



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

Entering my son's room one minute after he rushed off to university (sound track: "Bye Mum, I'm late...", door banging), I wondered once again how I could encourage him to adopt some "logistic initiatives" that could bring his "shell" up to the standards of the otherwise rather well-organised home. Or more concretely: how could I suggest that he initiate some attempt to dispose of the clothes that have been lying miserably on the floor for a few days or arrange for the levitation of some cookies' remainders into the trash bin? Otherwise formulated from a management's perspective: how could I influence his organisational behaviour within the overall (house) system organisation?

Anticipating that a frontal confrontation will probably result in having an acute effect rather than a sustainable change, I started to wonder on which elements that would impact his behaviour I could have some bearing on in the longer term (and in a subtle way of course). Back to the books and the science of organisational theory: 'people need to be motivated to actualize their potential and there are several ways of enabling them and empowering them to do so. These include the role of reward systems in motivating people according to their needs for extrinsic or external motivation and by providing opportunities that appeal to their intrinsic or internal motivation needs'. (I should probably invite his girlfriend more often to come over for dinner and stay for breakfast). In the working world it also seems that there has been lot of emphasis on 'motivating employees by organizing fun and recreation events where they let their hair down and indulge in the much-needed stress relieving activities' (this is more or less the definition of my place, in particular the hairy part). 'In recent years, employees are also motivated because of the presence of famous business leaders in the top management of the company as is the case with Apple, Microsoft for example' (let's not go there). 'The organizational structure is another aspect that can motivate employees. For instance, it has been found that flat organizations as opposed to hierarchical organizations motivate employees more. Next, the organizational culture plays an important role in motivating employees, an open and collegiate one being more effective' (having a pyramidal hierarchy in a recomposed family from the 21st century seems a myth, everything is open negotiation). 'The HR managers have an important role to play in motivating employees by interacting with them, finding their grievances, and proposing solutions to behavioural problems' (exactly what I was saying). "Having covered the various aspects of how the organizations can motivate the employees, it needs to be mentioned that mere reliance on salary and benefits cannot motivate employees completely. Apart from this, the fact that the brand image of the organization makes a lot of difference to the motivation levels of the employees is another factor. Dream companies (= homes) attract the best talent to those companies (=homes) that are often viewed as the benchmark for industry peers (friends, family, neighbours?). Of course, if the image does not meet up to reality or if the hype is without substance, many employees lose motivation to work in such companies (hum...) Two hours later, late for work, I had to admit that I had not managed to identify a set formula on what I could do or not do to motivate my son's organisational skills. In addition, the last article concluded as follows: 'The best approach would be to let employees find their own niche within the organization and let them actualize their potential instead of forcing them to do work that is not to their liking'. Which I immediately applied by dropping the clothes on the floor again and extracting the empty cans from the trash bin...Oh for sure he will find his own niche back once he comes home (sound track: Hi Mum, everything fine?, gosh I'm hungry...)

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

MSC-47: 7th priority list for Authorisation: *outcome of the Public Consultation presented to MSC*

ECHA recently circulated the Response to Comments (RCOMs) from the Public Consultation (PC) on the draft 7th priority list for Authorisation, which includes 4 Pb compounds and 2 perborates. The RCOMs summarize and interpret the comments made on: 1° the prioritisation scoring, 2° exemptions requested by industry and 3° on LAD/SSD. Eurometaux reviewed the RCOMs in detail, and prepared with ILA and the Nickel Institute a reaction contesting the ECHA conclusion that an Article 58 (2) exemption on alternative EU- wide Risk Management would (even) not apply to the uses of the 4 lead compounds. No technical discussion was allowed at this stage as it is scheduled for MSC-48 in June. However, Eurometaux was already able to raise generic concerns on 1° Article 58 (2) asking for an independent review by MSC (not being influenced by ECHA's conclusion), 2° a recognition of the consequences of the VECCO court case (exemption from Authorisation if a substance is listed for an EU-wide binding OEL), 3° a reminder on the more robust Latest Application Date (LAD) approach as suggested by Eurometaux and 4° attention for the impact on recycling especially for lead oxide. Eurometaux wanted to guarantee that these concerns were being taken up in the MSC minutes so as to ensure a proper debate in June. On the Pb compounds specifically, MSC appreciated the sector's effort to reconfirm the comments on the 6th list and for grouping the inputs for the PC, while on the perborates they underlined the differences with the borates, also referring to the fact that those are handled by different sectors. Eurometaux plans to submit comments on the RCOMs early May. The June MSC-48 will be crucial for the exemption debate and the Eurometaux A&R platform will review what can be done to influence ECHA's views (more information: Lisa Allen or Hugo Waeterschoot).

MSC-47: Substance Evaluation on Silver nanos: *a reasonable outcome but a need for a grouping strategy*

The Ag nano case was the first environmental nano assessment in the EU, thereby setting precedence. Industry started from the hypothesis that the ecotoxicity of the soluble form is protective for nanoparticles assuming that no specific nano-effects would be observed. The assessment strategy as proposed by the Netherlands (acting as the evaluating country) included an inventory of different forms, the selection of representative forms for an in-depth assessment using grouping, a physico-chemical testing and an ecotoxicity testing pack. Their original proposal was significantly reduced as it appeared that only 2 silver forms are produced in the EU. Also the recent Board of Appeal case requiring that each request under the Substance Evaluation programme be risk-based had an impact. MSC agreed to request physico-chemical and ecotox testing on the finest form with the highest surface area and that fate in soil studies would only be required if the ecotox tests provide a positive result. Timing to comply with the decision was adapted to this. The classical water solubility test was replaced by the Transformation Dissolution test, which is specifically designed for metals. A challenge for the future is that MSC/ECHA may now propose this pack for any new form put on the EU market given the lack of a grouping strategy. Eurometaux will therefore consider if such a strategy can be developed with the help of the ETAP panel (more information: Katrien Arijis, France Capon and Hugo Waeterschoot).

INTERMEDIATES AND STRICTLY CONTROLLED CONDITIONS

MSC-47: Eurometaux's intermediates: *a welcomed initiative with the request to continue it*

Eurometaux was able to present its intermediates' initiative to the MSC plenary meeting attended by all Member States, ECHA and Commission. The programme helps downstream users and metals sector to clarify and motivate what uses can be considered as "intermediates use". This is applied to metals or other substances used by the sector in complex materials like metal oxides in batteries, frits, or Coal Tar Pitch uses for anodes in the Al or alloy sectors. It was designed a year ago based on a combined need of industry and regulators (MSC) to clarify the status under (potential future) Authorisation programmes. The scope (UVCBs,...) and initiatives taken by the downstream user sectors were seen as strengths. MSC took note of the main learning lessons and several asked if the industry guidance notes could be made available e.g. for enforcers. MSC encouraged Eurometaux and other sectors to continue with this programme since it provides an improved insight on the potential need and impact on prioritisation (MSC interest) and on Authorisation (industry interest). The extension towards the article boundary was seen as an interesting complement (more information: Hugo Waeterschoot).

ECHA MEETINGS

ECHA's 4th Topical workshop on New Approach Methodologies (NAM) in Regulatory Science: *about science and read-across*

On 19-20 April, about 150 scientists from different jurisdictions (including US and Australia) came together in Helsinki to explore the potential regulatory benefits arising from using 'NAMs' (including '-omics' and high-throughput screening methods but also other alternatives to animal testing) in a combination of lines of evidence. The workshop was structured to be held in plenary sessions and break-out groups, the latter discussing in depth three case studies forwarded in advance to the participants. These case studies were used as a starting point to assess how such new approaches could be used in supporting e.g. read-across. Whilst it was agreed that omics and high throughput tools can very interestingly point to a hazard concern – based e.g. by the change of a small genetic or metabolic response- the discussions demonstrated that a key issue remains however the assessment of the clinical relevance of a possible early-sign effect? This observation was driven by some obvious gaps

(toxicokinetics), the lack of standards and understanding and performance of the tests. In general, it was concluded that at this stage there are far too many unknowns to use NAMs to substitute standard test requirement under REACH. Alternatively the workshop encouraged the use of these techniques as additional lines of evidence in a Weight of Evidence approach to support read-across and grouping. Industry should ensure it is not lagging behind with regulators and scientists searching actively to apply such data. This can be done by e.g. trying to discuss it further with interested bodies like the US EPA and assess applicability in the context of metal-specificities. As for the other topical workshops, presentations will be posted on the ECHA website and a report made available once reviewed by the Scientific Organising Committee (more information: Hugo Waeterschoot and Violaine Verougstraete).

High-level discussion on metal/inorganic specificities: *how to consider these in efficient risk management?*

Eurometaux has been invited for a two hours meeting with Jack de Bruijn (Director Risk Management), Elina Karhu (Head of Unit Classification and Prioritisation), Matti Vanio (Head of Unit Risk Management Implementation), Claudio Carlon (Head of Unit Evaluation II), and Jos Mossink (Substance identification and Data Sharing), to discuss the possibility of organising a workshop between ECHA and the metals/inorganic industry to discuss a range of strategic REACH and CLP issues. ECHA, in the context of their Regulatory Strategy, is indeed trying to set priorities for the High Production Volumes, so as to identify which substances have already been properly tackled, which need more data, which ones need risk management measures and those that are not a priority. This prioritisation requires ECHA to have a good understanding of the availability/quality of information on uses and exposure but also on possible sector-specific issues. A first key message for the sector is that ECHA is quite clear about the fact that the focus of REACH after 2018 will be on evaluation and risk management. ECHA also realises that there are many areas and processes where interaction has taken -or is still- taking place between the metal/inorganic sector and ECHA (e.g. SID, RMOa, classification guidance, Authorisation scoping,...) and believes it would be good to bring these different issues together and discuss the possibilities of developing a sort of 'sector approach' to strive for a more efficient and coherent risk management for all actors. The workshop (that could take place end of August) will be the kick-off for such a framework. Overall, it was very clear that ECHA would like to use "other tools" than the regulatory stick to solve issues for our sector and that they opened the door for metal-specific issues discussions and finding solutions together. The opportunities and the frame to give to this initiative will be further discussed with the REACH Forum and in the Evaluation and A&R platform meetings next week. More specifically, the groups will be asked to provide feedback on the list of issues we see as requiring structural solutions to move to a coherent and proportionate risk management and how such a framework could be set up (e.g. resources) (more information: Hugo Waeterschoot and Violaine Verougstraete).

NANOS

ECHA meeting with companies: *first step towards mutual understanding about Registration approach for nanomaterials*

In light of the delayed revision of the REACH Annexes and the number of appeals on ECHA's decisions on nanomaterials, ECHA has invited companies to informally discuss about how REACH Registration dossiers for nanomaterials could be improved (Cefic premises, 26 April 2016). In total 11 companies from EM, Cefic and NIA memberships participated in the meeting. According to ECHA, the limited REACH information on nanomaterials does not allow to counter the public perception and NGO claims that nanomaterials are different from other substances, and generally unsafe. ECHA intends to update relevant Guidance documents which should clarify how information on nanomaterials should be generated and reported in REACH dossiers. ECHA also intends to launch targeted actions (e.g. letter campaigns) after the release of the Guidance, to stimulate dossier improvements. In parallel, ECHA is also open to formally recognize examples of characterisation, effects, exposure, and risk assessments on nanomaterials that fulfil REACH requirements. Eurometaux will discuss with the Nano TF in May whether any example(s) can be proposed from the metals industry, in order to prepare these in collaboration with Cefic and others, ideally over the summer, and at the latest before the next ECHA NMWG meeting in November (more information: Caroline Braibant).

ECHA OTHERS

Proposal REF-6 project to REACH Enforcement Forum: *all deviations from OSOR principle soon under scrutiny?*

As agreed by the Eurometaux REACH Forum at its March meeting, Eurometaux prepared and submitted a proposal of a harmonised enforcement project to be considered for the 6th Enforcement Project coordinated by the ECHA Enforcement Forum (ECHA Forum) (so-called REF-6). The proposal submitted on 14 April aims at promoting a cross-EU assessment of individual registrations submitted outside joint submissions and multiple joint submissions submitted for the same substance by national REACH Competent Authorities. The proposed project complements ECHA's recent efforts to review the completeness of around 700 individual registrations following the Board of Appeal decision A-022-2013 related to the Registration of charcoal. All REF-6 proposals received will be discussed/selected by the ECHA Enforcement Forum at its November 2016 meeting (more information: Caroline Braibant).

IUCLID 6

As several of you have probably seen end of last week, version 6.0 of IUCLID is now online. Updated manuals and plugins are also available. More information can be found on the IUCLID 6 and ECHA web sites:

http://iuclid6.echa.europa.eu/view-article/-/journal_content/title/na-29-04-2016-iuclid-6-is-available

http://echa.europa.eu/view-article/-/journal_content/title/iuclid-6-is-available

As noted by ECHA, IUCLID 6 is based on updated technology, which will support the future evolutions of the tool. The format has been updated to take into account changes in the legislations and the test guidelines. The changes will help users to report the information in a clear and consistent way, improving the quality of the datasets. Of particular relevance to the metals/intermediates dossiers is the existence of the assessment entity feature, which will allow linking data through the different sections and increase understanding. IUCLID 6 contains support materials allowing the user to get relevant and targeted help when filling in the information directly within the tool itself. The IUCLID plugins, including the Validation assistant, have been updated as well. A webinar offering practical advice on the transition from IUCLID 5 to IUCLID 6 will soon be announced by ECHA. It is also proposed to have an internal training on the metal-specific aspects, new assets, first experiences after the summer, with support of ARCHE and EBRC (more information: Federica Iaccino, Maxime Eliat, Daniel Vetter and Violaine Verougstraete).

Another list of substances: upcoming ECHA Annex III substances list

As reported by Eurometaux after the CARACAL 19 meeting of November 2015, ECHA has been working on two tools related to the implementation of Annex III of REACH: a list of substances which fulfil Annex III criteria (CMR 1A/1B, or PBT/vPvB, or wide dispersive use), and a template to document how a given substance does not meet Annex III criteria. The list or inventory of substances will be populated by information in Annex VI of CLP + publicly available experimental databases + publicly available (Q)SAR models (e.g. OECD). It will be published in the second half of May, and should contain approximately 70.000 entries. As soon as the list becomes available, consortia and associations will need to check whether any substance has been incorrectly added to the list (more information: relevant CARACAL 19 document, second article of ECHA's Weekly news of 20 April, and Caroline Braibant).

ECHA Guidance on data-sharing: last opportunity to make data-sharing expectations consistent with REACH Regulation

Following the publication of the Implementing Regulation on Data-Sharing, ECHA launched the revision of its corresponding Guidance. Eurometaux, Cefic and Concawe are working on providing a compiled list of major, complementary and editorial comments, aimed at ensuring that ECHA's interpretation of the data-sharing requirements under REACH do reflect the original REACH Regulation, do not go beyond what is foreseen in the Implementing Regulation, and results in suggested examples rather than prescriptive rules. Although many metals consortia and associations have complained about the requirements laid down in the Implementing Regulation, only three (Precious Metals, Ferroalloys, and Cobalt) have so far contributed to the revision of the Guidance. Those who have not yet looked at the revised Guidance and proposed Industry comments should do so before 3 May, which is the date at which Eurometaux, Cefic and Concawe will finalise the list of compiled comments for ECHA (more information: Caroline Braibant).

COMMISSION REACH activities: hot topics/issues

C&L inventory project: Molybdenum and Tungsten colleagues fully involved!

During the last monthly call on the second pilot project (12 April) ECHA explained that 684 letters had been sent to the notifiers of the 11 substances in the scope (2 Mo, 8 W and fatty acids) on 5 April, and that ECHA will monitor whether they have been opened, read, and whether any interventions/interactions on the C&L Platform, or changes in the numbers of notifications or classifications, have taken place as a result of these letters. Eurometaux conveyed a number of practical questions raised by Molybdenum and Tungsten colleagues, including the need for guidance on how to remove obsolete classifications. Shortly after the call, ECHA clarified that removing obsolete classifications should be done using the "cease manufacture" functionality in REACH-IT. Commission and ECHA are also internally aligning views about what "a common agreed entry" referred to in Article 41 of the CLP Regulation should mean in practice; a proposal should be shared with CARACAL in June. In order to increase the awareness around the second pilot project and steer the decrease of diverging classifications, Eurometaux has contacted ChemWatch in order to publish a dedicated article on the topic in May (more information: Caroline Braibant).

CLP REFIT workshop: mapping of interactions with and consequences of CLP on other chemicals legislation

DG GROW and RPA organised a workshop to collect input on the effectiveness, efficiency, coherence and relevance of a number of chemical legislations (Brussels, 19 April 2016). IMA, ECI, NI and Eurometaux participated in the various breakout groups that

discussed: CLP classification rules and criteria, hazard assessment across legislation, hazard communication to DUs and consumers, and links with and impacts of CLP on downstream risk management measures, among others. Industry emphasized that hazard classes under CLP should relate to intrinsic properties and not exposure ones (e.g. nano is not a hazard property), that MeClas was a good tool to derive the classification of complex materials, and that the objectivity/factual integrity of CLH discussions are more likely to be compromised if downstream consequences of classification are high or no derogation is practically possible (e.g. Seveso). Several participants recognised that current chemicals legislation assumes a generalised risk on the basis of hazard only. The workshop complements targeted questionnaires, case-studies and the ongoing public consultation on the fitness check which are part of a study to be finalised in November 2016. Eurometaux will prepare a draft answer for the consultation and circulate this to members for completion before submission by 27 May 2016. A Staff Working document will report the outcome of the fitness check towards the end of 2017, and legislation-specific remarks and recommendations will be picked up in due course, as part of the applicable review in each legislation (more information: Violaine Verougstraete, Caroline Braibant, Marco Vallini, Katia Lacasse, Lara Carrier).

Workshop on the nanomaterials observatory: first phase announced for end 2016

The Commission has identified a Nanomaterials Observatory as the most cost-efficient transparency measure to gather and report information on nanomaterials (vs e.g. an EU Nanomaterial Register). While the Impact Assessment Report is finalized Member States, NGOs and Industry were invited to share views about this measure (Brussels, 25 April 2016). The Commission/ECHA proposal so far is to have the Observatory functioning as a specific section of the ECHA website, covering: legislation on nanomaterials, substances in nanoforms and information on these, nanomaterials in products and articles, and research activities. Information disseminated will mainly focus on that of interest for workers and consumers. Information will primarily be extracted from REACH dossiers, national registries, and complementary (market) studies. Information from relevant international regulatory programmes (e.g. OECD) will be prominent too. ECHA welcomes suggestions to develop criteria to distinguish reliable and relevant information and is open to partnerships (e.g. cross-links between sites, inspiration from DaNa and eNanoMapper initiatives). The Observatory will be implemented in three phases, with the first one available by end 2016 (followed by two updates in 2017 and 2019). Industry plead for the Observatory to be credible in order to help balance out the current negative perception around nanomaterials (more information: Caroline Braibant).

EUROMETAUX REACH activities: hot topics/issues

AUTHORISATION & RESTRICTION

Potential Fast-Track Restriction on construction material: call and comments

On 1 April 2016, a large group of A&R Platform members joined in a call to streamline a paper that had to be sent to CARACAL by 7th April. All agreed to send a clear signal to the Commission and Member States that this Fast Track Restriction proposal would neither be justifiable nor create any value added in terms of protecting health or the environment. A conclusion based not only on a set of considerations of principle but strengthened by an in-depth assessment of the Scoping study provided by several A&R Platform members. The Eurometaux paper made a strong plea to build further on the Construction Products Directive and to always resort to an impact study when considering such regulatory moves. The decision was also taken to liaise with Metals for Building and Construction Products Europe and to encourage these associations to consider a follow-up advocacy programme on this important subject (more information: Hugo Waeterschoot and Michel Vander Straeten).

Capacity building CTP: call and comments

Euroalliances organised a capacity building meeting to understand the challenges of Authorisation under REACH for its members using CTP-HT, as well as for the colleagues from other metal sectors also using these materials. The CTP-HT user sectors clarified that most volumes can be considered as intermediates (see intermediates programme) but that some uses would require Authorisation. Eurometaux was invited to present experiences with preparing for Authorisation especially the pros and cons for different industry organisational levels. Attendees debated the suggestions and defined some actions at consortium/company level aiming to clarify some outstanding challenges on the scope of Authorisation to the sectors and define how to best organize this upcoming REACH task. The meeting was most helpful for Eurometaux too on preparing a briefing pack on this theme and learning from the way that Euroalliances brought the different interested users together (more information: Nadia Vinck and Hugo Waeterschoot).

Refractory Ceramic Fibers (RCFs): clarifying the boundary between substance use and article status

The RCF manufacturers conducted an internal review to assess the boundary between the manufacturing and use of RCFs and the moment the article status could apply. They invited Eurometaux to facilitate the interpretation of this boundary as it is a

critical factor in interpreting the scope of Authorisation. The exchange underlined the need to continue and expand the “intermediates program” (see above) towards the article boundary to provide more certainty for the sector (more information: Klaus Kamps and Hugo Waeterschoot).

CII: Outcome of Working Group Coordinators & Delegation Members’ Call of 14 April 2016

In preparation of the Commission’s envisaged event in November 2016 (tbc), the CII organised a call with the chairpersons of its working groups in order to ensure that key deliverables are identified, developed with the wider CII membership, and shared with the Commission before the summer break. As a result, Coordinators are now preparing a number of papers to be discussed with members of the Working Groups in May. These include: impact of RAC Reference DNELs (vs OELs), OSH vs Restriction as RMO, a paper addressing Substitution and the Analysis of Alternatives, market failure and RMOs, etc. Resulting proposals will be integrated into the illustrative flowcharts that the CII uses to visually communicate its position. The CII will also discuss with Eurometaux whether the Eurometaux RMOa Guidance and template should be promoted by the CII. In parallel, continued outreach to representatives of the EU and national Unions, and relevant contacts in ECHA, Commission, EP and the REFIT Platform will continue. An informative website with the CII materials will also be launched at the beginning of May (more information: Kai-Sebastian Melzer and Caroline Braibant).

RMOa Guidance finalized and posted: available for self-assessment and identification of RMM information needs

The development of a Risk Management Option assessment (RMOa) guideline / self-assessment tool was one of the main projects of the Authorisation and Restriction Platform last year.

The self-assessment guidance, a template, and a role play aiming at “broadening the mindset” were recently made available on: http://www.reach-metals.eu/index.php?option=com_content&task=view&id=211&Itemid=319.

The aims of the guidance are to help industry to: a) anticipate RMOa assessments for substances that meet the criteria of the SVHC Roadmap, b) develop an open view on RMOa selection based on potential efficiency and efficacy of the RMM, c) anticipate data needs beyond information in the registration dossier to define the best RMOa option and d) help align the supply chains on relevant RMOa needs. Companies and Consortia are encouraged to include RMOa assessments into their Chemicals Management planning. Indeed, the momentum and relevance for the RMOa is fast growing in importance, now that ECHA recognizes the pivotal role of this instrument for any need and tool identification for “chemicals management concerns”. This is a much broader scope than initially foreseen, as it was first mainly applied to CMR materials. The A&R platform will define on 11 May when to organize a generic training on the Guidance and how to communicate it wider to ECHA, the Commission and the Member States. Feedback and learning lessons are collected via infoRMOa@eurometaux.be (more information: Michel Vander Straeten and Hugo Waeterschoot).

OTHERS

Update of the ECHA Guidance for identification and naming of substances under REACH and CLP: PEG and SIP

ECHA is about to launch a consultation round on the *Guidance for identification and naming of substances under REACH and CLP*. The purpose of the consultation is to update the guidance to address and describe the Substance Identity Profile (SIP) concept. The update will be limited to a proposed new appendix addressing the SIP concept. For this update ECHA will follow a full procedure, which includes consultation of the Partner Expert Group (PEG), the ECHA Forum for Exchange of Information on Enforcement (Forum) and the CARACAL. Federica Iaccino has been nominated to represent Eurometaux in the PEG consultation, which should start in May (more information: Federica Iaccino)

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

Bioelution and set-up of a new Round Robin testing: SOP and schemes

At the last Risk Assessment and Classification Taskforce meeting and bioelution workshop, it was proposed to launch a new round robin exercise to test the SOP that has been revised and clarified based on the learning lessons from the 2010-2012 interlab comparison exercise (summarised in Henderson et al. 2014). Several commodities/consortia expressed interest to participate in this project and are now putting their heads and efforts together to identify the set of most relevant test materials, the loading conditions and parameters that need to be explored in order to respond to the concerns authorities could express on the protocol. In parallel, a small group of enthusiasts is trying to draw the classification decision schemes that would allow a perfect balance between credibility, conservatism and proportionality. These schemes should be tested out with real alloys cases by interested companies/commodities before being consolidated in the guidance (more information: Federica Iaccino and Violaine Verougstraete).

Further outreach of REACH

OECD

Next steps towards metal guidance at OECD: *call and comments*

The metals guidance note on bioavailability –block 1 of a larger project aiming at proposing metals environmental risk assessment guidance to OECD- is now on its way towards finalisation. ARCHE is preparing a final version based on comments from The Netherlands and Canada, which will then be submitted a last time to the OECD Hazard Assessment Working group mid-May. A proposal for block 2, focusing on fate and exposure assessment, will be submitted to OECD by end of June for discussion at the Exposure Assessment Working Group end of August. In parallel, a fact sheet summarising all tiers of the Unit World Model will be submitted, as committed by Eurometaux during last year's meeting where a presentation was given on the possibilities of the model. Eurometaux and ICMM will both attend the OECD Taskforces meetings and report the outcomes to the Risk Assessment & Classification Taskforce and the ICMM Chemicals Management Working Group (more information: Marnix Vangheluwe, Hugo Waeterschoot, Ben Davies and Violaine Verougstraete).

Read-across nanos: *workshop in Brussels attended by ARCHE*

Koen Oorts kindly represented the metal sector at an OECD Meeting on Grouping and Read-Across for the Hazard Assessment of Manufactured Nanomaterials. The workshop was structured in several sessions covering a) Regulatory context in different jurisdictions - conceptual basis, b) Research Initiatives – Implementing Tools like NanoReg 2 and the ECETOC approach, c) Case studies, best practices and recommendations for read-across for nanomaterials in a regulatory context; followed by breakout discussions addressing the criteria to be considered when conducting read-across in the context of hazard assessment and the applicability of OECD Guidance Document on 'Grouping of chemicals (2014) to nanomaterials. Interesting elements mentioned were e.g. an approach to group all nanomaterials into a limited number of categories based on phys-chem properties; the reiteration of the importance of size, shape and surface treatment (despite the fact that a commonly agreed definition of nanoform is still missing), the lack of standardised methods for e.g. dissolution rate and what is 'similar' for grouping. It was also stressed that the rather theoretical discussions shall be tested with real cases. Examples from metal experiences were mentioned a couple of time, e.g. a TDp like approach as a basis for a solubility/fate test of nanos and the metal chapter in the OECD guidance on grouping that was proposed as a good template for the chapter for nano materials. It was generally felt that science is not yet ready for a final guidance on read-across of nanomaterials, but that one should start drafting a more elaborated chapter than what now exists in the OECD guidance on grouping. The outcome of this workshop will be a report (draft foreseen in June) that will be further discussed by the OECD working party on manufactured nano-materials (WPMN) (more information: Koen Oorts).

Calendar

- **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 31 – ECHA (Helsinki)
- **6-10 June:** SEAC 32 – ECHA (Helsinki)
- **6-10 June:** MSC 48A – ECHA (Helsinki)
- **14-15 June:** MSC 48B – ECHA (Helsinki)
- **16 June:** Exposure Scenario TF – MCC (Brussels)
- **22-23 June:** Management Board – ECHA (Helsinki)
- **23 June:** REACH Forum – MCC (Brussels)
- **6-8 July:** ECHA-OECD symposium on cost –benefit impact assessments for chemicals management – ECHA (Helsinki)

Acronyms

C&L: Classification and Labelling	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CARACAL: Competent Authorities on REACH and CLP Regulations	PC: Public Consultation
CII: Cross Industry Initiative	PEG: Partner Expert Groups
CLH: Harmonised Classification Proposal	(Q)SAR: QSAR: Quantitative Structure - Activity Relationship (models to predict toxicity)
CLP: Classification, Labelling and Packaging Regulation	RCF: Refractory Ceramic Fibres
CMR: Substances classified as Carcinogens, Mutagens or toxic to Reproduction	RCOM: Response to Comments
CTP-HT: Pitch, Coal Tar, High Temperature	REF-6: 6th Enforcement Project (ECHA Enforcement Forum)
DNEL: Derived No Effect Level	REFIT: Regulatory Fitness and Performance Programme
DU: Downstream User	RMM: Risk Management Measures
ECETOC: European Centre for Ecotoxicology and Toxicology of Chemicals	RMOa: Risk Management Option analysis
ECHA NMWG: ECHA Nanomaterials Working Group	SID: Substance Identity
ETAP: Environmental Technologies Action Plan	SIP: Substance Identity Profile
IUCLID: International Uniform Chemical Information Database	SOP: Standardised Operating Protocol
MeCLas: Metals Classification Tool	SVHC: Substance of Very High Concern
MSC: Member States Committee	TDp: Transformation Dissolution Protocol
NAM: New Approach Methodologies	US EPA: US Environmental Protection Agency
OECD: Organisation of Economic Cooperation and Development	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
OEL: Occupational Exposure Limits	vPvB: very Persistent very Bioaccumulative chemicals
OSH: Occupational Safety Health	WPMN: Working Party on Manufactured Nano-materials (OECD)
OSOR: One Substance One Regulation	