelling and Packaging Regulation	NSC: NanoSafetyCluster
CMD: Carcinogens and Mutagens Directive	PSLT: Poorly-Soluble Low Toxicity
CMR: Carcinogens, Mutagens or toxic to Reproduction	RMO: Risk Management Options
CTP-HT: Coal Tar Pitch High Temperature	SAICM: Strategic Approach to International Chemicals Management
ENES: Exchange Network on Exposure Scenarios	SCL: Specific Concentration Limit
IUCLID: International Uniform Chemicals Information Database	SDS: Safety Data Sheet
MEASE: Occupational Exposure Assessment Tool for REACH	SID: Substance Identity
MeCLAS: Metals Classification Tool	SpERC: Specific Environmental Release Category
MFA: Mass Flow Analysis	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials