



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Nanos, Evaluation and A&R meetings on 21, 22, 23 November
[See calendar for meeting rooms](#)

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Dear REACH Forum member,

The advantage of travelling abroad is that you learn amazing things about your home place.

Last week for example I heard that there are Belgian mermaids! Lovely girls, sitting dolefully on the shores of our cold rivers, attracting tourists and proposing to teach them to swim with a monofin and a fabric-made training tail.

*Even more: the Belgian mermaids only represent a small part of the professional mermaids' community (1000 in the US alone). It seems that people are attracted to swimming in mermaid costumes for many reasons, all basically boiling down to wish fulfilment. Candidate mermaids have probably forgotten that in the *Odyssey*, these creatures were far from sympathetic, driving sailors to madness and transforming ships into wrecks.*

Still in these days where advocacy and visibility are corner stones of our activities, and dreaming is welcomed, it is hard to resist the temptation to fabricate a fairy neoprene tail, inlaid with precious metals and settle in a fountain close to the EU institutions, to sing a metals melody: the 21st century version of Homerus' imagination ☺ or a metals adaptation of Walt Disney's heroin (which seems much more popular in the mermaid community).

I may end up by taking a selfie with a Commission representative who listened unconsciously to the Risk Controlled environment. Even better would be to have a chorus like in the Greek ancient theatre to voice our passions: heroic, predicting a bright future, mermazing!

Please don't hesitate to join... Sea you later



"This world is but a canvas to our imagination" (Henry David Thoreau)

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

MSC-56: slow progress with the 8th priority list recommendation and a long debate on the outcome of the Substance Evaluation for Aluminium compounds

MSC had a short debate on the outcome of the Public Consultation on the proposed 8th priority list to update the authorisation list. Comments were only received for NMP an important aprotic solvent also used by several metal users' groups. Most questioned why ECHA and the Member States proceed in parallel with a prioritisation for authorisation while a restriction is already under debate proposing a "DNEL-based" approach. The first debate in MSC demonstrated a growing support for such parallel risk management processes given other uses than those at the workplace appear to exist. Evidently this requires close follow-up by industry. MSC also debated the outcome of the Substance Evaluation on 3 Aluminium salts used in applications like water cleaning. MSC proposed to clarify the outstanding uncertainty on the mixed mutagenicity evidence through some test work, which was contested by the concerned chemicals sectors. Alternatively, some MSC members indicated that the mixed information that is currently available could be sufficient to launch a harmonised classification as mutagenicity 2 for the bioavailable Al ion. They therefore supported the conclusion of France to first clarify this. Eurometaux has informed the Al sector on the MSC outcomes and provided some recommendations to the sector. Both issues will be debated in the upcoming Evaluation Platform session of 22 November (more information: Hugo Waeterschoot).

MSC-56: draft CoRAP 2018-2020 published including a suggestion for a "mixture" and Cr2O3

ECHA released on 24 October its proposal for an updated CoRAP list for the period 2018-2020, which was for the first time debated in MSC during the same week. Overall, the proposal only includes a low number of new proposals (14) while almost half of the existing entries (48) have been delayed for one or more years. This was heavily criticised by the NGOs. ECHA responded that the delays were caused by running in parallel the compliance checks (CC) on standard information data gaps on CoRAP substances. These CCs often clarify the concern raised in the Substance Evaluation thereby deleting the need for it. Member States confirmed that they had a workload issue given that besides preparing new Substance Evaluation reviews

they must now also deal with returning registration updates from the first CoRAP years. No metal entries (Sb compounds, TiO₂ or CeO₂) were delayed, but two new surprising entries raised questions by Eurometaux: Indium-Tin-Oxide (ITO) for review in 2020 by the Netherlands and Cr₂O₃ by France already for 2018. Eurometaux indicated that ITO could be considered as a mixture while Cr₂O₃ is already posted on Annex XIV and authorisations are being granted. ECHA replied that the substance/mixture status will be clarified in a SID CC in 2018 and additional concerns were identified for Cr₂O₃ (Repro, sensitisation, ...). Eurometaux also pleaded at MSC for more and earlier contacts between the reviewing Member State and the concerned consortia, noting an increasing delay for such first contacts (more information: Hugo Waeterschoot).

MSC- Evaluation workshop 16-17 October: *an opening towards consulting Industry to define relevant substance groups for data review and gap filling?*

The annual MSC Evaluation workshop allows to reflect and do strategic planning to enhance the development, implementation and processing of Dossier and Substance Evaluation activities. Last year, the “Chemicals Universe” mapping was presented, ultimately aiming at identifying by 2020 the substances that further need RMMs or data gathering or on the contrary, substances that can be set aside for the moment given of lower concern from a registration completeness’ perspective. ECHA focussed more this year on some of the implementation tools and on how this ambitious target can be achieved. The most relevant approach to industry is the grouping approach, which would allow for selecting a group of chemicals for a given endpoint/data gap based upon a common read-across or source substance used. Eurometaux proposed that industry should be “pre-consulted” given it is best aware about the read-across and related source substances, included in the dossier. This pre-consultation should best occur before ECHA opens a formal Compliance Check or a Member State selects a substance for Substance Evaluation. MSC appreciated this idea and would further consider how this could work using the COLLA pilot cases as an example. The drawback is that industry may need to widen its horizon in respect to read-across approaches. The outcome of the workshop will be debated at the Evaluation Platform on 22 November (more information: Hugo Waeterschoot).

Authorisation

ECHA Substitution Workshop – Helsinki: *towards a European substitution strategy*

As a follow-up on the “thought starter on a substitution strategy” discussed at the June CARACAL meeting, it was decided to organise a workshop allowing stakeholders to exchange views. The workshop, held by ECHA on 9 and 10 October, gathered around 50 participants including Member States, industry and NGOs. Eurometaux was one the industry representatives who presented its views and used that opportunity to recall some key messages: i) a cross-policy holistic approach is needed, ii) efforts should focus on identification and minimisation of actual risks, iii) RMOas should be the starting point for substitution, iv) the metals industry is committed to controlling risk and supports capacity building through supply chain interaction. Eurometaux promised to organise an industry workshop on the subject in 2018. The major conclusions drawn by ECHA were on i) ECHA data accessibility, ii) access to finance to support substitution, iii) capacity building through supply workshops and creation of networks. All the presentations, including ECHA’s final conclusions, are now available on the ECHA website - <https://echa.europa.eu/-/workshop-on-substitution-strategy-9-10-october-2017-echa>. ECHA aims at having a substitution strategy endorsed by its Management Board in December 2017 (more information: Lorenzo Zullo).

Eurometaux’s intermediates programme: *progress on all 3 cases (EPMF, Catalyst sector and CTP-HT use in the ferro sector)*

The intermediates programme from Eurometaux’s Authorisation and Restriction platform aims at clarifying/confirming the status and boundaries of intermediates listed on Annex XIV and used in the inorganics sector. In this second round of the project, 3 cases were debated/reviewed earlier this year with ECHA requiring follow-up and guidance development by each of them. EPMF recently submitted a draft guidance document on the use of PbO for precious metals’ refining while the European catalyst manufactures are progressing towards such a guidance. The case on the use of CTP-HT in tap-hole clay was not yet clear for ECHA and thus triggered a meeting between ECHA, Eurofer and Eurometaux. The case was convincingly presented by Eurofer and ECHA indicated some further points of attention, mostly related to the upcoming final judgement of the Acrylamide court case on intermediate use. The status of the project will be discussed at the upcoming A&R session (23 November) while Eurometaux will investigate about the potential use of anthracene for repair works in high furnaces, given it was raised as a potential use (more information: Hugo Waeterschoot).

Others

Accredited Stakeholders workshop: *ECHA’s strategic plan-conflicts of interest- enforcement*

ECHA organised its annual accredited stakeholder workshop in Brussels on 18 October, alternating breakouts and plenary sessions to discuss their 2019-2023 strategic plan, their approach to managing conflicts of interest and transparency and the Enforcement Forum work. ECHA aims to become by 2023 the main source of knowledge and advice on chemicals, serving a

wide range of EU policies and stakeholders. To achieve this, the following strategic priorities are proposed: amplifying the identification and risk management of substances of concern, making a difference in the safe and sustainable use of chemicals by industry, maximising the use of data and competences for the benefit of human health and the environment. For each strategic priority, areas of operation have been identified such as enhanced mapping and prioritisation and challenges, sectorial approaches or concerted regulatory action. Stakeholders were invited to identify their biggest challenges but also potential benefits and need for support, before indicating where they could contribute. During the session devoted to conflicts of interest, stakeholders were asked to identify what works well and where there is room for improvement. The last session of the day discussed enforcement issues and more specifically what the Forum could do to improve cooperation with stakeholders, possible joint actions and concerns on level playing field in the implementation of REACH and CLP (variations in enforcement in different Member States). The workshop attracted less stakeholders than usual despite being held in Brussels, which is slightly regrettable as it represents an easy and informal opportunity for networking and picking up 'emerging topics' (more information: Violaine Verougstraete).

COMMISSION REACH & CLP Activities: hot topics/issues

DCG

DCG-SMEs: who should help SMEs to overcome economic barriers associated to the 2018 REACH registration deadline?

The European Commission realised that some SMEs might not be able to register their chemicals for the 2018 REACH registration deadline due to economic barriers and asked the Directors Contact Group (DCG) to think about possible solutions. On July 2017, ECHA circulated to the DCG Sherpas group a proposal suggesting that consortia give to SMEs, on a voluntary basis, free access to data and to the joint registrations. Eurometaux, in a joint statement with Cefic and Concauwe, strongly opposed this proposal. The position taken by industry was strongly criticised and considered as being non-constructive. A brainstorming was organised in September between ECHA, Cefic and Eurometaux to hear the different opinions and discuss a possible way forward. ECHA recently circulated a revised proposal, which contains less extreme options than 'free access' (i.e. lump sum, staged payment systems) and a clear indication that SMEs must remain committed to contribute to future REACH costs (dossier update, substance evaluation, etc.). However, concerns raised by industry that point to the fact that this recommendation is in breach of several European laws and REACH principles are still not considered. A conference call will be organised in the coming weeks to agree on the approach to be adopted by Eurometaux at the November DCG meeting, where the recommendation is expected to be discussed and adopted. One of the complicating factors in this debate is the non-alignment of the different industry sectors who have different interests at stake (more information: Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

EUROMETAUX REACH & CLP Activities: hot topics/issues

Resource mapping to respond to REACH / ECHA challenges

SVHC proposal on Co₃O₄ with > 0.1 % NiO: Eurometaux contributions to Public Consultations on Co₃O₄

The Netherlands has proposed Co₃O₄ with > 0.1 % of NiO to be included on the candidate list as a CMR chemical due to the impurity content of NiO, aiming for a reduction of the impurity level to protect workers. Given the precedent setting nature of listing inorganic substances on the candidate list for its impurities, Eurometaux exceptionally participated in the Public Consultation (PC) and prepared in close consultation with the Cobalt and Nickel sectors, a response to the PC that closed on 20 October. While not rejecting the need for attention for the risks potentially caused by impurities, the response focussed on conceptual aspects like alternative ways to reduce risks for impurities in a better and more efficient way. More generically oxides of different metals will be on the rise in the future due to increased recycling efforts, a trend supported by the Circular Economy policy. The need for attention accorded to impurities and the way on how authorities seem to be handling this matter will be an important point of debate at the upcoming A&R platform (more information: Hugo Waeterschoot).

Public Consultation on the Environmental Classification of Lead: Eurometaux, ILA and user sectors submitted contributions

Denmark recently submitted a proposal for the classification of Lead metal for the environmental toxicity endpoint. The proposal is highly contested by the metals sector given it does not make a distinction between the massive and the powder form, wrongly interpreting the role of the Transformation Dissolution tool and the CLP metals classification scheme, whilst not recognising the data treatment rules for data-rich substances like Lead. Eurometaux's metals environmental classification taskforce reviewed the case and agreed to prepare inputs for the Public Consultation; Eurometaux on the points of principles

and methodological aspects, whereas ILA's contributions would focus on the Pb data set and those of user sectors on the impact of the suggested classification of the massive form for alloys. All contributions were submitted to ECHA by 30 October (more information: Steve Binks and Hugo Waeterschoot).

Exposure Scenarios Taskforce: *various points raised at the latest meeting held on 4 October*

The taskforce got updated on the latest developments of the ENES programme and its action plan for 2017-2020. It then shared preliminary outcomes of mass flow analysis (MFA) exercises conducted by a couple of consortia. Specific case studies were presented, identifying typical bottlenecks as well as possible improvements concerning data retrieving and data reporting. Further improvements in the reporting template will be implemented. The other ongoing projects that were discussed included the further development of Specific Environmental Release Categories (SpERCs) and the validation of MEASE 2.0. The cross-industry activities on SpERCs continue to proceed under Eurometaux's chairmanship and aim at defining quality criteria to be used as a basis for the SpERCs quality check. The taskforce agreed that SpERCs should be robust for regulators (e.g. RAC questions the SpERC used in the REACH Applications for Authorisation). By end of the year the first SpERC factsheets on service life of metals used in batteries, metals present in low release articles and in metallic articles with no emissions should be ready. A call for further volunteers to test MEASE 2.0 was issued as well. The meeting concluded by a short but interesting presentation on ProScale. This tool was proposed a few years ago as a new approach to describe relative potential toxicological performances of products. ProScale is intended to be used as additional information in the framework of LCA (life cycle analysis), with a first focus on human toxicity impacts and with the possible extension to ecotoxicity and other product groups. The minutes of the meeting will be circulated soon (more information: Federica Iaccino, Violaine Verougstraete and Lorenzo Zullo).

Risk Assessment & Classification Taskforce meeting - MCC: *very interesting meeting again...*

The Risk Assessment and Classification Taskforce held its autumn meeting on 11 and 12 October, discussing a variety of topics ranging from environmental classification to Adverse Outcome Pathways, Man via the Environment to Human biomonitoring. Thanks to the chairs' experienced management, the group was able to debate in depth the sometimes very complex topics that were on the agenda, identifying possible precedents and resulting actions, even interrupting the meeting in due time to explore the diversity of competences amongst the members locked in an 'Escape Room'. Mission accomplished! The adventurous evening did not affect the participants' ~~energy~~ enthusiasm to further think over the learning lessons of the TiO₂, Ni compounds and Co metal classifications and to conclude on a close monitoring of the REACH and OSH developments. The minutes will be circulated very soon and we are already looking forward to our next gathering (more information: Hugo Waeterschoot and Violaine Verougstraete).

SPERCs Workshop: *progress on quality criteria and steps forward towards an overall review.*

On 20 October Eurometaux hosted the second cross-industry SpERC workshop, as follow-up to the one organised in 2016. The objective of this workshop was to test and benchmark suggested quality criteria against case studies on SpERC factsheets (FS) and background documents (BD) that were developed by different trade associations including ATIEL, CEPE, ECPA, EFCC/FEICA, ESIG/ESVOC, Eurometaux and Fertilisers Europe. One of the main issues that emerged was the potential "conflict" between SpERCs developed by different sectors. This was particularly relevant for the solvent sector that needs to define a hierarchical approach to combine SpERCs that are developed by solvent manufacturers vs. those developed by downstream users. Further clarifications and alignment emerged as needed regarding the interpretation and use of certain terminologies such as "rigorously controlled conditions", "obligatory RMMs" and "waste". Overall the proposed quality criteria were considered appropriate and the next months will focus on their finalisation. There was general agreement to involve Member States in this validation to ensure that the SpERCs review foreseen in 2019 (as part of the ENES programme) will be based on the same approach followed by the internal review to be conducted by industry in 2018 (more information: Lorenzo Zullo).

Non-Toxic Environment

Non-Toxic Environment brainstorming: *working together towards possible proposals*

A first brainstorming was organised between the interested EHS/REACH/SUS Committees' members to achieve support and gather ideas on how to further build on the outcomes of the Risk Controlled Environment workshop of October 2016, considering the publication of the Non-Toxic Environment Strategy in 2018. Undeniably the sector wants to be proactive towards the European Commission to influence the NTE strategy before it is released, making sure it does not close the door on our proposal for a risk-controlled environment. After a series of interactive exercises to put all participants in a creative atmosphere, three groups were formed to brainstorm the different pillars of a possible strategy: messaging (how do we justify why our "risk-controlled environment" proposal is better for Europe's strategic priorities than a hazard-based non-toxic environment?), credibility (how we make our "risk-controlled environment" proposal credible? what could industry do?),

audience (who needs to hear our proposal, and what do they need from us to be convinced to act on our behalf?). A report of the session will be circulated soon, reporting the inputs and ideas collected that will be used to propose an action plan (more information: Chris Heron, Hugo Waeterschoot and Violaine Verougstraete).

UVCB

SID and intermediates (webinar 26 October):

UVCBs dossiers submitted in 2014 need to be updated as soon as possible as they are no longer exempted from ECHA's screening exercises. Several aspects related to substance identity and data reporting in IUCLID 6 have triggered exchanges with the ECHA SID and Computational Units. A webinar was organised on 26 October to encourage harmonisation of approaches between registrants, aiming also at clarifying the latest outcomes from discussions with ECHA and how to best organise the updated dossiers without providing redundant data (i.e. the constituents' approach leads to identify a number of metals already registered in 2010 for which the information is typically repeated across UVCBs). A proposal to be further discussed with ECHA would be to restrict IUCLID 6 information to the constituents' summaries (rather than reporting all robust study summaries). In the meantime, the data sharing agreements in place since 2014 are undergoing updates to ensure IUCLID 6 compliance of the data exchanged in order to update UVCBs Dossiers. The next meeting of the taskforce is set for 27 November (more information: Federica Iaccino).

Metal-specific REACH application tools and concepts

Workshop on classification of metals and alloys and its implications in the non-toxic society - Stockholm

Eurometaux was kindly invited by the MITF (Metall Information Taskforce) and Jernkontoret (Swedish Steel Producers' Association) to give a presentation on the 'industry proposal classification scheme for special mixtures in CLP' in the context of a debate between the Swedish Chemicals Agency, EU Commission and industry on the Non-Toxic Environment. The presentations and the panel debate illustrated that there is interest on all sides to continue the discussions but that communication and sharing knowledge on the different realities and agendas is a must. The Swedish Parliament has defined some very clear directions to move towards and milestones to achieve, which gives them strength in the debates with other Member States and clear targets. For example, when referring to "non-toxic materials cycles", it is meant that there should be the same requirements for new and recycled materials. The EU Commission representative, who is actually the penholder of the NTE strategy to come, explained that they use the same starting point as industry: risk = hazard x exposure but that they keep the reduction of hazard as a first step (with substitution etc.) and that decreasing exposure (avoiding some uses or unnecessary uses) should be targeting less hazardous chemicals. Other aspects promoted are the design of sustainable chemicals, encouraging R&D and improving knowledge and access to information (including biomonitoring). He was not able to provide the audience with a precise timing with regard to the NTE communication schedule, pointing however –and not without humour- to all ongoing processes at Commission level as being related (Circular Economy package, REACH review, CLP and other legislations, REFIT, review of 2020 SAICM objectives, 2030 UN Sustainable Development Goals). Industry presented some interesting case studies where classification and REACH issues were affecting directly the steel/brass manufacturing/uses/markets. Bioelution was repeatedly mentioned over the day, including during a presentation by KTH. While the Swedish Chemicals Agency confirmed its interest for the tool, it is clear that to ensure its acceptance, its applicability and limitations should be transparent and strive towards simplicity. A report will be available soon (more information: Camilla Kaplin and Violaine Verougstraete).

Metals Sectorial Approach

Making progress with the Baseline Report: *and a trust-building workshop on 24 January*

The template for the baseline report was finalised by mid-October, taking into account some last comments issued during and after the REACH Forum meeting. The consortia were invited to provide Eurometaux with the list of substances (or group of substances) for which they plan to compile baseline reports. In follow-up, they got hyperlinks to the online-based questionnaire for each baseline report they plan to submit. Up to now, 116 links have been distributed. As agreed with the Forum, the baseline reports received before the end of November will be used to prepare an 'extract' that will allow the Steering Committee to suggest common points of attention and priorities for the trust building workshop with ECHA. This extract will be discussed at the next Forum meeting. The workshop is scheduled for 24 January, in Brussels (exact fancy location to be confirmed as we still won't have access to the MCC) and all consortia are invited as this will represent a very good opportunity to agree on the further content and modalities of the inorganic sectorial approach. A Save the Date will be sent soon (more information: Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

Nanos

Regulation developments - Commission Recommendation 2011/698/EU revision & Amendments of the REACH Annexes

The feedback by stakeholders on the new Roadmap on the Revision of Commission Recommendation 2011/698/EU on the definition of a nanomaterial show a high demand to finally open the main consultation on the definition revision itself. Eurometaux decided not to answer but to wait for the revision consultation. A feedback on the roadmap was deemed not efficient, and neither was a comment on the definition itself right at this step. Meanwhile the Commission have published the amendments of the Annexes to REACH for the registration of nanomaterials. Important points have been discussed within the taskforce identifying and insisting on the importance of clear term definitions, understanding which methods need to be used and especially clarification of data requirements based on tonnage band. In addition, a general concern on the regulation revisions order and timetable will be expressed. Eurometaux will send the feedback in, keeping the deadline, end of this week. The future way forward will be discussed (along other topics) at the Nano Taskforce meeting in Brussels on 21 November 2017. An invitation has already been sent out to the taskforce (more information: Nathalie Kinga Kowalski).

NanoReg²: Regulatory Preparedness Workshop, JRC Ispra, October 5-6, 2017

NanoReg² project's targets are to compile regulatory tools, develop grouping and intelligent testing strategies built on data management tools and produce robust information on safety. The objective of the workshop was to openly discuss how regulators can better prepare themselves to deal with the risk assessment of nanotechnology innovations. This included discussing how to achieve the Safe Innovation Approach (SIA) where safety should be applied early on, and industry and regulators should dialogue and share knowledge. REACH, Food Contact Materials and Novel Foods were taken as examples in EU legislation, but OECD is also lagging behind and faces regulatory "disruptive elements" like new emerging materials (bionanos) and new categories of applications not fitting in existing clusters (e.g. driverless cars). The meeting concluded on the evidence that showing 'what' and 'when' to communicate are not defined. As there are no rules and no incentives for innovators to communicate this would be the first step to work on in the future (more information: Christine Spirlet, Nathalie Kinga Kowalski).

Others

Workshop on TiO₂ Substance Evaluation Meeting - UK: *several challenges ahead*

The TiO₂ sector met in Runnymede (greater London) on a series of issues related to TiO₂ and other Titanium compounds. As the sector recently joined the Eurometaux REACH programme, Eurometaux provided support on suggested items, in particular the Substance Evaluation process and experience. France will undertake the Substance Evaluation which is amongst others, based on a concern that was recently clarified by RAC's classification opinion (CMR endpoint). It remains therefore somewhat unclear what the further intentions of MSC are in respect to the TiO₂ Substance Evaluation, scheduled for 2018. For the sector, it would therefore be most critical to check the updated CoRAP as soon as available (available since 24 October) and scrutinise the updated Justification Documents (the old version still seems to be part of the package). Eurometaux indicated that while there will not be a public consultation launched on the CoRAP update, regular stakeholders in MSC can pose questions and make comments in preparation of the MSC review in December (more information: Hugo Waeterschoot).

FURTHER OUTREACH OF REACH

OECD

OECD has launched a survey to inform of their discussion on the potential future role of OECD in maintaining or supporting a Global Chemicals Knowledge Base (GCKB). The questions that can be found here: <http://survey.oecd.org/Survey.aspx?s=6f67f41794bf417b99b3b97f046609f5> aim at capturing the needs and expectations of users of such a knowledge base and solicit input from members and stakeholders involved in the OECD Chemicals Programme. The survey is to be completed by 10 November. Eurometaux has circulated a draft with proposed responses to the Risk Assessment and Classification Taskforce. Input is welcomed (more information: Hugo Waeterschoot and Violaine Verougstraete).

COMMUNICATION

Vilnius: Cefic and Eurometaux invited to exchange on Supply chain communication experience

The Lithuanian MSCA invited Eurometaux to share the sector's experience concerning supply chain communication and interaction with the downstream user, at a workshop they organised in Vilnius on 19 October. Eurometaux explained their tactic to support this as well as the approach and support provided by most metal consortia. Eurometaux emphasised the tools the sector developed and promoted for the purpose of estimating exposure and risks at DU level such as SPERCs and MEASE, or how DUs could review, and implement the Exposure Scenarios (like the Scaling tool) and interact with suppliers (Guidance on Exposure Scenarios for Dummies). The input from the metals sector was considered pragmatic and was highly appreciated by MSCA as well as attending industries (more information Federica Iaccino and Hugo Waeterschoot).

Eurometaux Executive Committee- General Assembly: *Commissioner Vella on chemicals management*

Commissioner Vella was invited on 19 October to highlight the main priorities of EU Environment Policy as well as its consistency with other EU policies. He sketched the main challenges Commission has ahead (e.g. REFIT exercises and better Regulation, need to solve the issues at the interface Waste/Chemicals/Products), was well aware of the importance of metals in our modern society, but also mentioned costs and health benefits of having chemicals well legislated. These costs come from the recently published Study on the cumulative health and environmental benefits of chemical legislation (<https://publications.europa.eu/en/publication-detail/-/publication/b43d720c-9d80-11e7-b92d-01aa75ed71a1/language-en>). Unfortunately, no Q&A could take place, on Mr Vella's request. Eurometaux subsequently made a presentation on the evolution of chemicals management towards a non-toxic environment and how the metal sector could possibly propose a response focusing on the control of exposure and hence risks, where those occur. The input from the participants to the 5 October brainstorming (see above) was very helpful to define the content of this proposal (more information: Guy Thiran, Chris Heron and Violaine Verougstraete).

International Lead and Zinc Study Groups: *EM's presentation on the theme "Turn the challenges of EHS in new growth initiatives –identifying possible paybacks"*

Eurometaux was invited to give a presentation on the theme "Turn the challenges of EHS in new growth initiatives –identifying possible paybacks". This was an additional opportunity to exchange on the evolution of chemicals management in the EU and internationally, and to identify possibilities for cooperative work to ensure that metals manufacturing, uses and recycling fit in the "non-toxic perspective" advocated by society. It is also important in this context to maintain and/or restore level playing fields (EU vs. non-EU, chemicals vs. waste, EU vs. national initiatives, chemicals management vs. circular economy) (more information: Violaine Verougstraete).

CALENDAR

- **Week of 6-11 November: Exact date to be confirmed: 2017 Forum's Open session for ECHA's Accredited Stakeholders Organisations**
- **21 November: Nanos Taskforce meeting (Cogerimo - Brussels)**
- **22 November: Evaluation Platform meeting (Bluepoint - Brussels)**
- **23 November: A&R Platform meeting (Cogerimo - Brussels)**
- **23-24 November: ENES (Helsinki)**
- **27 November: Intermediates Taskforce (Cogerimo - Brussels)**
- **1 December: RAC-43 + SEAC-37 – ECHA (Helsinki)**
- **4-8 December: RAC-43– ECHA (Helsinki)**
- **11-16 December: MSC-57 – ECHA (Helsinki)**
- **14-15 December: ECHA Management Board – ECHA (Helsinki)**
- **20 December: REACH Forum (Bluepoint - Brussels)**
- **24 January 2018: Sectorial workshop with ECHA (Tbc – Brussels)**

NB: Please note that the MCC will be in renovation from end of October 2017 to end of February 2018, therefore the important meetings will be taking place either at:

- Bluepoint: <https://www.bluepoint.be/en/brussels/> - 80 Bd. A. Reyers - 1030 Brussels (Metro Diamant). If you are staying overnight there is the Hotel Plasky that is situated very nearby <http://hotelplasky.be/>.

From Midi Station to arrive by public transport: you need to get the metro (line 2 or 6) to Madou and then the bus 29 (direction Hof Ten Berg) – 10 stops to Diamant (or Plasky for the hotel). The other option is of course to take a taxi.

Or from Montgomery hotel it is only two stops with the Tram 7 (from Montgomery – Direction Heizel)

- Cogerimo: 168 Avenue de Tervueren – 1150 Brussels (Metro Montgomery)

ACRONYMS

BG: Background Document	MSCA: Member States Competent Authorities
CARACAL: Competent Authorities for REACH and CLP	NGO: Non-Governmental Organisation
CC: Compliance Check	NMP: 1-Methyl-2-pyrrolidone
CLP: Classification, Labelling and Packaging Regulation	NTE: Non-Toxic Environment
CMR: Carcinogens, Mutagens or toxic to Reproduction	OECD: Organisation of Economic Cooperation and Development
COLLA: Collaborative Approach	OSH: Occupational Safety Health
CoRAP: Community Action Rolling Plan	PC: Public Consultation
CTP-HT: Coal Tar Pitch High Temperature	RAC: Risk Assessment Committee
DCG: Directors' Contact Group	REFIT: Regulatory Fitness & Performance Programme (EU)
DNEL: Derived No Effect Level	RMM: Risk Management Measures
DU: Downstream User	RMOa: Risk Management Option analysis
ENES: Exchange Network on Exposure Scenarios	SAICM: Strategic Approach to International Chemicals Management
FS: Fact Sheet	SEAC: Socio-Economic Analysis Committee (ECHA)
GCKB: Global Chemicals Knowledge Base	SIA: Safe Innovation Approach
IUCLID: International Uniform Chemicals Information Database	SID: Substance Identity
LCA: Life Cycle Analysis	SME: Small & Medium Enterprise
MEASE: Occupational Exposure Assessment Tool for REACH	SpERC: Specific Environmental Release Category
MFA: Mass Flow Analysis	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MSC: Member States Committee (ECHA)	

Erratum

Please note that we made a mistake in last September Chemicals Management News, related to the outcomes of the TiO₂ CLH discussions: we mentioned that "The final RAC opinion on titanium dioxide, concluding that it should be classified as a suspected human carcinogen Carcinogenicity cat 2; H350 (inhalation) was adopted in written procedure before RAC 42". H350 was incorrect, it should be **H351** (thanks Patrick for spotting this)