



## EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

*The man emerges nearly every morning from the grove when the traffic light goes red and knocks on the cars' windows to propose an old -and usually wet- newspaper. One euro or two are welcomed as an alternative. As the probability that the traffic light will turn to "green" is as low as having metal specificities brought up spontaneously by authorities in a regulatory debate, I started imagining scenarios to reply to the man's solicitations. Shake my head while looking straight ahead? Raise open hands to indicate that "unfortunately today -no way" with an apologetic smile? Or become abruptly deaf and/or awfully busy reading the papers on the passenger seat? He did not wait for me to work out what would be the most appropriate scenario. On one of those days when the Brussels weather was milder, and the car window open, he asked me what I was reading with so much interest. 'I'm proofreading a note on bioelution'. 'Can you tell me what it is?' was his immediate reply. That's how a long trail of short morning exchanges started close to two years ago: some days he tells me how his contacts with the car drivers are going or he asks for quick (medical) advice; other times he enquires whether I'm still working on alloys or going to Finland again. The chronicity pushed us to an implicit deal: once a week I give him the coins I find in my bags and my jacket, and in exchange he does not try to push the rest of his papers into my car. The weeks when I do not see him and cannot provide him with the coins, these however strangely remain "his". They collect in one part of my backpack and seem to weigh a bit more until I'm back in Brussels and give them away.*

*Last week I was pondering how long he would continue to haunt this place, relying on unpredictable reactions from drivers to get his income. He mentioned that he did not know yet: he was addressing his immediate needs only and not the ones of tomorrow. He smiled and reckoned that this might sound a bit "short-term". A confident sigh later, he added 'don't look disappointed: are you not working for the long-term? My needs could change with time and if once they would be related to steel pans or dental amalgams' (the alloy examples I mentioned) 'I know you will still stop at the red light'.*

*"You can't grow long-term if you can't eat short-term. Anybody can manage short. Anybody can manage long. Balancing those two things is what management is" (Jack Welch)"*

*Violaine Verougstraete, EHS director Eurometaux*

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## ECHA REACH activities: hot topics

### ECHA COMMITTEES

**MSC 40: Prioritisation for Authorisation: first review of the public comments outcome on the 6<sup>th</sup> list: the start of an (expected) long MSC assessment process**

ECHA provided an overview indicating how they will handle the extensive comments received from stakeholders during the Public Consultation on the draft 6<sup>th</sup> prioritisation list for substances to be added to Annex XIV. This proposal includes a series of Pb and Borate compounds as well as Coal Tar Pitch, and constitutes therefore a great challenge for the entire metal sector. ECHA thanked industry for the quality and the relevance of the comments –as well as for their coordination- and promised to reflect this in the selection review. ECHA as well as MSC Rapporteurs are presently preparing RCOMs on the substances listed. They expect that the RCOMs will be published sequentially, by theme: on the 6<sup>th</sup> of March for responses to comments on the priority assessment, by 13<sup>th</sup> of March on the proposed exemptions and by the 20<sup>th</sup> of March on the transitional arrangements (LAD and SSDs). Eurometaux had the opportunity to raise the main concerns of the non-ferrous metals sector, which were defined in a series of conference calls in preparation of MSC. Only a limited number of MSC members reacted so far as they are waiting for the RCOM tables by theme before expressing opinions. MSC 41 (20-24 April) will therefore be the meeting whereby most of the discussions will take place that will determine which of the listed substances will go forward on the 6<sup>th</sup> list (more information: Hugo Waeterschoot).

**MSC 40: prioritisation for authorisation: activities on the 7<sup>th</sup> list launched while the 6<sup>th</sup> list opinion forming is still ongoing**

MSC clarified the further time schedule for the finalisation of the 6<sup>th</sup> opinion, which is expected to be voted at MSC 42 (June) before being forwarded to the Commission after the summer holiday. In parallel, ECHA has launched the first activities on the establishment of the 7<sup>th</sup> list by scoring all new SVHC substances added in December 2013 and June 2014 to the candidate list. They will also update the scoring of the substances already scored before, based on updated information in the available registration files. Eurometaux therefore recommended the concerned Consortia to update the registration files by the latest early March to ensure the updated information is recognised in the priority scoring. A first proposal for the 7<sup>th</sup> list is expected at the June MSC meeting while the Public Consultation is scheduled for October-December 2015. MSC will adopt its opinion by the latest in June 2016. The MSC chair expressed the possibility that substances deleted from the 6<sup>th</sup> list could be picked up for the 7<sup>th</sup> (more information: Hugo Waeterschoot).

**MSC 40: the CoRAP update was adopted: some metals in the focus**

MSC agreed and voted in a unanimous way on the third CoRAP update covering 2015-2017 and adding thereby close to 50 additional substances to the list. MSC checked the relevance of the grounds and justifications for listing, which should be risk based and new. The latter was an issue for ZnO on which an ESR Risk Assessment was conducted. The new concern was based on the potential for risk of the nano form brought forward by Germany. Metals (and their concerns) on the adopted CoRAP now include for 2015 : AlCl<sub>2</sub> basic, AlCl<sub>2</sub> (CMR, consumer use and high volume), AlSO<sub>4</sub> (CMR, sensitizer, WDU, ...), for 2016 : ZnO (nano, WDU, ...), TiO<sub>2</sub> (CMR, sensitizer, vPvB, consumer use, ..), Potassium TiO (CMR, exposure for workers), Tin sulfate (CMR, sensitizer, ...) and for 2017: Fe<sub>2</sub> (SO<sub>4</sub>)<sub>3</sub> (WDU, sensitizer, ...), dipotassium tetraborate (WDU and high risk characterisation ratio,... ) and Cerium oxide (CMR and WDU). Industry was invited to appoint speaker contact points by substance in order to facilitate the Substance Evaluation communication with the reviewing country and to contact the review country preferably minimum a year before the start of the assessment (more information: Hugo Waeterschoot).

**MSC 40: changes on procedures agreed: some challenged by Eurometaux as reducing the interaction level for industry**

MSC was informed about several important changes in operational procedures. On SVHC identification, only the majority view will be forwarded in the opinion to the Commission while the minority comments (position and motivation) will be collected through written procedure and forwarded separately to the Commission. Industry felt this would impact clarity and requested that the minority positions would also be published on the ECHA webpages. ECHA also informed MSC that they changed retroactively several procedures on Testing Proposals and Dossier Evaluations. Eurometaux and ORO evaluated the measures, resulting in a letter to ECHA indicating that while several of the changes were welcomed (in particular the standardization of the response time, the potential to update the Registration file in case of a Draft Decision on a Testing Proposal to 60 days, the flexibility for complex cases and the pre-information list of substances ECHA could potentially conduct a Compliance Check on), others were contested. In particular, the measure to delete the potential for industry to update registration files on Compliance Checks within a standard period after the Draft Decision. A meeting with ECHA's Evaluation Director to clarify this issue led to the conclusion that this measure was taken to ensure effectiveness by reducing ECHA's workload; but this was challenged by Industry. Eurometaux and ORO further contested that these measures were introduced before they were communicated to those affected (industry), while industry is clearly a key partner in these processes. These comments were repeated by Industry at the MSC plenary, ECHA responded that these decisions had been made and would not change. The concerns of industry could therefore (only) be considered within a year when their impact can be judged (more information: Hugo Waeterschoot).

## **AUTHORISATION**

**Workshop on lessons learnt on Authorisation Applications: a useful mid-February workshop**

ECHA and Commission organized a review workshop on AfA experience and further needs in Helsinki on 10 and 11 February. Cefic and Eurometaux were closely involved in the preparation as well as in the workshop itself, co-chairing session with ECHA and heads of unit at Commission. The session on experience confirmed not only many of industry's learning lessons (see next section) but also the difficulties of RAC and SEAC to get organized and aligned. Nevertheless, the AfA process clearly works and generally results in pragmatic conclusions when the application is of good quality. The forward-looking session raised more attention when discussing some of the progress made in potential areas to soften or streamline the requirements for certain uses (for low volumes, legacy spare parts), potentially planned used (bio-essentiality and type-rated materials) and identified additional areas for potential simplification/streamlining (e.g. on process chemicals and recyclables). Commission and ECHA indicated they would take these recommendations forward to the Member States task forces dealing with the authorisation process.

### ***Interactive session on AfA experience: Industry chairing an interchange session***

An interactive session with the aim to pick up learning experiences on AfAs from consortia/companies that went through the AfA process was organized as a poster/discussion session alongside the ECHA AfA workshop. Key learnings on anticipating authorisations in the future and picked up by the non-ferrous metals sector included: 1) it is considered beneficial for Member States to involve industry during the RMOa process. 2) Most companies/trade associations have not performed high level RMOAs in anticipation of authorisation confirming the need for more activity in this field to collect relevant and reliable information ahead of any Annex XIV listing. 3) Proactive preparation of SEAs and AoAs are critical for companies to make informed business decisions on authorisations. 4) Supply-chain mapping is a weakness of industry requiring early attention given the supply chain impact of authorisations. 5) Working as a group on AfAs encourages the learning process and is also cheaper. Industry in turn requested more flexibility from Commission in respect to defining the latest application dates (LADs) and sunset dates (SSDs) based on the complexity of the supply chain while ECHA was encouraged to publish the reference DNELs as soon as possible in the process. The session was well received by ECHA and industry giving them “food for thought” on the AfA process and relevance of anticipative action (more information Aggie Kotze).

## **ECHA MEETINGS**

### **Meeting CSR/ES coordination group February 6: *need to keep the manufacturers/importers involved***

On the 6<sup>th</sup> of February, the Chemical Safety Report/Exposure Scenarios Roadmap coordination group came together to undertake a systematic review of the status of Roadmap action areas and their predicted future work during 2015-2016 as well as to identify the priority areas for action which can serve as a basis for the Roadmap’s third implementation plan. Action areas to closely follow up are related to tonnage/use information that once provided could improve prioritisation and the IT tools (areas 2.6 and 3). A number of templates are further developed and tested to facilitate the use of the information on ES and CSR by both authorities and the supply chain. While downstream users are actively involved and often in the lead for a series of initiatives, the ultimate improvement of the CSAs and resulting ES communicated in the supply chain will also depend on the extent to which suppliers will implement tools/templates and update their registration dossiers with the new information. The involvement of suppliers in the development stage of these tools is crucial to have outcomes that help all actors (e.g. use maps, SPERCs, safe use information on mixtures, use of REACH information in other legislations, standard phrases etc.). ECHA will update the Member States and the Commission at the next CARACAL meeting on the progress of the Roadmap under the heading “Improving use and exposure information in the chemical safety assessment”. ECHA will raise the need to get more input from Member States and propose enhanced cooperation. Eurometaux reports on the Roadmap initiatives to the ES Taskforce and provides technical input when feasible with the support of ARCHE and EBRC (standard phrases, SPERCs, template for measured data at the workplace...) (more information: Violaine Verougstraete).

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## **Commission REACH activities: hot topics/issues**

### **REACH Committee: *positive outcome for lead metal- new REACH Annex II***

At its 5 February meeting, the REACH Committee –finally- approved the 7<sup>th</sup> Adaptation to Technical Progress (ATP) to the CLP but after removal from the lead entry. The Commission will return to it in the 9<sup>th</sup> ATP after the summer. In the interim, the Commission or ECHA will facilitate a meeting of experts to discuss the methodology for classifying alloys i.e. the use of bioelution and bioavailability data. This meeting should be inclusive and include industry experts. It will give Member States more time to study the proposal further as none of the options for an alternative approach discussed at the meeting had majority Member States support. The 7<sup>th</sup> ATP -without lead but including GaAs- will now be published in the Official Journal as a Commission Regulation, and will enter into force 20 days later. The final implementation date by which duty holders must comply is expected to be 1 January 2017. The REACH Committee also approved and updated REACH Annex II, stipulating the requirements for the compilation of safety data sheets- drafted by the Commission to avoid the possible confusion generated by two conflicting amendments of REACH Annex II coming into force simultaneously (more information: Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

### **DCG Sherpa call: *next meeting of the DCG postponed and some further awareness-raising needed***

The Sherpa group discussed a number of issues in order to prepare the next Director’s Contact Group (DCG), initially scheduled for April. For example, ECHA is trying to receive information on the number of substances on the European market in order to be able to estimate the workload regarding the registration deadline 2018. They have first contacted Eurostat, the EU Commission and Cefic, organisations that can be expected to have large data bases of the required information. The information sought for is “which substances will be registered” (substance identification, number of substances) and “how many companies” will participate in the registration process (at the level of associations, including those in the supply chain)?

Names of companies are not searched for. Other aspects discussed were the 2018 ECHA Registration Roadmap (with a request to associations to raise awareness including on published documents) and the draft Implementing Act on cost-sharing in SIEFs being prepared by the Commission. A revised version should be presented to CARACAL at its meeting in March 2015 and it has been agreed that the Sherpa documents related to SIEFs will not be modified before the updated Implementing Act comes into force. It was finally proposed to postpone the DCG meeting to a later stage (more information: Caroline Braibant).

#### **Commission Impact Study on REACH: *the metals sector contributing actively***

In January the Commission launched a Business Impact Study on the potential costs and impacts of REACH so far, to identify areas to improve it and reduce the impact on SME while maintaining or increasing innovation. The study is conducted by CSES, Ökopol and RPA while Cefic, FECC, Eurofer and Eurometaux were invited to participate in a review panel to guide the study (see January news). The consultants explained the aims, concerns, tools and working procedures during a webinar call on 18 February with the Authorisation and Restriction platform and other interested companies, emphasizing the generic questionnaire, the in-depth interview and case studies they would like to conduct in the next 4-6 weeks. Eurometaux encouraged its members to contribute to the questionnaire, helped to improve it and circulated the link widely to the metals sector. In addition Eurometaux set up a SurveyMonkey exercise and an excel spreadsheet to facilitate the sector's ranking of business concerns with REACH and to collect the costs for registrations. These activities are presently ongoing, with Eurometaux providing further support services to the REACH Forum (more information: Hugo Waeterschoot).

#### **JRC survey combined toxicity: *a sector response thanks to your cooperation!***

The Joint Research Centre (JRC) has launched a survey intended to collect up-to-date information and experience on the current use of different approaches for assessing human and environmental health risks from exposure to chemical mixtures, to launch the development of a consistent assessment approach. A questionnaire addressed to experts in authorities, academia, NGOs, consultancy and industry that are involved in risk assessment (human or environmental) of chemical mixtures was posted online. The Eurometaux Risk Assessment and Classification taskforce worked towards a common submission on behalf of the metal commodities, consortia and companies. This was a good opportunity to remind regulators/JRC about the metal specificities, specific approaches and tools (like the TDp, bioaccessibility, BLMs, MeClas), backed up with useful literature/explanations kindly provided by the members of the Taskforce. The results will feed into the JRC and European Commission activities but the next steps and timings for this new framework are not clear yet (more information: Hugo Waeterschoot and Violaine Verougstraete).

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## EUROMETAUX REACH activities: hot topics/issues

### AUTHORISATION

#### **Authorisation & Restriction platform meeting: *a very charged agenda but good progress with all 3 projects***

The Authorisation and Restriction platform met on 18 February for a fully charged agenda focused on progress made at the recent MSC 40 with the 6<sup>th</sup> and 7<sup>th</sup> priority list to amend Annex XIV (see also above under MSC 40); an explanation of the successful outcome of the restriction of Cd compounds in artist paints; a webinar on the Commission's Business Impact Study; the outcome of the ECHA Commission AFA workshop and a detailed discussion on the 3 main platform projects (i.e. developing an RMM strategy, a RMO template and guidance for the metals sector and the study on recycling of metals and the potential impact of authorisation). The platform provided good input on the RMM strategy, allowing thereby further refining of "*the vision on RMM strategy*". Additional clarifications will be provided on the RMO template and the guidance to allow Consortia to apply the template in 2015-2017. In this respect, the meeting clarified the difference between the scope of Eurometaux's Risk Management Strategy (covering all potential concern areas of the new ECHA combined screening tool ACROSS) and the zooming in RMOa for SVHCs. The RMOa template is presently tested in a pilot case while a second case is encouraged. The A&R platform further confirmed the scope and type of cases it would like to investigate under the short SEAs to assess the impact of the authorisation scheme for typical real cases covering the recycling supply chain (input-process-output). Additionally, Consortia were reminded to complement the overview table summarizing the main metal recycling streams that could be affected by a potential authorisation of an SVHC metal (compound) (more information: Aggie Kotze, France Capon and Hugo Waeterschoot).

#### **Cross-industry initiative: *the metals sector requesting high level attention for alternative management policies for metals with concerns at the workplace***

The Nickel Institute took leadership in a communication/briefing exercise to request for more attention for alternative risk management strategies other than authorisation for substances used at the workplace and with concerns restrained to workers' exposure. Such strategies could be found in other EU Occupational Safety and Health legislative activities and be

more effective while less burdensome and impacting the metals supply chain. After extensive consensus building regarding a position paper with a series of metals, organic and inorganic sectors/associations including Eurometaux, co-signed letters went out to Commissioners involved to raise awareness and requesting for a meeting. In parallel, material for “speaking notes” based on materials provided by the sectors was collected, to prepare for such sessions with Commissioners which may take place in the weeks to come (more information: Kai-Sebastian Melzer, Hugo Waeterschoot).

## RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES

### **Brainstorming on classification: *learning from experience to identify preventive actions***

A small group came together on 23 February to brainstorm on possible actions—including at high level- so as to ensure that classification remains proportionate and appropriate, i.e. backed up with the right (metal) science, with a good understanding of implications (at authorities and industry level) to facilitate implementation. The group started from the experience acquired by the sector over the last 10 years and tried to identify the common features and causes behind the existing cases so as to be able to identify some corrective and preventive measures. The outcomes of this exercise are currently summarized in a 4-pager that will be shared with the different committees in Eurometaux for feedback and agreement on actions to be undertaken in the coming months (more information: Guy Thiran, Hugo Waeterschoot and Violaine Verougstraete).

### **Risk Management discussion at the EHS Steering Committee: *recognition and relevance beyond REACH***

The main headlines of the draft Risk Management support programme as designed by the REACH Authorisation and Restriction platform were presented to the EHS Steering Committee on 19 February. The discussion focused on the scope of the programme (what type of concerns to anticipate for?) and the need for a clear “vision statement” on Risk Management, both valuable recommendations also identified by the A&R platform. The EHS Steering Committee acknowledged that the principles of the Risk Management might also be useful to other parts of the Eurometaux EHS activities (more information: Veronique Steukers, Hugo Waeterschoot and Violaine Verougstraete).

## METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

### **Ongoing interaction with Cefic on standard phrases: *ESCom and MESCom***

Version 2.0 of the ESCom Standard Phrases catalogue will soon become available. The current version of the catalogue contains standard phrases for exposure determinants of several exposure/risk assessment tools (e.g. ECETOC-TRA, MEASE etc.) but there were no clear rules applied in building these phrases and/or in identifying their coverage and representativity. Many of the phrases have also been built from the perspective of the risk assessment in the CSA/CRS while the focus is now to generate phrases that are relevant for the Downstream User who is receiving the ES attached to the SDS. The updated catalogue will now include a list of exposure determinants per exposure/risk assessment tool, which provide recommendations in the ES for communication that are understandable for and within the control of downstream users. Eurometaux and EBRC were asked to propose a set of standard phrases for MEASE, which can be used to provide information on use conditions/risk management measures in the ES for communication. EBRC has provided a set of phrases to the ESCom working group and is now further exploring the possibility to include the other standard phrases developed for the metals (MESCom) in the ESCom catalogue. The MESCom proposal has been circulated to the ES Taskforce for comments and suggestions Q4 2014 (more information: Daniel Vetter, Violaine Verougstraete).

## COMMUNICATION ACTIVITIES

### **ChemWatch Summit: *messages on Substance Evaluation***

Eurometaux was invited to speak at the annual EU-Chemwatch Summit on chemicals management organized on 25-26 February in Brussels on the theme of Substance Evaluation under REACH. Eurometaux raised experience with the process and indicated the importance of analysing the outcomes of substance evaluations carefully on their relevance for other substances with (potential) equal concerns and of encouraging registrants to anticipate SE reviews when listed on CoRAP. He raised several examples to demonstrate this while asking ECHA for more attention to define and communicate the horizontal learning lessons from “closed” Substance Evaluations. The key messages of the presentation were picked up in the Chemwatch publication of 26 February (more information: Hugo Waeterschoot).

### **Presentation at the copper consortium: *REACH playing field***

Eurometaux gave a presentation on 25 February to the copper consortium members on the new features/actions developed by ECHA to streamline resources and increase efficiency, namely the integrated screening tool and the Risk Management concept. Key message of the presentation was that faced with authorities injecting more intelligence in a running system

(more use of IT, links, horizontal learning lessons and precedents), we need –as industry- to have a clear and better understanding of the objectives & drivers to be prepared in due time and anticipate where possible. A robust dossier regularly updated; remain aware of trends and authorities' interests as well as investing in some self-screening of possible risk assessment/management weaknesses for your metal (or other substances of relevance for the companies) were the main recommendations made by the REACH team. Eurometaux and the REACH forum are there to help by organising the Evaluation and Authorisation/Restriction platform meetings, the KnowMe database and the Reach Metals Gateway, guidance notes as well as support at ECHA level (more information: Violaine Verougstraete).

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## Further outreach of REACH

### OECD

#### **MERAG fact sheets updated: *preparing an outline for the OECD environmental risk assessment guidance***

ARCHE updated two MERAG fact sheets based on the outcome of the November Industry science review workshop and the comments submitted by external reviewers. The two fact updated sheets cover effects assessment (data selection, quality and relevance assessment) and bioavailability for the three relevant environmental compartments: water, sediments and soil. The revisions allowed bringing the fact sheets in line with the latest science, better defining the scope of the MERAG fact sheet (including on what is not covered) and streamlining the different chapters. These two fact sheets were prioritised given they address the two main items the OECD intended to discuss first in the metals environmental guidance development initiative (supported by the Taskforce on Hazard Assessment). Eurometaux and ICMM will meet the OECD secretariat by the end of the month to check how the two fact sheets could now best provide input to this combined OECD-BIAC initiative and what further material and advocacy will be required to ensure a successful review (more information: Marnix Vangheluwe, Hugo Waeterschoot, Ben Davies and Violaine Verougstraete).

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## Calendar

- **2-6 March:** RAC 32a – ECHA (Helsinki)
- **9-13 March:** SEAC 26 – ECHA (Helsinki)
- **10 March:** Assessment Entity Workshop-MCC (Brussels)
- **10-13 March:** RAC 32b – ECHA (Helsinki)
- **17 March:** REACH Forum – MCC (Brussels)
- **20 March:** Working Meeting on Classification Methodology on Alloys/Bioelution MCC (Brussels)
- **20-24 April:** MSC 41 – ECHA (Helsinki)
- **26 May:** Evaluation Platform – MCC (Brussels)
- **27 May:** Authorisation & Restriction Platform – MCC (Brussels)
- **1-5 June:** RAC 33 – ECHA (Helsinki)
- **8-12 June:** MSC 42 – ECHA (Helsinki)
- **8-12 June:** SEAC 27 – ECHA (Helsinki)
- **3 September:** Authorisation & Restriction Platform – MCC (Brussels)
- **7-11 September:** RAC 34 – ECHA (Helsinki)
- **7-11 September:** SEAC 28 – ECHA (Helsinki)
- **14-18 September:** MSC 43 – ECHA (Helsinki)
- **23 September:** REACH Forum – MCC (Brussels)
- **7-8 October:** ECHA/EFSA Topical Scientific Workshop on Soil Risk Assessment – ECHA (Helsinki)
- **26-30 October:** MSC 44 – ECHA (Helsinki)
- **23-27 November:** RAC 35a – ECHA (Helsinki)
- **30 November – 4 December:** RAC 35b – ECHA (Helsinki)
- **30 November – 4 December:** SEAC 29 – ECHA (Helsinki)
- **7-11 December:** MSC 45 – ECHA (Helsinki)
- **15 December:** Evaluation Platform – MCC (Brussels)
- **16 December:** Authorisation & Restriction Platform – MCC (Brussels)
- **17 December:** REACH Forum – MCC (Brussels)

# Acronyms

ACROSS: ECHA combined screening tool	JRC: Joint Research Centre
AfA: Application for Authorisation	LAD: Latest Application Date
AoA: Assessment of Alternatives	MeClas: Metals Classification Tool
A&R: Authorisation & Restriction	MEASE: Occupational Exposure Assessment Tool for REACH
ARCHE: Assessing Risk of Chemicals <a href="http://www.arche-consulting.be/">http://www.arche-consulting.be/</a>	MERAG: Metals Environmental Risk Assessment Guide
ATP: Adaptation to Technical Progress	MESCom: Metals catalogue of standard phrases
BLMs: Biotic Ligand models	MSC: ECHA Member States Committee
CARACAL: Competent Authorities for REACH & CLP	OECD: Organisation of Economic Cooperation and Development
CEFIC: European Chemical Industry Council	ORO: Only Representative Organisation
CARACAL: Competent Authorities for REACH & CLP	REACH: Registration, Evaluation, Authorisation and Restrictions of Chemicals
CEFIC: European Chemical Industry Council	RA: Risk Assessment
CMR: Substances classified as carcinogens, mutagens or toxic to reproduction	RAC: ECHA Risk Assessment Committee
CSA: Chemical Safety Assessment	RCOM: Response to Comments
CSR: Chemical Safety Report	RMM: Risk Management Measures
CoRAP: Community Action Rolling Plan	RMOA: Risk Management Options Analysis
DCG: Director's Contact Group	RMO: Risk Management Options
DD: Draft Decisions	SDS: Safety Data Sheet
DNEL: Derived No Effect Level	SEA: Socio-Economic Assessment
EBRC: consultancy <a href="http://www.ebrc.de/index.php">http://www.ebrc.de/index.php</a>	SIEF: Substance Information Exchange Forum
ECHA: European Chemicals Agency	SME: Small or Medium size Enterprise
ECETOC-TRA: ECETOC Targeted Risk Assessment Tool	SPERC: Specific Environmental Release Category
ES: Exposure Scenarios	SSD: Sunset Date
ESCom: Exposure Scenario Communication phrases catalogue	SVHC: Substance of Very High Concern
ESR: Existing Substances Regulation	TDp: Transformation Dissolution protocol
GaAS: Gallium Arsenide	WDU: Wide Dispersive Use