



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

And the sun is still shining...

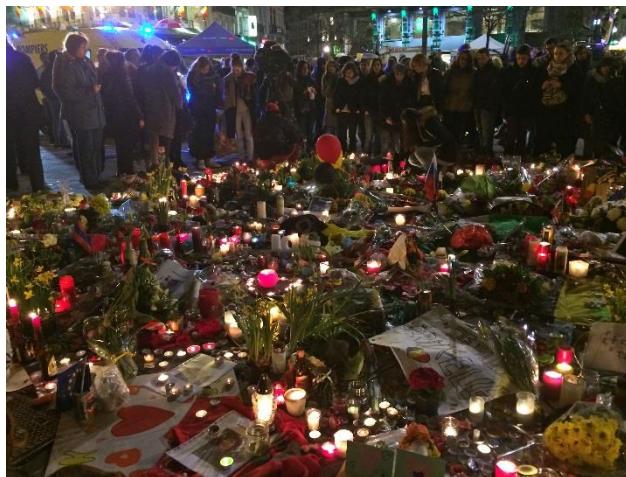
We wanted to believe that terror and death would stay away from our daily lives and our immediate surroundings; that we would continue to stroll through Brussels with that strange mix of empathy and relief we sensed when discovering about innocent victims falling, but elsewhere, not so close to home. Of course, the last weeks had accentuated the existence of tensions in the EU capital, bringing closer to mind the Paris events, but still...

That 22nd March started as a normal day, with people running to avoid being late, kids walking to school, drivers cursing the closed tunnels and offices filling up for the working day with the all-nationalities crowd emerging from the public transports. The sunshine, the first flowers and the blue sky made it look like a promising day. Two hours later, Brussels was completely stunned by a handful of men who decided to kill all promises of life and spring, taking with them the insouciance and the enjoyment. Sirens, fear and an immeasurable sadness would take over.

The original (21 March) idea for this editorial was to elaborate on the reflexion of Tom Gardner "Why Does Pessimism Sound So Smart? Especially When Things Are So Good!». The headline of his argumentation is that the pessimist appears to be intellectually captivating, garnering far more attention than the optimist, who is often viewed as a naive sucker. It seems to have always been this way. He reports that John Stuart Mill wrote 150 years ago: "I have observed that not the man who hopes when others despair, but the man who despairs when others hope, is admired by a large class of persons as a sage".

However, one week after 22 March, pessimism does not seem to bring us one step further.

To the contrary, it appears nearly disrespectful to those who lost relatives, in view of the courage of the people who decide to continue, to not let anguish, absurdity or despair get the better of them. And now, Brussels is functioning again –albeit with wounds- just like the other towns and populations hit by such attacks did before the "Brusseleirs", thereby demonstrating the example that 'To the pessimist a bad event is the end of the story. To the optimist it's a slow chapter in an otherwise excellent book.'



Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

RAC-36: Authorisations and Restrictions: *Chromates, reference DNELs/dose-responses with or without thresholds*

RAC met during the two first weeks of March to further examine a number of Applications for Authorisation (AfAs) and discuss restriction and CLH proposals. RAC agreed on 3 draft opinions on the uses of chromium trioxide in functional chrome plating, functional chrome plating with decorative character, and etching. RAC experts also identified “key issues” in the 27 AfAs (mainly chromates) received in the November 2015 submission window. Those issues will be translated in questions to the applicants. A number of those questions relate to the description of occupational exposure, operational conditions and risk management measures, essential aspects to allow RAC to assess the submission and issue an opinion. Eurometaux asked whether the learning lessons of these AfAs discussions could not be integrated in the ECHA Guidance R.14 on occupational exposure that is currently being updated, so as to give clear indications to applicants on the kind of description and contextual information they need to include in their AfAs. The restriction on D4 and D5 targets their use in personal care products that are intended to be used or disposed of with water, e.g. shower gels, shaving foams and shampoos. The driver is their PBT and vPvB properties. RAC also debated at length the CLH proposal for salicylic acid, and for 7 other organic substances. In addition, RAC had a first discussion on the derivation of dose-response levels for RCFs and cobalt compounds. Industry experts were able to attend the discussions and provide comments at the meeting. Important elements at stake appeared to be, among others, the depth of the work done by the consultants contracted by ECHA (checking or not primary studies), the prevailing impact of positive studies in the genotoxicity database (Co) and the comparison with asbestos (RCFs). Consortia are now further preparing comments on those aspects so as to get ready for the next discussion in May-June. Finally, RAC was updated on the two REACH Article 95 (3) requests issued by Commission: one on NMP, to resolve the differences between the DNEL proposed by RAC in the context of a restriction and the OEL recommended by SCOEL; and the other one on the comparison of the scientific aspects/methodologies SCOEL and RAC use to set inhalation and dermal values or to assess threshold and non-threshold substances. This latter package, of direct relevance to the metal sector, will only be initiated by December 2016. A workshop should be organised in November by DG Grow to inform stakeholders on the outcomes of this second mandate. One can expect that main differences will be the interpretation of the starting point (which effect to take) and the assessment factors (more information: Violaine Verougstraete).

SEAC-30: Authorisations and restrictions: *many, many, many... learning lessons for the metals sector*

SEAC-30: the meeting was opened by a speech of the Executive Director in support of SEAC’s independent activities in response to the critiques from the European Parliament ENVI Committee on the DEHP case. SEAC-30 handled more than 40 Applications for Authorisations (AfAs); some for conformity check, others to issue a final opinion. Most AfAs related to chromates and arsenic acid uses in the metals sector; and were therefore highly relevant and interesting in terms of learning. The cases included upstream manufacturers as well as downstream user applications; some of them of very high quality, others showing serious shortcomings. Most interesting the Afa for the use of As and Cr in the copper foil sector where the absence of a SEA and a not well motivated Assessment of Alternatives (AoA), almost pushed SEAC to their first negative opinion. The impact of the quality and completeness of the Afa on the granted Review Period but also the organisational requirements appear more and more clear now that experience with AfAs has increased. The main learning lessons on the organisational and technical aspects of the submissions, as well as the level of proof on SEA and AoA were presented at the last Eurometaux A & R meeting. In addition, the Eurometaux staff organised or contributed to several debriefing sessions with metal user sectors at large, some being suggested by ECHA. It helped both the users as well as Eurometaux to draw overarching conclusions on when best submitting at user or formulator or manufacturers’ level (more information: Hugo Waeterschoot).

ECHA MEETINGS

ECHA Management Board preparation: *focus on the 5 year plan and the European Parliament critiques*

The March MB meeting focussed its attention on the critiques from the European Parliament on the functioning of Commission and ECHA. Whilst this does not appear to fall within their competence, the ENVI committee sent a letter stating that the Commission (read ECHA – RAC/SEAC committees) went beyond their mandate by issuing a positive opinion for an authorisation for DEHP in recycled plastics. ENVI felt that providing an Authorisation for recycling would maintain this SVHC in the economy, continuing the potential for exposure and harm. They felt this was a political rather than a scientific choice. Eurometaux and Cefic supported ECHA in their reply stating that ECHA stayed within its mandate and that the decision was very transparent and based on scientific, technical and economic evidence, as mandated by REACH. Moreover safe recycling is a cornerstone of the circular economy. The ECHA MB appreciated this intervention very much. The second main issue related to the 5 year-forward planning of ECHA’s activities, which provides an excellent insight to industry of ECHA’s priorities. The Evaluation

processes and Risk Management programmes are clearly those that will further develop and extend while registration activities will from 2018 onwards decline (more information: Guy Thiran and Hugo Waeterschoot).

ECHA PROGRAMMES

Substance Evaluation: *delivery at full speed!*

ECHA published the CoRAP update 2016-2018 on 22 March, including antimony metal and 2 antimony compounds for substance evaluation by Germany in 2018 (for CMR concerns) and prolonging the review year for TiO₂. The latter allows to carry out a compliance check for the standard information requirements in 2016. Of direct relevance for the sector is the substance evaluation of the Ag nano substance for review by MSC by end April. The sector received ECHA's comments on the draft decision and prepared replies. In general, the Ag sector is supportive of the comments but reminded the reviewing country that the quantity used as well as the number of nanoforms is very limited: therefore the requested additional information should remain proportional. Finally, ECHA announced that the Al salts registrants will receive the draft decisions on the 3 salts listed on CoRAP during the last week of April, asking industry to prepare comments within 30 days. The reviewing country (France) concluded they could not fully clarify the concern (CMR, high RCR and aggregated tonnage), leading them to request additional information. While the 3 salts are handled by Cefic subgroups, it is of critical importance to the entire Al sector that the French conclusions and requests are relevant for the metals sector as well, given the consequences of a potential CMR identification for the Al ion. The sector was immediately informed by Eurometaux on the scheduled release and was urged to keep contacts with the Cefic sector groups (for more information: Violaine Verougstraete and Hugo Waeterschoot).

NANOS

ECHA & Nanomaterials: *Status of Guidance and implementation of their 3-Year Work Plan*

ECHA clarified in a document for CARACAL and at the CASG Nano meeting of 10-11 March that four Guidance documents would be prepared to support registrants with the identification, assessment and registration of their nanomaterials: i) guidance on how to group nanoforms of the same substance on the basis of three criteria, ii) and iii) clarified information requirements for nanomaterials for human health, iv) guidance on how to use data for different nanoforms within the same substance registration. The Partner Expert Groups (PEG) for these will be set up before the moratorium on guidance documents begins, will work on the basis of texts already developed by the ECHA NMWG, and should be published by mid-2017. In the absence of amended REACH Annexes, the guidance documents will be based on ECHA's experience with e.g. Dossier and Substance Evaluation of dossiers containing nanoforms. ECHA has contacted Eurometaux, Cefic and NIA to organise a meeting aimed at achieving a collaboration ground and common understanding on the practical implementation of ECHA's 3-Year Work Plan on Nanomaterials. The meeting will be hosted by Cefic on 26 April, and be open for companies involved in REACH Registration dossiers which contain or will likely contain organic and/or inorganic nanomaterials, and which have the authority to agree, commit, and transmit messages from the meeting to the members of the joint submissions of relevance (more information: Caroline Braibant).

COMMISSION REACH activities: hot topics/issues

CARACAL

CARACAL 20: *Outcome of 8-9 March meeting*

As indicated in the previous edition, many different topics were discussed, covering various REACH and CLP processes. Eurometaux intervened on a number of them on behalf of the REACH Alliance and will provide written comments on the CARACAL documents of relevance by 8 April. Among others, Eurometaux requested that RAC's knowledge on metal-specific concepts, methodologies or guidance documents increase, and for the Commission to foresee a more flexible approach than the current one to facilitate the update of Acute Toxicity Estimates in Annex VI of CLP when new evidence becomes available. We also asked the Commission to share a better overview of the projects and tasks conducted under the chemicals legislation REFIT. We pointed towards a number of shortcomings in the scoping study on a fast-track restriction of CMRs in construction articles, and will do the same for the study assessing the impacts of REACH and corresponding legislation in different countries/regions on the international competitiveness of the EU industry. On bioelution, Commission announced they plan to consult the Commission's Legal Services to clarify the legal issues raised by some Member States and ECVAM on the applicability of CLP article 12(b), and will report back to CARACAL in June. They are also preparing a 'business impact study' with ECHA and ECVAM to demonstrate the regulatory relevance and importance to develop a validated protocol. Eurometaux

provided an update, stressing the ongoing work on the classification schemes and strengthening of the SOP (more information: Caroline Braibant).

OTHERS

CASG Nano: Outcome of 10-11 March meeting – little progress...

The Commission clarified that a slightly revised definition for nanomaterial will be proposed in a public consultation aimed at collecting comments and finalising the review by mid-2016. As regards transparency measures, an EU Nanomaterials Observatory will be set up and hosted by ECHA, aimed at informing consumers and workers. A preparatory workshop will be organised on 25 April to launch this initiative, which will be included in ECHA's 3-Year Nanomaterials Work Plan. Commission's proposed amendments to the REACH Annexes were vividly discussed during the meeting. The Nano Taskforce has prepared Eurometaux comments that were submitted to the Commission by 25 March. An updated Commission proposal should become available via a public consultation in spring 2016, in order to proceed with a vote by the REACH Committee in late 2016. The REACH Annex amendments are unlikely to be adopted before 2017, and will not enter into force before the 2018 Registration deadline (more information: Christine Spirlet and Caroline Braibant).

CMR restrictions for textiles and construction materials: Eurometaux opposes improper use of fast-track procedure

On 22 March 2016, the Commission closed a public consultation on a possible restriction of CMR substances in textile articles and clothing for consumers, using a simplified procedure under Article 68(2) of REACH. This Fast Track Restriction allows bypassing the need for a socio-economic analysis, scrutiny by RAC & SEAC, as well as a Public Consultation. The Commission was clear that the consultation was to test out the use of the fast track procedure. Several metals and compounds were on the extensive list of CMR substances subject to a general concentration limit despite that they are often not found in textiles. Commodity and consortia took care of technical input and endorsed the Eurometaux statements on the principles. Eurometaux indicated that a fast-track restriction procedure should be a tool for an accelerated treatment of an identified concern where urgent action is justified. This is clearly not the case here. A careful risk based impact assessment and socio economic assessment, as well as a public consultation should therefore be part of any restriction to ensure its relevance. In parallel, the Commission issued a scoping study for a fast track restriction on construction articles containing CMR substances, a proposal with potentially even more severe implications for metals. The A&R Platform members are preparing a response to the Commission, and reiterated the principles of good regulation and the requirement for a risk based need (more information: Michel Vander Straeten and Hugo Waeterschoot).

CLP Refit: Public Consultation and workshop: Unique opportunity

The Commission will organise a workshop on 19 April to present the key aspects of the 'study on the regulatory fitness of chemicals legislation (excluding REACH), in particular the CLP Regulation and related legislation' launched by DG Grow. The purpose of the workshop is to present key aspects of the study, to identify potential gaps and opportunities for further assessment and to collect ideas and information from stakeholders. The workshop will be structured around a number of break-out groups discussing relevant topics such as CLP classification rules & criteria, effectiveness of hazard communication to consumers, hazard assessment procedures across chemicals legislation, downstream consequences of CLP classifications and SME awareness. A thought-starter document will be shared with all participants prior to the workshop. Eurometaux will register for the workshop and report the main outcomes to the Forum. Please note as well that the Commission's open public consultation on the fitness check on chemicals legislation (excluding REACH) is running until 27 May, and can be accessed via http://rpaltd.co.uk/chemicals_fitness_check. This consultation is open to all interested stakeholders including NGOs, trade organisations, consumer associations, industry associations (EU and national), sector groups, companies, regulatory authorities and individual stakeholders (more information: Violaine Verougstraete, Caroline Braibant and Hugo Waeterschoot).

EUROMETAUX REACH activities: hot topics/issues

RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES

REACH Forum meeting: 2016 task list reviewed and launched!

The meeting was well attended and allowed to combine a number of information and discussion items. During the morning session, consortia were encouraged to use standard phrases and participate in the development of a mass-flow analysis approach to reported volumes per use information; to plan/anticipate Evaluation processes; and to develop the relevant knowledge/competence to continue delivering the relevant support to their members beyond Registration and Evaluation.

Companies should in turn liaise with other companies and discuss (cross-consortia) organisational needs to prepare RMOa, Authorisation related advocacy, or Applications for Authorisation. Members were invited to participate in selected case studies conducted as part of the fitness check of chemicals legislation, and to join the new REACH Review Task Force, Final Slags Task Force, and Organising Committee for the upcoming chemicals management event. As regards dissemination of REACH data, it was agreed to inform ECHA about consortia's data ownership, and to highlight a number of misleading contents in the recently disseminated Infocards and Brief Profiles. Finally, the REACH Forum agreed to propose an enforcement project for ECHA's 6th Enforcement Project, targeting individual registrations submitted outside joint registrations (more information: Caroline Braibant).

RMOa Guidance and template: *ready for roll-out*

The A&R Platform agreed at its meeting held on 17 March to the publication of the updated RMOa guidance that now also includes an example. It further supported its promotion to Member States (in particular their Risk Management Experts meeting in RiME), ECHA and the Commission, in view of obtaining their support. In addition to external events, Eurometaux will organise an internal training so as to ensure proper understanding and use of the guidance and its updated templates. Companies and consortia are encouraged to conduct RMOas on a voluntary basis for SVHC substances to anticipate such activities by Member States in execution of the SVHC route map. The tool is free for metal companies and the A&R Platform agreed with Conditions of Use (licenses) for consultants wanting to perform an RMOa in accordance with the Eurometaux guidance (more information: Michel Vander Straeten, Hugo Waeterschoot).

RMOa in Plastics: *Industry shadow RMOa to be considered soon*

Eurometaux participated in a RMOa workshop organised by the European Plastics Converters Association (EuPC) on 18 March. During this workshop, it appeared that the plastics industry has so far not conducted any in-house RMOa, despite having been confronted with various RMOas performed by Member States. Their experience has shown that exposure or analysis of alternatives types of data collection are not efficient when they are launched only after a given substance is put on the Candidate List or prioritised; subsequently EuPC aims to support its members in launching these initiatives much earlier in the process (more information: Caroline Braibant, Hugo Waeterschoot, Michel Vander Straeten).

AUTHORISATION

Authorisation & Restriction Platform: 17-18 March Platform meeting: *4 interactive sessions*

A very busy agenda (as usual!) for the Authorisation and Restriction platform sessions, balancing delivery of information with knowledge building, discussions on the projects' progress and strategic aspects. Eurometaux informed the participants on the status of the different authorisation lists, noting that CTP-HT was selected this year for authorisation; whilst the RCFs and Pb compounds are currently not included in view of the ongoing debate on the relevance of alternative EU-wide risk management measures (RMM). Borates will not be included in Annex XIV this year, as they are waiting for a clarification on how to handle bio-essential uses. The participants agreed on forwarding the updated RMOa guidance, which now includes a practical hypothetical example, to ECHA and Commission for an informal review and discussion. Additionally, the meeting requested Eurometaux to plan for an internal practical training session on the RMOa technique. The participants were informed on the recent status of the Recycling and Authorisation programme: the company BIS reports were or will be sent first to the companies whilst Eurometaux will receive only a "generic conclusions" report from the consultant. The overall conclusions and updated version of the prevention and mitigation measures were discussed, receiving several proposals for changes and updates. Eurometaux will include these and circulate early April a package for review in anticipation of a meeting with ECHA on the theme of authorisation and recycling. The last session of the platform focussed on a strategic debate on the increasing attention for RMM and how to position and balance the views of the sector in preparation of the Eurometaux REACH-RMM seminar in October (more information: France Capon, Klaus Kamps, Michel Vander Straeten, Violaine Verougstraete and Hugo Waeterschoot).

Article boundary assessment: *first example case shows difficulty to apply the existing guidance to metals cases*

The Eurometaux intermediates programme (see REACH news of February) is in its final stage with downstream users updating their internal guidance notes and selecting indicative best case examples for the ECHA Examples Manual. The exercise demonstrated that in some cases, in addition to the intermediates uses, the substance / article boundary is also very difficult to define and interpret. Eurometaux therefore supported a pilot case on specific metal-containing catalysts where the use of a carrier could help in defining the switching point to article status. As for intermediates, it is very relevant to define this as clearly as possible to help understand the boundaries for authorisation for the involved sectors and companies. While the case seems technically reasonably clear, the application of the ECHA guideline seemed less relevant given clearly written for organics rather than inorganics where form and shape are often more important or relevant. When this case can be closed successfully,

it is aimed to add a module on “article boundary” to the intermediates assessment exercise that will be repeated by the end of the year when the next Annex XIV list and the 8th prioritisation list are released (more information: Hugo Waeterschoot).

Co strategy: a difficult situation to manage due to multiple ongoing programmes

The cobalt sector is faced with multiple parallel challenges leading to risk management measures under REACH, including a review of the reference Dose Response/DNEL for a potential restriction, a potential authorisation threat (ECHA and Commission pushing for a solution that would allow bio-essential elements going through the authorisation pathway), ongoing testing programmes, updates for the reprotoxicity endpoints and several CLH proposals for an harmonised classification for CMR endpoints. Eurometaux therefore invited the Consortium for a strategic debate on the ongoing and forthcoming challenges, discussing pros and cons for different solutions. The exercise was most meaningful for all demonstrating that the EU-OEL approach would not be a potential feasible/timely option for several metals (including Co) whilst the balance of the drawbacks of restrictions versus authorisations, requires a careful assessment. In respect to cobalt, the session concluded that it would be utmost relevant to confirm the “threshold status” of the Co-ion CMR effect independent of the further RMM decision (more information: Carol Pettit, Violaine Verougstraete and Hugo Waeterschoot)

CLASSIFICATION

CLP REFIT case studies: opportunities

Eurometaux is participating in several case studies set up by a consortium of consultants (RPA, NCEC, Milieu and Ökopol) in the context of the CLP REFIT exercise. In some cases, Eurometaux is contacted to provide a first generic and multi-metallic input. Consultants may follow up with commodities/consortia to have additional metal-specific insights. The case studies that were proposed to the metal sector are all relevant, covering aspects like appropriateness of the CLP guidance until a possible alternative for PBT assessment, translation of CLP to waste and differences in national implementation concerning the efficiency of risk management measures. These case studies are therefore a unique opportunity to raise metal specificities and tools like the RMOa guidance/template and MeClas (more information: Caroline Braibant, Hugo Waeterschoot and Violaine Verougstraete).

C&L Inventory: Various Member States interested in participating in project and related activities

The second pilot project aimed at improving the convergence of the C&L Inventory was presented to CARACAL on 9 March. All activities presented were supported and several Member States including AT, DE, and UK, and probably also IE and PL, volunteered to join the related work group and to contribute to the development and implementation of a joint strategy and plan to incite companies to agree on their classifications. ECHA has recently informed Eurometaux that the dedicated webpage will be updated and a short guide will be published soon, and formally announced in ECHA’s e-news and ECHA letters will be sent to the notifiers of the ten substances in the scope of this project immediately after. As from April, ECHA will monitor discussions in the C&L Platforms for these substances until June, and discuss possible changes which could be implemented to improve the C&L Inventory (more information: Caroline Braibant).

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

Bioelution: ECVAM template and classification schemes: continue working

In follow-up of the bioelution workshop held on 16 February, a number of volunteers (thanks!!) have started to work on the constitution of a “package of material” to submit to ECVAM as soon as the latter starts on the validation process. The ECVAM presubmission template form has been completed and shown to CARACAL during Eurometaux’s intervention on 9 March (see above). Further work is also ongoing in the sector on the bioelution protocol to strengthen and clarify issues like loading, physical form to use in the tests, etc. Metals interested in participating in a new round robin test aiming at checking whether the interlab variability could be improved by using this revised SOP will have a first discussion on 4 April. Another important issue that required follow-up after the workshop was to ensure that the proposed classification schemes are conservative enough to address cases where alloys would release more ions than the reference materials, whilst remaining proportionate and achievable for companies. Once agreed, the classification schemes will be included in an industry guidance note. Finally, Eurometaux has also been approached by other sectors to discuss CLP Article 12(b) and applicability of bioelution to other solid mixtures e.g. glass. Consistency between sectors will be important to maintain, as much as possible (more information: Federica Iaccino and Violaine Verougstraete).

MeClas Technical meeting on 23 March: waste, database, Seveso and alloys

The MeClas Steering Committee discussed a number of technical features related to further developments of the MeClas tool, more specifically how to build in a waste, a Seveso and a transport module (the latter to be finalised in 2017). Also the review of some key ERVs, the preparation of guidance for ECHA on complex materials and the finalisation of a publication were

debated, with very welcomed support from the Steering Committee members (more information: Frederik Verdonck, Dagobert Heijerick, Hugo Waeterschoot and Violaine Verougstraete).

KnowMe database: updates will be published in April

The last MSC and SEAC meetings have been particularly interesting in terms of setting precedents and clarifying how ECHA acts towards specific evaluation and authorisation issues. The main lessons learnt during these key meetings are summarised in the KnowMe database. An updated version will go live during the first week of April listing key messages gained at MSC meetings and another will follow mid-April reporting lessons acquired at SEAC meetings. Make sure you check the new challenging decisions taken by regulators. Questions and feedback on the information and on the database are most welcome (for more information: Federica Iaccino).

COMMUNICATION ACTIVITIES

ChemConf Amsterdam: promoting the assessment entity for better understanding of complex cases

The metal sector was invited by ECHA to make a presentation on the opportunities offered by the inclusion of the 'assessment entity' feature in the forthcoming IUCLID 6 tool when reporting complex cases. The assessment entity, by 'wrapping' datasets and making links throughout IUCLID and Chesar will improve the transparency, the user-friendliness but also the understanding of the assessment approaches followed for e.g. inorganic UVCBs or substances with different hazard properties in the same registration and in different uses. The presentation was included in a seminar on 'REACH IT Tools', involving ECHA, industry speakers and consultancies such as EBRC (more information: Violaine Verougstraete).

Calendar

- **19 April:** Workshop on the regulatory fitness of chemicals legislation (excluding REACH) –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)
- **26 April:** Practical Implementation of ECHA's 3-Year Work plan Meeting – Cefic (Brussels)
- **10 May:** Evaluation Platform – MCC (Brussels)
- **11 May:** Authorisation & Restriction Platform – MCC (Brussels)
- **16-17 May:** REACH Conference – Prague (Pruhonice)
- **18 May:** MeClas Training for new EU countries – Prague (Pruhonice)
- **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	MeClas: Metals Classification Tool
AoA: Analysis of Alternative	NMP: 1-Methyl-2pyrrolidone
C&L: Classification and Labelling	OEL: Occupational Exposure Limits
CARACAL: Competent Authorities on REACH and CLP Regulations	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CASG: Competent Authorities Sub-Group (EC)	PEG: Partner Expert Groups
CLH: Harmonised Classification Proposal	RCF: Refractory Ceramic Fibres
CLP: Classification, Labelling and Packaging Regulation	RCR: Risk Characterisation Ratio
CMR: Substances classified as Carcinogens, Mutagens or toxic to Reproduction	REFIT: Regulatory Fitness and Performance Programme
CoRAP: Community Action Rolling Plan	RMM: Risk Management Measures
CTP-HT: Pitch, Coal Tar, High Temperature	RMOa: Risk Management Option analysis
DNEL: Derived No Effect Level	SOP: Standardised Operating Protocol
ECHA NMWG: ECHA Nanomaterials Working Group	SVHC: Substance of Very High Concern
EURL-ECVAM: European Union Reference Laboratory for alternatives to animal testing	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
ERV: Ecotoxicity Reference Value	vPvB: Very persistent very bioaccumulative chemicals