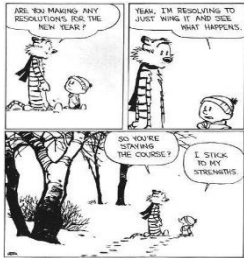




EUROMETAUX CHEMICALS MANAGEMENT NEWS



Wishing you all a fantastic, happy, peaceful and marvellous New Year 2018



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Dear All,

Here we are (again)!

2017 is leaving the scene with regrets, like a grumpy old actor expressing his discontentment to the public by sending wind and heavy rains or snow to make us shiver... but that actually also push us presto to 2018 and its promises.

Provided you are in a nice place and can make it an enjoyable moment, this time is a good one to look back on the achievements and actions of these last 12 months, contemplating which events transpire from the 2017 agenda (once proud and virgin white, now crumpled and full of scribbles), which successes come to mind, which acute stresses made it to chronic burden (and which ones changed from chronic stress to acute relief), and where changes occurred that made us stronger.

Whilst that overview will -of course- be different for each of us, and still needs to be blended with all the colours and happenings of our non-working life to provide a representative picture of 2017, there is probably one "fundamental" we all share: the 'us' factor. The 'us' factor in our Eurometaux/REACH & EHS working life is the emerging element from this past year (again). The 'us' that aided whilst swimming in deep waters, that held out a hand to reach the border, that re-energised the belief in a common cause, and helped overcome the feeling of loneliness we have sometimes in a hotel room or during a confrontation with authorities. But also the 'us' that made us, as a team, want more and therefore ask more from you, caused us to be demanding and sometimes sharp. Because we still see that as the best way forward in the regulation labyrinth, enabling us to bridge ideas and focus on implementation, to transmit the experience and knowledge the sector has accumulated over the years. The 'us' that should make the most of the old dinosaurs' science and the newcomers' pertinent questions, benefit from the differences in perception and culture, the evolving Europe and the changing modalities in cooperation.

So, tonight, please allow me to raise a glass of (bubbles- calva- wine: the choice is up to you!) to 'us' and 2018: we will take up the potentials and the talents to make it a YEAR!

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH & CLP Activities: hot topics

ECHA Committees

MSC-57: SVHC identification of Co₃O₄ with < 0.1% of NiO, a surprising outcome

MSC reviewed the comments received during the Public Consultation for BAP and Co₃O₃ with > 0.1 % NiO. The latter substance of high interest for the metals sector was retrieved from written procedure on demand of a Member State challenging the relevance of handling impurities for SVHC identification in this way. Eurometaux provided input into the extensive debate between the Member State representatives, using a set of argumentations agreed with the Co and Ni sectors. In the end, Member States concluded that *"the handling of impurities under the SVHC road map requires more debate in RIME and CARACAL to ensure the Risk Management Measure (RMM) is efficient and relevant"*. The Netherlands (submitter of the Annex XV dossier for the SVHC identification) valued the comments and withdrew the proposal, a quite unique move. Whilst this is an excellent outcome in the short term, it doesn't mean the case of the RMM identification for impurities is solved in the longer term. Indeed, RIME and CARACAL will continue the debate. Moreover, the submitting country requested the Co sector to continue the reduction of impure Co₃O₄ according to their promise during the Public Consultation. The package that was agreed upon also includes 3 more cadmium compounds (nitrate, carbonate and hydroxide) which were approved in written procedure and consequently not debated (more information: Hugo Waeterschoot).

MSC-57: Adoption 8th priority list, CoRAP progress and many precedent setting evaluation cases

MSC-57 adopted the 8th priority list that includes 7 substances including NMP. With regard to the inclusion of NMP, it appears that MSC would like to keep pressure on the Commission to progress with the Restriction on the 3 aprotic solvents and on NMP in particular, promoting an EU-wide OEL or equivalent to reduce the risks at the workplace. MSC debated the CoRAP update including the "reference year changes". The rapporteurs checked the quality and relevance of the motivation in the Justification Documents for each of the substances to ensure they were all risk based. The Rapporteurs suggested to the MSC *to agree with the postponement* of almost half of the substances listed on the CoRAP due to running Dossier Evaluations (DE) that could change the risk basis or even remove the need for a Substance Evaluation (SE). The reason for the fast track SE on Cr₂O₃ was not provided, although it became clear that France (evaluating Member State) intends to check properties that would allow to assess the relevance for SVHC status. The latter would be problematic for many granted authorisations or AfA resubmissions under preparation in which Cr₃ has often been considered as a -future- technically feasible alternative. Finally, MSC spent a lot of time reviewing several cases including the SE on Ziram (an organo zinc compound) requesting further tests to clarify a Parkinson-like disease concern), and a DE requesting the need to repeat a 90-day test due to an unbounded NOEC

at levels above the classification trigger. MSC concluded the tests need to be repeated at higher doses given other toxicological properties cannot be excluded. The DE and SE learnings will be taken forward to the next Eurometaux Evaluation platform meeting (more information: Hugo Waeterschoot).

MB-48: an exceptional open session where some strategic issues were debated

For the first time ECHA's Management Board organised a session open to the Regular Stakeholders wherein a quite important policy paper on the Substitution strategy was reviewed, and a status report on the progress on nano REACH guidance and a presentation and briefing document on how to further value chemicals data collected by REACH were discussed. It was confirmed that the last registration deadline would not mean that no further chemicals management data would be generated under REACH. To the contrary, the review of the testing proposals and evaluation processes will continue, aiming at further completing and improving the registration dossiers and their quality. A consultant prepared a view on how ECHA/EU could further develop the use of existing REACH data and infrastructure and presented several options: a) maintaining the present data infrastructure whilst making it more efficient (Steward option), b) promoting experimenting and innovating with chemicals management data (Incubator option) and c) ECHA REACH database becoming the main source of knowledge and advice on chemicals, across the EU and possibly integrated with other data sources (Hub option). The latter option received most support by MB members suggesting, among others, to include data relevant for the Circular Economy and Non-Toxic Environment strategy. This option was also supported by industry (represented by Cefic) as long as the data ownership rules are respected. REACH becoming a "one-stop-shop" on information and knowledge on chemicals is also more efficient for industry and allows easier updating when relevant new information becomes available. The contrast with the constructive debate on the future value of chemicals data could not have been greater when ECHA reported about the lack of progress on the nano-strategy. ECHA, Member States and NGOs blamed the Commission on the lack of progress with the definition and the legal uncertainty this causes. They concluded that these aspects are paralysing the progress on the REACH nano guidance and improved registration information (more information Hugo Waeterschoot).

MB-48: the substitution strategy towards safer alternatives debated in the open session

All MB representatives supported the substitution strategy to safer alternatives as presented by ECHA, thereby providing a strong signal to industry and society. The strategy is broader in scope than for SVHCs (actually all concerns) and promotes a relative balanced view on substitution, based on technical and economic feasibility and some broader perspectives (including the circular economy). Eurometaux intervened, underlining the importance of a holistic view considering circular economy, recycling and reduced use of carbon sources. Moreover, Eurometaux indicated that for efficiency reasons the strategy should preferably focus on those substances with outstanding high exposure recognising significant exposure reduction as a risk management measure that could be equal to substitution. ECHA's strategy foresees 4 areas of work/activities, covering networking events (like NeRSAP), facilitating the use of REACH data for sustainable substitution (allowing comparisons of hazards and risks), facilitating access to funding and support and lastly capacity building via supply chain workshops. In this respect Eurometaux had already confirmed its interest to organise such a workshop, emphasising the holistic view required for an efficient and effective substitution strategy (more information: Hugo Waeterschoot).

COMMISSION REACH & CLP Activities: hot topics/issues

CARACAL

Several topics discussed at the November CARACAL 25 meeting required some follow up. For example, in the context of the TiO₂ classification debate, Commission had posed the question at the meeting whether it would not be appropriate to classify poorly soluble low toxicity particles (PSLT), or a well-defined group of PSLT, in the same way as TiO₂, following a grouping approach? Eurometaux commented that there is the need to clarify a number of aspects, such as terminology, criteria and testing, before being able to move to a group classification.. Authorities and stakeholders should also use this opportunity to reflect whether the current CLP text/guidance are the most appropriate tools to deal with particle effects.

The Nickel Institute / NiPERA commented the ECHA draft guideline on "*articles intended to come into direct and prolonged contact with skin*" in relation to the Restriction entry 27 of Annex XVII to REACH on nickel and nickel compounds. Several concerns were raised, in particular linked to the fact that the draft guideline seems to go, without scientific justifications, well beyond the scope of the restriction, leading to unnecessary negative and disproportionate impacts on many nickel-containing articles.

On the topic "*labelling of metals in massive form*", which was not discussed at CARACAL 25 due to a lack of time, comments were submitted by The Netherlands, Sweden, Norway and Austria on the Eurometaux proposal submitted in November. These Member States generally supported the need for a guidance document to explain how to deal with metals in massive form and asked ECHA to lead the work, to establish a dedicated group of experts that would also involve Member States and

to consider the implications for downstream users (more information: Hugo Waeterschoot, Violaine Verougstraete, Lorenzo Zullo).

Directors Contact Group (DCG)

With the objective to “solve the problem of SMEs that might not be able to register their chemicals due to economic barriers”, ECHA had drafted over the summer a recommendation to be endorsed by the DCG, suggesting that registrants give SMEs access to data and the joint registration dossier “for free” or at “substantially reduced costs”. Despite the fact that the initial draft had been criticised by industry in a joint statement signed by Cefic, Concawe and Eurometaux, ECHA and the EU Commission submitted a document to DCG for approval end of November. The strong alliance established between Cefic and Eurometaux, allowed to bring up the workability and legal vulnerability issues and ensure their consideration by ECHA and the EU Commission, leading the DCG to reject the proposed document and to ask for a revision. The initial proposal was substantially revised, and now addresses all the legal issues that were identified. In particular the following aspects were addressed: i) reduction of scope to the 1 – 10 tpa tonnage band; ii) elimination of recommendations for ‘data for free’ or ‘substantially reduced fee’; iii) removal from the poor/unacceptable rationale that supported the initial recommendation (e.g. already sunk costs, avoiding reimbursement mechanism, etc.); iv) reversal of the order of issues in the document, so no ‘previous registrants’ splash’ about ‘lump sums’ or ‘for free’ in the title or early in the document; v) raised awareness about Article 12 of Annex III data-waiving possibility to minimise fee cost; vi) more visibility for existing ECHA data-sharing dispute mechanisms; vii) revision of the wording to make clear that SMEs’ commitment lies with the outcome of future discussions and not only in their participation in such debates and viii) a payment instalment possibility is included, but linked to a bank guarantee, as a protection mechanism to protect against default. The final DCG recommendation was published on 15 December on ECHA’s website (more information: Sandra Carey and Lorenzo Zullo).

EUROMETAUX REACH & CLP Activities: hot topics/issues

Resource mapping to respond to REACH / ECHA challenges

REACH Forum Meeting: *a last busy and stimulating meeting*

The REACH Forum met on 20 December. Activities are proceeding well on several fronts, including on the metals and inorganics sectorial approach (MISA). An overview of 17 baseline reports submitted before the meeting was presented. Based on additional substance-specific baseline reports expected to be received and processed beginning of January, a small group of volunteers and the REACH staff will make a proposal for the content of the workshop to be held on 24 January with ECHA. Work is still needed to help shape the sector’s response to the Non-toxic-Environment (NTE) Strategy expected to be released by the European Commission in 2018: focus on risk rather than on hazard seems to be a must, as well as the need to tackle it from a broader perspective, going beyond pure chemicals management and including other policy areas such as climate, energy, circular economy etc. The proposed priorities of the Authorisation and Restriction Platform were presented and discussed with emphasis put on regulatory approaches towards impurities, the role of industry in the ECHA substitution strategy and the legal interpretation of REACH Article 58(2). The discussion on classification focused on the learning lessons from the titanium dioxide proposed classification and the potential implications for Poorly Soluble Low Toxicity substances. The REACH and OSH theme was still on the agenda, including an update of the revision of the Carcinogens and Mutagens Directive, CII activities in preparation to the upcoming EU Commission Common Understanding Paper on REACH and OSH and a report on the discussions held in RAC on the establishment of BOELs for nickel and its compounds. As usual, consortia had the opportunities to share an update on their ongoing activities and gave an indication of their plans for 2018. Detailed minutes of the meeting will be circulated soon. The dates of the REACH Forum meetings in 2018 are: 21 March (TBC), 27 June, 19 September and 18 December (more information: Lorenzo Zullo).

Potential Restriction on 5 cobalt salts: *Eurometaux provided support to stimulate downstream users' engagement*

The Cobalt Reach Consortium organised on 14 December 2017 an industry workshop in Brussels with the manufacturers and downstream user sectors of the 5 salts that would be part of a future REACH restriction. Main aims included i) the briefing of the downstream user sectors on the findings from the CoRC surveys conducted for ECHA's recent Call for Evidence (July to September), ii) their further engagement in gathering additional relevant information and iii) providing arguments to help assess the most relevant scope and options for the restriction to be suggested to ECHA. The breakouts showed clear differences amongst the different user sectors regarding the available data, and new data to be gathered for the different steps in the upcoming restriction case development (scoping by ECHA, data to support the draft restriction, critical review of the proposed SEAC/RAC opinions). The afternoon session facilitated by Eurometaux helped the attendees to better understand how ECHA would select the best Risk Management Option under the restriction scheme, what the decision criteria would be, what information could help in steering the choice and some of the pros and cons of the different options. The workshop ended with the CoRC Restriction Chair (Wouter Ghyoot, Umicore) confirming the need for further collective action on the additional data gathering/confirmation required for the exposure assessments (by EBRC) and the socio-economic assessments (by EFTEC) for the RMOs defining the main next steps (more information: Wouter Ghyoot, Violaine Verougstraete and Hugo Waeterschoot).

EHS & REACH Steering Committee: *meeting on 12 December*

The EHS & REACH Steering Committee had its last meeting of the year on 12 December. This was the opportunity to take stock of the developments on a number of EHS issues (e.g. water, Industrial Emissions Directive) but also to discuss more in depth some cross-cutting chemicals management topics like the non-toxic environment and the impacts of metals' classifications. The Steering Committee was also updated on the metals and inorganics sectorial approach (MISA) and the latest REACH and OSH developments. As usual, very helpful input was provided by the members. Among the challenges for 2018, the setup of an efficient 'chemicals management' structure, respecting the specificities and assets of REACH and EHS, but also the membership rules and fair contributions, was identified as requiring close follow-up, in cooperation with the REACH Forum (more information: Veronique Steukers and Violaine Verougstraete).

Cobalt CLH taskforce: *2 calls and meeting with Commission planned*

The Cobalt CLH taskforce had two calls during this month of December, to further prepare collectively the response to the proposed classification of cobalt metal as CMR with a SCL of 0.01%. The mapping of downstream consequences, the identification of the socio-economic impacts associated with the proposed classifications, the definition of key messages, and bioelution testing are all crucial elements of the advocacy to be launched before the REACH Committee votes on the proposed entry. A first exchange with the EU Commission will take place on 12 January. This will be a good opportunity to 'test' the storytelling and ensure it is representative for the concerns of manufacturers and users of cobalt metal alike and addresses both scientific and socio-economic aspects. A debrief call is scheduled for 19 January. The minutes of the two December calls have been circulated as will be the draft slides to be presented on 12 January (more information: Brigitte Amoruso, Ruth Danzeisen, Hugo Waeterschoot and Violaine Verougstraete).

Non-Toxic Environment: *preparing the sector's response*

The European Commission's forthcoming Non-Toxic Environment strategy, setting out a framework for achieving a less hazardous environment and where possible with non-toxic material cycles, will be a key topic in the 2018 agenda. This topic has been discussed in several Eurometaux Committees during the December meetings (REACH Forum, EHS and REACH Steering Committee, Sustainability Committee). The committees have recommended to define some common and agreed key messages we would provide to Commission in order to avoid a too narrow focus of the strategy on hazard and hazard-driven substitution as well as a possible action plan that will provide proposals for better controlling metals' exposure and risks. A questionnaire has been posted to collect the input of all interested contributors and can be found here: <https://form.jotformeu.com/73542299440359>. Please do not hesitate to contribute before 26 January (more information: Chris Heron, Kamila Slupek, Hugo Waeterschoot and Violaine Verougstraete).

Metal-specific REACH application tools and concepts

SPERCs: *involvement of ECHA and Member States in the finalisation of the quality criteria*

The decision taken at the October SPERCs workshop to involve ECHA and Member States in the finalisation of the quality criteria has now been implemented. An initial communication to ECHA was sent in December together with the finalised minutes of the industry workshop. The SPERCs Taskforce is now preparing an official letter that will be sent out at the end of January. It will contain the latest version of the quality criteria and an invitation to join the next SPERCs Taskforce phone conference scheduled on 19 February. This cooperation is expected to facilitate industry to get ready for the quality review believed to be conducted in 2019-2020 as part of the ENES work programme (more information: Frederik Verdonck and Lorenzo Zullo).

Bioelution: *meeting with KTH and call with ECVAM*

The work on bioelution is proceeding further with the preparation of the submission of the gastric fluid protocol to ECVAM and all accompanying pieces of evidence. Key is to ensure that all the parameters of the test are well defined and backed up by data/transparent arguments. In this context, a discussion with the KTH lab -currently testing a number of copper and steel alloys- was organised on 13 December so as to identify possible differences in the test setting and protocol. Although it is usual that each lab has its 'settings and habits', in this difficult context of validation and acceptance of bioelution, it is crucial that the test modalities are as harmonised as possible. A call with ECVAM also took place on 18 December to agree on further tests to be carried out to clarify some test parameters (e.g. kinetics, loading etc.) (more information: Adriana Oller and Violaine Verougstraete).

Man via the Environment: *call with volunteers on 6 December*

One of the 2017 REACH Forum projects aims at improving the Man via the Environment assessment, both for Registration and Authorisation purposes. A workshop and a seminar both took place in 2016-early 2017, to discuss with industry and authorities (ECHA, RIVM) what could actually be improved in a tiered way, to improve data quality and better consider metal specificities. One of the recommendations made at the seminar referred to a possible improvement of the EUSES model, which originally was not meant to be used as a tool to perform Man via the Environment assessments, but has been extensively used. ECHA has now planned to update EUSES and will organise a workshop in April. Frederik Verdonck (ARCHE) is part of the organising committee set up by ECHA. The call aimed at discussing with industry a list of possible updates/developments the metal industry would like to see included in an upgraded EUSES and its possible contribution. Comments on the list –available upon request- can be sent until 5 January (more information: Frederik Verdonck, Hugo Waeterschoot, Annalisa Bortoluzzi and Violaine Verougstraete).

Metals Sectorial Approach

Metals and Inorganics Sectorial Approach (MISA): *first report on collected baseline reports and draft agenda for Trust Building workshop with ECHA on 24 January*

Several consortia completed the baseline report format and suggested priorities for the parallel technical programme (so-called Track 2) to improve the metals' assessment cases. The answers received so far, from aluminium, copper, nickel, arsenic, and molybdenum, frits, pigments, and soluble zinc, were compiled and presented to the REACH Forum while further commitments for completing the baseline reports were noted. The responses also provided guidance on how to interpret the outcome of the Survey Monkey reports. An updated version of the outcome report will be circulated early January to a group of volunteers for comments, to finalise a report on Track 1 (improvement of the quality of the dossiers) for the workshop. ECHA is currently also conducting a quite detailed assessment of most metal and inorganic registration entries, which will complement the industry presentations at the 24 January workshop, allowing as a result to collectively define priorities for improving the completeness and quality of the registrations. The REACH Forum further agreed with the draft outline agenda for the 24 January meeting, which aims to find an agreement on how to progress the Metals and Inorganics Sectorial Approach process-and content-wise. The next step after the workshop will include the signature of a charter to demonstrate commitment and the launch of the MISA based on annual priorities (more information: the Eurometaux REACH team).

FURTHER OUTREACH OF REACH

OECD

Other

BSOH: *seminar on carcinogens at the workplace as an eye-opener on a very active Belgian society*

NiPERA and Eurometaux were invited to give a presentation at a seminar on carcinogenic agents organised by the Belgian Society for Occupational Hygiene (BSOH). The main objectives of the BSOH are to support the knowledge, competence and expertise of occupational hygienists, encourage the further development of occupational hygiene at a scientific and professional level, circulation and exchange of occupational hygiene knowledge, make publicity for the specialised field of occupational hygiene and collaborate with other societies, national and international organisations involved in occupational hygiene. A look at the website of this very active society is certainly recommended as occupational hygienists are an essential link between regulatory decisions affecting the workplace and their implementation in practice. The programme of the day included for example an interesting comparison between the existing categorisations

of carcinogens and what they mean in practice, a presentation on the evaluation of the global burden of occupational cancers, but also more specific presentations on diesel exhaust, the nickel occupational exposure limits, wood dust or silica. Eurometaux shared its perspective on possible learnings for OSH from the chromates authorisation (more information: Steven Verpaele, Violaine Verougstraete).

CALENDAR 2018

Here below is an extensive list of all the foreseen meetings for 2018, at ECHA/Helsinki and the REACH Forum meetings at the MCC/Brussels. **Please note that all the RAC/MSC & SEAC meeting dates are tentative.**

- 24 January: MISA Workshop – Radisson RED Hotel (Brussels)
- 29-31 January: REACH Stakeholder's Day – ECHA (Helsinki)
- 6-9 February: MSC-58 – ECHA (Helsinki)
- 27 February to 2 March: RAC-44(A) – ECHA (Helsinki)
- 6-9 March: RAC-44 (B) – ECHA (Helsinki)
- 12-16 March: SEAC-38 – ECHA (Helsinki)
- 20 March: Authorisation & Restriction Platform – MCC (Brussels) – **TBC**
- 21 March: REACH Forum – MCC (Brussels) – **TBC**
- 22-23 March: Management Board-49 – ECHA (Helsinki)
- 23-27 April: MSC-59 – ECHA (Helsinki)
- 8 May: Evaluation Platform – MCC (Brussels)
- 9 May: Nanos Taskforce – MCC (Brussels)
- 4-8 June: RAC-45 – ECHA (Helsinki)
- 11-15 June: MSC-60 – ECHA (Helsinki)
- 11-15 June: SEAC-39 – ECHA (Helsinki)
- 20-21 June: Management Board-50 – ECHA (Helsinki)
- 26 June: Authorisation & Restriction Platform – MCC (Brussels)
- 27 June: REACH Forum – MCC (Brussels)
- 10-14 September: RAC-46 – ECHA (Helsinki)
- 10-14 September: SEAC-40 – ECHA (Helsinki)
- 18 September: Authorisation & Restriction Platform – MCC (Brussels)
- 19 September: REACH Forum – MCC (Brussels)
- 27-28 September: Management Board-51 – ECHA (Helsinki)
- 8-12 October: MSC-61 – ECHA (Helsinki)
- 16 October: Evaluation Platform – MCC (Brussels)
- 17 October: Nanos Taskforce – MCC (Brussels)
- 19-23 November: RAC-47 (A) – ECHA (Helsinki)
- 26-30 November: RAC-47 (B) – ECHA (Helsinki)
- 26-30 November: SEAC-41 – ECHA (Helsinki)
- 10-14 December: MSC-62 – ECHA (Helsinki)
- 13-14 December: ECHA Management Board-52 – ECHA (Helsinki)
- 17 December: Authorisation & Restriction Platform – MCC (Brussels)
- 18 December: REACH Forum - MCC (Brussels)

ACRONYMS

AfA: Application for Authorisation	NOEC: No Observed Effect Concentration
BOEL: Binding Occupational Exposure Limit	NTE: Non-Toxic Environment
BSOH: Belgian Society for Occupational Hygiene	OECD: Organisation of Economic Cooperation and Development
CARACAL: Competent Authorities for REACH and CLP	OEL: Occupational Exposure Limit
CLH: Harmonised Classification and Labelling process	OSH: Occupational Safety Health
CLP: Classification, Labelling and Packaging Regulation	PSLT: Poorly Soluble Low Toxicity particles
CMR: Carcinogens, Mutagens or toxic to Reproduction	RAC: Risk Assessment Committee
CoRAP: Community Action Rolling Plan	RIME: Risk Management Experts
DCG: Directors Contact Group	RMM: Risk Management Measures
DE: Dossier Evaluation	SCL: Specific Concentration Limit
ECVAM: European Centre for the Validation of Alternative Testing Methods	SE: Substance Evaluation
ENES: Exchange Network on Exposure Scenarios	SEA: Socio-Economic Assessment/Analysis
MB: Management Board (ECHA)	SEAC: Socio-Economic Analysis Committee (ECHA)
MISA: Metals and Inorganics Sectorial Approach	SME: Small & Medium Enterprise
MSC: Member States Committee (ECHA)	SPERC: Specific Environmental Release Category
MvE: Man via the Environment	SVHC: Substance of very High Concern
NGO: Non-Governmental Organisation	

Upon request an extensive list (35 pages 😊) of the acronyms can be received. Send an e-mail to Ailsa at lee@eurometaux.be