



# EUROMETAUX REACH PROGRAMME



## REACH on the BEACH

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Dear REACH Forum member,

*Why is June the best month of the year?*

*Some people stress that this is the month to beat the "good resolutions blues": six months ago, most of us had the best of intentions all forgotten within a few weeks. So why not try a reboot of our goals at this half-year stage.*

*To start with, we can make the most of the longer days and this could actually help fighting the blues mentioned above. That indoor gym membership we paid for in January and never used can be more easily transmuted into outdoor activities that will enable us to make the most of the warmer weather and keep us fit (without costing a Euro).*

*We can also re-discover the terraces, new cocktails, the trends of summer fashion and simply the pleasure of promenading.*

*We see people leaving their offices to go on early holidays, reminding us that there is some life outside of work and that our creativity could also apply to the design of the holiday's actions plan.*

*We hear kids yelling that school is over, tired teachers smiling and feel the (albeit sometimes temporary) students' relief.*

*We can get festival-ready, preparing ourselves to jump up and down to the sound of Emir Kusturica or the Arctic Monkeys, either with our feet in the mud or completely dehydrated by the sun.*

*But most significantly, we slow down progressively, allowing our bodies and minds to prepare themselves to let go and revert to essentials.*

*I tried... I promise: I tried.*

*Although I have to confess that I did not make any New Year good resolutions this year, for the very relevant reason that I wanted to avoid the blues six months later. Let's call it experience.*

*I did not find my way to the gym but made the most of the long days to take my PC outside and work in all kinds of places outdoors, especially in Helsinki where the days are even longer. Finnish terraces were part of the spots I conscientiously tried out with glasses being regularly refilled by Terry, the inimitable barkeeper of the Scandic Marski.*

*But the promenade turned into a run: from meeting to meeting, from call to appointment, trying to finalise as much as possible before the summer break, driven by the firm (?) belief that everything would stop over summer. Really?*

*I cursed the "out of office autoreplies" I received from clever people I needed a response from, but who spent these last weeks not only dreaming of, but actually going on vacation.*

*I felt the warmth of the sun through the window, got a cold from the air conditioning of the Metals Conference Centre, smelled the sweat in the public transport, heard parents searching frantically for day care solutions and saw students express more doubts than liberation.*

*I attacked the first day of Couleur Café in a perfect state of exhaustion, not even able to notice the surrounding temperature or the smell of weed, just trying to convince my legs to abandon their usual state of immobility.*

*I did not feel lonely last month though. I was not the only one who was attacked by the June fever. Actually, I had a lot of companions of infortune tapping like hell on their computers without giving a glimpse at the weather outside, sending emails late in the summer evenings.*

*So dear friends, take a deep breath: we are in July. Maybe we can do ourselves a favour and try to decelerate a nanobit? I would like to propose herewith to send those silly hamsters that are keeping our brains busy to the REACH on the Beach section of this news and invite you for a real drink to celebrate all the work we've managed to do over these last 30 days!*

*Enjoy the summer and its essentials!*

*Violaine Verougstraete, EHS director Eurometaux*

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## ECHA REACH Activities: hot topics

### ECHA Committees

#### **RAC-41: TiO<sub>2</sub> becomes a cat 2 carcinogen, CTP-HT still without clear dose-response**

The proposal from France to classify TiO<sub>2</sub> as carcinogen cat 1B (inhalation) has been debated by RAC members over two sessions (1 and 8 June), concluding finally that the substance meets the criteria to be classified as suspected of causing cancer (category 2). This classification story has been closely followed up by Eurometaux, as it could set a precedent for other poorly soluble low toxicity particles (inorganic pigments, mineral, raw materials, slags, some Co -V and Mo compounds, iron oxides, silver oxide, Al oxide, Cu oxide...). Based on this precedent-setting, Eurometaux had asked RAC to be able to bring in an industry expert (Rodger Battersby, EBRC), who very actively highlighted the more generic particle issues. Key technical elements of the debate were the consideration of interspecies differences in rats' particle kinetics vs. humans triggering differential particle-related pulmonary responses, the interspecies differences in lung responses of rats vs. other rodents triggering different adverse outcome pathways, the use of advanced and updated human respiratory tract deposition and

retention models and the use of epidemiological data. TiO<sub>2</sub> disposes indeed of a large epi database, covering more than 24,000 workers and 50 years of exposure/time and the studies did not demonstrate a clear association between exposure and cancer in humans. Some principle issues were discussed as well like e.g. is CLP appropriate to classify a hazard related to a particle effect? Or what should be done when testing under experimental conditions is outside the scope of CLP/OECD guidance? Finally, some useful learning lessons could also be drawn from the 'dynamics' of the meeting. After glyphosate, the debates on TiO<sub>2</sub> also triggered a lot of interest –including from the media- and had been preceded by an advocacy campaign and high-level contacts within ECHA/Commission. Both manufacturers and users of the substance were attending the meeting, also raising issues related to the 'practicability of the classification' to be considered when drafting the entry in Annex VI. RAC is now finalising the opinion that will either be briefly discussed at the RAC meeting in September or approved by written procedure. It will subsequently be sent to the Commission and made publicly available on the ECHA website. Another interesting discussion at RAC-41 was devoted to the derivation of the carcinogenicity dose-response relationship for coal tar pitch high temperature. This work is done to support the future applicants for Authorisation and help them to assess the excess cancer risks, but also to set a DNEL on toxicity for reproduction. The contracted consultant focused on a component-based approach, and assessed several possibilities in such a context, comparing each of those to the availability of data. The practical boundary to the derivation of different methodologies is that in the end it has to be monitorable to have a chance to be applied. This is not totally clear yet. Also, at this moment, the consultant's focus was mainly on inhalation and RAC considered that some further discussions may be needed on dermal exposure. Finally, RAC considered that some key evaluations by some authorities were still missing. The consultant was requested to provide RAC with some options over the summer so that significant progress could be made at the September meeting. RAC really stressed the way they would assess the cancer risks of these two substances so that Applicants take this advice into account as early as possible in preparing their applications for Authorisation (more information: Violaine Verougstraete).

#### **SEAC-35: Restriction cases with potential important learning lessons**

SEAC debated several Restriction cases each of them interesting from the perspective of horizontal learnings for the metals sector or even industry in general. The first related to the restriction of Pb stabilisers in PVC is a logic follow-up on the voluntary out-phasing by the EU manufacturing and user Industry to prevent import. The case raised discussions on the role of recycling versus incineration, demonstrating that risks for Pb exposure through recycling were minimal compared to the incineration of PVC construction waste, thus justifying a higher concentration limit for recycled materials to prevent hampering recycling. A second learning related to the contribution of the restriction compared to the overall annual Pb emissions (+/- 5000 x more). The main discussion point for industry remains the accumulation of incremental small impacts on the IQ deficiency of children. The proposed restriction of Pb-shot in Wetlands was the second one of interest and was felt to be in conformity. The main driver of the restriction is a minimal harmonisation of the restriction requirements across the EU of the RAMSAR convention. The way the environmental impact assessment and the monetisation for this first restriction is established will set an important precedent for the metals sector. The Public Consultation will be opened soon and run for 6 months. The third restriction case that was debated related to diisocyanates, a respiratory sensitiser wherefore BAuA proposes a strict exposure control and training system as an alternative to Authorisation. Manufactures/importers will be obliged to instruct and check their users. A rather novel concept complementary to the CM-directive which defines risk management for the users (more information: Hugo Waeterschoot).

#### **SEAC-35: long series of AfA cases concluded but raising some concerns from a level playing field aspect**

Besides several trend setting Restrictions SEAC debated in an efficient way a series of Authorisations (mostly still on Chromate cases). Although two raised the specific interest of industry given they were in its view not treated in an equal way to previous cases. Eurometaux reacted, stating that the level playing field on the MOCA and Cr6+ cases for ZFL were in our view not respected. In the first case the supplier requested for an Authorisation for the remaining uses that could not yet be substituted. The same company provides the alternatives at a better margin and demonstrated they wanted to substitute all as soon as was technically feasible. SEAC nevertheless granted only the minimal Review Period. The second contested case covered a very narrow use in aviation (helicopters) using very low quantities (< 100 kg/y). Again SEAC was unusually strict in its review period based upon the claim that the AoA was too broad. Both Cefic and Eurometaux therefore decided to further follow up on those to prevent the elaboration of such cases for future more relevant cases (more information: Hugo Waeterschoot).

#### **MSC-54: SVHC identification for Equivalent Concern, subgroup on UVCB assessment and interesting court cases**

The approval of 2 new SVHC cases (Bisphenol-A and PfhxS) attracted extensive debate setting precedent on the level of proof for equivalent concern for the ED properties on Human Health (Article 57 f). The update on the court cases by ECHA indicated that the General court will soon (13 July) conclude on the VECCO case, setting for sure an important standard on how to handle "intermediate status" of a carrier metal (in this case As). The court will (on July 6) also form an opinion on the Acrylamide case (requiring Authorisation for some intermediate uses). The outcome of both cases will be closely watched by ECHA, the EU-Commission as well as Industry. MSC further debated on a series of dossier evaluations. The Triazole Substance Evaluation case sets precedent given its conclusion that testing (EOGRTS) is not required because of a deficient existing study using

inappropriate dosing (justification: this will not provide better RMM, a legal requirement for a Substance Evaluation information request). A second most relevant case related to a CC on Butyl Glycolate demonstrating that the lack of a solid read-across waiver can result in a request for extensive testing. The registrant was allowed to strengthen the read-across during the PfoA process but MSC did not agree with the result. NGOs and industry felt that the expertise of ECHA on such complex read-across cases should be made available to the registrant to prevent the need for such expensive tests. Finally MSC took note of the outcome of the first meeting of the UVCB ad hoc group presenting the scope of its activity. It confirmed the need for further guidance and clarity on when a component based and when (exceptionally) a whole testing approach should be conducted, the non-relevance of WAF based testing approaches for UVCBs (and complex mixtures) and the recognition of existing approaches developed by industry. MSC will organise a workshop on the theme and solicited interest from the attending STO (more information Hugo Waeterschoot).

#### **MB-46: waiting for the new Executive Director**

IMA, Eurometaux and Cefic prepared the 46<sup>th</sup> ECHA Management Board meeting by reviewing all documents made available in advance. While most of the Agency's programmes are up to date and have a high-performance rate, industry noted a clear change in the Board's activities: the work to support the day-to-day business continues, but the activities on challenges or issues like the strategy for ECHA post 2020 are slowed down or even restricted to a minimal level, waiting for the new Executive Director. The Management Board had for example planned a third session to define its strategic options for the post 2020 period, but the options presented for debate have lost the broad thinking mind-set that was seen last year. During the preparatory call, industry reconfirmed the importance for a strategic review of ECHA's objectives and tasks for repeating its support for 1° ECHA becoming the "one stop shop" for chemicals information in the EU (for use by Commission or Member States services) and 2° a more supportive role for ECHA towards industry (including advising on read across). Also planned for the meeting of 20-21 June is an update on the progress made with the SVHC Roadmap as well as the annual report of the Board of Appeal (BoA) officer, the latter always being an excellent summary of learnings from last year's BoA cases. Eurometaux will circulate a summary of the Management Board meeting outcomes when made available by the industry representatives (Cefic) and ECHA (more information: Hugo Waeterschoot).

#### **ECHA 10 years: learning from the past, designing the future**

ECHA celebrated its 10 years by organising a conference- bringing together key actors in the setup of REACH and the Agency, current key players representing Commission, ECHA's Management Board, ECHA's Executive Director and representative of the staff- before looking forward. The alternating plenary presentations, video messages and panels allowed the audience to take stock and react to the reflections shared by the speakers, not only on the background and intentions that have driven the creation of the agency, but also on its actual performance and the overall achievements of the REACH system. Clear messages on the future outlook were provided as well, like for example that a performant chemicals management system in the EU (i.e. protecting environment and health while keeping industry in the EU) can only go through an EU system, that REACH constitutes a global standard setter but that further efforts should be devoted to enhance enforcement and quality of the data. Geert Dancet's builder role and the commitment of ECHA's staff (less than 5% turnover) in achieving such an efficient agency (more than 95% of the KPI were met over the last 10 years) were also acknowledged, encouraging the panel charged with the "future outlook part" to refer to ECHA as a future "one stop shop for chemicals management". Interestingly, reference was made by Commissioner Elżbieta Bieńkowska (DG GROW) to the RMOa tool and by Geert Dancet to the collaborative approaches with industry. The REACH considerations were nicely complemented by a key note address by the Prime Minister of Finland, Mr Juha Sipilä and followed by a reception in ECHA's famous canteen (more information: Hugo Waeterschoot and Violaine Verougstraete).

#### **Helsinki Chemicals Forum: 8-9 June**

The event took place in a context of celebration: 10 years of REACH/ECHA and 100 years of Finland. Much of the event followed the spirit of the ongoing REACH Review/REFIT, even if the scope was very much international. In the introduction, Elżbieta Bieńkowska (Commission) clearly stated that the recycling of materials containing hazardous substances is acceptable if they are combined with valuable materials. Five panels were organized over the two days. In the first panel (moderated by Cefic), speakers agreed that although REACH and chemicals' legislation has progressed much quicker than in the previous century (cf. paragraph 19.1 of Agenda 21, Rio de Janeiro, 1992), much remains to be done to make it work. The ongoing TSCA Reform will give EPA much more power and flexibility than before to regulate substances. Sector specific approaches were mentioned, and enforcement was recognized to be the weakest link of the process, but no clear solution was found to resolve this. In the second panel (moderated by UNEP), chemicals management was put into the broader context of sustainability, related to the 2020 and UN Sustainable Development Goals in particular. Different regions and countries have deployed different resources and approaches to meet this goal, but success needs to be measured in a longer-term (2050) horizon. In the third panel (moderated by DG ENV), panellists concurred with the idea that chemicals management will be a driver for market supply and demand, as noticed by the current and enduring citizen revolution and various related market disruptions (when compared to good old business as usual). Very often the question is what to comply with first, amongst the wide variety of compliance priorities (regulatory, suppliers, customers, investors?). The

implementation and impact of Circular Economy elements do add considerable uncertainty in predicting market drivers. In the fourth panel (moderated by ChemWatch), alternative approaches to animal testing were confirmed to be a key asset in speeding up the number of substances that are risk assessed and political decisions made (to close the current window of 5-10 years between the identification of a concern and its proper regulatory management). Grouping approaches (QSAR and read-across) were repeatedly presented as the most efficient way forward to scan and manage potential risks. The fifth and last panel (moderated by ECHA), tackled the enormous challenge of information on substances in articles. It was clear that there is a need for a harmonised international notification system and the resolution of the thin barrier between IPR/CBI and 'right/need to know' of consumers. A solution could be for companies to communicate transparently about criteria to select substances they decide to work with (including hazard, release, performance, environmental footprinting aspects, etc.). This is closely dependent on the dissemination of information in REACH dossiers and (currently still insufficient) supply chain communication. Across all panels, the general observation (and concern) that chemicals management is not yet a true corporate mission of companies, was made. The report of the event should be available on their webpage at the end of June (more information Caroline Braibant).

## Authorisation

### **Chromates AfA Debrief Workshop: 27 & 28 June in Brussels: the collection of experience of more than 120 AfAs**

By mid-November ECHA will carry an in-depth review of the AfA process and experience up to now. Key in this consideration are the chromate cases that contribute for almost 2/3 of all AfAs so far. ECHA requested Eurometaux to facilitate a debrief with the Cr6+ user sectors and consultants to collect their experience, explore potential areas for improvement and launch an initial debate on the challenge of re-applying. A Survey Monkey designed by Eurometaux collected a wealth of information for the majority of the Cr AfAs, demonstrating that a significant part of the metal user groups have picked up the key comments/shortcomings of present AfAs and recommendations for reapplying. These include, besides content aspects on the SEA and CSR, also the need for narrower uses to be applied for, defined in line with the substitution potential as well as different AfA Consortia models. While the downstream user application model was felt the most appropriate there was clear recognition for upstream application models in the case of large numbers of small downstream users. Albeit, alternative "dual-models" whereby the manufacturer applies for the formulator and in complement the downstream users apply separately were seen as an important potential for improvement. The most relevant learning lessons from the session will be taken forward to the Eurometaux A&R platform (more information: Hugo Waeterschoot).

## UVCBs

### **ECHA visit Umicore (Hoboken): 30 June**

In the context of the ongoing discussions on the inorganic UVCB dossiers, and in follow-up of ECHA's SID Unit visit end of March, Christel Musset (Director Registration) and H  l  ne Magaud (Computational Unit) were invited to Hoboken on 30 June, in a further attempt to find the best balance between information requirements under REACH and the practical situation faced by UVCB registrants. They were joined by 4 representatives from DG GROW, which allowed to link the REACH discussions to the Circular Economy package and the ongoing Commission consultation on the interface Waste/Chemicals/Products. The discussions and visit on site allowed to achieve some key common understandings on the variability of the input, the importance of sampling and assaying and the necessity to keep some flexibility in the process to address a variety of materials, as part of the business model. The explanations on the overall flowsheet highlighted the key relation between input-process-output knowledge but also the importance of collectors for recovery of precious metals and other metals. The difficulties resulting from the REACH Regulation/Waste Directive interface were helpfully explained by translating them in practical daily challenges. The comprehension that was attained will allow to build further towards some solutions over the coming months. Eurometaux would like to extensively thank Umicore for the time and energy they invested in this visit, and in particular for their openness and keenness to find workable ways forward for all inorganic UVCB registrants. The outcomes of this visit and the further work will be discussed with the REACH Intermediates Taskforce (more information: Nathalie Dom, Hugo Waeterschoot and Violaine Verougstraete).

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## COMMISSION REACH Activities: hot topics/issues

### CARACAL

#### **CARACAL-24: CLP session**

The CLP session of CARACAL started its open session by discussing bioelution and more specifically, the outcomes of the integrated report produced by the ECHA Bioelution Expert Group. DG Grow stressed the importance of this work, making a

clear distinction between the discussions on the applicability of CLP article 12(b) and the scientific/technical work on the consideration of bioavailability/bioelution in CLP. DG ENV insisted on the scope of the report (alloys, systemic effects, oral exposure) and highlighted the additional issues that would request further discussion (e.g. the relation between bioaccessibility, bioavailability and bioelution and/or the possibility to use safety factors, the use of bioavailability for CMR substances, and also the problem of "broadening the scope" (informal discussions with NL & DE representatives took place after the meeting). Several Member States made interventions to express their concerns with the use of bioelution under CLP, balanced by others who clearly asked for the continuation of the work so as to be able to clarify whether the concept can actually be used and implemented. CARACAL concluded that the work will be pursued, with Eurometaux submitting the full bioelution protocol to ECVAM in the coming months. They will reconvene the ECHA Bioelution Expert Group afterwards. This positive outcome is to be thanked to the continued support of Commission but also the impressive mobilisation of industry in the days before CARACAL: several MSCAs acknowledged the importance to find a solution for alloys, mentioning their specific properties! CARACAL also discussed further CLP and GHS-related items like bridging principles and the setup of a global classification list. Both GHS and CLP will launch some further work on the integration of non-animal testing methods for classification of health hazards and the definition of criteria to allow such results in classification. Whilst the current focus is on skin corrosion and skin irritation, there are some designs to also move to more complex endpoints (acute toxicity, mutagenicity and carcinogenicity). These items will require some monitoring in the autumn. The tools required to implement CLP Annex VIII on Poison Centres were discussed as well: working groups have been established to discuss the setup of a one stop notification portal to be operational by January 2019, of a products categorisation system and the drafting of supportive guidance. An update will be provided at the next CARACAL. At the next CARACAL, the labelling of massive metals should be discussed as well: Commission has asked Eurometaux to set up a small working group, involving interested Member States to draft some guidance and to report back (more information: Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

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## EUROMETAUX REACH Activities: hot topics/issues

### Resource mapping to respond to REACH / ECHA challenges

#### **Final Slags Taskforce Meeting: *very productive meeting on 6 June***

The main agenda items for this meeting were the status and possible contribution of Final Slags to the Circular Economy, the impacts of the cobalt metal CLH process and the identification of possible threats related to the standards for construction products. A draft paper circulated shortly in advance of the meeting aimed at clarifying the different status slags may have under the REACH Regulation (as well as some of the consequences) and at demonstrating that they may contribute significantly to the Circular Economy if well managed under REACH. Very useful comments were provided by the participants during the meeting, which will allow to refine the position paper supporting the conclusion that, provided the composition and behaviour of the final slags are well controlled and managed, final slags can be a solution to address scarcity of some primary materials (like natural aggregates) and promote recycling of metals as they are often an output product of metals recycling. The Taskforce has also agreed to further develop its analysis of the consequences of the cobalt CLH proposal, by adding further data and information to the contribution they made to the Public Consultation. Draft minutes will be circulated soon and the next meeting should take place in autumn, back-to-back with other REACH meetings (more information: Daniela Cholakova, Hugo Waeterschoot and Violaine Verougstraete).

#### **Exposure Scenarios Taskforce Meeting: *15 June Meeting***

Since a few years, ECHA has been trying to set up models to distinguish between substances needing regulatory attention and substances that could potentially be de-prioritised. Whereas the 'high volume equals high risk' statement is not correct for many metal substances, evidence needs to be provided to prove reasonable lower exposure than potentially expected. In this framework, the meeting of the taskforce was devoted to exchange on the development of ad hoc tools that would help in providing such evidence. Initial steps were taken in the development of new SPERCs linked to the service life of articles with negligible release of metals, such as on metals use in the construction field and in batteries. Besides, the development of efficient data collection campaign to quantitatively describe metals mass flow analysis (MFA) was discussed as a valuable tool that can prove reasonable low exposure across the supply chain: an ad hoc model was exchanged and will be further distributed to support the data collection. Aiming at ensuring consistency in reporting uses and uses information across metals, the group agreed to initiate the preparation of use maps for alloying processes and to discuss the first results in the autumn meeting. A live demo of the Mease 2 was given to present the updated tool and to show its improved functionalities. A beta version of Mease 2 will soon be circulated. Minutes of the meetings will follow (more information: Violaine Verougstraete & Federica Iaccino).

### **REACH Forum Meeting: *another intense agenda for the Forum***

The REACH Forum met on 20 June to catch up before the summer break. A status report on the activities of the various Taskforces was circulated ahead of the meeting, with the chairs kindly pointing to some key ongoing issues during the meeting. This was considered to be a good practice and will be repeated in the future. The REACH Forum was further informed on ECHA's commitment towards the setup of the metals sectorial approach and the activities carried out by the Steering Group. The consortia confirmed the general willingness to participate in the approach and underlined the need to well define, as first step, the structure of the baseline report which will be the basis for future work at both industry and authorities level. Other important items in the agenda included REACH/OSH interface, the revision of the Carcinogens and Mutagens Directive, updates and learning lessons on the CLH cases (cobalt, copper, titanium dioxide), as well as the upcoming cobalt and lead restriction cases. The report on the authorisation and restriction activities highlighted the importance of further monitoring the developments on Article 58(2) and the reflection on a support structure for AfAs. The REACH co-chair presented a very interesting report on the "10 years of REACH litigation" workshop held end of May and the Forum was reminded that a series of one-pagers are available on data-sharing issues. The meeting was concluded with the traditional but very useful 'catch-up' tour of the consortia who mentioned the evaluation, PACT or CLH initiatives they are confronted with. The minutes of the meeting will be circulated in the coming weeks. The next meeting will be held on the 27 of September (more information: Lorenzo Zullo).

### **Cobalt metal CLH Taskforce: *an update before the summer break***

Participants of the taskforce were invited to a call on 29 June, aiming at providing them with a status update on the RAC process, on the advocacy activities on bioelution and cobalt science, and the development of socio-economic impact/assessment cases. A slide deck was circulated before the call and was used as background structure. A number of actions were agreed upon, to be carried out before the first RAC discussion (September) focusing more on cobalt, or after RAC has issued its opinion, when Commission will reflect about the entry to include in Annex VI of the CLP. A call for volunteers to contact MSCAs was launched. A technical advocacy toolkit will be circulated with the draft minutes of the call, as well as a tracker of advocacy activities to coordinate the messages to be provided to the MSCAs at the different stages of the process. In parallel, work on bioelution and the development of SEA cases will continue (more information: Carol Pettit, Brigitte Amoruso, Ruth Danzeisen, Hugo Waeterschoot and Violaine Verougstraete).

## **Metal-specific REACH application tools and concepts**

### **Bioelution: *meetings with Eurofer and DG ENV***

In follow-up of a discussion he had with Daniel Calleja-Crespo (Director General DG ENV), Eurometaux's Director General Guy Thiran managed to have an appointment with Kęstutis Sadauskas (Director DG ENV) to discuss the specific problem of alloys' classification, the impacts of such classification on innovation and Circular Economy, as well as the shortcomings of the CLP in addressing such materials. The timing of the meeting proved to be excellent as it took place the day before the discussion of bioelution in CARACAL. It was the opportunity to request continued support for the ongoing work, to include the consideration of bioavailability in the CLP framework and express our commitment to DG ENV to inject the required resources in the validation of the protocol by ECVAM. A preparatory meeting was held with Eurofer to exchange on the respective classification concerns and proposed ways forward, which allowed the ferrous and non-ferrous sectors to deliver perfectly aligned messages to DG ENV (more information: Guy Thiran, Hans Regtuit and Violaine Verougstraete).

### **Workshop on Nickel Allergy & EU Restrictions: *Nickel institute presents state of play and regulatory challenges on Nickel allergy***

On 27 June the Nickel Institute has organised a workshop to discuss achievements and challenges ahead in the implementation of the EU nickel restriction under REACH, the issue of defining "articles intended to come into direct and prolonged contact with the skin", associated ongoing EU activities, and the results of a new scientific studies relevant to the EU nickel restriction. The workshop allowed strengthening the need for authorities to reflect on "real" skin sensitisation risks. Industry hopes that ECHA will manage to guide authorities towards the right interpretation of the EU nickel restriction, based on scientific evidences. Presentations and background material are now available on the Nickel Institute's website and can be downloaded at [this link](#).

## Metals Sectorial Approach

### **Metals sectorial approach: a letter from Geert Dancet and call on the baseline report**

One of the actions Eurometaux had to follow-up after the Steering Committee meeting early April was to clarify ECHA's commitment towards the sectorial strategy and ensure they would actively participate in the two axes of the proposed approach, namely the improvement of the quality of the REACH dossiers and in the discussions of the outstanding technical issues identified by the Forum. A letter was sent by Geert Dancet, ECHA's Executive Director to Eurometaux's President and Director general on 6 June, outlining the potential benefits of the approach as well as its possible "milestones" (development of a baseline report, signature of a charter, definition and planning of priorities, reporting), and also confirming that ECHA has planned to make resources available for the approach, including in the discussions on horizontal issues and to follow up the development of assessment methods. This letter was distributed to the REACH Forum, the EHS Steering Committee and Eurometaux's Management Committee. Also, a very first draft of a "baseline report template" was circulated to the Steering Committee for discussion during a call fixed for 29 June. This baseline report should help to identify a 'starting point' for the approach and allow to measure progress over 2017-2020. It has been agreed to proceed in two steps: a first -internal- exercise checking by means of a user-friendly template a number of items in the dossiers (e.g. use of read-across, type waivers, type of modelling tools used etc.), so as to be able in a second step extract an overview of the overall strengths and weaknesses of the sector's dossiers in order to share with ECHA. The Steering Committee provided comments that will be considered in a revised version of the template. As soon as the template has been updated, it will be circulated to the consortia with a proposal of a webinar to explain how to complete it. The REACH team will also make use of the coming weeks to think about headlines for the charter and organise reporting. A call of the Steering Committee will be held during the second half of August to exchange on those latter actions. Finally ECHA informed CARACAL on the setup of the metals sectorial approach, inviting Member States to reflect about their participation, confirming herewith 'that they go for it' (more information: Hugo Waeterschoot, Lorenzo Zullo and Violaine Verougstraete).

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## FURTHER OUTREACH OF REACH

### OECD

#### **Working Party on Exposure and Hazard Assessment meetings: tomorrow**

The OECD countries experts on hazard and expert assessment met on 12-13-14 June for their annual face-to-face meeting, discussing a range of topics and exchanging information on ongoing projects. These meetings are not only a golden opportunity to get updated on global regulatory developments but also to catch the upcoming trends. Combined exposure, exposure in/from products, biomonitoring, UVCBs, IATA (Integrated Approaches to Testing and Assessment) and AOPs (Adverse Outcome Pathways) are all confirmed topics of interest for the participating OECD countries. The AOP and NAM (New Approaches Methodology) aspects in particular may require some further discussion at the next Risk Assessment and Classification Taskforce meeting as regulators progressively include those elements in their prioritisation schemes. But the OECD meetings are also a nice forum to test the interest of colleagues for new concepts: Germany presented a pre-project proposal to develop criteria to identify industrial chemicals with the substance properties (Persistence in the environment, Mobility in the aquatic environment and/or Toxicity), which cause concern to raw water resources used for the production of drinking water. Eurometaux made a presentation on the 'Man via the Environment' project, reporting on the seminar co-hosted with RIVM and ECHA last January and the next steps that are planned, triggering some interest from the US, Japan and Canada. Highlights of the meetings will be circulated in the coming weeks (more information: Violaine Verougstraete).

### Other

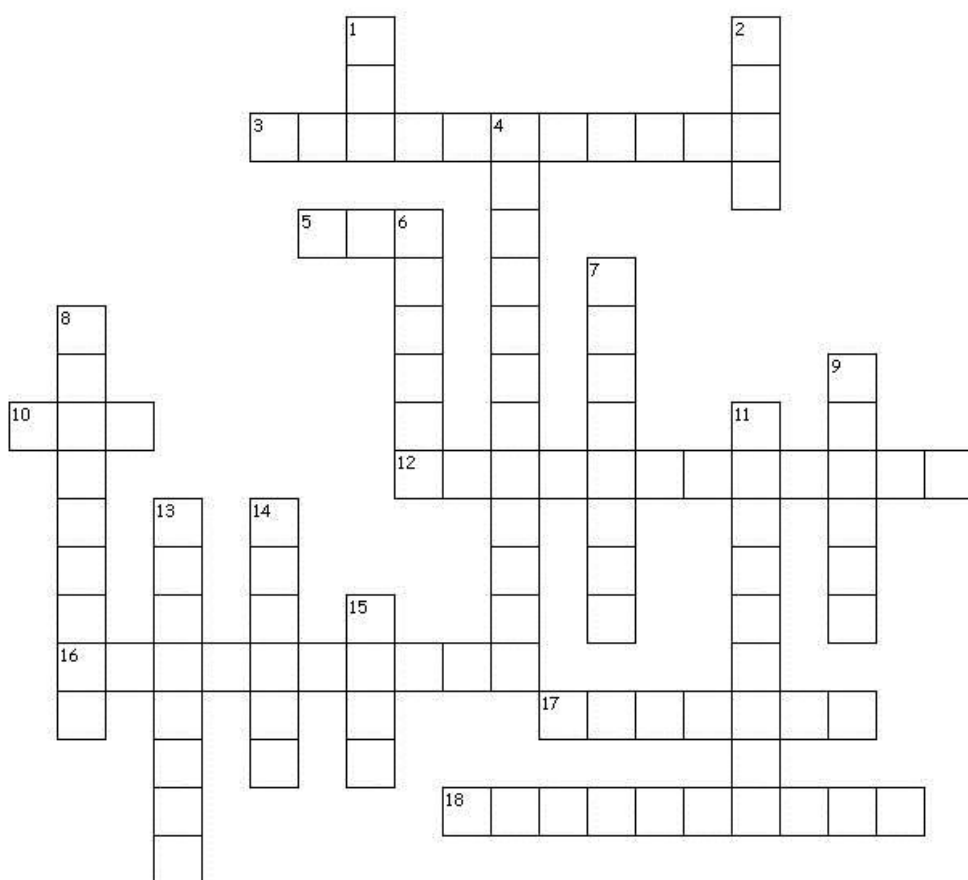
#### **Single Market Forum (SIMFO) Malta- 19 June: EU Single market, Growth and REACH**

The Maltese presidency organised a high level session of the Single Market Forum as a closing meeting for a series of sessions and a workshop inspired by the cooperation between the EU-parliament (INCO) and the EU Commission. The aim is to identify how barriers to the EU single market can be further reduced and what policy/regulatory actions could further stimulate the single market strength. REACH was one of the 8 themes of the Single Market Forum besides SME policy, the collaborative economy, the exchange of working permissions and others. The debate on REACH was organised by DG Grow who invited 4 key speakers (an MSCA, UEASME, Cefic and Eurometaux to give a presentation focusing on the theme). Eurometaux provided a perspective for the future suggesting the need to reduce the administrative burden while focusing on voluntary improvements of chemicals management by industry and the use of REACH data for other key EU legislations to prevent reinventing the wheel time after time. Eurometaux suggested further to replace the momentum for forced substitution by

the drive for innovation in chemicals management including exposure reduction and most importantly the alignment and integration of REACH within waste, substance in articles legislation and the circular economy policy objectives to promote a sustainable materials policy. Eurometaux concluded that metals are well placed for this purpose given their durability, recyclability and high reuse potential. The presentations were followed by a debate concluding that REACH would not end by 2018, and that the future challenges would require much more an integration of objectives and the EU industry may be better prepared than others, or even have a competitive advantage, when a chemicals management policy is rolled out worldwide (more information: Hugo Waeterschoot).

## REACH on the BEACH

### 1. Read-across and down



#### Across

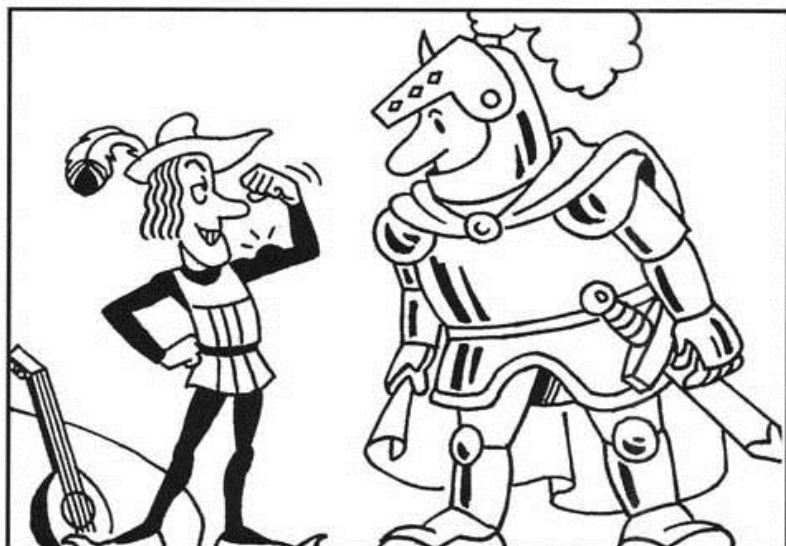
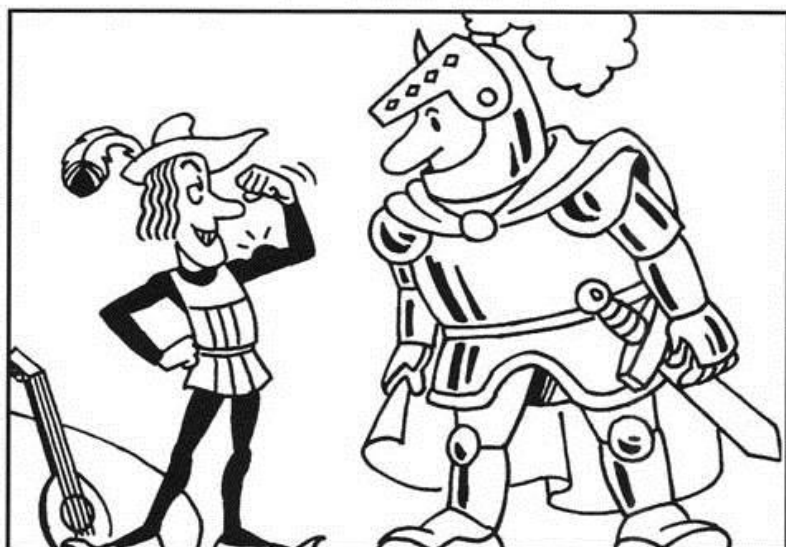
- 3. Post RAC drink
- 5. Substance of concern
- 10. UK authority
- 12. ECHA's objective
- 16. If you REACH behave well
- 17. Downstream users
- 18. Vio and Adriana's hobby

#### Down

- 1. What is needed in REACH
- 2. Nice meetings in Paris
- 4. Restriction
- 6. Metal in the Dutch spotlight
- 7. Driver for risk management
- 8. Working body in Eurometaux
- 9. ECHA's Director
- 11. Word used in the evaluation platform
- 13. We could not do without
- 14. Nightmare?
- 15. Small

## 2. When Hugo meets MSC

Where are the 7 differences between the two images??



## CALENDAR

- 30-31 August: OECD Workshop (Ottawa)
- 11-15 September: SEAC-36 + MSC-55 – ECHA (Helsinki)
- 18-22 September: RAC-42 + SEAC-36 – ECHA (Helsinki)
- 26 September: A&R Platform meeting – MCC (Brussels)
- 27 September: REACH Forum – MCC (Brussels)
- 28-29 September: ECHA Management Board – ECHA (Helsinki)

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

## ACRONYMS

AfA: Application for Authorisation	MvE: Man via the Environment
AoA: Assessment of Alternatives	QSAR: Quantitative Structure-Activity Relationship (models to predict toxicity)
CARACAL: Competent Authorities for REACH and CLP	RAC: Risk Assessment Committee
CC: Compliance Check	RMM: Risk Management Measures
CLH: Harmonised Classification and Labelling process	RMOa: Risk Management Option analysis
CLP: Classification, Labelling and Packaging Regulation	SEAC: Socio-Economic Analysis Committee (ECHA)
CTP-HT: Coal Tar Pitch High Temperature	SID: Substance Identity
DNEL: Derived No Effect Level	SIMFO: Single Market Forum
ED: Endocrine Disruptor	SME: Small or Medium size Enterprise
ECVAM: European Centre for the Validation of Alternative Testing Methods	SPERC: Specific Environmental Release Category
EOGRTS: Extended One-Generation Reproductive Toxicity Study	STO: Stakeholder Observer
EPA: Environmental Protection Agency (US)	TSCA: Toxic Substances Control Act (US)
GHS: Globally Harmonized System	
IATA: Integrated Approaches to Testing and Assessment	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MFA: Mass Flow Analysis	VECCO:
MSC: Member States Committee (ECHA)	WAF: Weighted Average Flux
MSCA: Member States Competent Authorities	