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EUROMETAUX CHEMICALS MANAGEMENT NEWS

REACH Forum meeting 20 December

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Dear REACH Forum member,

Once upon a time, far away from here, lived a princess in a magnificent palace at the bottom of a lake.
Her name was 'Regulatory' and she spent her days promenading between the marble walls of meeting rooms and a beautiful garden with well-defined flowers and clear paths. Regulatory was a very sweet girl, filled with good intentions, dreaming about a world where everyone would be safe and happy, having clean jobs and eating organic food. Her world however stopped at the edge of the garden, which was limited by access rules she never tried to transgress.

A bit further away, on the surface of the lake, lived a king. His abode was also a palace, composed of various substances, some bright and coloured, others more prickly and stinky. He devoted his time to fixing best processes and techniques as his dream was to make his kingdom sustainable.

One day the king heard about the princess and her ideal world. He had no knowledge about the inhabitants residing at the bottom of the lake. He thought however that it could be a good alliance that may lead to a more sustainable world.

But how to meet Regulatory was the challenge. People from the bottom and the surface of the lake did not interact with each other. Actually the king could not even swim.

He asked for advice and obtained the following from an old witch: "because of her status as princess, Regulatory would not spontaneously leave her palace. And without an invitation, the king would not get access to the palace. He could however be subtle and explore the possibilities of connecting with the princess through her garden. Maybe that, by depositing some of his most glittering substances between the flowers, he could trigger the princess's curiosity and be able to meet her. Maybe that with patience and time, he could even encourage her to have a conversation, leave the limits of her world and convince her to visit his?"

This is how the story continues, but not ends…The king learnt to swim, the princess became interested in expanding her promenades.
Up to you to write what comes after…

Adriana and Violaine

ECHA REACH & CLP Activities: hot topics

ECHA Committees

RAC-43: ***restrictions on lead and lead compounds***
RAC's agenda for its first week of meetings included several items directly relevant to metals. The discussion on the restriction of the use of lead compounds in PVC was finalised, and the corresponding part of the opinion will be revised to consider the topics that were brought up during the meeting (the length of service life and its implications for exposure/risk, the possible overlap with RoHS, how to ensure a consistent message of this restriction with the granted authorisation for lead chromate pigments etc.). Lead compounds "shall not be used in articles produced from polymers or copolymers of vinyl chloride (PVC) not specifying what intended function is and articles produced from polymers or copolymers of vinyl chloride (PVC) shall not be placed on the market if the concentration of lead (expressed as Pb metal) is equal to or greater than 0.1% by weight of the PVC material". Higher limits are proposed for derogated articles (1% for soft PVC recyclates, 2% for rigid PVC). An important message that was provided is that this restriction is about minimising exposure to lead compounds, and not about clean recycling loops or facilitating the circular economy as requested by several parties during the Public Consultation. Emissions from PVC occur mainly at the waste stage –not during service-life- and keeping Pb in articles is therefore considered an effective risk management measure as it significantly delays entry into the life cycle stage where emissions are the highest. The risk from service life emissions can be further minimised if recycled PVC is encapsulated by virgin PVC, or enclosed so that it is not exposed to weathering, abrasion, etc. It should be kept in mind that the maximum estimated emission from PVC represents ~0.1% of the total of other lead sources.
The other Pb restriction that was discussed aims at restricting the use of lead gunshot (where lead gunshot means any gunshot made of lead, or any alloy or compound of lead comprising more that 1% of that alloy or compound). 1. It shall not be used in gunshot for shooting with a shotgun within a wetland or where spent gunshot would land within a wetland.2. Lead gunshot

shall not be in the possession of persons in wetland. The main issue for discussion was the inclusion of peatland in the restriction which was challenged during the Public Consultation for reasons of proportionality, but considering the exposure risk and difficulties in differentiating between 'wet' and 'dry' peatland, RAC supports including both 'wet' and 'dry' peatlands in the scope of the restriction. The effectiveness of the measure was also debated as it is impossible to estimate it quantitatively. If fully implemented, the restriction would prevent an annual release of up to 1452-7767 tonnes of lead in wetlands. However, in light of a likely limited enforcement, the acceptance by hunters will be key in achieving high effectiveness. The enforceability of the restriction was further questioned by several members. Commission mentioned that further discussions with the Member States will be required. It was suggested to recommend a review of the effectiveness of the proposed restriction some years after its entry into force. These questions, as well as the 'buffer zone' around the wetland will be further discussed at RAC-44 (more information: Steve Binks and Violaine Verougstraete).

RAC-43: ...*and further discussions on the Ni OEL*

A second discussion took place in RAC on the proposed OEL for Ni and its compounds, in the context of the amendment of the CMD. The proposals included an inhalable OEL of 0.03 mg Ni/m³ for nickel compounds considering the presence of a mode of action (MoA)-based threshold for cancer, a respirable OEL of 0.005 mg Ni/m³ for nickel metal and compounds, a Biological Guidance Value of 4.5 µg Ni/l and the application of a SEN notation for dermal sensitisation. The Rapporteur presented the background information in support of the recommended values. RAC members commented mainly on the need for the document to include a better analysis of the genotoxicity data and the rationale for going from *in vitro* to *in vivo* data; they requested that the MoA-based threshold for cancer be presented as a weight of evidence. The possible need to add additional assessment factors to the nickel subsulfide derivation and to provide a more detailed description of the human equivalent concentrations to rat aerosols were mentioned. DG Employment indicated that while the inhalable OEL will be considered under the Carcinogen Mutagen Directive (CMD), it is not clear under which directive the respirable OEL will be placed. It is most likely that it will be Chemicals Agent Directive but the ACSH group may need to be consulted on this topic. As next steps, ECHA and the Rapporteur will revise the nickel background documents and RAC Opinion. Public comments with responses will be posted. The OEL Opinion will be finalised at RAC-44. Two other OELs/dose-response proposals, for benzene and acrylonitrile, were debated as well and discussions will also have to be closed by the end of the next RAC meeting (as the mandate stipulates that opinions shall be available by 26 March 2018). Interesting in this OEL context is the endorsement by RAC of the joint RAC/SCOEL report on the methodology related to the exposure of chemicals at the workplace in relation to non-threshold substances. Key recommendations of the report are a) for RAC to consider if the current ECHA guidance is appropriate or whether modifications are needed to accommodate the mode of action-based threshold approach in addressing carcinogenic risks (note: the concept of a "practical threshold" used by SCOEL was considered by the taskforce to be more appropriately described as a "mode of action-based threshold"), b) for SCOEL to consider the outcome of the report for the revision of their methodology (expected before the end of the year), c) when proposing an mode of action-based threshold, remaining uncertainties need to be clearly described for (i) the uncertainty surrounding the identification of the threshold itself and (ii) the uncertainty in identifying the actual level (value) of the threshold. This report completes the previous ones issued by the joint RAC/SCOEL taskforce, focusing on a comparative critical assessment of the REACH DNEL and OEL methodologies a) for the inhalation route and b) for the dermal route, including 'skin notation' and dermal DNEL (more information: Adriana Oller and Violaine Verougstraete).

SEAC-37: *restrictions, a complementary debate with RAC including many precedent setting cases*

SEAC also debated the 2 lead-based restrictions but from the perspective of the socio-economic benefits and the effectiveness of the proposed EU-wide restriction measures. The lead in PVC was an easy deal given the EU manufacturing industry voluntary switched to alternatives which were even more effective, with only a slight increase in cost. The additional costs for EU society are therefore very limited and only to be borne with the import of articles. The benefits were expressed as preventing emissions (> 7 tons of lead) from waste-burning installations and to a much smaller (negligible) extent contact with window frames. The benefits assessment based on prevented emissions is an approach that will certainly be used for other metal dossiers in the future and is an approach that was originally developed for PBT organic substances. SEAC agreed with the exemptions for increased Pb concentrations in recycling streams as a cost-efficient way to prevent exposure (see also RAC conclusions). Also this conclusion sets clear precedent for metals recycling.

The last SEAC meeting focussed on the costs of the restriction, including higher costs for the shot and costs for the abrasion of the barrels (totalling between 35 and 61 million Euros). At the meeting in September they questioned why the restriction was restricted to shot used in wetlands making it difficult to enforce it. ECHA clarified that the boundaries were defined by the Commission, but that they were coherent given waterfowl actively search for Pb pellets as feed. Now that SEAC members understood the boundaries of Pb in the shot case (wetland areas) they were able to focus on the benefits assessment. SEAC did not use the reduced emission model (like for Pb in stabilisers) but a cost for loss of birds (dying indirectly from ingesting Pb shot). An average cost for a duck was stated (150€) resulting in benefits of > 105 million €/y, so a very proportional case. This approach based on biodiversity loss is an important and precedent-setting one, although it was recognised that a very simplified approach was used in this case. SEAC also debated a third very important Restriction proposal: diisocyanates,

whereby the authorities suggested a quite unique restriction approach: making the supplier responsible for an extensive and in-depth training programme to ensure users reduced exposure to this sensitiser as much as possible. The requirements for the training of 1.6 million (or even 2.5 million) workers are very significant hence the costs (between 100 and 200 million €/y). Alternatively the restriction is very proportionate given the benefits are estimated to be an order larger. Therefore SEAC's main debate focussed on the enforceability and how to ensure that the training would be effective. No doubt that this case sets extensive precedent for industry in general and the handling of sensitisers specifically. Finally SEAC agreed the conformity of a restriction on the uses of CMR substances in tattoo inks a case that will be debated in 2018 (several of them include metal based inks) (more information: Hugo Waeterschoot).

SEAC-37: ***authorisations focussed on review periods including a first rejection***
SEAC reviewed a series of AfAs, many on chromates. The HAPOC case (a German consortium of suppliers and users of Cr6+ compounds) was a most interesting one and included several learnings. First, the application was filed in German, which delayed the review process for a year and used a very different approach and terms as suggested by the guidance. This raised so many misconceptions that in the end, during the Trialogue procedure, the submitter modified its AfA significantly so that it was more in line with the guidance.. The different uses included well-documented single uses as well as very poorly-documented multiple uses. SEAC considered them carefully ensuring balance with how previous cases like CTAC and others were handled. They concluded for the HAPOC case review periods of 12 years without conditions, up to 4 years with conditions (to split the applications when resubmitted) and even one negative opinion for a sodium chromate application give the Consortium could not provide the additional minimal information on a very poorly-motivated case, as agreed during the Trialogue. This would be the first rejected application.

SEAC-37: ***review periods longer than 12 years***
SEAC was informed about the agreement and the criteria used by SEAC to justify/motivate a longer review period than the maximum of 12years as it stands today. Whilst these criteria were very strict from the risk perspective (minimal risk level (10-5) to be achieved), they leave much more leverage on the SEA part which was welcomed. The agreement came just in time to allow SEAC to assess an EDC case requesting a longer review period (RP) than 12 years. The case complied with the recent criteria set by CARACAL for such a longer period. However, SEAC did not apply a longer RP given the case was felt compliant before the CARACAL guidance was agreed. Even though it did not concern a metal, Eurometaux contested this case given it fitted the criteria, but did not find support either from SEAC or from other industry sectors. Neither did SEAC agree to extend the review period on MOCA from 4 to 7 years as suggested by the applicant during the second consultation. The main problem was that the consultant used a quite unusual model to estimate the benefits and this was not appreciated by SEAC. Finally ECHA informed SEAC that several reapplication dates (RP – 18 months) expired including one on As_2O_3 (used to produce ammonium) indicating that suppliers may not sell As_2O_3 anymore for this application, while the applicant would lose its authorisation period soon (more information: Hugo Waeterschoot).

Authorisation

Helsinki 13-14 November AfA workshop: ***stocktaking of experience with AfA***
ECHA organised an AfA stocktaking workshop in Helsinki to evaluate learnings but also how the processes of AfA submission and assessment could be improved. The outcome of the Eurometaux Chromates workshop of June was presented (by Cefic) confirming the process seems to work well, but emphasising the difficulty with upstream applications. Eurometaux chaired a session of the conference with ECHA and took part of a panel debate looking for ways forward. The meeting concluded that the AfAs submitted were of better quality, due to increased experience and more DUs applying, while showing understanding that upstream applications may have their role. Alternative application models like the dual application model (manufacturers applying only for the formulator stage and formulators or users applying for their use) were seen as an effective solution, while industry raised the need for clarity on longer review periods when justified. The forward-looking session emphasised the need for more emphasis on substitution whereby Eurometaux as panel member indicated this needed a solid technical and economic base as well as attention paid to circular economy and carbon footprint aspects (more information: France Capon and Hugo Waeterschoot).

Others

Accredited stakeholders workshop: ***slides now available***
As explained in the October Chemicals Management news, the main objectives of this annual workshop were to receive feedback from stakeholders concerning ECHA's strategic plan for 2019-2013 and its three tactical priorities, i.e. amplifying the identification and risk management of substances of concern, making a difference in the safe and sustainable use of chemicals by industry and maximising the use of data and competences for the benefit of human health and the environment. In

addition, stakeholders were asked for feedback in reply to ECHA's policy of managing conflicts of interest and to the Forum's engagement with its stakeholders. The proceedings are now available (see https://echa.europa.eu/documents/10162/23509454/181017_aso_ws_proceedings_en.pdf/449f039a-4bee-3aa4-c764-f9b6b4ff92dc). The proceedings include some interesting slides from ECHA on their 2019-2023 programme (in case you need to explain it in consortia meetings) and on how they managed the conflict of interest issue in the context of glyphosate. The report/slides also summarise the contributions from the stakeholders during the workshop (more information: Violaine Verougstraete).

Exchange Network on Exposure Scenarios: ***freezing Helsinki on 22-23 November***
Pablo Rodríguez Domínguez (Nickel Institute) brightly represented Eurometaux at the 11th ENES meeting, held in Helsinki. The programme of the two-day meeting included hands-on exercises to better understand how the communication up and down the supply chain can work in practice, with for example Chesar practical exercises of importing use maps prepared by the downstream user sectors and generating safe use information. Participants were invited to comment on the draft work programme until 2020 and in particular the solutions proposed to identify and address the remaining gaps in communication on safe use along the whole supply chain. These comments will be further discussed and considered in a final version of the action programme before the end of the year. The event's material will soon be made public on ECHA's website (more information: Pablo Rodríguez Domínguez, Lorenzo Zullo and Violaine Verougstraete).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

CARACAL 25: ***2018 registration, restrictions, TiO2, REACH review and non-toxic environment… and much more at stake!***
The 25th CARACAL meeting took place on 15 and 16 November in Brussels. The 2018 registration deadline was one of the REACH hot topics, due to uncertainties associated to the high number of SMEs involved. In addition, more clarity was requested by authorities regarding the status of phase-in substances after that deadline. The learning lessons from the use of REACH Article 68.2 (fast-track procedure for restriction) were debated with a focus on the refinement of the restriction on CMRs in textiles. Authorities also had an exchange on the guidance document on the nickel restriction, for which the final version is expected to be endorsed at the next CARACAL meeting (March 2018). Another important topic was the proposed classification of TiO2 as carcinogen cat 2, following the opinion issued by RAC in October. The debate addressed the following questions like whether CLP can deal with particles, how to deal with different physical forms and conditions of use of TiO2? Can mitigation of labelling be a way forward? The discussion will continue at the next CARACAL. Due to time constraints the topic "labelling of metals in massive form" was not discussed and stakeholders were invited to submit their comments in written form before 15 December. The EU Commission communicated that a REACH Review working document and related communication are expected in Q1 2018; such documents, together with the upcoming strategy on endocrine disruptors and ongoing international activities (2020 SAICM and 2030 UN Sustainable Goals) will represent the base for building the European Non-Toxic Environment Strategy. Full detailed notes were circulated (more information: Celia Gyspert and Lorenzo Zullo).

EUROMETAUX REACH & CLP Activities: hot topics/issues

Resource mapping to respond to REACH / ECHA challenges

Evaluation platform: ***22 November, focus on recent CoRAP experience and tissues used in TRGS/Comet***
The evaluation platform took note of the recent and ongoing Substance Evaluation lessons especially on the 3 Al-salts. While the request from MSC is moderate with aim to clarify the uncertainty related to the MUTA endpoint, the registrants seem resistant to ensure the follow-up and potentially consider launching a BoA case. This risks triggering a Muta 2 classification proposal from the Member States which would affect the Al sector far beyond the salts. The recently proposed CoRAP update did not change the timing and concerns of the already listed metal compounds but surprisingly included Cr_3O_2 for SE consideration including SVHC endpoints. Kai Melzer presented learnings from the TiO_2 case demonstrating the boundaries for MSC in requesting SIDs and specific toxicity information for nano forms. The panel also took note of the recent learnings and MSC recommendations in respect to the tissues to be selected and analysed for gene mutation and somatic cell impacts in the *in vivo* Transgenic Rodent Gene and Somatic mutagenicity test (OECD 488) and the mammalian Alkaline COMET tests

(OECD 489) and was invited to check the registration files for this endpoint. As usual the platform session included an extensive session on experience exchange including amongst (many others) the COLLA experience on Antimony compounds and the read-across debate on Co compounds (more information Kate Belska and Hugo Waeterschoot).

Authorisation and Restriction Platform: ***an overly busy agenda reflecting the raising attention and initiatives on REACH RMMs***

The Eurometaux Authorisation and Restriction platform met on 23 November in Brussels, giving information and debating a long series of REACH Authorisation and Restriction related issues. Besides updating the platform on ongoing A&R issues (including the ongoing SVHC identification debate on Co_3O_4 due to its assumed impurity (NiO) and 3 Cd compounds, the restriction cases on Pb in shot and in PVC stabilisers as well as the innovative restriction on diisocyanates) the focus was mainly on the status of the Intermediates project (with ECHA participating in this debate by conference call) and the status of the legal review on Article 58 (2) in anticipation of the potential Pb compounds inclusion for Annex XIV by the Commission. The A&R platform further agreed on the priorities for 2018 including 1) the issue of impurities in substances requiring RMM, 2) the need for a clear view on ECHA's substitution policy including positioning and workshop contributions, 3) finalising the debate on Article 58 (2) and 4) supporting metal industry sectors that need to prepare for an authorisation. The Committee further debated the different ways on how a restriction can be implemented (as a restriction of a use, an OEL, or a workplace condition, …) and agreed to include these options as an annex to the industry-RMOa guidance Eurometaux has developed in the last years (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

Nanos Taskforce 21 November: ***Updates and preparation for 2018 challenges***

The discussions of the taskforce focused primarily on the possible issues associated with the REACH Regulation and registration of nanomaterials. It is expected that Commission will launch a consultation on the revision of its recommendation on the definition on nanomaterials in the coming 4-8 weeks. The taskforce will react to the document. The consultation on the amendments of the REACH Annexes, which run in October / November, showed a common understanding between the stakeholders on the missing clarifications. Core points of the feedback are that clear definitions of key terms like e.g. nanoform are missing and that there are few possibilities to avoid additional animal testing. The taskforce concluded that the industry needs to explore further the possibilities of grouping nanomaterials. The ongoing discussions, also at OECD and UN levels, indicate that a more active participation of industry in the development of new legal texts or guidelines is welcomed by most authorities. In addition, the taskforce agreed to further work with other industry associations, whenever the possibility arises to present shared statements or joint positions to the regulators. To ensure a clearer communication, the taskforce will meet from 2018 onwards twice a year and ensure regular updates (more information: Christine Spirlet and Nathalie Kinga Kowalski).

Final slags: ***a SEA study launched***

The recent RAC classification proposal for Cobalt metal (C1B by all exposure routes with an SCL of 0.01 %) risks to impact the reuse of Final Slags from the metals sector significantly. The Authorisation and Restriction panel together with the Final Slags taskforce therefore agreed to launch a quick SEA investigation to evaluate the potential impact. In a pilot study the consultant will assess the differentiated impact for the slags produced by a recycling plant using several scenarios (C1A by all routes with an SCL of 0.01 % and by inhalation only + an SCL of 0.01 %). Besides a quantitative investigation of the pilot case the exercise aims to define the cost drivers so that other sites can assess their impact using the excel calculation tool that will be developed for the pilot case (more information Daniella Cholakova and Hugo Waeterschoot).

UVCB Taskforce: ***face-to-face meeting on 27 November***

The inorganic UVCB dossiers submitted in 2014 are currently under refinement and first updates will be submitted in the coming weeks. To ensure consistency in the dossiers update preparation, the intermediates taskforce met again on 27 November. The meeting started with an overall summary of the different exchanges that were held with ECHA Units. ECHA SID Unit recognised that composition variability is an unavoidable feature in the inorganic UVCBs that will be mainly tackled with appropriate RMMs. However, each registrant is expected to report legal entity specific information next to the joint submission ones. In parallel, the discussion with the Computational Unit led to summarise hazard information in a tabular format, in order to show how the constituent-based approach for UVCB creates a link to the existing REACH Dossiers submitted in the past years. This redundancy in the REACH data used for the UVCB assessment is showed with the intention of maintaining the IUCLID Assessment reporting as developed in 2014, i.e. constituent hazard data are only reported as summary level. Finally, it was anticipated that MSC has started mapping which sectors have done work on UVCBs assessment and distilling how this was done in order to understand specificities of UVCBs assessment needed when any new UVCB cases will be discussed at MSC. Eurometaux shared the internal guidance on inorganic UVCBs with Joop De Knecht (in charge of the mapping exercise at MSC from RIVM) and will propose to meet him in Q1 2018 to discuss the metals approach. On the practical aspects of the update submissions, in the second part of the meeting, the taskforce dived into the dossier details and identified practical solutions to ensure consistent report in IUCLID 6 and in the CSR. As consistency is also a mean to ensure robust approach in the sector, details on the methodology to submit information will be available in the minutes of the meeting.

Updated dossier submissions will start in December and are expected to be mainly finalised in spring 2018 (more information: Federica Iaccino).

SPERCs workshop: ***towards quality review in cooperation with ECHA and Member States authorities***
On 20 October, Eurometaux hosted the 2017 SPERCs industry workshop. The main objective was to test and benchmark suggested quality criteria against six case studies on SPERC factsheets and background documents developed by different trade associations. Further discussion will be required to define hierarchical approaches to be used when dealing with SPERCs developed at different levels of the supply chains. ECHA and Members States will be involved in the finalisation of the quality criteria, after an industry final tuning foreseen in December 2017. Further (internal/external) review is also foreseen to be conducted as part of the "ENES Work Programme 2020". Minutes of the workshop, already circulated within the SPERCs TF, can be provided by Eurometaux upon request (more information: Frederik Verdonck and Lorenzo Zullo).

Metal-specific REACH tools applications and concept

Book: ***finally out!***
A group of metal scientists active in the Eurometaux Risk Assessment and Classification Taskforce or belonging to the academic world and consultancies, has endeavoured to bring together in a single handbook the experience on the risk management of complex inorganic materials like ores and concentrates, pigments, alloys or slags. This project was launched on request of the Elsevier editions. The book, "Risk Management of Complex Inorganic Materials: A Practical Guide" explains the main characteristics of these complex materials affecting their hazard and risk assessment and management. It also describes the methodologies and tools (e.g. bioelution, MeClas, MEASE, UVCB approach etc.) to perform hazard and risk assessment of such materials using case studies with emphasis on metal-specific principles, the interpretation of data and test results and their use in the context of a regulatory framework. The book is now officially available and can be ordered from https://www.elsevier.com/books/risk-management-of-complex-inorganic-materials/verougstraete/978-0-12-811063-8 . A big thanks to all the authors for their huge support in carrying this titans' teamwork, with a special mention to Ailsa Lee who proofread all the chapters and ensured that the different perspectives on Shakespeare's language were harmonised! We hope this book will be of use to contribute to the appropriate risk management of our materials, by industry and/or regulators (more information: Violaine Verougstraete).

Classification mapping: ***completion of the work expected in Q1 2018.***
The development of the classification mapping tool is proceeding. As agreed by the REACH Forum, external support to validate and complement the initial work conducted by the Classification Mapping Taskforce will be asked for. A request for a quotation has been sent to four different consultants. Their quotations, together with specifications on their expertise and details on the approach they plan to follow are expected by 15 December. The work is expected to be completed in Q1 2018. Such a tool should allow to easily identify and map cross legislative impacts linked to hazardous substance reclassifications (more information: Lorenzo Zullo).

Metals Inorganics Sectorial Approach

Baseline reports and draft agenda for 24 January: ***ongoing***
Several consortia have now completed and submitted the" baseline reports surveys". Eurometaux will have a look at the received reports and extract a "high-level overview" that will be circulated to the Steering Committee of the sectorial approach and the REACH Forum. This overview, which should include information on the items of the registration dossiers requiring some further attention **and** list the technical aspects that consortia would like to see further discussed with ECHA, will constitute the basis for the trust-building workshop that will be held on 24 January in Brussels. ECHA is also proceeding with data-mining of the metals/inorganic dossiers (more than 300) and will present its findings as well. The objective is that all participants will be able to discuss in January on how to collectively improve data quality on some critical endpoints and agree on some milestones/resources to solve the identified technical issues. A draft agenda for the workshop will be circulated soon to the Steering Committee and it is hoped that as many consortia (secretariats, companies) as possible will attend it, so that remaining questions/uncertainties can be solved and the project launched. The inorganics sectors (i.e. members of the REACH Alliance) will be invited as well. ECHA has also requested the sector to draft a short one-pager on the approach that could be posted on ECHA's website to ensure transparency towards third parties like e.g. Member States (more information: Lorenzo Zullo, Hugo Waeterschoot and Violaine Verougstraete).

FURTHER OUTREACH OF REACH

OECD

Working Party on Hazard Assessment: *work on prioritisation of chemicals*
Several OECD countries shared their experience on prioritisation of chemicals for assessment/management at the last OECD Working Party on Hazard Assessment meeting (June 2017). In follow-up, delegates asked the secretariat to set up a platform to further exchange on the topic of prioritisation. A first call was held early November. Canada, Japan, New Zealand, USEPA provided updates. The USEPA indicated that further information on the process under the amended TSCA can be found at the following webpage: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/prioritizing-existing-chemicals-risk-evaluation. Canada mentioned that they are looking to bring additional information into the prioritisation process, in particular from other Health Canada risk assessment programmes, biomonitoring and monitoring programme information and trying to integrate information from New Approaches Methodologies (NAM). New Zealand highlighted that they are currently designing a prioritisation framework and are drawing on the US, Canadian and Australian approaches. They noted the challenge when there is only limited exposure information. It was also mentioned during the call that a small working group set up after the June meeting, including Canada, US, Australia, Colombia and the EU reflects further on a possible project that could be done on "priority setting". Canada is drafting a proposal for consideration which will likely focus on capturing the current priority-setting processes and working towards guiding principles. A project proposal will be shared with the WPHA (more information: Violaine Verougstraete).

Global Knowledge Database: *survey*
OECD has organised a survey to inform their discussion on the potential future role of OECD in maintaining or supporting a Global Chemicals Knowledge Base. The survey aims to capture 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 Nickel Institute and Eurometaux's draft responses were circulated to the Risk Assessment and Classification taskforce for comments. The metal input overall supported the setup of such a knowledge base, highlighting the potential opportunities like the use of the Mutual Acceptance Data tool for quality check, the improved assessment on combined toxicity and exposure, the possibility to develop more strategic views on monitoring vs. modelled data but also drew OECD's attention to potential challenges like the need to have in place a mechanism guaranteeing quality assurance and respect of data ownership, a balanced attention for groups of chemicals/materials (e.g. organics vs. inorganics) while maintaining user-friendliness of the tool (more information: Kai-Sebastian Melzer, Hugo Waeterschoot and Violaine Verougstraete).

COMMUNICATION

TiO_2: *dossier update provided at the MedPharmPlast annual event.*
Based on slides kindly prepared by Rodger Battersby (EBRC) for the Titanium Dioxide Manufacturing Association, Eurometaux provided an update on the TiO_2 dossier at the MedPharmPlast annual event. Following background information on the French Annex XV dossier (proposal to classify TiO_2 as Carc 1B), details on the RAC opinion (classification of TiO_2 as Carc 2) were provided, as well as clarifications on the next steps (i.e. CARACAL, REACH Committee, Parliament/Council scrutiny). Main concerns are related to the repercussion that such a dossier might have on other poorly soluble low toxicity particles. Main concerns raised by the audience attending the MedPharmPlast event were related to the implications for surfaced-coated particles, which, according to RAC, would require to be assessed on a case-by-case base for higher hazardous classification. The slides of the presentation can be provided upon request (more information: Lorenzo Zullo and Violaine Verougstraete).

CALENDAR

- **4-5 December : RAC-43 (part 2) –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: METCO Event (Tbd - Brussels)**

NB: Please note that due to works on the lifts from end of October 2017 to end of February 2018, the important meetings will be taking place at:

- ***Bluepoint: https://www.bluepoint.be/en/brussels/ (Metro Diamant). If you are staying overnight there is the Hotel Plasky that is situated very nearby http://hotelplasky.be/ but coming from Midi Station it is bit more "complicated" 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)***

ACRONYMS

AfA: Application for Authorisation	PBT: Persistent, Bio-accumulative and Toxic Chemicals
ACSH: Advisory Committee on Safety and Health at workplace	PVC: Polymers or Copolymers of Vinyl Chloride
BoA: Board of Appeal	RAC: Risk Assessment Committee
CARACAL: Competent Authorities for REACH and CLP	RMM: Risk Management Measures
CHESAR: Chemical Safety Assessment and Reporting Tool	RMOa: Risk Management Option analysis
CLP: Classification, Labelling and Packaging Regulation	RoHS: Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment
CMD: Carcinogens and Mutagens Directive	RP: Review Period
CMR: Carcinogens, Mutagens or toxic to Reproduction	SAICM: Strategic Approach to International Chemicals Management
COLLA: collaborative approach	SCL: Specific Concentration Limit
CoRAP: Community Action Rolling Plan	SCOEL: Scientific Committee on Occupational Exposure Limits (EU)
CSR: Chemical Safety Report	SEA: Socio-Economic Assessment/Analysis
CTAC: Chromium Trioxide Authorisation Consortium	SEAC: Socio-Economic Analysis Committee (ECHA)
DNEL: Derived No Effect Level	SEN: sensitisation
DU: Downstream User	SID: Substance Identity
EDC: Endocrine Disrupting Chemicals	SME: Small & Medium Entreprise
ENES: Exchange Network on Exposure Scenarios	SPERC: Specific Environmental Release Category
IUCLID: International Uniform Chemicals Information Database	SVHC: Substance of very High Concern
MEASE: Occupational Exposure Assessment Tool for REACH	TSCA: Toxic Substances Control Act (US)
MeCLAS: Metals Classification Tool	UN: United Nations
MoA: Mode of Action	USEPA: United States Environmental Protection Agency
MSC: Member States Committee (ECHA)	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
NAM: New Approaches Technology	WPHA: Working Party on Hazard Assessment
OECD: Organisation of Economic Cooperation and Development	
OEL: Occupational Exposure Limit	