



## EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

*Uncertainty corresponds to 'situations in which the possible states of nature and/or the probability of occurrence of each state are not foreseeable with complete confidence'. In situations of uncertainty, people may cling to information like a 'frog adrift in the ocean clings to a coconut'. But how far should we go in the collection of "coconut- information", in order to appropriately manage decision-making uncertainty?*

*RAC's conclusion that cobalt - one of the metals that has the best documented mechanisms of action when it comes to genotoxicity- should be considered as a non-threshold, partly driven by the fact that besides the known mechanisms there may be 'other potential mechanisms of actions that could be without threshold', lingered in my head the rest of the RAC week. Ruth and I had somehow washed away the incredulity with a G&T on a sunny terrace (it's the a good season for doing so in Helsinki!), but I could not prevent myself from looking at RAC members the next morning with a mix of perplexity and frustration. Knowing my inability to remain straight-faced, this probably provided some interesting video recordings for the technician.*

*When making decisions, people avoid choices for which they are missing information. This sounds reasonable enough. Why would you choose something if you are not sure about it? Sociological experiments have demonstrated that missing information causes people to make irrational choices; something known as the Ambiguity Effect. Its central thesis is that people prefer to choose an option with a known probability over one with unknown probability. It is a cognitive bias that helps the brain to process information quickly -even when that processing is sometimes flawed. In decision-making, the Ambiguity Effect can lead people to make a (possibly bad) decision where all information is known, instead of a (good) decision without the full-picture. Since the majority of people don't like risk, their uncertainty increases with missing information and an unknown probability.*

*As risk assessors, we must analyse uncertainty throughout our work. It shows up after going through the limitations of effects data, the discussion on the representativity of exposure datasets and the holy 'margin of safety'. As much as possible, we need to describe this uncertainty: has it to do with data, an incomplete understanding of processes, or with the most fundamental ways of viewing the questions? It is however not sufficient to domesticate it. Uncertainty pervades the entire decision-making process and is not limited, nor even necessarily concentrated in scientific risk assessment. Risk assessors and other analysts make numerous explicit and implicit choices in treating uncertainty, which have tremendous and often unaudited impact on the decision-making process.*

*Are there any tricks or solutions? Websites discussing the Ambiguity Effect in the business or behavioural areas stress that it is important to give people handles that allow them to grab hold of the proposed action/decision. Examples of handles that are provided and that can help people overcome the Ambiguity Effect range from 'metaphors' (comparing the unknown to something that is well known), statistics or guarantees. We may need to reflect together on how to transpose those handles to our REACH discussions to come. Choices in the treatment of uncertainty should be active, not passive, with shared responsibility between the risk manager and the risk assessor. That's something valid for us as well.*

*"It is in the admission of ignorance and the admission of uncertainty that there is a hope for the continuous motion of human beings in some direction that doesn't get confined, permanently blocked, as it has so many times before in various periods in the history of man". Richard P. Feynman*

Violaine Verougstraete, EHS director Eurometaux

# ECHA REACH activities: hot topics

## ECHA COMMITTEES

### **RAC 37 A: dose-responses for cobalt and RCFs, chromates AfAs review: *learnings and trainings***

RAC 37 has spread the review of the Applications for Authorisation (AfAs) for chromates, EDC, arsenic acid over its two-weeks' meeting. Discussions alternated between the learning lessons to be drawn from these cases (occupational exposure, man via the environment, information needs), discussions on restrictions (phthalates in articles submitted by ECHA and Denmark, TDFAs in combination with organic solvents in spray products for consumers submitted by Denmark) and capacity-building. With regard to the latter, two trainings have been organised for the RAC members: one on Risk Management Measures in large scale industrial processes provided by the German industry, another one on environmental assessment on request of RAC members. The debates on the dose-response/ DNELs for cobalt compounds and Refractory Ceramic Fibres were finalised. RAC concluded on a non-threshold dose-response for cobalt compounds and an excess risk at dose level  $\times 1.05 \text{ (mg Co/m}^3\text{)}^{-1}$  for workers exposure and dose level  $\times 5.88 \text{ (mg Co/m}^3\text{)}^{-1}$  for the general population; these elements will now be forwarded to the Commission. For RCFs, where the derivation of a dose-response was addressed in the context of a possible Authorisation, the outcome of the discussion was that for now, it is impossible to agree on a value and on a single methodology. Considering that the recent Commission proposal to amend the CMD with 13 binding OELs includes a value for RCFs, RAC agreed to leave the report as it is for now, simply asking the consultant to reflect the last comments made. An update was also provided on the REACH vs. OSH debate, more specifically on the efforts RAC and SCOEL are asked to deploy to come to a joint opinion on the NMP case. Key differences remain the application of assessment factors and the context in which the results are used (OEL for the workplace vs. DNEL for workers and general population). This update as well as the issues raised by RAC members on the quality of the AfAs illustrated once more how much Authorisation remains affected by the differences in information requirements and ways of presenting the information compared to Registration. It is therefore important that after this first wave of AfAs, a stock-taking exercise is organised by the end of 2016, so as to best prepare for possible metal applications (more information: Violaine Verougstraete).

## ECHA MEETINGS

### **11<sup>th</sup> ECHA Stakeholders Day (Helsinki, 25 May 2016): *Risk Management true context behind Registration***

The event was devoted mainly to preparing for the 2018 registration deadline. It was made clear that registration is only the start of REACH and that dossiers have to be updated regularly in order for ECHA to properly focus follow-up actions on substances that matter the most. In this context, dossiers seem rather weak regarding use and exposure information, resulting in poor quality eSDS as well. ECHA recommended to implement the use maps that were developed to collect proper use information. The dossiers should be updated using the upcoming versions of IUCLID, REACH-IT, etc. which should now more systematically host critical information. ECHA would like registrants to move from a tick-box exercise to a true demonstration of safe manufacture and use of substances (WSSD 2020 goal). It stated that quality has generally improved but industry commonly fails to sufficiently document its arguments and justifications for e.g. not generating (animal) test data. A speaker reminded that even in cases where safe manufacture and use are demonstrated, authorities follow a tick-box approach and request additional data even when existing information provides "sufficient confidence" on the (non-)toxicity of a substance; an illustration of where the regulatory requirements overrule the scientific conclusion. One of the key take-aways of the event is that the quality and recency of the data in the Registration Dossiers are recognized as key to ensure an efficient and targeted follow-up through Evaluation, RMOAs, and Risk Management measures as applicable (more information: Caroline Braibant).

### **NeRSAP 5: *a combined session with the Royal Society of Chemistry on 3 May in London***

NeRSAP is the Network of Risk, Socio-economic analysis (SEA) and Assessment of Alternative (AoA) Practitioners, which was created three years ago by ECHA, Cefic and Eurometaux on request of the metals sector. The network aims at exchanging practical experiences with SEA and AoA tools in the context of Authorisation and Restriction but also in the broader context of chemicals management. NeRSAP's 3<sup>rd</sup> anniversary was celebrated in the beautiful settings of Burlington House, the Society's location in Piccadilly. The UK Health and Safety Executive and the Royal Society of Chemistry who organised the meeting opted for a broad agenda with 3 themes: 1. bridging the gap from Risk Assessment to Impact Assessment, 2. bridging the gap from Impact Assessment to Socio-Economic Assessment and 3. going beyond a traditional Risk Assessment (e.g. man via the environment). ECHA animated the afternoon discussion where the 3 themes were debated for the Environment and Human Health endpoints. One surprising finding was that, in general, environmental assessments are more difficult given that the link between unit risk and impact assessment is often absent, and it is also more difficult to define a realistic precautionary approach. This may partially result from the lower level of experience with environmental chemical assessments. It was announced that the 6<sup>th</sup> NeRSAP will be organized in Brussels early 2017, under the auspices of Eurometaux. Assessing man via

the environment will be one of the themes on which presentations will be solicited (more information from Hugo Waeterschoot).

## **ECHA OTHERS**

### **ECHA report on the operation of REACH and CLP 2016 (so-called REACH Review report): *the use of chemicals is getting safer but the journey is not over!***

ECHA published on 26 May its second report on the operation of REACH and CLP. The report provides a picture of the “impact, success and remaining challenges of this legislation” but also lists a number of commitments and recommendations. According to Mr Dancet’s accompanying letter, “*the main message from the report is that REACH and CLP are functioning well: the means to enable companies, Member States, the European Commission and ECHA to fulfil their responsibilities have been put in place; companies are responding to the legislation; the legislation is being enforced by Member States and the positive impacts of REACH are increasingly visible.*” Whilst registrants are strongly encouraged to further increase the quality of the data in the dossiers and the consistency of the information flows along supply chains -basis for REACH and CLP processes-, the report also emphasises the fact that ECHA has moved from a data-gathering organisation to one devoted to knowledge management. In so doing, an integrated regulatory approach is taken to manage those processes. The report, its recommendations and commitments will be carefully analysed by the REACH team, so as to extract key contributions for our REACH Review work and the Chemicals Management event that will take place in October. Some appetisers already: “*The Commission is invited to fundamentally review the current legislative requirements for information on substances in articles and this could usefully form part of work on the circular economy and the drive towards a non-toxic environment*”, “*The Commission should explore how REACH and CLP information could be used by authorities worldwide and potentially accepted under other jurisdictions to document the safe use of chemicals. This could be linked to the ongoing harmonisation work of tools, formats, test methods and information requirements taking place at the OECD level*”, “*An implementing regulation could be considered to ensure mandatory reporting of use and exposure information on a regular basis.*” Or “*ECHA will promote methods, tools and approaches that are alternatives to vertebrate animal testing and is committed to ensuring that animal testing is only requested when necessary in its own decisions*”. The report concludes that “*on balance, the Agency does not see the urgent need to revise the REACH Regulation. [...] Nevertheless, should the European Commission chose to amend the legislation, ECHA can suggest a number of changes to smooth or improve its clarity and effectiveness*” (more information: Hugo Waeterschoot, Caroline Braibant and Violaine Verougstraete).

### **Inorganic/metals framework set by ECHA: *reminder to send comments by 3 June***

As announced in the last REACH News, an inorganics/metal sectorial approach will be established by ECHA to set priorities, so as to identify which substances are already properly tackled, which need more data and which ones need risk management measures. This prioritisation requires ECHA to have a good understanding of the availability and quality of information on uses and exposure but also on possible sector-specific issues. ECHA has already set up such a sectorial approach for petrochemical substances (PETCO) and will approach the chemical sector to invite them to the development of a comparable framework for organic substances/issues. A kick-off workshop involving ECHA and industry will be organised end of August (29-30, Helsinki, modalities tbc) to explain how this framework would work and what could be the issues to tackle. ECHA has asked Eurometaux to provide them with a list of issues the sector is (still) wrestling with and also on who the ‘metal sector’ actually ‘covers’ (which consortia, which substances, do we have contacts with other inorganics etc.?). To address these questions, two Excel sheets were prepared and distributed to the REACH Forum, the Evaluation and Authorisation and Restriction Platforms. Comments and corrections can be sent before 3 June (more information: Hugo Waeterschoot, Caroline Braibant, Federica Iaccino, Michel Vander Straeten and Violaine Verougstraete).

### **ECHA Annex III Inventory: *now available and worth a check!***

As pre-announced in the April REACH News edition, a list of substances which fulfil Annex III criteria (CMR 1A/1B, or PBT/vPvB, or wide dispersive use) has been populated. The list released by ECHA contains approximately 70.000 entries including metals and metal compounds. Consortia and associations are invited to check whether any substance has been incorrectly added to the list (cf. <http://echa.europa.eu/information-on-chemicals/annex-iii-inventory>). During a personal exchange at 11<sup>th</sup> ECHA Stakeholder Day, ECHA has furthermore clarified that Article 74.2 of REACH (“*A fee needs not be paid for a registration of a substance in a quantity of between 1 and 10 tonnes where the registration dossier contains the full information in Annex VII*”) has to be applied within the context provided by Recital 34 of REACH. The fee waiving thus only applies to substances which do not fulfil Annex III conditions and for which a full Annex VII dossier is provided anyway. The aim of Article 74.2 is to incentivise and encourage registrants to provide this information (more information: Sarah Hottenroth and Caroline Braibant).

### **ECHA Guidance updates before moratorium: *Eurometaux to be involved in various PEGs in 2016 and 2017***

ECHA's moratorium on Guidance and other tools aimed to support 2018 Registrations started on 31 May 2016. REACH Guidance documents that are or will be under consultation, and not part of the standstill, include the Guidance documents on: registration, data-sharing, substances in articles, repeated dose toxicity, PBT, consumer exposure assessment, CLP rules, labelling and packing, and four updates or annexes related to nanomaterials. Eurometaux has appointed nominees for the relevant Partner Expert Groups (PEG) or will do so when invited. Our aim is to provide comments on the proposed changes as relevant, and to inform on the availability of the final documents in due course (2016/2017) (more information: Violaine Verougstraete and Caroline Braibant).

### **CSR/ES Roadmap survey: *assessment of actions***

ECHA is carrying out an interim evaluation of a series of initiatives established by ECHA and its stakeholders under the CSR/ES Roadmap. The latter aims to i) increase the understanding among the actors in the chemical supply chain and ii) to develop methods, processes and tools to facilitate the efficient and useful communication of use and exposure information up and down the supply chain. 21 actions to 2018 have been defined for achieving these objectives. These are managed by a coordination group comprising ECHA, the Commission services, the sector organisations Cefic, Concawe, Eurometaux, Fecc, DUCC, and Member State authorities' representatives from Austria, Finland, Germany, Italy, the Netherlands, and Poland. The survey available on <https://www.webpolsurveys.com/S/BEAEA0D555D9B35B.par> aims at collecting the views of the registrants, downstream users and authorities on the relevance of the programme for your organisation and for industry at large, the effectiveness of the work in generating useful outputs; and efficiency of the work in terms of effort compared to outcome. Deadline for completing the survey is 8 June but we got the possibility to submit our responses on June 17, so as to be able to discuss our input at the 16 June Exposure Scenarios Taskforce meeting (more information: Federica Iaccino, Frank Van Assche and Violaine Verougstraete).

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## COMMISSION REACH activities: hot topics/issues

### **NANOS**

#### **3<sup>rd</sup> Regulatory Review on nanomaterials: *Launched despite revision of definition and continued delay in REACH Annexes ...***

Eurometaux was approached to provide information on the challenges brought by the environmental legislation for nanomaterials (so-called 3<sup>rd</sup> regulatory review on nanomaterials). In a response prepared with the Nano Taskforce, Eurometaux stressed the fact that metals and metals compounds placed on the market for decades or centuries now 'happen' to fall under the EU definition of nanomaterial, is causing more administrative burden than actual improvement of risk management. Eurometaux further insisted that a physical form (i.e. nano) is in itself not a hazard endpoint or predisposition for (more) hazard. We asked that aggregation, agglomeration and natural binding behaviours of nanoparticles should be considered before assuming generalised emissions and exposure to nanoparticles. Eurometaux concluded that it does not see any justification to conclude differently today than during the 2<sup>nd</sup> regulatory review. We did signal that guidance and standard test (conditions) for testing the fate properties of nanomaterials (cf. also Eurometaux activities below) are lacking as well as guidance to help companies in characterising their various materials and demonstrating that their materials are not nanomaterials. Finally, we asked that for substances where some physical forms have different hazard properties, it should be possible to derive a classification for the hazardous form that is different from the other form(s), both for the environmental and human health endpoints under CLP (more information: Caroline Braibant).

#### **Revision of nanomaterials definition and REACH Annexes: *Not anywhere close finalisation...***

Belgium, France, Sweden, Germany and the Netherlands have recently urged the Commission to provide the feedback it had committed to come with after the last CASG Nano meeting (Brussels, 10-11 March 2016). In its response to the querying Member States, the Commission indicated that it was facing internal delays with the various deliverables (including the Impact Assessment (IA) reports which were considerably challenged by the Regulatory Scrutiny Board (RSB)), and that the diverse comments received need to be weighted in the light of the potential changes to these reports and the forthcoming legislative proposal. The Commission hopes to finalise the RSB process before the next July REACH Committee meeting, so that it could be discussed by the CASG Nano at a meeting tentatively planned on 4-5 July. It however also considers the possibility of not meeting this goal and having to target the September REACH Committee meeting instead... The Commission is now finalising the IA Reports, preparing responses to the comments received, and updating the legislative proposal for amending the REACH Annexes. Nothing has been mentioned on the revision of the definition, but more information may become available at the next meeting of the Cross-Industry Platform on nanomaterials (Cefic, 20 June 2016) (more information: Caroline Braibant).

## REACH AND CLP

### **REACH Review: Commission's Roadmap released**

Better regulation requires the Commission to issue Roadmaps for each review, fitness check or (ex-post) evaluation it performs on EU legislation. Although the REACH Review is prescribed in the REACH Regulation itself, the Commission has clarified the purpose, content, scope, evidence base, and related activities of the 2017 REACH Review (cf. [http://ec.europa.eu/smart-regulation/roadmaps/docs/2017\\_env\\_005\\_reach\\_refit\\_en.pdf](http://ec.europa.eu/smart-regulation/roadmaps/docs/2017_env_005_reach_refit_en.pdf)). Milestones to prepare for include: targeted consultations in the context of thematic studies between 2014 and 2016, a public consultation in Q2/Q3 2016, and a conference with all stakeholders after 2018 (more information: Caroline Braibant, see also news item on ECHA's REACH Review report above, and news item on Eurometaux REACH Review paper below).

### **Fitness check of chemicals legislation: Eurometaux submits response to survey**

In addition to the various targeted inputs provided by Eurometaux on the effectiveness, efficiency, coherence and relevance of a number of chemical legislations, Eurometaux also prepared and submitted comprehensive and detailed responses to the 35 questions of the survey. The Eurometaux input was circulated by mail to Members of the REACH Forum, inviting them to also contribute to the online survey, in order to balance out the represented views as other stakeholders taking care of other interests are also expected to contribute in numbers. Several members confirmed having submitted their individual responses before the deadline of 27 May. Thanks! (more information: Violaine Verougstraete, Hugo Waeterschoot, Annalisa Bortoluzzi and Caroline Braibant).

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## EUROMETAUX REACH activities: hot topics/issues

### RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES

#### **Evaluation platform: learnings by the dozens**

The Evaluation platform met on 10 May for a very interesting exchange on the learnings of the silver substance evaluation case and the calcium propionate testing strategy, but also to hear the latest developments on the Extended One Generation Repro Test and the Fish Embryo Acute toxicity Test, discussed at MSC 47. A 'hands-on' training on KnowMe allowed to collect a number of very helpful suggestions to further increase the usefulness of the knowledge database. Several consortia shared their experience and learning lessons were drawn from the second soft letters campaign. The 'legal team' explained their analysis of the EU-Ombudsman case requesting/insisting that the applicants check for alternative ways to animal testing, to develop the requested information with an action ensuing for consortia having submitted testing proposals. The meeting concluded with the presentation of the main outcomes of the recent topical workshop at ECHA on New approaches Methodologies (NAM) (e.g. how NAM data could be used to strengthen the read-across justification) and the explanation of the background behind ECHA's invitation to develop an inorganics framework. A number of actions were agreed on, including the setting up of a working group with interested consortia to share the outcomes of the RAAF testing or collecting cases where there is discrepancy between in vitro and in vivo results for skin irritation/corrosion. Minutes were circulated on 17 May (more information: Hugo Waeterschoot, Federica Iaccino and Violaine Verougstraete).

#### **Authorisation platform: a very useful meeting preparing for challenging debates at regulatory level**

The Authorisation and Restriction Platform was organised back-to-back with the Evaluation platform, which allowed to explain link between Evaluation and Risk Management through the RMOa tool. After a status report on the different steps towards prioritisation for authorisation (SVHC listing, 7<sup>th</sup> and 8<sup>th</sup> priority list) the meeting focussed most of its attention to the potential OSH exemption for lead and the reporting of the conclusions of the Recycling and Authorisation study. The next MSC meeting (MSC- 48) scheduled for early June will consider if all conditions are met to recommend Article 58 (2) on alternative EU wide risk management to be applied for the 4 Pb compounds under review. This would set an important precedent. The study on recycling and authorisation identified 3 practical recommendations to prevent and mitigate the effect of Authorisation on recycling. The outcome as well as the mitigation proposals were extensively reviewed and debated by industry at the meeting and will be presented on 6 June to ECHA. The A&R platform further recommended a training session on the updated and published RMO guidance. It also debated its contribution for the Chemicals Management seminar in October based on a paper indicating the future direction of RMM under REACH (more information: France Capon, Klaus Kamps, Michel Vander Straeten and Hugo Waeterschoot).

### **Recycling and Authorisation: study confirms that recycling can be hit and highlights need for mitigation measures to prevent unfair impact**

Last year, Eurometaux launched a project to investigate if and to what extent Authorisation could harm the recycling sector, and to identify which processes would be vulnerable. Six case studies covering input, processing and output of recycling processes were conducted by an independent consultant (Mike Holland) with the active contribution of Aurubis, Umicore, Metallo-Chimique and Afillips. They show that the recycling sector is indeed particularly vulnerable to Authorisation given that many steps in its operations can be considered as "uses" under REACH. The recycling of scrap containing SVHC substances and the use of metal compounds as process chemicals appear potentially exposed to Authorisation, while the direct costs of authorisation can climb significantly for mixing operations, especially. Despite these vulnerabilities, the direct costs of Authorisation seem to remain reasonably small for the sector; they are all related to internal processes that do not affect the customers. The indirect costs could however impact the competitiveness of the EU sector as they concern sourcing of secondary materials as well as some output flows (recycled substances containing SVHCs risking unfair competition with primary materials). The second part of the project identified 3 reasonably simple solutions capable, within the present legal framework, of improving the situation of recyclables: consider "mixing" as a processing step of recycling, list UVCBs rather than SVHCs in UVCBs on Annex XIV and recognise that collector/scavenger metals to recover metals as by-products or added value materials are part of a manufacturing process. The recycling sector does not aim at escaping the legal consequences of annex XIV listing but wants to ensure that it is not especially hit, which would be contrary to the objectives of the circular economy policy. Both the conclusions of the study and the suggestions for mitigation measures will be presented to ECHA and the Commission early June (more information: Michel Vander Straeten and Hugo Waeterschoot).

### **ECHA and chemicals management reviewed by Deloitte: Eurometaux provided extensive input**

Deloitte is organizing extended interviews with MSC STO representatives soliciting their view of ECHA's performance over the last years and for the longer term future. The study is conducted for the Commission as part of a report to be published by the end of the year reviewing performance and efficiency as well as looking towards the 2020 objectives. Eurometaux provided its experience with the 4 formal ECHA committees (RAC, SEAC, MSC and the Management Board) and suggested areas for improvements. The Committees are well organized, transparent and in general they perform well from an efficiency viewpoint, but the expertise in RAC on non-CLP issues is problematic as well as its drive towards "precaution". Eurometaux also drew attention to the overlap with the BPR and PPP hazard assessments, and the double legislation by the ELV-ROHS-WEEE and restrictions and indicated that there was room for improvement and who knows mergers. Eurometaux underlined the lack of recognition of the value of other EU-wide RMMs under the Authorisation scheme, as a real shortcoming that causes conflicts with industry and incoherent approaches and overlap in managing workplace exposure issues and product releases. In short, existing workplace and product legislation is often more targeted and efficient than REACH but may require a "reboost". REACH certainly built more knowledge on chemicals management and increased the supply chain communication on risks and risk management whilst creating more level playing fields between different groups of chemicals (e.g. more attention for PBTs) but at the same time created significant burden due to complex and administrative measures and requirements with often very limited value for the improvement of the chemical management level. Moreover, inorganics are not always treated with the same level of attention as organic substances, and this should be corrected in the future, the best way probably being ECHA taking more sectorial approaches. The shift of the chemicals strategy toward Risk Management to achieve the SAICM objectives is clear from ECHA's management planning but at present it is somewhat difficult to get industry oriented and motivated in that direction. At the international cooperation level it is noted that ECHA outsources more and more to the OECD and is (getting) more involved in the UN-GHS updates. However, industry would insist on even more alignment to prevent the EU system from deviating from other jurisdictions and creating maximal value for data sets developed under REACH (more information: Hugo Waeterschoot).

### **Meeting with Marco Mensink, Cefic's new Director General: discussing key concerns**

Guy Thiran and Violaine Verougstraete met Marco Mensink and Peter Smith on 17 May to exchange on key concerns both associations have with regard to REACH and CLP and further discuss best cooperation modalities. Peter Smith confirmed that Guy Thiran will remain his alternate at ECHA's Management Board. While both organisations are committed to 'make REACH work', they may adopt different approaches when it comes to the REACH Review or the added value of Authorisation (even simplified) when OSH legislation is in place and works. Interestingly, Mr Mensink proposed to carry out a 'look back' exercise assessing the REACH deliverables for the different sectors (e.g. costs, benefits, making the environment safer...) to present to Commission and ECHA. Also the possible involvement of Cefic at OECD level (via BIAC) was evoked, so as to have consistent messages from the EU industry (more information: Guy Thiran and Violaine Verougstraete).

### **Eurometaux and ILA review upcoming REACH challenges: a fruitful exchange helping to define a strategy**

The Lead sector has to deal with multiple upcoming REACH and CLP challenges including: the potential prioritization of 4 Pb compounds used in the most important commercial application of lead (batteries), the debate on the applicability of EU-wide OSH legislation as an alternative risk management measure (Article 58 (2)), a restriction on the use of Pb-shot in wetlands

areas, a restriction on the use of Pb-stabilisers in specific plastics and the environmental hazards review and classification of Pb metal. On 4 May, Eurometaux and ILA held a meeting to review the potential timing and main challenges to help defining a strategy aimed for a successful result for industry including balancing credibility of the sector and efficiency of the measures proposed. Especially the discussion on the applicability of Article 58 (2) required specific attention given its precedent setting nature and the quite restrictive view (overly conservative conditions) that the ECHA secretariat seems to have in mind before accepting this specific exemption of uses from authorisation. ILA and Eurometaux believe that such exemption may be granted by the Commission in the case of the use of those 4 compounds in battery manufacturing given exposure is restricted to the industrial workplace and covered by an EU-wide binding OEL and in view that none of the compounds are present in the battery placed on the market. Any additional requirement on substitution isn't part of the REACH definition for Article 58 (2). As a result of this debate, ILA and Eurometaux submitted a letter to ECHA stressing an interpretation of Article 58 (2) that would be more in line with the REACH objective and legal text (more information: Lisa Allen, Steve Binks and Hugo Waeterschoot)

#### **Preparation of RAC and SEAC discussions with CTAC: Cefic and Eurometaux reviewed the status of the AfAs**

The first batch of more than 50 chromates applications is presently up for final debate in RAC and SEAC. By far the largest application group was submitted by CTAC, the chromates authorisation consortium including all importers, and major user groups such as steel or aeronautics. In order to be well prepared for the upcoming RAC and SEAC meetings, Eurometaux, Cefic and CTAC met on May 19. The outcome of the last ECHA committees, follow-up submissions of data by CTAC as well as updated information on the draft opinions were used to identify the aspects requiring specific attention at the upcoming discussions. An analysis of the most up to date information showed that the Man via the Environment assessment is a main driver in the impact assessment for the SEA. This did not come as a surprise considering the previous experience with As<sub>2</sub>O<sub>3</sub>, the way the consultants assessed this endpoint as well as the lack of measured data. CTAC, Eurometaux and Cefic reviewed the various outstanding issues to ensure a proper understanding, so as to facilitate an assessment of the equality of treatment of the different applications. CTAC is indeed keen on getting equality of treatment of their upstream application when compared to other more downstream applications (more information: Hugo Waeterschoot and Violaine Verougstraete).

## CLP

#### **CLH proposal for Titanium Dioxide: preparatory work launched by TDMA**

France has submitted an Annex XV proposing a harmonised classification of TiO<sub>2</sub> for carcinogenicity (cat 1B, H350i). The proposed scope for the CLH entry is: "Titanium dioxide in all phases and phase combinations; particles in all sizes/morphologies", based on available evidences and information in the registration dossier (e.g. mechanism of carcinogenicity, characterization of the particles). Key issue of relevance for the other metals is that TiO<sub>2</sub> is considered as a type of poorly soluble particles and that the main proposed mechanism of carcinogenicity by inhalation is based on the low solubility and biopersistence of the particles, leading to pulmonary inflammation then oxidative stress. France considers that secondary genotoxicity and cell proliferation can result in carcinogenicity but do not appear to exclude direct genotoxicity. The Titanium Dioxide Manufacturers Association (TDMA) has already started to prepare the CLH debate and in particular the Public Consultation, by organising a webcast and a Q&A to inform downstream users, launching scientific work on lung overload (with e.g. a proposal for a workshop on mechanism of action and species sensitivity and a communication at Eurotox 2016) and looking at the socio-economic impact of a TiO<sub>2</sub> classification. The Public Consultation started on 31 May and will last until 15 July (more information: Hugo Waeterschoot and Violaine Verougstraete).

## REACH REVIEW

#### **REACH review: Interesting brainstorming on how the metals industry expects REACH and Risk Management to function**

The *ad hoc* REACH Review Task Force met on 9 May 2016 to discuss three proposals which are part of the Eurometaux contribution to the REACH Review exercise: 1) clarify potential exposure to and risks associated with the use of substances by optimising the use of Substance Evaluation; 2) improve the selection and demonstration of the performance of RMOs, by further anchoring RMOA as a preliminary step to identify and justify a proposed RMO, and by harmonising the minimum requirements and promoting a consistent approach towards RMOA; and 3) promote more use-targeted risk management options, in particular Authorisation, which can be more efficient and effective if it applies to specific uses only. Practical considerations were addressed for each one of the proposals, which will be reflected in the document to be submitted to the REACH Forum. Participants agreed that only relevant extracts of the document may be used externally, when necessary. The updated version will be sent to and discussed by the REACH Forum on 23 June 2016 (more information: Caroline Braibant, Hugo Waeterschoot and Violaine Verougstraete).

## **Second Classification and Labelling Inventory pilot project: Cf. ChemWatch article published on 26 May and ECHA proposing to revise CLP regulation**

ChemWatch published an article which very well summarises the status of the second pilot project. The article is available on: [https://chemicalwatch.com/47664/echa-eurometaux-lead-second-cl-notifications-project#utm\\_campaign=47506&utm\\_medium=email&utm\\_source=alert](https://chemicalwatch.com/47664/echa-eurometaux-lead-second-cl-notifications-project#utm_campaign=47506&utm_medium=email&utm_source=alert).

The next conference call with ECHA and Commission (23 June 2016) should aim at discussing a common message to be given to CARACAL on 29-30 June. Authorities would, for example, like to propose an interpretation of what “agreed entry” means in the context of Article 41 of CLP. In its REACH Review report, ECHA has suggested that the CLP regulation should be revised to make data-sharing and agreement on classification mandatory for all notified substances (more information Caroline Braibant).

## **INTERMEDIATES**

### ***iUVCB: SIDs refinement ongoing***

Substance identity is a key part of the risk assessment and ECHA has shown to be very strict in its evaluation of this section, as demonstrated by the experience with the inquiries. To meet regulatory requirements when identifying iUVCBs, process, source and composition are known to be key parameters to be evaluated and reported. At the December 2015 meeting with the ECHA SID Unit, we agreed that industry would refine iUVCBs identifiers so as to clarify which parameters are considered “fixed” or “variable”. This is in line with ECHA’s reasoning that not all three parameters are variable simultaneously. A small group of the REACH Intermediates Taskforce worked on the iUVCB SID refinement. An excel template was developed, in line with the current SIP (Substance Identity Profile) requirements and ECHA’s request, while still considering issues specific to the metals industry. It was clarified that the starting point for any SID refinement is the knowledge that industry has on its substances, i.e. why a substance is put on the market as e.g. matte and not as another substance. Such industrial knowledge has to be translated into well reported substance identification information so as to allow ECHA to assess substance identity and sameness, and consider information as sufficient. At the 20 May call of the subgroup, the proposed excel template has been recognised to be helpful in distinguishing between ‘decisive parameters’ and ‘indicative parameters’ for an iUVCB unambiguous identification. Few refinements are still expected by end of June after which the examples will be further harmonised across consortia. We hope to be able to discuss how to finalise agreements on the SID/SIP with ECHA after summer. Once the way forward is identified and agreed, SID in the REACH dossiers will be updated (more information: Federica Iaccino)

## **METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS**

### ***Bioelution: some progress with ECVAM, a cookbook and schemes for your comments***

The Commission informed us last week that ECVAM has finally responded to its request to take up the validation work of the bioelution protocol. This means that industry will be contacted soon by ECVAM and requested to submit all data and experience that could help ECVAM to carry out their preliminary assessment. In parallel, ECVAM will prepare and send a request to PARERE (PARERE is a group including Member States Representatives discussing regulatory relevance of proposals, see <https://eurl-ecvam.jrc.ec.europa.eu/about-ecvam/scientific-advice-stakeholders-networks/parere>). An ECHA expert group should be set up and ECVAM should engage with this expert group to further evaluate the submission, identify validation status etc., and devise a validation plan. This move from ECVAM is of course utmost welcomed by industry but means that we should foresee resources at consortia and Eurometaux level to pass the next hurdles (submission of information package in the appropriate template, exchanges with ECVAM, discussions in PARERE, discussion at the next CARACAL of Commission’s legal services on CLP articles 12(b) and 6(3), etc.). In parallel with this, several consortia/commodity experts continue to discuss the setting of a round robin test that could address pending issues in the gastric bioelution protocol for alloys and complex materials. This RR test could be proposed to ECVAM as potential validation study. Finally, we will circulate soon the revised CLP classification schemes for alloys and we would really appreciate as much as possible ‘testing’ of their applicability before submitting those to ECHA. Please do not hesitate to check whether those schemes work: the cobalt CLH proposal submitted by the Netherlands (proposing a SCL of 0.01% for carcinogenicity) makes the need for such schemes even more acute ( more information: Adriana Oller, Federica Iaccino, Hugo Waeterschoot and Violaine Verougstraete).

### ***Meeting with the Glass Alliance: bioelution’s applicability and scope for discussion***

On 12 May, Steve Binks and Violaine Verougstraete met with representatives from the glass sector to exchange on the applicability of ‘bioavailability and bioelution’ in the current regulatory context. ILA and Eurometaux’s presentation included an update on the lead metal classification and the reference to bioavailability in the 9<sup>th</sup> ATP, as well as technical explanations

on the bioelution test. The glass sector was very keen to have as well more information on the 'regulatory acceptance process' and the metals sector strategies. Issue of concern to them is the reference in the discussions with Commission and Member States to the possible use of bioelution to assess bioavailability of metals, metal compounds and complex metal-containing materials. The terminology 'complex metal-containing materials' was used at the time of the expert workshops organised by Commission to ensure the conclusions would not exclude materials like inorganic UVCBs for example. The glass sector would prefer to have the boundaries of the applicability of bioelution clarified. In the context of the ECVAM and OECD validation work, we will ensure that the scope and purposes are described precisely so as to avoid possible impacts on the glass strategies when it comes to REACH Registration obligations (more information: Steve Binks and Violaine Verougstraete).

## **COMMUNICATION ACTIVITIES**

### **Metals sector view on Authorisation and Evaluation and MECLAS training at the REACH Conference in Prague: *active input***

Eurometaux contributed very actively to the REACH conference in Prague (17-18 May) which was attended by several MSCAs from eastern European countries as well as by ECHA and the Commission. The sector explained its experience with Authorisation and Evaluation processes and their interlinkage. The Eurometaux presentation indicated how to best anticipate and/or respond to such challenges from a longer term perspective which was very well appreciated by industry as well as by authorities. Kai-Sebastian Melzer explained how the CII initiative could help achieving the REACH aims in an efficient way. Eurometaux was also invited to chair the Authorisation session of the conference, where the debates were excellent (see next item). In order to promote better hazard identification for inorganic complex materials and mixtures, ARCHE and Eurometaux organized a "hands-on" MECLAS training allowing attendees to understand the power and possibilities of the tool and datasets running. Participants were invited to calculate increasingly complicated hazard identifications for metal mixtures and UVCBs. The session also learned ARCHE and Eurometaux how to further and better organize MECLAS training sessions (for more information: Frederik Verdonck, Kai-Sebastian Melzer and Hugo Waeterschoot).

### **REACH and OSH: *DG-ENV and Kai-Sebastian Melzer in debate at the REACH Conference in Prague***

Christian Heidorn, the DG ENV desk officer in charge of the REACH and OSH debate, spoke at the REACH Conference in Prague. He provided a status report on the difficult debate between REACH-DNEL and OSH-OEL settings. The NMP pilot case in which RAC and SCOEL are involved is progressing slowly and underlining differences rather than commonalities (see RAC item). The Commission DGs (EMP-ENV-GROW) are presently working on a common understanding paper to make the MSCAs on REACH and OSH work together. The publication of the paper is expected by the end of the year after being reviewed during a Stakeholder Workshop scheduled for November 2016. The Commission is working on a "typology" to identify when OSH may be a sufficient RMO and when a REACH Authorisation on top of OSH would be justified. Despite the fact that Commission submitted last week a proposal to include about 13 new binding-OEL proposals in the Carcinogens and Mutagens Directive, Christian Heidorn felt that the number of chemicals covered by an EU-wide OEL is very limited and progressing too slowly and conveyed the view that the low implementation level and the lack of enforcement of OSH at national level somehow confirm the benefits of REACH as an additional risk management layer for the workplace. Kai-Sebastian Melzer (Nickel Institute) challenged this in a presentation that explained the views and proposals of the CII initiative which promotes the RMOa as the key tool to define the best RMM. He stated that OSH is in principle the preferred route when exposure is mainly restricted to the workplace and there is no risk at the level of Man via the Environment and Consumer exposure. The CII has made concrete proposals for improving the efficiency of the OEL setting process. The benefit of the OSH approach is that an *OEL also applies to intermediates as well as to process chemicals*, as being substances used at the workplace. The issue was further explored in a panel debate facilitated by Eurometaux whereby the Czech MSCA indicated preference for OEL-OSH when the exposure is limited to the workplace which is in line with the CII proposal (more information or copies of the presentation: Kai-Sebastian Melzer, Brigitte Amoruso and Hugo Waeterschoot).

### **SETAC Europe 2016, Nantes : *ARCHE and Eurometaux posters contribution on "hot themes"***

This year's annual SETAC Europe meeting took place in Nantes from 21-26 May. Close to 2000 scientists from scientific institutions and universities, regulators and industry met in nearly hundred sessions and presented research on almost 1000 posters. But SETAC remains above all a network meeting where contacts can be made and scientific challenges be discussed in an open way. The metal sector was again very well represented with all base metals attending and contributing. ARCHE and Eurometaux presented 2 posters on hot items at regulatory level, one on its strategy for combined toxicity assessment of inorganic UVCBs and another one on how diffuse sources balances can help to identify and prioritise concerns. Both posters raised quite some attention from regulators but also the scientific community. Due to its broad attendance by industry organisations, the meeting allowed for exchanges on ETAP agenda items like degradation assessment, progress on bioavailability based EQS setting and the outcome of recent research on combined toxicity of metals. The Metals Advisory Group chaired by Ilse Schoeters, requires some special attention given it provides an overview of recent regulatory science developments at worldwide level. Finally SETAC allows to pick up trends in scientific development. Two noticeable trends of

relevance to the metals sector included the focus on endocrine disruptor mechanisms and more mature research on nano particles, including many metals (more information: Ilse Schoeters, Patrick Van Sprang, Koen Oorts and Hugo Waeterschoot).

## Further outreach of REACH

**Helsinki Chemicals Forum (Helsinki, 26-27 May 2016): *Chemicals management globally, its links with Circular Economy, Seveso or Indoor Air Quality...***

This year's programme covered chemicals management from angles beyond REACH. The first panel discussed how SVHCs regulated by REACH should be managed in the waste stage, in the context of Circular Economy. The panellists agreed that tracing and tracking the use and presence of SVHCs in products is one of the solutions for regulating SVHCs in waste and recycling. However, SVHCs that are critical (because they are still needed or used) need to be distinguished from those that are less or not critical (because alternatives exist). The most sustainable solution (e.g. recycling, incineration, landfilling, other) must be decided on a case-by-case basis and following a life-cycle approach, coupled with the objective of sustainable consumption and production. A number of recommendations from the first panel were applied in the last panel in the context of the construction sector. Increased energetic performance triggers increased isolation potential of construction materials, which indirectly cause chemicals to concentrate indoors. The influence of (chemicals of concern in) construction products on the quality of indoor air is hence more evident today than it was in the past. The need for weather-resistant materials in construction also sheds light on the need to consider use-specific approaches for regulating PBTs, and PBTs in waste. It was recognised that chemical safety should not be compromised. Another panel discussed global data-sharing opportunities, which would ideally require a common international repository, mining and integration/reporting format, and ownership and confidentiality rules. This could be achieved if a common set of (mandatory) minimum standard data sets could be defined, in order to compose global dossiers, similar to what exists for the pharmaceutical sector. ECHA is already sharing data with EU and international authorities and all participants recognised that industry, as main data-holder/owner, should lead discussions on global data-sharing. Other panels addressed plant safety in a context of economic pressure, and a global approach to regulating perfluorinated chemicals (more information: Caroline Braibant, see also : <http://yritysasiakkaat-messukeskus-en.mailpv.net/a/s/95487057-43a1f62c120cc5b76000ce6a9e1c278f/1240185>).

**EU-REACH-like schemes developing around the world: *Approaches to data-sharing and model agreement from CDI/CoRC!***

Some of the metals REACH Consortia have decided to make available their EU REACH dataset for other EU-REACH-like schemes around the world. This may require to amend the REACH Consortium Agreements in place or produce dedicated Licence to Use Agreements (LtUs) so as to explicitly authorise EU consortium members to use consortia data for purposes other than EU REACH. It may also require to develop data-sharing agreements with potential registrants in e.g. China, Korea or Turkey. The Cobalt REACH Consortium (CoRC) has made available a sample or model LtU agreement that has been posted on the REACH Metals Gateway in the REACH Forum members' section. This (draft) version of the LtU template has been prepared for consortium members needing to obtain a right to use the EU-REACH data in Korea, and can be adapted to other non-EU jurisdictions. The sample copy of the (draft) LtU template is provided *caveat utilitor* for preliminary information only, given that it has not yet been fully applied in practice. There is a separate version of the template LtU to be signed with an external third party (i.e. outside consortium member), and with an Only Representative (OR) that represents another company or group of companies. Other model agreements are being prepared by Korean authorities and other industry associations and will be posted on the RMG as they become available (more information: Carol Pettit and Caroline Braibant).

## OECD

**Bioavailability Guidance: *submission to the OECD Taskforce on Hazard Assessment (TFHA)***

The – expected – final version of the “*Guidance Note on the incorporation of bioavailability concepts for assessing the chemical ecological risk and/or environmental threshold values of metals and inorganic metal compounds*”, based on the updated MERAG fact sheets has been submitted to the OECD Taskforce on Hazard Assessment for a last round of comments before – hopefully- its declassification (i.e. formal adoption) and publication. Eurometaux and ICMC will prepare a short presentation for the Taskforce meeting (20-21 June) to highlight the most recent changes and inclusion of comments from The Netherlands and Canada. This guidance is part of a three-block project aiming at drafting a support guidance that would facilitate the environmental risk assessment of metals and inorganic metal compounds at global level. The TFHA agreed with the development of such a project back in 2014, supporting that block 1 would focus on the consideration of bioavailability in the assessment, with the aim to crystallise both state-of-the-art concepts and experience in a guidance note. If this version of the guidance is accepted, efforts will focus on block 2 ‘fate modelling’ with a submission end of June to the Taskforce on Exposure Assessment. Eurometaux would like to thank Marnix for his huge and patient work on the guidance and encourage him to

'have a go' at the next one (more information: Marnix Vangheluwe, Ben Davies, Hugo Waeterschoot and Violaine Verougstraete).

## Calendar

- **30 May – 3 June:** RAC 37B – ECHA (Helsinki)
- **30 May – 3 June:** SEAC 31A – ECHA (Helsinki)
- **6 June:** discussion with ECHA on outcomes Recycling study – ECHA (Helsinki)
- **6-10 June:** SEAC 31B – ECHA (Helsinki)
- **6-10 June:** MSC 48A – ECHA (Helsinki)
- **14-15 June:** MSC 48B – ECHA (Helsinki)
- **15 June:** Meeting of PEG on ECHA Guidance on Data-Sharing (Helsinki)
- **16 June:** Exposure Scenario TF – MCC (Brussels)
- **20-21 June:** OECD Taskforce on Hazard Assessment meeting –OECD (Paris)
- **22-23 June:** Management Board – ECHA (Helsinki)
- **23 June:** REACH Forum – MCC (Brussels)
- **29 June:** WS on Socio-economic analysis in applications for authorisation and restrictions under REACH (Brussels)
- **29-30 June:** CARACAL 21 (Brussels)
- **4-5 July:** CASG Nano (Brussels) – Tentative! May be postponed to 19 September.
- **6-8 July:** ECHA-OECD symposium on cost –benefit impact assessments for chemicals management – ECHA (Helsinki)
- **29-30 August:** inorganics framework workshop tbc –ECHA (Helsinki)
- **31 August-1 September:** OECD Taskforce on Exposure Assessment meeting –BAUA (Dortmund)
- **5-9 September:** RAC 38A – ECHA (Helsinki)
- **12-16 September:** RAC 38B – ECHA (Helsinki)
- **12-16 September:** SEAC – ECHA (Helsinki)
- **13-15 September:** MSC 49 – ECHA (Helsinki)
- **28-29 September:** Management Board – ECHA (Helsinki)
- **28 September:** Authorisation & Restriction Platform – MCC (Brussels)
- **29 September:** REACH Forum - MCC (Brussels)

## Acronyms

AfA : Application for Authorisation	NAM: New Approach Methodologies
A&R : Authorisation and Restriction	NeRSAP : Network of REACH Socio-Economic and Assessment of Alternative Practitioners
AoA : Assessment of Alternative	NMP : N-methylpyrrolidone
	OECD: Organisation of Economic Cooperation and Development
ATP : Adaptation to Technical Progress	OEL: Occupational Exposure Limits
BIAC : Business and Industry Advisory Committee to the OECD	OR : Only Representative
BPR : Biocidal Products Regulation (EU 528/2012)	OSH: Occupational Safety Health
CASG : Competent Authorities Sub-Group (EC)	PARERE : group linked to ECVAM discussing regulatory relevance
CARACAL: Competent Authorities on REACH and CLP Regulations	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CDI : Cobalt Development Institute	PEG: Partner Expert Groups
CII: Cross Industry Initiative	PETCO: Petroleum stream substances and coal stream substances
CLH: Harmonised Classification Proposal	PPP : Plant Production Products
CLP: Classification, Labelling and Packaging Regulation	RAAF : Read-Across Assessment Framework
CMD : Carcinogens and Mutagens Directive	RAC : Risk Assessment Committee (ECHA)
CMR: Substances classified as Carcinogens, Mutagens or toxic to Reproduction	REACH : Registration, Evaluation, Authorisation and Restrictions of Chemicals
CoRC: cobalt REACH consortium	REACH IT : REACH Information Technology system
CSR : Chemical Safety Report (REACH)	RCF: Refractory Ceramic Fibres
CTAC : Chromium Trioxide Authorisation Consortium	RMM: Risk Management Measures

DNEL: Derived No Effect Level	RMOa: Risk Management Option analysis
DUCC : Downstream Users of Chemicals Co-ordination Association	RSB : Regulatory Scrutiny Board
ECHA : European Chemicals Agency (REACH)	ROHS : Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (Directive 2002/96/EC)
ECVAM: European Union Reference Laboratory for alternatives to animal testing	SAICM : Strategic Approach to International Chemicals Management
EDC : 1,2-dichloroethane	SCOEL : Scientific Committee on Occupational Exposure Limits (EU)
EQS : Environmental Quality Standards	SEA : Socio-Economic Analysis
ELV : End-of-life Vehicles Directive (2000/53/EC)	SEAC : Socio-Economic Analysis Committee (ECHA)
ES :Exposure Scenario	SETAC : Society of Environmental Toxicology and Chemistry
eSDS : Extended Safety Data Sheets	SID: Substance Identity
ETAP: Ecotoxicity Advisory Panel	SIP: Substance Identity Profile
HCF : Helsinki Chemical Forum	SVHC: Substance of Very High Concern
IA : Impact Assessment	TDFAs : (3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl)silanetriol and any of its mono-, di- or tri-O-(alkyl) derivatives
ILA : International Lead Association	TDMA: Titanium Dioxide Manufacturers Association
IUCLID: International Uniform Chemical Information Database	TFHA : Task Force Hazard Assessment
iUVCB : Inorganic Unknown or Variable Composition, Complex Reaction Products and Biological Materials	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
LtUs : License to Use agreements	vPvB: very Persistent very Bioaccumulative chemicals
MeCLas: Metals Classification Tool	WEEE : Waste from Electrical and Electronic Equipment (Directive 2002/96/EC)
MSCA : Member States Competent Authorities	WSSD : World Summit on Sustainable Development (Rio+10, Johannesburg 2002)
MSC: Member States Committee	