



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

It started at home with the printer going on strike at the exact -and unique- moment I needed it to complete the medical fiche my youngest was supposed to return to school the day before (7.05 am), continued when I walked straight into a puddle on my way to the car (7.11 am, both shoes), got prolonged by improbable encounters with all kinds of trucks in the small roads I take to avoid traffic jams (8.03 am, is Donald Trump right?), worsened when I dropped my daughter off without a proper goodbye (8.06 am, too late= no cuddle) and found my parking spot at the office occupied (8.13 am). 'Nothing serious but nothing easy' was I thinking when entering the office; I presume the coffee machine will be capricious and that we will get further comments on the bioavailability guidance. Indeed! But when a bit later I surprised myself by feeling swamped by 7 incoming emails (8.43) and distressed by stains on the carpet of the EM corridor (9.15 am), I started to wonder if I was not hit by a seasonal RAD. Bless the web that becomes an ally in such cases of uncertainty: I quickly found a 10-question test to help me make a diagnosis! Here it is:

'Do you suffer from REACH Affective Disorder? Take our quiz and find out! Just answer each statement by selecting 'yes' or 'no' truthfully.

- I start to crave sweet things and could literally raid the reserve of mignonettes in the Metals Conference Centre. **Yes - No***
- I 'm obsessed by the intensity of the beamer's light in meetings and dark slides affect me. **Yes - No***
- I've become a sloth – I do not want to go onto the ECHA website once a day. **Yes - No***
- It's hard to explain but I just feel sad and out of sorts when I read the ECHA news. **Yes - No***
- REACH? What's that again? My normal energy levels start to plummet. **Yes - No***
- I find I need recognition for my work and affection from the members far more than normal. **Yes - No***
- I feel iReachable, and sometimes my nearest and dearest get their heads bitten off. **Yes - No***
- Although I want recognition and credibility, I lose interest updating dossiers. **Yes - No***
- I get restless in meetings on Intermediates and reinvent Chemicals Management during sleepless nights. **Yes - No***
- I become a comfort-REACHfood monster- craving anything like process simplifications, clarification workshops, IUCLID options and circular economy potentialities. **Yes - No***

You scored more than 5? Be aware you may be coping with potentially high levels of RAD.

What do to about it? First discuss your results with your RP (REACH Practitioner): you must rule out any other possible causes. Then try self-help: our next Edition (REACH News N°50) will provide you with tips and simple remedies for coping with RAD! In the meantime, hold on and please read this monthly overview...

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA MEETINGS

Workshop on 'REACH(ing) the WSSD 2020 goals on 27-28 January 2016: paving the way for the REACH Review

Eurometaux (Guy Thiran) attended the high-level Workshop on REACH(ing) the WSSD 2020 goals organised by ECHA in Helsinki on 27-28 January 2016. In reality, this workshop mainly aimed at identifying recommendations for adapting REACH in the future

(post 2018), notably in view of the Commission REACH review foreseen in 2017. The workshop was opened by D. Calleja-Crespo (the new Director General of DG Environment) who insisted in particular on the need to ensure that EU Chemicals Policy and the overall EU Circular Economy objectives would be consistent. He also announced that DG Environment was preparing for 2017 a strategy for an EU toxic-free environment. Discussions were articulated around 3 main themes: data quality and availability, supply chain and communication, and regulatory risk management aspects. The whole debate looked at the REACH / CLP policy in a rather holistic way. The prioritisation and selection of substances for regulatory risk management appeared to be a major concern for authorities. Most participants, in particular from ECHA, stressed the importance of RMOA in identifying the most suitable risk measures to be adopted for chemicals of concern. Practical answers will need to be found to ensure that the RMOA can be effectively implemented on the basis of adequate data. One can expect more specific discussions on this item in the future, possibly on a sectorial basis. The discussions also stressed the need for better consistency between REACH and other policies, calling in particular for more effective use of REACH data in other policies (more information: Guy Thiran).

How to value health impacts of chemicals: *first steps in Helsinki*

ECHA convened an Expert Workshop on valuing the health impacts of chemicals in January, with speakers invited from both North America and Europe. Other attendees were from EU member states, industry, NGOs and other organisations including OECD. Valuation is necessary for socio-economic assessment under REACH, but as yet there are no agreed values to apply to specific health impacts, and there remain a number of methodological issues that require resolution, for example on discounting and the aggregation of values. Papers included a review of a recent study funded by ECHA that has considered a number of health impacts of relevance under REACH (cancers, fertility issues, skin sensitisation, etc.). The debate at the workshop should be regarded as a first step in a longer process, with the work being taken forward over the next 2 years by both ECHA and OECD, the latter having been awarded a 2 year contract from the Commission to consolidate available research. The OECD project will convene a further meeting at ECHA in July this year (more information: Mike Holland and Hugo Waeterschoot).

CSR/ES Roadmap Coordination group meeting: *Use maps and SDS*

Objectives of this meeting bringing together ECHA, Member States and the different industry sectors were to plan the actions and milestones for the Roadmap for 2016-2017. More specifically, the group discussed possible approaches to implement the available product packages like the use maps and associated exposure assessment determinants (SWEDs, SpERCs, SCEDs), IT tools like ECom, scaling and the possible organization and planning of workshops in Q2-Q3 2016. The last part of the discussions was devoted to the request raised by end-user sectors to enhance the quality of the SDS, estimated as being inconsistent in the presented classifications and/or presenting flaws in different sections of the SDS. This issue will be further addressed by the Coordination group in its next meetings. The outcomes of the meeting were further discussed with the Exposure Scenarios Taskforce (more information: Violaine Verougstraete).

ECHA OTHERS

Registration: *ECHA released soft letters to encourage Registration updates before considering follow-up*

ECHA shortlisted nearly around 200 substances for further scrutiny by the Member States Competent Authorities to decide whether there is a need to generate further information or launch regulatory actions such as Dossier or Substance Evaluation, Harmonised Classification and Labelling, Authorisation or Restriction. These substances have been identified by ECHA's automated screening of the registration database and by using information from other REACH and CLP processes and external sources, such as published scientific data, QSARs models and databases on uses and exposure. ECHA provides industry an opportunity to update their registration dossiers by March 11 (before the manual screening by Member States) and mailed out a 'soft letters' campaign to registrants to encourage this. Several metal Lead Registrants received such letters, in which we noted the ECHA request to pay attention to "volume by use data" and the sensitization endpoints (data, testing strategies or waivers for skin and respiratory sensitisation). The latter is most probably an indication for future PACT and SVHC activities on this endpoint based on the "equivalent concern" consideration for selecting candidates for Authorisation. Compared to the first batch of letters sent last year, ECHA provided a timeline and was more explicit on the issues that require an update. This was a follow-up of industry's request for more clarity. ECHA will also host a webinar for registrants on 17 February where the screening process and follow-up actions will be further explained (information on this will follow) (more information: Violaine Verougstraete and Hugo Waeterschoot).

DISSEMINATION

ECHA latest dissemination out: *info cards and brief profiles now available for registered substances*

On 20 January, ECHA launched its revamped dissemination website in which information is available in three layers of complexity: the simple info card, the more detailed brief profile and the full source data (<http://echa.europa.eu/information->

[on-chemicals](http://echa.europa.eu/documents/10162/13653/dsm_15_dissemination_manual_en.pdf)). These are available for all registered substances and generated automatically from all the Registration dossiers submitted for the same substance, as described in the Data Submission Manual 15– Dissemination (http://echa.europa.eu/documents/10162/13653/dsm_15_dissemination_manual_en.pdf). Some Eurometaux members have already identified inconsistencies between the data that has been submitted in their Dossiers and what has been automatically extracted in e.g. the brief profiles. This may be due either to incorrect data originally submitted in (individual) Dossiers and/or inherent limitations of the system. For the inorganic UVCBs, for which dossiers are complex and do not allow straightforward extractions of data, a temporary fix has been found with ECHA to refer to constituents' data. Eurometaux will collect possible inconsistencies identified in info cards and brief profiles by its members and share these with ECHA who will be able to progressively improve the resulting contents of these dissemination tools (more information: Violaine Verougstraete and Caroline Braibant).

IUCLID 6 and metal/UVCB specificities: testing and clarifications

IUCLID 6, to be released Q2 2016, will provide a new software architecture that allows the implementation of new end-user functionalities and enhance a number of non-functional requirements that were identified as potential weaknesses in IUCLID 5 (e.g. increased data storage and capacity, ease of use etc.). For metals and UVCBs, IUCLID 6 should include functionalities that will improve the reporting and understanding of data/approaches associated with metal specificities (e.g. the fact that the toxicity is driven by the ion while we may have data coming from studies carried out with metal compounds as test materials, the constituents-based risk assessments for UVCBs etc.). ARCHE, EBRC and Eurometaux remain actively involved in the discussions with ECHA and evaluation of proposed solutions. It is foreseen to organize trainings for the members on the changes and metal-relevant functionalities like among others the 'read-across' reporting and the assessment entity (more information: Maxime Eliat, Federica Iaccino, Daniel Vetter and Violaine Verougstraete).

COMMISSION REACH activities: hot topics/issues

Implementing Regulation on Data-Sharing: time for consortia to check level of transparency, fairness and non-discrimination of their Letter of Access agreements, and prepare for strongest implementation of OSOR principle!

The Implementing Regulation on Data-Sharing that was published on 5 January and enters into force on 26 January is available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0009&from=EN>. The Regulation is above all aimed to avoid abusive behaviours of certain registrants versus e.g. SMEs and to improve the implementation of the One Substance, One Registration (OSOR) principle. Cefic, Concawe and Eurometaux have been invited to provide early input to be considered by ECHA when updating the ECHA Guidance on Data-Sharing which should facilitate the overall interpretation of the recent Regulation. Three aspects of the Regulation are worth addressing in the Guidance update: 'every effort', 'itemisation' of administrative and study costs, 'reimbursement mechanisms', and practical implementation of 'unanimous consent'. Eurometaux members' input was gathered at a dedicated meeting on 18 January and further refined with the other associations' input for submission to and consideration by ECHA in early February. Following this early contribution, Eurometaux hopes to be nominated on the Partner Expert Group (PEG) appointed to comment on the proposed changes to the ECHA Guidance. As regards the OSOR principle, progressive changes to REACH-IT will prevent the submission of separate registrations for the same substance, and also force existing separate registrations to become part of the joint submission when updates are submitted. This will also be further detailed in the ECHA Guidance on registration, for which a PEG is currently being set-up too (more information: Caroline Braibant).

C&L Inventory: scope of second pilot under preparation

Eight tungsten and two molybdenum substances have been volunteered for the second pilot project aimed at increasing the convergence of the C&L Inventory. Before including these substances to the scope of the project, Commission and ECHA have asked Eurometaux to clarify the reason for volunteering these. Three reasons have been raised: general compliance with Article 41 of the CLP regulation, clarify which classifications in the C&L inventory should be used for the setting of emission limit values according to IED or for waste classification, in order to avoid the unsubstantiated use of "worst case" classifications in the C&L Inventory (and avoid having to use RAC's stretched resources to discuss harmonised classification proposals instead), and new classification evidence becoming available and published that may allow other notifiers to update their classifications towards more convergence. Whilst the scope of the project is still to be determined, ECHA is preparing a set of documents to raise awareness on the need to comply with Article 41 and provide simple instructions to update formerly submitted classification notifications. The next monthly conference call with Commission and ECHA is planned on 11 February (more information: Caroline Braibant).

EUROMETAUX REACH activities: hot topics/issues

INTERMEDIATES

Intermediate use of materials in complex (in)organic materials: *Eurometaux organized a workshop bringing together downstream users, consortia representatives, Commission and ECHA*

A series of Downstream User sectors developed draft guidance notes on how to justify and interpret intermediate status for SVHC substances like Coal Tar Pitch high temperature and metal oxides used in complex (in)organic materials like anodes for the aluminium, alloys, graphite and calcium carbide production, frits and complex inorganic pigments, batteries and some specific catalysts. The guidance notes are a follow-up of a previous workshop held in July 2015 to help industry align on the interpretation, while providing potential reference materials for ECHA, Commission and enforcement authorities. Eurometaux -supported by Cefic- organized a follow-up workshop to provide a discussion forum with ECHA to review the draft guidance notes. The workshop identified some areas for improvement and ECHA proposed to include some examples in the Intermediates Practical Guide, to help align enforcement authorities (more information: Klaus Kamps, Hugo Waeterschoot and Violaine Verougstraete).

Intermediates UVCB Taskforce meeting: *Consistency in REACH, SID, combined toxicity etc. follow-up*

Whilst it is acknowledged that a lot of efforts have been made over the last years to register appropriately the inorganic UVCBs and ensure a coherent assessment approach; a number of on-hold (e.g. combined toxicity) or unsolved (inquiries) issues will require the Taskforce to further work on technical and communication aspects in 2016. This becomes even more crucial now that UVCBs appear in other REACH programmes than Registration. Communication and consistency with other REACH platforms/taskforces will be key. The Taskforce also debated at the meeting ECHA's recommendation to refine the Substance Identity and its reporting modalities, using the examples and arguments brought up with ECHA in the 2 December meeting as a starting point. A methodology to identify iUVCBs' "sameness" that would both match with regulatory requirements and NFM specificities was agreed and consortia/companies will develop UVCB-specific tables. The following steps will be on how to improve the reporting in IUCLID 6 (how to make best use of the assessment entity in IUCLID 6.1). A temporary solution to overcome the inquiry issues was also proposed and explained in detail (temporary placeholder). Finally, the taskforce discussed how to improve the placeholders used in 2014 dossiers, i.e. on combined toxicity and on man via environment assessment: planning and timing have been settled to test combined toxicity methodology developed for iUVCBs (more information: Katia Lacasse, Federica Iaccino and Violaine Verougstraete).

Discussion with Complex Inorganic Pigments/Frits consortium: *SID, TDp and bioelution etc.*

Further to ECHA's suggestion to exchange with registrants of other inorganic materials facing equivalent SID difficulties in their registration dossiers, representatives of the frits/complex inorganic pigments consortia and Eurometaux sat together mid-January to identify commonalities and possible synergies. It was agreed to keep each other updated on progress and clarifications made vs. ECHA, because issues on e.g. naming, analytical details to report, tests like TDp and bioelution are very comparable for complex inorganic pigments and UVCBs. This meeting was also the opportunity to remind the REACH Annex V exemptions from registration for a number of our materials and ensure the topic would be closely followed up during the upcoming REACH Review discussions (more information: Federica Iaccino, Hugo Waeterschoot and Violaine Verougstraete).

CLASSIFICATION

CLP: *TiO₂ a substance under SE and CLP review setting precedents for inert metals*

Eurometaux provided support to a review session on TiO₂ REACH challenges on CLP and Substance evaluation. Both challenges could set significant precedence for inert inorganic substances including many metals. Very comparable to the Ag case, the substance Evaluation on TiO₂ assesses different powder forms and sets physico-chem and testing requirements for such forms. On the CLP, France prepares a carcinogenicity cat 1b classification purely on the basis of a positive rat study while other species are negative for this inert substance, probably one of the best demonstrations of a lung overload case. The meeting focused on both the scientific and advocacy aspects concluding many commonalities with ongoing metal and Eurometaux activities like the "lung overload issue". It was therefore suggested that both organisations work together on the lung-overload case in order to prevent this leading to irrelevant carcinogenicity classifications not caused by the intrinsic properties of the substance but due to the test procedure (more information: Hugo Waeterschoot and Violaine Verougstraete).

CLP support activities: *Eurometaux supporting Consortia on CLP reviews of environmental classifications*

Both Ag and Cu are faced with the follow-up on environmental classification proposals and upcoming challenges as a result of Biocides dossiers where they act as active substances. Eurometaux provided support to the Cu sector in helping define the timeline for advocacy messages in respect to the 9th ATP (M factor discussion) and how to restart the debate with ECHA on the Cu effects assessment. For Ag, the discussion resulted from a biocide case on an Ag-containing Zeolite where the metals

classification scheme and strategy were not correctly applied. An action towards the Commission is currently prepared (more information: Katrien Delbeke, France Capon, Katrien Arijs and Hugo Waeterschoot).

OTHERS

Exposure Scenarios Taskforce meeting: *Guided tour in IUCLID 6 and Chesar, updates on MEASE 2.0 and ECHA guidances*

The ES Taskforce screened on 19 January the communication materials made available by the CSR/ES Roadmap activities like the use maps, the “volume/use information” and the link with ECHA’s dissemination activities. This was completed by a very useful guided tour in IUCLID 6 and Chesar, focusing on the changes that will be crucial for our metals’ reporting and by a status report on the developments of MEASE 2.0. An update was also provided on technical discussions that Eurometaux, supported by ARCHE and EBRC, had on aspects requiring some ‘specific’ considerations in the forthcoming IT tools like the ‘multiple PROCs issue’ and the reporting of ‘read-across’ justifications for environment. Minutes will be circulated to the ES Taskforce (more information: Frank Van Assche, Daniel Vetter, Maxime Eliat and Violaine Verougstraete).

Circular Economy & REACH: *Successful brainstorming between Sustainability, EHS and REACH experts on 14 January*

Sustainability, EHS and REACH experts met at a dedicated Sustainable Resources Management (SRM) Working Group meeting on 14 January to assess the various impacts of the legislative proposals and actions included in the Circular Economy package released in December. The items which were identified as having a strong REACH dimension include: definition of by-product, definition of final recycling, the tracking and elimination of (legacy) hazardous substances in products and recycling material loops, and the waste assessment in substances’ CSR. This will be discussed at the next REACH Forum meeting, and fed back to the SRM Working Group in order to include any relevant comment in the broader Eurometaux position and view on Circular Economy (more information: Caroline Braibant).

AUTHORISATION

Simplification for Authorisation: *Cefic activity to provide guidance on the simplification for AfAs on process chemicals*

The Commission-ECHA-Industry workshops on AfAs, which took place in October and November 2015, identified the need to develop fit-for-purpose guidance for substances used in manufacturing as process chemicals, so that full applications would not be needed when e.g. exposure is very low. Cefic started a project to develop a thought-starter, a decision tree and potentially also some guidance for industry to define under which conditions simplified AfAs could be recommended. Eurometaux had already developed a thought starter paper discussing simplification for substances used as process chemicals in the metal sector, which facilitated its contribution to a brainstorming activity organized by Cefic. Eurometaux would like to ensure that the proposed fit-for-purpose from solvent-process chemicals only would be extended to all industrial chemicals with low exposure potential. A second argument raised by Eurometaux is that ‘low exposure’ should not merely be equivalent to closed systems but could also be confirmed by monitoring evidence or dependent on the type of used materials (e.g. massive) (more information: Hugo Waeterschoot).

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

MERAG guidance: *updated guidance ready for publication*

For a long time MERAG has been a highly valued reference compendium that helps industry as well as authorities to define metal-specific approach for testing strategies, hazard and risk assessment. Therefore ARCHE has updated the MERAG guidance fact sheets to include recent evidence, techniques and models so as to promote high quality hazard and risk assessments for metals. In particular, the fact sheets on bioavailability correction, data quality & relevance and exposure assessment needed to be refreshed after nearly 10 years. The updated versions were reviewed by the metals sector and subsequently by external partners, including the OECD Taskforce on Hazard Assessment for the critical fact sheet on bioavailability. ICMM provided support to prepare for the publication of the fact sheets and a background document, which is now imminent. As a next step ICMM, Eurometaux and commodities should develop a communication strategy to widely distribute the new guidance and finalise the last outstanding fact sheet on classification and labelling (more information: Violaine Verougstraete, Hugo Waeterschoot and Ben Davies).

MERAG classification guidance: *different sections on mixtures integrated into one guidance*

This MERAG fact sheet on classification provides guidance for industry and authorities on how metals, metal compounds and mixtures as well as complex inorganic substances and mixtures should be adequately classified under CLP and GHS for the environmental hazard endpoints. It bundles recent technical experience, concepts and methods needed to conduct this task in line with regulatory requirements of the CLP and the GHS while promoting best quality assessments recognizing the specificities of metals and its mixtures. The ARCHE update that also includes practical examples was extensively reviewed and complemented by Eurometaux resulting in a version ready for use on substances and soon also for the mixture section. The

major novelty on the latter is that MERAG provides specific tailor-made guidance on how to assess the environmental hazard identification and classification for materials like inorganic UVCBs, alloys and Ores and Concentrates. The guidance for these specific group of materials will have to be complemented with the health endpoints which is still an ongoing debate. It is therefore proposed to use MERAG for internal purposes (industry) while scheduling its publication for the outside world as soon as complemented for health endpoints and peer reviewed by external parties like the other MERAG fact sheets. This guidance would be more than helpful to respond to ECHA's question to Eurometaux to consider drafting an update of the CLP for complex inorganic materials (more information: Hugo Waeterschoot, Violaine Verougstraete and Ben Davies).

COMMUNICATION ACTIVITIES

ICMM-CMWG meeting: Eurometaux participation focused on chemicals management conceptual work to be done

Twice a year the ICMM-CMWG meeting brings Consortia, some international operating companies, ICMM and Eurometaux together to align programmes on Chemicals Management. It allows for aligning agendas, sharing burden and identifying new priorities in respect to regulatory challenges on Chemicals management. Eurometaux's contribution at the winter meeting in Paris (11-12 January) focused on the MERAG guidance progress, further risk assessment guidance update needs at OECD level (MERAG and bioelution for alloys and UVCBs), progress and further steps needed to develop the "rapid degradation concept" for environmental hazard identification and the outcome of the OECD PRTR meeting on diffuse sources and emission ratios from product uses. The OECD staff responsible for Chemicals Management attended part of the meeting presenting their programmes, in particular those of relevance for the metals sector. They expressed appreciation for Eurometaux's constructive attitude and input in the OECD activities underlining that this helps the concepts and guidances becoming more relevant for metals. They understood and recognised the concern of the metals sector that the Mutual Acceptance of Data principle is and remains an important tool for metals to justify investing in a single high quality data set and would consider how this could be further or better recognised by regulatory bodies (more information: Violaine Verougstraete and Hugo Waeterschoot).

OTHER

Substitution: first Eurometaux multi-committee brainstorming meeting on 5 January 2016

Substitution is a topic discussed in a number of regulatory contexts, from waste legislation to product and chemicals legislation, as well as at OECD level. Eurometaux often participates in events where substitution is discussed, and is increasingly asked to position itself on substitution. In order to define such a position, a brainstorming meeting took place between representatives from the Sustainability, EHS and REACH committees on 5 January. At this meeting the participants identified the various drivers behind substitution, the regulatory contexts in which it features, and the outline of a Eurometaux mandate, focused on the minimum conditions that are required to avoid regrettable substitution. The next exchange of the group will take place in March (more information: Caroline Braibant).

Calendar

- **1-5 February:** MSC 46 – ECHA (Helsinki)
- **3-4 February:** REACH Committee
- **8 February:** BIAC (Paris)
- **16 February:** Bioelution workshop
- **18-19 February:** CASG nanos
- **29 February – 4 March:** RAC 36 A – ECHA (Helsinki)
- **7-11 March:** RAC 36 B – ECHA (Helsinki)
- **7-11 March:** SEAC 30 – ECHA (Helsinki)
- **8-9 March :** CARACAL (Brussels)
- **16-17 March:** REACH Committee
- **17-18 March:** Management Board – ECHA (Helsinki)
- **17 March:** REACH Forum – MCC (Brussels)
- **17 March:** Authorisation & Restriction Platform – MCC (Brussels) (2hours - after the REACH Forum)
- **18 March:** Authorisation & Restriction Platform – MCC (Brussels)
- **19-20 April:** 4th ECHA Topical Science Workshop on OMICS in Chem. Man. – ECHA (Helsinki) (on invitation only)
- **25-29 April:** MSC 47 – ECHA (Helsinki)
- **10 May:** Evaluation Platform – MCC (Brussels)
- **11 May:** Authorisation & Restriction Platform – MCC (Brussels)

- **18 May:** MeClas Training for new EU countries – (Prague)
- **23-27 May:** RAC 37A – ECHA (Helsinki)
- **30 May – 3 June:** RAC 37B – ECHA (Helsinki)
- **30 May – 3 June:** SEAC – ECHA (Helsinki)

Acronyms

AfA: Application for Authorisation	PEG: Partner Expert Group
C&L: Classification and Labelling	PRTR: Pollutants release and Transfer Register
CLP: Classification, Labelling and Packaging Regulation	QSAR: Quantitative Structure - Activity Relationship (models to predict toxicity)
CSR: Chemical Safety Report	RMO(a): Risk Management Options(analysis)
ES: Exposure Scenarios	SCED: Specific Consumer Exposure Determinants
GHS: Global Harmonised System of classification and labelling of chemicals	SDS: Safety Data Sheet
IUCLID: International Uniform Chemicals Information Database	SE: Substance Evaluation
	SEAC: ECHA Socio-Economic Assessment Committee
MEASE: Occupational Exposure Assessment Tool	SID: Substance Identity
MERAG: Metals Environmental Risk Assessment Guide	SME: Small or Medium size Enterprise
MSC: ECHA Member States Committee	SpERC: Specific Environmental Release Category
NFM: Non-Ferrous Metals	SVHC: Substance of very High Concern
OECD: Organisation of Economic Cooperation and Development	SWED: Specific Worker Exposure Description
OSOR: One Substance, One Regulation	TDp: Transformation/Dissolution protocol (to measure release metals)
PACT: Public Activities Coordination Tool	(i)UVCB: (inorganic)Unknown or Variable Composition, Complex Reaction Products and Biological Materials

N°49...

...means we are approaching N°50. Would you mind to respond to a **very short** survey posted on:
<https://www.surveymonkey.com/r/5PCZSB6> so as to help us attack the numbers 50-100?

Many thanks to you all!