



## EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

*“The elevator chat” exercise: I got quite intrigued by the concept when one of my Eurometaux colleagues mentioned that he managed to sell the relevance of holding a debate on recycling/ circular economy/authorisation to an EU Commissioner in an Asian elevator. The theory behind the exercise says that it is about seizing the “teachable” moment; finding the succinct, meaningful way of communicating about a project or an issue.*

*Upon which, I tried to figure out some “elevator chat” scenarios, starting from the North and moving back to Brussels:*

- *Let’s take an elevator in ECHA: as an industry person, your mobility in ECHA is quite limited: you are identified by a single day badge (including a red dot if you deserve lunch) that does not allow you to go anywhere else than to the basement or the canteen. The elevator is packed with stakeholders transported at high speed to the ‘cellars without daylight’ where the meetings are held. I discovered recently that some Committee experts bravely take the stairs. But the way down, barely lit, with twists and turns, is not conducive for having conversations, except with some of the ECHA staff checking why a single day badge is walking around.*
- *An elevator at Commission: take the ‘grey cages’ in Breydel, with their stops at every floor and amassed people trying to escape via the mysterious ‘level 5’ ...your thoughts are devoted to keeping on breathing and trying to understand the logic. Compared to that, Beaulieu with its plants and glass roof looks like a greenhouse. But by the time you’ve gathered whether the ladies running around are butterflies or not, you have arrived at your destination and the meeting starts.*
- *The Metals Conference Centre: is actually the best place –if you are lucky- to transform an elevator chat into a long exchange of thoughts, including on claustrophobia. While you won’t be disturbed by the intense communication of the maintenance service, you may be by the ‘inhabitants’ of the rest of the building, so acquainted with these elevators that they know that banging on the doors will at some point reactivate movement. We have health-based elevators: “better take the stairs” is the message.*

*But it seems that my scenarios may lack a bit of an international touch.*

*So, I could imagine a silent, luxurious and covered with carpet elevator in Shanghai, New York or Tokyo, which would have to gravitate 32 floors, giving me the time to feel like Bill Murray (“Lost in translation”). And for a more modern touch, I could even sketch one of those outdoors lifts, made of glass again, bringing people to its centre to avoid vertigo.*

*I have the elevator, so now for the regulator. If he/she is a popular one, we may be several attempting to share the way to heaven. How to manage that? Jostle, spend the day next to the elevator, set up a queuing system to each have our “teachable” moment? The exercise may well become a pre-elevator struggle exercise.*

*Oh...but suddenly, here I go. Coincidence or miracle of God Advocacy, I did it: I’m locked in a 1 square meter space with the Director I had targeted, to travel 15 floors together. He is fixing his phone, texting, avoiding any eye contact after the short indifferent nod he gave when entering the elevator. I could cough, raise my voice, call him by his name, twist my foot, spill coffee but there it goes; I have an empty head, unable to remember what I wanted to communicate about. Probably the effect of altitude: I will let him get out, in profound silence (he will give short nod when he exits) and go back to the ground floor to remember what it is all about...*

Violaine Verougstraete, EHS director Eurometaux

# ECHA REACH activities: hot topics

## ECHA COMMITTEES

### **RAC-40: Geert Dancet, glyphosate, AfAs, CTP-HT**

The two weeks of RAC meeting started with a speech from Geert Dancet, who highlighted the huge amount of work done by RAC but also mentioned the amendment of the Carcinogens and Mutagens Directive and Commission's communication on OSH/REACH that 'introduce an equivalence between OELs and DNELs'. He announced that RAC will be further asked to develop dose-responses and DNELs, which would allow Commission to use the outputs from both Committees so as to revitalise the OSH Directives. This actually introduced the announcement by the RAC Chair that RAC has been requested by Commission to work on several substances to develop Binding OELs/dose-responses, including for arsenic acid and compounds and MOCA (before end May), nickel and nickel compounds, acrylonitrile and benzene (before 26 March 2018). Eurometaux and the Nickel Institute will follow up on this announcement –that may set precedents for other metals as well- as there are several uncertainties related for example to scope, participation of industry experts and consideration of the SCOEL practical threshold. RAC also endorsed the report produced by the Joint SCOEL/RAC Taskforce on the comparison of methodologies when deriving OELs/DNELs for the inhalation and dermal route. The rest of the first week of meetings was devoted to Restrictions and the review of Authorisation Applications. RAC adopted its opinion, in support of the proposal by ECHA and Denmark to restrict the four phthalates (DEHP, DBP, DIBP and BBP) in articles. The recommendation is to ban phthalates in articles that cause exposure through the skin or by inhalation, such as flooring, coated fabrics and paper, recreational gear and equipment, mattresses, footwear, office supplies and equipment, and other articles moulded or coated with plastic. RAC also supported the proposal by Denmark to restrict the placing on the market of sprays used for the general public containing TDFAs derivatives. SEAC agreed its draft opinion in support of the proposal. The products should not be placed on the market if they contain TDFAs in a concentration equal to or greater than 2 parts per billion by weight in a mixture with organic solvents. Spray products comprise aerosol dispensers, pump and trigger sprays and mixtures marketed for spray applications. The restriction proposal on lead compounds in PVC was estimated in conformity. On authorisation, RAC and SEAC committees agreed in total on 19 draft opinions on the specific uses of chromium (VI) substances, 1,2-dichloroethane and diglyme. Two CLH dossiers triggering a lot of interest, including from media, were discussed during the second week. For glyphosate, the committee concluded that the scientific evidence available now warranted the following classifications for glyphosate according to the CLP Regulation: Eye Damage 1; H318 (Causes serious eye damage), Aquatic Chronic 2; H411 (Toxic to aquatic life with long lasting effects) but did not meet the criteria in the CLP Regulation to classify glyphosate for specific target organ toxicity, or as a carcinogen, as a mutagen or for reproductive toxicity. For titanium dioxide, a first discussion took place aiming at highlighting the 'key issues' that will be touched upon in the context of the proposed classification of this material (carcinogenicity Cat 1B, by inhalation). This debate aimed at 'familiarising' the RAC with inhalation toxicity aspects for particles and the lung overload concept. The next discussions will take place in June and September. The Eurometaux stakeholder observer was accompanied by DrBattersby, in view of the possible precedent-setting of this discussion for other poorly soluble particles without cell toxicity (more information: Violaine Verougstraete).

### **SEAC-34: a series of restrictions and authorisations under review**

SEAC 34 will probably be remembered as the meeting with the largest number of AfAs to be reviewed. The Committee paid specific attention to ensure that the conditions and review periods were as comparable as possible when applicants (parallel manufacturers or importers) applied for the same supply chain and provided an equivalent demonstration of technical and economic feasibility. Several applicants requested more than 12 years, using reasons such as the time of installation or lack of substitutes for the long foreseeable future. Those requests were rejected due to the lack of a framework for longer periods, but also because specific exceptional motivations were missing. Remarkable was a case on an organic substance for which the impact costs of the Man via the Environment scenario, based on excess risk, reached more than 100 times those of the workers. Other cases raised significant precedents like e.g. benefits in the order of > 10 € for an application cost that must be 10,000 x higher and a case whereby a threshold substance failed adequate control and no dose response information was available. The next A&R will look into these cases to draw learning lessons for upcoming applications of the metal sector. One case on chromium trioxide required an intervention from Eurometaux and Cefic, as the "right to know" of the applicant was breached due to SEAC considerations on the Review Period and conditions not being communicated to the applicant during the 2<sup>nd</sup> Public Consultation round. SEAC also debated the conformity of Pb and Pb compounds in PVC and agreed that the dossier was in conformity. Eurometaux requested to have the scope put on Pb compounds, deleting Pb metal from it. The Key Issues discussions focussed mainly on how the breakeven analysis would be the right approach to demonstrate proportionality for a restriction with very small costs to implement. From a conceptual and methodological perspective, it was really a remarkable SEAC meeting (more information: Hugo Waeterschoot).

## **RAC-SEAC: presentation of the outcomes of the scientific seminar on Man via the Environment**

Learning lessons and key conclusions from the “Man via the Environment assessment seminar” held on 26 January were presented by Eurometaux to both RAC and SEAC. This seminar aimed at identifying how the Man via the Environment scenario could be further improved, specifically for metals and inorganics, so as to ensure the results would be relevant. This scenario has become even more important now that it is used for Restrictions and Authorisations, in which the emissions of companies are translated in monetised impacts. The seminar provided clear suggestions on what type of data and changes of existing models would improve the assessment, in a tiered way. The seminar was co-organised by RIVM, ECHA and Eurometaux and presented as such to the ECHA committees. Both committees recognised the value of the recommendations and suggested to move forward with the improvement of EUSES for metals/inorganics, as an enhanced first tier. The committees further indicated they would welcome guidance that could ensure that the Man via the Environment assessment would result in more appropriate outcomes in future applications for authorisations for inorganics. RIVM, ECHA and Eurometaux confirmed their interest to work on these suggestions (more information: Violaine Verougstraete and Hugo Waeterschoot).

## **AUTHORISATION**

### **AfA training for potential future applicants on 18-19 April: a combined effort from ECHA, Eurometaux and Cefic**

ECHA, Eurometaux and Cefic organise every 2 years a training session for future Authorisation Applicants. This year’s session is scheduled for 18 and 19 April in Helsinki. As these trainings intentionally focus on practical experience, it will start with a presentation and explanation of the recently published “ECHA Practical Guide on how to apply for Authorisation” ([https://echa.europa.eu/documents/10162/13637/apply\\_for\\_authorisation\\_en.pdf/bd1c2842-4c90-7a1a-3e48-f5eaf3954676](https://echa.europa.eu/documents/10162/13637/apply_for_authorisation_en.pdf/bd1c2842-4c90-7a1a-3e48-f5eaf3954676)) complemented by case studies presented by consultants on different aspects such as organisation, SEA and AOA development, etc. The second day will focus on the questions raised by participants whilst completing their registration as well as providing discussions in “café style” on specific themes like the upcoming CTP-HT AfA challenge. The interactive nature of the workshop will allow participants to discuss AfA aspects directly with ECHA staff including the chairs of the Committees who will review the Applications once they have been submitted (more information: Hugo Waeterschoot or Erwin Annys).

## **UVCBs**

### **Substance Identity of inorganic UVCBsD: a visit of ECHA in Umicore**

On 31 March, representatives from ECHA’s SID Unit, Umicore, Eurometaux and consortia met in Hoboken to further debate UVCB SID aspects. Umicore kindly provided the opportunity to combine discussions with an on-site ‘metallurgical workshop’ on metals specificities and difficulties in assessing SID to match what has been prescribed by REACH. Discussions led to the conclusions that the Substance Identity Profile (SIP) format developed and submitted to ECHA in August is a good basis, although some further qualitative descriptions on the known metal species present/not present should also be reported. On the other hand, when coming to legal entity specific data, ECHA maintained its requests to receive more specific information than what we proposed in the SIPs. At the end of the meeting, an acceptable way forward was identified by agreeing that *qualitative* descriptions would be acceptable, as long as those are justified by process/chemistry knowledge and/or qualitative XRD analysis, and that all this additional information is reported in the legal entity IUCLID & CSR. Additional aspects on grouping of UVCBs were debated at length, but might be solved only when the further refinements are completed. As follow-up of the meeting, ECHA will share the procedures to use in case refining SID of an existing dossier would require a split into more dossiers. They already indicated that there will only be a technical fee per registrant (300€) associated with that. After Easter, an invitation will be sent to the Eurometaux Intermediate Taskforce to have a meeting so as to report on the outcomes, harmonise the further efforts for the refinement of SIDs and decide how to tackle combined toxicity (more information: Nathalie Dom, Frederik Verdonck, Katrien Arijns and Federica Iaccino).

## **DATA-SHARING**

### **Free-riding during updates: meeting with ECHA, some ideas launched**

On 8 March, the chairs of the data-sharing Taskforce and Eurometaux had the opportunity to discuss with several ECHA representatives some of the issues faced when updating dossiers, more specifically the fact that some (co-)registrants stop contributing to the cost of keeping the dossier up to date after obtaining a registration number, leaving the consortia secretariats and remaining contributors in a non-sustainable situation. ECHA invited Eurometaux to present some specific cases and make proposals on how this issue of the data-sharing/joint submission after registration could be addressed. ECHA agreed that a lack of (interest in) updates is a key obstacle for REACH success. They also launched several ideas in the discussion, like

e.g. having a validity period to be applied on registration numbers as it may be helpful to justify and trigger updates outside Dossier or Substance Evaluations. Circulation of Dossier Evaluation decisions to all registrants and not only to the Lead Registrant will allow to raise awareness on a specific update need. However it will not necessarily trigger an intention to contribute to the update. Working through the completeness check feature may not help as most information is submitted only once via the lead registrant, so a manual Completeness Check will not discriminate existing registrants who contribute to the update of the joint information from those who do not/free-ride. They also announced that the October update of REACH-IT will allow all registrants (not only lead registrants) to see which Annexes have been fulfilled by each registrant and whether they are active/inactive or have opted out from the joint submission. ECHA and industry agreed to continue their dialogue and use the REACH Review and a possible Implementing Regulation on updates to identify solutions to ensure the effective and fair implementation of updates. The REACH Review in particular should address gaps in the regulation which prevent the set-up of a truly collective responsibility for each joint submission, even beyond 2018. Further details can be found in the minutes of the meeting circulated on 9 March (thanks to the superefficient chairs!) (more information: Caroline Braibant, France Capon and Violaine Verougstraete).

## **OTHERS**

### **MSC workshop on the Integrated Regulatory strategy: “mapping the chemicals universe”**

The EU Commission, ECHA and Member States committed to the UN SAICM 2020 chemicals management targets, translating those in two main EU objectives: ensuring complete and good quality registration files for all chemicals > 1 ton and having all chemicals > 100 tons evaluated for potential further information or risk management needs, or identifying them as chemicals/uses of chemicals of low to no concern. This process is called “mapping the chemicals universe”. This MSC workshop debated measures that could help speed up the screening of the remaining 3000 chemicals that have not been evaluated so far (including almost all UVCBs and many metals and metal compounds). The primary aim is to identify potential unknown concerns as much as possible through massive electronic and manual screening methods. The debated Integrated Regulatory Strategy provides an overarching framework encompassing the screening tools like ACROSS but also Evaluation and RMOA assessments. Initiatives like grouping of substances and sectorial approaches (like the metal sectorial approach and the pilot cases) were identified as additional measures that should help Member States and ECHA to achieve 2020’s ambitious targets. Outcomes of this workshop were presented to CARACAL (see below) and ECHA’s Management Board, where they received wide support from the MSCAs (more information: Hugo Waeterschoot).

### **ECHA Management Board meeting: confidentiality and transparency**

The 45<sup>th</sup> Management Board meeting package was somewhat ‘lighter’, presumably because the 2018-2020 work plans had already been adopted and due to the ongoing selection procedure for the new Executive Officer, which is preventing the sitting Executive Officer to take too many forward-reaching actions. The preparatory call with the other industry sectors identified some of the topics as directly relevant for industry. The most important ones included: 1) an audit report on the security level of confidential data, which demonstrated that several Member States as well as some Commission services are in breach of the requirements. Industry, represented by Peter Smith at the meeting, requested strongly to have this situation corrected as soon as possible. 2) The Management Board was informed on the progress made with the Collaborative Approach (former ‘Pilot Cases’), now being a subproject of the Integrated Regulatory Strategy. It was confirmed that Germany formally selected the Antimony compounds. 3) ECHA still receives large numbers of high tonnage registrations raising questions on how to handle late comers. Finally, Eurometaux highlighted the increasing importance of RIME due to a growing portfolio of tasks (PACT management, RMOAs, suggestions for SVHCs, criteria for ACROSS, ...). PACT becomes more and more a parallel way for MSCAs to discuss critical issues for industry in a non-transparent way without any observers’ attendance or input. The industry delegation agreed to explore informally with the ECHA secretariat how this process could be made more transparent (more information: Hugo Waeterschoot).

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## COMMISSION REACH activities: hot topics/issues

### **CARACAL**

#### **Outcomes CARACAL 22-23 March: heavy agenda**

The first 2017 CARACAL meeting discussed a range of CLP and REACH topics, but also provided a status update on aspects like the Circular Economy and the REFIT discussions. On the first day -the new registration requirements for substances manufactured/imported in Europe between 1 to 10 tonnes not to be implemented before 2018- were discussed based on the

outcome of a consultant study showing benefits in increasing information and testing requirements. Industry's concerns on the additional unexpected burden will be considered in the discussions that will be held in follow-up. On the OSH/REACH interface, the European Commission announced its plan to use RAC as scientific body to be consulted for the determination of certain occupational exposure limits. The choice between RAC and SCOEL will be done on a case by case basis. RAC's opinion would be forwarded to the Advisory Committee (ACSH) without passing by SCOEL. This announcement generated several reactions from Member States and industry, concerned by the already high workload of RAC but also by the expertise such activities require and that are more specifically present in SCOEL. Alternative regulatory options for skin sensitizers will require further discussion due to the current lack of methodology to demonstrate permanent skin damage, a necessary condition for including them in the Candidate List. The second day of the meeting focused mainly on the status of REFIT. Commission and consultants provided short overviews on the projects carried out in the context of REACH & CLP REFIT, as well as the Non-Toxic Environment (NTE) Strategy. Commission described in several presentations how the different projects all aim at implementing the 2020 SAICM, the 2030 UN Sustainable Development, and the 2050 NTE goals. In practice, this means that besides the Public consultation -that resulted in hundreds of comments- Commission launched a myriad of studies covering almost all aspects of REACH and CLP, to check if the processes deliver, are efficient and contribute to the overall goals. The CLP REFIT studies outcomes were presented in more detail by RPA, emphasising for example, that the effectiveness of the CLP on risk management is limited (contrary to REACH), with a cost of 1,3-1,6 billion Euros/year for benefits that are much lower. The CARACAL agenda included two additional agenda points that are crucial for the metals sector: one on the classification and labelling for metals in massive forms versus powders (triggered by the selenium case) and one on the progress with the bioelution issue. The second issue was parked until June due to lack of time to debate it. The debate on the cut-off of massive vs. powders allowed Member States and industry to agree that the 1 mm, which is relevant for the environmental classification, would probably not be applicable as such for human health endpoints and will depend on the potential exposure pathway. Most surprising in this debate was the comment of Commission that selenium was not a metal nor a metalloid and that therefore the classification scheme for metals would not apply (more information: Lorenzo Zullo and Hugo Waeterschoot).

## EUROMETAUX REACH activities: hot topics/issues

### RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES

#### **REACH Forum meeting on 2 March: *post-2018 REACH activities and ECHA 2020 regulatory strategy targets***

The REACH Forum had a challenging agenda for its first meeting of the year, including discussions on ECHA's new Integrated Regulatory Strategy (IRS), the metal sectorial approach, data-sharing issues and the possible post-2018 REACH support. ECHA's commitment to map the chemicals universe by 2020, so as to meet the SAICM objectives is monitored with great interest. Several tools are proposed by ECHA to achieve an efficient mapping and more specifically to identify "higher" and "lower" priority chemicals, like grouping, early interaction with registrants and sectorial approaches. Further work on the dossier data quality/completeness will be crucial to be categorised as lower priority. The REACH Forum further debated the metal sectorial approach concept as proposed in a briefing note sent ahead of the meeting. A Steering Committee, bringing together the REACH groups and EHS Steering Committee chairs, as well as volunteers, will be set up to define more precisely the modalities and constitute an interface with ECHA. The outcomes of the two brainstorming meetings on REACH post-2018 and AfA support (22 and 23 February) were shared with the Forum, with the secretariat proposing to circulate 'thought-starters' for comments and refinement after Easter. Updates on the latest developments on the REACH OSH interface, the consideration of metals science by RAC and the cobalt/TiO<sub>2</sub> classifications were presented as well, generating lively and constructive discussions and proposing actions ranging from exploring across-industry support for more technical activities. These discussions also alimented the key messages the sector would like to provide on the REACH Review. These messages will be further reviewed and formatted with the support of Chris Heron (Eurometaux) so as to be able to use them in different forums and post them on the Eurometaux policy website. A draft Executive Summary of the Forum meeting will be circulated soon (more information: Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

#### **Circular Economy Conference: *providing metals' views on the interface between Circular Economy and Chemicals policies***

Mark Mistry (Nickel Institute) represented Eurometaux in a panel discussing the "difficulties in the application of EU waste classification methodologies and impacts on the recyclability of materials". The intervention highlighted that classifying waste streams as hazardous, due to hazardous substance content, does not create any benefits but might distort efficient recycling and lead to a loss of waste streams outside the EU. More specifically, the Eurometaux/Nickel Institute contributions stressed that the metals recycling industry is characterized by a complex network of different operators specialized in the recycling of certain metals across various borders. As consumer products become more complex and comprise more metals, the network and exchange of secondary raw materials allows to increase the yield and to recover more metals. Shipment of waste and

classification are therefore a key concern and waste classification of utmost importance. As important to stress is the fact that the companies operate under controlled conditions and are committed to ensure protection of the environment and all workers, so as to move towards a risk-controlled Europe. Such a risk-controlled Europe does not require per se the banning of all hazardous materials: some of these are needed to recover metals, like Lead in precious metals recycling. Knowledge on materials, processes, identification and management of risks are the sector's key assets, and thus justify the definition of targeted approaches (more information: Mark Mistry, Chris Heron and Violaine Verougstraete).

#### **REACH Review/REFIT: *meeting with E. Bieńkowska on the REACH Review***

On 21 March, Eurometaux (Guy Thiran), Cefic, FECC and UEAPME met with the cabinet of Elżbieta Bieńkowska, EU Industry Commissioner to present the key industry messages on the review of the REACH Regulation. The key aspects Eurometaux stressed are that an effective REACH Regulation is a key part of our long-term vision for a "risk-controlled Europe", that the Commission's Review should prioritise keeping REACH data state-of-the art, including defining a mechanism to share the burden. It should also make data the starting point for risk assessments and related policy decisions. There are also opportunities to make REACH more cost- and societal- efficient by focusing on what matters - a substance's actual exposure and by strengthening enforcement of the REACH requirements. Commission explained that the REACH Review will focus on specific issues that require correction. They have noted that the RMOA tool (Risk Management Option Analysis) is receiving more acceptance from European and national authorities. Other point of agreement is the need to prioritise enforcement – in particular regarding the import of chemicals and products. Finally they expressed concerns about the growing gap between EU and US perspectives on chemicals policy, and invite industry to contribute to their mid-2017 reflection on "Globalisation and Industry" (more information: Guy Thiran).

## **EVALUATION**

### **Metal consortia challenged with ECHA's Evaluation decisions**

Over the last weeks, several consortia were challenged by draft or final decisions from ECHA's MSC, focusing on reprotoxicity. Most are related to conducting a first or a second Pre Natal Development Toxicity study and the motivation used to waive it. Most consortia waivers were not felt valid as those seem to suggest that there is no need for a second species PNDT because the first was negative. However, the reasoning in REACH is the opposite, and requires further testing when the first result is negative. Therefore, this issue usually results in a request for a 2<sup>nd</sup> PNDT and subsequently an Extended One Generation Reprotoxicity Study (EOGRTS), amounting up to more than 1 million Euros. This can be prevented by an early investment in toxicokinetics evidence. However, Eurometaux noted that several consortia did not invest in this kind of data as not a formal endpoint under REACH. The opportunity to organise a workshop on the relevance and role of toxicokinetics as a possible way forward when having negative evidence in such testing schemes was raised and will be further discussed with the Evaluation platform (more information: Hugo Waeterschoot).

## **METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS**

### **CSR/ES Roadmap: *meeting Coordination Group to discuss work plans and ENES***

Eurometaux hosted on 3 March the meeting of the CSR/ES Roadmap Coordination group, which brings together ECHA, Industry sectors and some Member States to discuss the further actions to be carried out on CSRs and ES to improve the communication within the supply chain and the overall understanding between registrants and downstream users. Every industry association was asked to update the group on its plans for further work on tools like use maps, SPERCs, SCEDs, occupation exposure assessment tools and communication elements. The group proposed to replace the ENES (Exchange Network on Exposure Scenario) meeting initially planned for the week of 8 May by a more targeted workshop on some tools (e.g. use maps) on 3-4 May. ECHA will further draft a framework for the 2017-2020 future programme including 5 action areas, review its list of accredited stakeholder organisations and draw up a shortlist of key, representative downstream end-user organisations for future direct contact in order to broaden the participation of downstream users in the overall ENES work. The 5 agreed actions include: the setup and running of a monitoring mechanism to measure that more DU companies implement good risk management practice and more registrants identify appropriate risk management advice for their substances, support active sectors to set up and publish use maps, run ECHA's webpage hosting use-map information as single point of access for registrants, maintain and adapt the key Roadmap/ENES tools (based on experience), promote the use of the tools outside the ENES community, and further include Member States and end-user perspectives, to better understand their needs and communication modalities (more information: Violaine Verougstraete).

## **Alloys classification: VNMI and FME met the Dutch competent REACH and CLP authorities on Cobalt classification and bioelution**

VNMI and FME, two Dutch Industry associations supported by TATA steel, arranged a meeting with the Dutch science body on REACH and CLP (RIVM) and the Ministry for Health and Welfare (VWS). Eurometaux provided technical and policy assistance, given its experience with metals classifications and the debate on the acceptance of bioelution/bioavailability in the context of the classification of alloys. The meeting aimed for an exchange with the Dutch authorities on the downstream consequences of low specific concentrations, like the one proposed on cobalt metal by the Netherlands as well as on the position of the Netherlands in the EU debate on bioelution. The metals sector explained that the derived SCL would have enormous consequences for the recycling of large volume streams of metals like steel, hence the circular economy concept. Cobalt metal included in alloys is not, in the opinion of the industry associations, causing a risk for public health or the environment. RIVM and the Ministry replied that economic consequence are dealt with by the EU Commission and should not be considered by RAC. The participants discussed the concern some Member States have that bioelution tests on mixtures would be used to “escape CMR classification” and therefore are in breach of Article 6(3) of the CLP. Industry associations replied that bioaccessibility is a worst-case estimate of bioavailability, providing an indication whether there is or not a relevant exposure level that could cause a toxicity effect. The analysis by Commission’s legal services on Article 6(3) was evoked. Industry referred as well to the release/surface which is used when assessing the environmental hazard properties of alloys. The Dutch industry agreed to prepare a summary one pager with the arguments on why/how the classification of alloys should integrate bioaccessibility considerations (more information: Frank Buijs, Robert Van Beek, Hans Regtuit and Hugo Waeterschoot).

## **METALS SECTORIAL APPROACH**

### **Further discussions on the metal sectorial approach: *progress***

ECHA referred to the metals sectorial approach at the MSC workshop on the Integrated Regulatory Strategy as being one of the tools that will help achieve the 2020 targets by promoting registration dossier quality and completeness and addressing some outstanding technical issues for the metals sector. Several talks with ECHA senior staff further shaped the proposal for the Metals Sectorial Approach. The commitment would be solidified in a “charter” signed on a voluntary basis binding the parties until the end of 2020. The charter would describe the overall objectives approach, the two tracks (quality of the dossiers and technical issues) and the governance. As a first step a baseline template report could be prepared, as a kind of checklist enabling a company or consortium to assess the overall completeness of their registration dossier. This check could be complemented with information by ECHA on ongoing REACH regulatory initiatives or screening. Based on that baseline assessment, some objectives would be defined by both parties allowing to make progress in a more efficient way through grouping, prioritising and collaborative action. ECHA and Eurometaux would, in parallel, progress as much as possible on the technical outstanding issues. Ensuring transparency of the approach will be key as well as defining a kind of reporting of the progress. The role of Member States still needs to be discussed. The REACH Forum agreed at its meeting to task a Steering group to further define the modalities and be an interface between ECHA and the REACH Forum. It is noted that signing the charter would not be restricted to Eurometaux REACH Forum members, in this respect ECHA provided Eurometaux with a list of metals and metal compounds in their registration data base allowing to clarify those that are covered by the membership and those that are not. This list will be circulated soon (more information Violaine Verougstraete and Hugo Waeterschoot).

## **Calendar**

- **3 April:** Metals Sectorial Approach meeting – MCC (Brussels)
- **4-5 April:** ECHA Stakeholders’ Day – ECHA (Helsinki)
- **4-5 April:** Risk Assessment and Classification Taskforce meeting – MCC (Brussels)
- **18-19 April:** Annual AfA training seminar for potential future applicants – ECHA (Helsinki)
- **24-28 April:** MSC-53 – ECHA (Helsinki)
- **15 May:** A&R Workshop with ECHA on Intermediates/articles – MCC (Brussels)
- **16 May:** Evaluation Platform meeting – MCC (Brussels)
- **17 May:** A&R Platform meeting – MCC (Brussels)
- **18 May:** NeRSAP – ECHA (Helsinki)
- **29 May – 2 June:** RAC-41 – ECHA (Helsinki)
- **May-June:** CASG Nano meeting – Brussels (Date to be confirmed)
- **5-9 June:** RAC-41 + SEAC-35 – ECHA (Helsinki)
- **12-16 June:** SEAC-35 + MSC-54 – ECHA (Helsinki)

- **12-13 June** : OECD Working Party on Hazard Assessment meeting (Paris)
- **13-14 June** : OECD Working Party on Exposure Assessment meeting (Paris)
- **20 June**: REACH Forum – MCC (Brussels)
- **20-21 June**: ECHA Management Board – ECHA (Helsinki)
- **28-29 June**: CARACAL 24 – Brussels (Provisional)
- **30-31 August**: OECD Workshop (Ottawa)

**NB: Please note that RAC/MSC/SEAC dates are all tentative and can be subject to change**

## Acronyms

ACROSS: ECHA Integrated Substance Screening Tool	PACT: Public Activities Coordination Tool
ACSH: Advisory Committee on Safety and Health at workplace	PNDT: Pre-Natal Development Test
AoA: Assessment of Alternatives	PVC: Polyvinyl Chloride
CARACAL: Competent Authorities for REACH and CLP	RAC: Risk Assessment Committee
CLH: Harmonised Classification and Labelling process	REFIT: Regulatory Fitness & Performance Programme (EU)
CLP: Classification, Labelling and Packaging Regulation	RIME: Risk Management Experts meeting
CMR: Carcinogens, Mutagens or toxic to Reproduction	RMOa: Risk Management Option analysis
CSR: Chemical Safety Report	RPA: Risk & Policy Analysts
CTP-HT: Coal Tar Pitch High Temperature	SAICM: Strategic Approach to International Chemicals Management
DNEL: Derived No Effect Level	SCED: Specific Consumer Exposure Determinants
DU: Downstream User	SCL: Specific Concentration Limit
ENES: Exchange Network on Exposure Scenarios	SCOEL: Scientific Committee on Occupational Exposure Limits (EU)
EOGRTS: Extended One-Generation Reproductive Toxicity Study	SEA: Socio-Economic Assessment/Analysis
ES: Exposure Scenarios	SEAC: Socio-Economic Analysis Committee (ECHA)
EUSES: European Union System for the Evaluation of Substances	SID: Substance Identity
IRS: Integrated Regulatory Strategy	SIP: Substance Identity Profile
IUCLID: International Uniform Chemicals Information Database	SPERC: Specific Environmental Release Category
MOCA: 4,4'-Methylenebis(2-chloroaniline)	SVHC: Substance of very High Concern
MSC: Member States Committee (ECHA)	TDFA: (3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl)silanetriol and any of its mono-, di- or tri-O-(alkyl) derivatives
NTE: Non-toxic Environment	
OEL: Occupational Exposure Limit	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
OSH: Occupational Safety Health	XRD (analysis): X-Ray Powder Diffraction

AND FINALLY WISHING YOU ALL A VERY.....

