



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

A number of things can be anticipated and planned: a workshop, a project or a presentation can be carefully organized using tools and logistics to ensure it nears its objective and its target audience. If you are well prepared, the inch of “unscheduled” that will unavoidably pop up may even give the event a welcomed touch of spontaneity rather than affecting its overall development. Think about (past year examples): the frenetic musical chairs game at the MCC when the number of participants exceeds the number of seats, the unforeseen –and often argumentative- intervention of an unexpected participant, the Belgian strike depriving you from a guest speaker or the “typical” pouring rain that makes our guests arrive completely sodden, the last flicker of the beamer lamp plunging your technical slides in the dark, the acute stress manifestations of the MCC wifi when you need to make a demo, etc. The unexpected factor requires an immediate reaction and, as such, is a great test of your overall fatigue: in January you are waving it away with a Hugo-joke, in June you wonder where the next hit will come from. Sometimes this unforeseen factor, rather than staying limited to an ‘inch’ becomes a ‘mile’, and your organization starts to become loose and your marks to be vague, Caro’s Excel sheets become useless and inevitably you stop running around, wondering ‘and now?’. Like last week, when entering a Museum of Contemporary Art, I found no more, no less than this on the highest floor of an otherwise empty Palazzo:



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It took me a couple of instants to push aside my initial expectations and then suddenly, the settings became populated with ideas jumping in my mind one after the other: from drawing a ceiling on the floor, to inverting the world, doing handstands to enter and hide in the cupboards, writing you a story and inviting you all to a magnificent ball. Surprises and the unconventional stretch the borders of creativity, enlarge our limits without any brain effort or resulting lassitude.

And that’s what I sincerely wish for all of you for this summer period: a moment, a place, an opportunity of unbound and unburdened imagination.

Violaïne Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

MSC

MSC agrees on the 6th priority list for Authorisation: *a future challenge for the metals sector*

After long deliberations and extensive discussion with industry, MSC agreed on an opinion for the 6th Authorisation priority list. The list contains amongst others, several borate compounds, four lead compounds and Coal Tar Pitch. The discussions in MSC, fired by industry (IMA and Eurometaux), focused on eliminating Pb compounds with low scorings, as well as basic principles like the non-relevance of the substitution principle for non-replaceable/bio-essential uses and exemptions based on “existing EU-wide substance specific Risk Management measures” (article 58(2)). On the latter, MSC agrees that several Pb compound uses would fulfil this requirement based on the EU-BOEL for Pb and additionally substitution focused legislation like RoHS and ELV. For the first time MSC also agreed to eliminate substances (three Pb compounds) from the 6th list based on volume by use data provided by industry. The metals also plead for prolonging the LADs from 18/21 to 35 months for Pb and Borates compounds which was granted based on the experience with chromates. Several MSC members took minority positions on the Borates and the Pb compounds supporting the view of industry that the Authorisation scheme is not the best Risk Management Option for these substances (more information: Roger Doome and Hugo Waeterschoot).

ECHA prepares its opinion for the 6th prioritisation list proposing

The prioritisation for Annex XIV is the only process whereby ECHA provides the final opinion to the Commission and not the ECHA Committees. ECHA has of course to recognize and preferably build on the ECHA Committee opinion. Discussions at MSC made it clear that ECHA will propose to include Borates, CTP and other organic compounds for the 6th list and leave Pb compounds for the future. Formally, this is based on the too high workload that the MSC proposal would lead to, as well as the prioritisation order. Alternatively, it allows the Commission to advance the discussion on the OSH-REACH interaction in the months to come, which is critical for the Pb case. While most Member States indicated understanding for the split of the MSC opinion, some felt that Pb compounds should go first given of higher political importance (more information: Hugo Waeterschoot).

MSC welcomes the Eurometaux initiative to clarify Intermediate status for 6th list compounds

Intermediates are exempted from Authorisation so an accurate assessment of what uses could benefit from this structural exemption is key from a cost impact but also from a liability point of view given an incorrect interpretation can have very severe consequences in respect to market access. This assessment is especially difficult for metal compounds used in matrix materials like frits, enamels, batteries and CTP in anodes/cathodes for the metals industry. Eurometaux organized a project under its RMM strategy to help industry clarify this, complemented by informal discussions with ECHA and the Commission during a workshop now taking place on 2-3 July. The initiative was very much welcomed by ECHA, the Commission, as well as MSC to reduce the uncertainty for the applicants and especially the Downstream User sectors but also because it allows authorities to better understand the technical processes and therefore encourages a more informed decision-making during the application and the enforcement phases. Several Consortia and Downstream User sectors are actively preparing the input material for the informal workshop whereby they will present their motivation for intermediate status of uses based on scientific technical grounds (more information: France Capon, Aggie Kotze and Hugo Waeterschoot).

RAC

RAC-33: *one week of examinations of AfA, CLH and Restriction dossiers...and some further capacity-building*

Between 1 and 5 June, the RAC members reviewed several Applications for Authorisation for trichloroethylene and lead chromate, examining also in parallel an interesting table prepared by ECHA, which summarises in an Excel format the previous RAC Opinions on excess risk/additional statistical cancer cases that were considered, the review periods requested and additional RAC recommendations. A reference DNEL was approved for the reprotoxic effect of diglyme. Parental toxicity, the weight and relevance of epidemiological data in CLP, historical controls, read-across and submission of publications outside the Public Consultation are examples of issues that were debated during the CLH discussions. Commission mentioned that they had received a very high number of complaints in 2014 from industry on the outcomes of CLH discussions at RAC. Whilst the Commission asked RAC to make an extra effort on the transparency of the Opinions, a warning was given to industry stakeholders that REACH article 77(3) procedures, which e.g. mandate RAC to re-open a case, should remain exceptional. Finally, a REACH Article 95 request was discussed: this article charges the Agency to take care to ensure early identification of potential sources of conflict between its opinions and those of other bodies established under Community law, including Community Agencies, carrying out a similar task in relation to issues of common concern. In this context, Commission is requesting RAC and DG EMPL/SCOEL to solve the disparities between the DNEL RAC fixed in the context of a restriction and the OEL derived by SCOEL for NMP (more information: Violaine Verougstraete).

SEAC

SEAC-27: increased focus on recycling and alternative Risk management Option

ECHA's Committee for Socio-Economic Analysis (SEAC) held its 27th meeting from 8 to 11 June 2015, first spending a day on refreshing knowledge on key economic concepts and getting updated on latest research related to Willingness To Pay (WTP) as a key criterion to evaluate risk management options for PBTs and, ...potentially other substances. Deliberations on proposals for Restriction and applications for Authorisation made clear that SEAC is keen to consider the benefits of Recycling, consistently referring to the concepts of circular economy and resource efficiency. However, the fact that new members joining SEAC are mostly young economists or chemists with no on-the-ground experience with waste and recycling issues puts the onus on Industry to keep this awareness and inclination alive. Equally noteworthy is SEAC's increasing eagerness to check whether there are no alternative Risk Management Options likely to be equally efficient. From now on, ECHA will promote and support early examination of alternative Risk Management Options, starting with new Restriction preparations at Member State level. On Authorisations, SEAC tries to find a way between two mounting pressures, i.e. Member States being wary not to further compromise economic activity and NGOs eager to see SEAC expressing a negative opinion on weak dossiers. So it now tends to focus on the review period as the critical point of its reflections. Review periods might be shorter than 4 years, whereas 12 years seems to remain sort of a glass ceiling (more information: Michel Vander Straeten and Hugo Waeterschoot).

ECHA MEETINGS

ECHA Management Board meeting, attended by Guy Thiran - Director General - Eurometaux

ECHA's Management Board met on 18-19 June in Helsinki. The industry was this time represented by Guy Thiran. Eurometaux's interventions focused on technical and practical points of discussions related to current ECHA activities, and the preparation of their 2016 work programme. On behalf of EU industry, Eurometaux expressed strong support for more transparency and constructive involvement of concerned stakeholders in ECHA activities (i.e. industry, NGOs, and Unions); making reference to the more transparent approach towards prioritisation for REACH authorisation that has been announced. Eurometaux warned that ECHA budget and staff restrictions should not prevent the agency from providing quality support to other parts of their REACH & CLP activities and requested to be involved in forthcoming discussions concerning EU commitments for the 2020 World Summit on Sustainable Development. Eurometaux also conveyed support for ECHA's efforts to increase the understanding and reporting of complex cases (for example the assessment of entity concept in IUCLID and Chesar), requesting these to be continued with necessary intensity. Guy Thiran called for a better consideration of the competitiveness and economic consequences of REACH-related decisions, and underlined the need for ensuring a much stronger alignment between REACH and other EU policies. He also requested a better use of REACH data, and closer analysis and use of risk management options (more information: Guy Thiran, Violaine Verougstraete and Hugo Waeterschoot).

Assessment entity approach: face-to-face meeting on 2 June to test developed specifications for metal aspects

An ECHA proposal for implementation of the assessment entity approach in IUCLID and Chesar was discussed on 2 June, testing it with metal cases and specificities (e.g. transformation of registered substance in ion, complex materials composed of multiple constituents). Working with 'assessment entities', which are "wrappers" of the information of interest for the assessment, will clearly facilitate the linking and reading of key elements of an assessment of a complex case (composition-use-exposure-management). This technical meeting also allowed to further discuss aspects such as: when the assessment is being carried out for a "workplace" where several PROCs are carried out under the same conditions using one set of measured data covering all the tasks (several PROCs), use of biomonitoring data for the assessment and Chesar aspects of relevance to the metals. Many thanks to EBRC and ARCHE for their outstanding support (more information: Maxime Eliat-Eliat, Daniel Vetter and Violaine Verougstraete).

Chesar consultation group meeting: ARCHE, EBRC attending to highlight and defend metal specificities

ARCHE and EBRC participated in the Chesar Consultation Group meeting organized by ECHA on 10-11 June that aimed at demonstrating the functionalities implemented to date for Chesar 3. A summary of the changes of relevance for the metals has been circulated to the Exposure Scenarios Taskforce. Important is that the development of the latest version of Chesar 3 will allow the calculations for metals, contrary to the previous Chesar versions. While a one-click CSR might not be possible for metals and some minor issues remain, a workaround exists for all of them. One example of such a workaround applies for the regional assessment: while it can only be calculated by EUSES in Chesar, it is possible to report regional PECs calculated by other models or report measured data. Other aspects that require some adaptations are Kow, vapour pressure, biodegradation, which are physico-chemical and fate parameters waived for most metals but still requested by Chesar. ARCHE is working on a template that could present a way forward. To summarise, Chesar 3 will be able to calculate correct exposure estimates for metals as long as the assessor is aware of the limitations of Chesar and the workarounds that are required (more information: Daniel Vetter and Maxime Eliat-Eliat).

AUTHORISATION

AfA workshop: Eurometaux co-organised industry briefing on Authorisation application process

The annual ECHA-Industry AfA (Application for Authorisation) workshop was for the 6th time co-organised between ECHA, Cefic and Eurometaux. The workshop aimed as a training for future applicants on how to best prepare for an Authorisation application. Both the application process as well as content aspects were explained in quite some detail while as extra benefit the event allows for building networks with ECHA's Authorisation team. New was that for the first time Industry could speak from real practical experience given the first substances passed the full application system last year. This presentation was given by Eurometaux. Several metal companies and European Aluminium attended the training in anticipation of the upcoming 6th priority list (more information: Hugo Waeterschoot and Sandro Starita).

NeRSAP 4: good technical debate on standardizing reference values for REACH SEAs and welcoming the metals contribution on Business Impact Studies on recycling and Authorisation

The 4th meeting of the Network of REACH SEA and Analysis of Alternatives practitioners took place on 15-16 June in Brussels. This initiative aims for informal exchange and SEA-AoA method capacity-building between experts from Member States, SEAC, ECHA, industry and Commission and the meeting was this time hosted by Cefic. NeRSAP debated quite extensively on proposals from ECHA on Willingness To Pay (WTP) and DALYs/QALYs, economic values used in SEA studies. The aim is to provide industry and consultants with some standardized reference values that are reasonably representative for the EU situation and would facilitate and reduce cost and efforts for industry to establish SEAs. Industry welcomed the comments of NeRSAP on the proposed SEA methodology for the metals pilot business cases to investigate the potential impact of authorisation on the recycling supply chain. The presentation was provided by Mike Holland, who is one of the two consultants conducting the studies. NeRSAP expressed an interest in the outcome and invited Eurometaux to present it at a webinar that will take place in the autumn (more information: Hugo Waeterschoot and Michel Vander Straeten).

DISSEMINATION

Publication of the ESS and OSOR principle: Cefic and Eurometaux expressed concerns that this would favour opt-out and unlawful individual registrations

In her response to the joint Cefic and Eurometaux letter asking ECHA to couple its enhanced transparency initiatives (e.g. publication of the Endpoint Study Summaries) with action to reinforce compliance with the OSOR (One Substance One Registration) principle, Christel Musset, head of ECHA's Registration Unit, acknowledged the need for this and assured Industry that ECHA is working on a number of solutions. One of them is to remind and underline ECHA's mandate as regards compliance with OSOR in the Implementing Act on Data-Sharing currently under discussion by CARACAL. Another solution is to equip REACH-IT with a mechanism that should prevent more than one registration being submitted for the same EC number. Both are briefly outlined in a dedicated paper that was presented to CARACAL 18 and is open for comment until 15 August. It appears that all co-registrants will need to be members of the joint submission even if they opt-out for one or the other (justified) reason and this raises some practical questions that are still being explored by ECHA. ECHA's involvement and role in opt-out and dispute situations will in turn become more active and forceful too. The paper will be circulated to the REACH Forum to collect comments that can be filed by the applicable deadline (for more information: Caroline Braibant).

OTHERS

C&L Platform pilot project: all to ensure compliance with Article 41 of CLP while ECHA works on parallel measures to enhance readability of C&L Inventory

Recital 46 and Article 41 of CLP foresee that the notifiers and registrants shall make every effort to come to an agreed entry to be included in the C&L Inventory for the substance of interest. The C&L Platform was set up by ECHA to facilitate communication between entities having notified different classifications so they can agree on the applicable classification. In order to stimulate the use of this Platform, a pilot project covering a hundred substances (including eleven substances managed by REACH Forum members) was launched in March. Though the platforms were activated for 50% of the substances, in all cases the activity is limited to one kick-off message from the lead notifiers and registrants, a reminder, and no reaction from entities having submitted different classifications... In their presentation to CARACAL 18, ECHA and the Commission both proposed to continue the pilot project over the summer hoping that the number of aggregated classifications per substance continues to decrease (very slowly), while they develop additional options to improve the display and usability of the C&L Inventory. ECHA reminded that Article 41 obligations apply to all substances (also those outside the pilot project) so Eurometaux will soon invite all its members to post a kick-off message in the C&L Platform of substances outside the pilot project. The next conference call between ECHA, the Commission, Cefic, FECC and Eurometaux on this topic is scheduled on 7 September (for more information: Caroline Braibant).

ECHA requests action from registrants on 200 shortlisted substances: *at least seven inorganic substances targeted*

Different than for Substance Evaluation, the selection of substances for Dossier Evaluation Compliance Check was so far a non-transparent process for industry. This improved recently with the *publication of the list of substances that could be up for such Compliance Checks*. A recent workshop of the MSC held in May and attended also by stakeholders (including Eurometaux), welcomed more transparency and predictability. Among others, it was suggested to also use more **soft measures** rather than “Statements of Non-Compliance (SoNCs)” in case relevant information seems to be lacking from the dossiers, in order to allow Industry to improve/update their dossier pro-actively rather than reactively and under a legal frame.

On 26 June ECHA letters were sent via REACH-IT to the registrants of 250 selected substances identified via IT screening (ACROSS), inviting the registrants to address potential shortcomings in their dossiers by reviewing it, and, if relevant, updating it with information related to the identified shortcoming. Shortcomings identified so far related to Substance Identification, information on tonnages per use to inform priority-setting, CMR and sensitisation properties and risk of using the substance, and insufficiently strong grouping and read-across justifications. Several metal compounds are among the selected substances. The respective commodity associations have informed Eurometaux accordingly, who is collecting questions and comments from its membership in order to discuss them with ECHA at an ECHA-Industry conference call on 3 July; the outcome of this call will allow preparing generic response templates to complement the more substance-specific communications and actions, as relevant in each case (more information: Hugo Waeterschoot).

COMMISSION REACH activities: hot topics/issues

CARACAL

CARACAL-18: *Mostly good progress and no bad surprises*

Eurometaux represented the REACH Alliance in the 22-23 June CARACAL meeting. Main items of interest for the inorganics sector included the Implementing Act on Data-Sharing and the related OSOR principle, the acceptance of bioavailability/article 12(b) of CLP considerations to classify alloys, the 9th ATP to CLP, the simplification of Applications for Authorisation, and nanomaterials, among others. Detailed updates are provided here below and were circulated to the REACH Forum/REACH Alliance. Overall the outcome of the meeting was positive and Eurometaux will monitor upcoming developments on the items listed above as well as on the thinking about REACH & Circular Economy, the interpretation of “placing on the market” under CLP and how it could affect REACH, and ongoing discussions on the possibility to adjust environmental classifications in harmonised classifications in order to align them with the new classification criteria adopted in the 2nd ATP to CLP (more information: Caroline Braibant).

Implementing Act on Data-Sharing: *Last opportunity to comment by 10 July*

While the latest version of the Implementing Act presented to CARACAL 18 on 24 June contains a number of improvements, REACH Forum members insisted on the need to continue opposing any remaining retroactivity, mandatory reimbursement mechanism, or requirement for the itemisation of costs in the Act. Because these are also of concern to Cefic and CONCAWE, it was agreed to submit a collective comment on the Act, which is due by 10 July. A draft comment will be circulated to the REACH Forum before finalisation and submission to the Commission, who will subsequently use the comments received to produce a version to be discussed (and voted upon?) by the REACH Committee in September. This version should be made available before the REACH Committee meeting, so CARACAL members including Industry can review how their comments have been considered. If the Act cannot be voted upon in September, this will be postponed until the October REACH Committee meeting (more information: Caroline Braibant).

Simplified AfA: *Process chemicals and recycling under consideration by AfA Taskforce*

ECHA reported the outcome of the 22 June Application for Authorisation Task Force (AfA TF) at CARACAL 18. The AfA TF has produced templates to facilitate the production of simplified AfA and will now adjust these in light of the comments submitted via the public consultation on simplification of AfA for low volumes and legacy spare parts. The next cases that the TF will consider for possible simplification include process chemicals and recycling. Eurometaux offered to share the outcome of an ongoing project aiming at illustrating the impact of Authorisation on recycling, which was very welcomed by the Commission. As regards bio-essential uses, some CARACAL members recognised the non-adequacy of Authorisation for uses where substitution is not possible at all and Eurometaux plead for a legal mechanism that could exempt such uses from Authorisation and, in the event such legal mechanism is not available in current legislation, also foresee a simplified approach towards Authorisation for this use (more information: Caroline Braibant and Hugo Waeterschoot).

Bioavailability and 9th ATP to CLP: *Crystal ball needed*

The report made by the Commission at CARACAL 18 on the 27 April expert workshop on bioavailability indicated general support to consider bioavailability when classifying alloys. Three Member States were vocal at the meeting in supporting the approach but insisted on the fact that Industry and experts should make further progress with the scientific and practical questions to enable the validation of the bioelution approach at OECD level. While this work delivers, CARACAL seemed to agree that a pragmatic solution had to be found for addition of Pb metal to the 9th ATP to CLP, following the approach recommended by the UK. The 9th ATP to CLP, which also includes copper and borate substances, is being prepared by the Commission, using both the RAC opinion on copper compounds as well as information more recently submitted by Industry, in order to formulate a proposal that can be discussed and voted upon by the REACH Committee in September (more information: Caroline Braibant, Hugo Waeterschoot and Violaine Verougstraete).

Pb SCL: *Bioelution working meeting planned on 14 July*

While the proposal from DG GROW/DG ENV for the 9th ATP that should go for inter-service consultation is not known (see above), one may expect that there will be a differential treatment of the powder and the massive form with regard to the Pb metal SCL. How bioavailability -and the associated requirements for a validated bioelution approach- will be included in the draft 9th ATP entry is not clear either but in any case it is expected that the metals sector will work further over the summer on the list of issues/actions identified at the expert meeting held end of April. This Commission meeting had concluded that a follow-up meeting would be organized to discuss the pending concerns and the submission of the approach at OECD. An industry brainstorming on 'bioelution-next steps and required actions' will therefore take place on 14 July, to organise and distribute work and allocate resources (more information: Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

Nanomaterials: *JRC 3rd report on definition soon available but impact assessment reports not ready yet*

The Commission announced at CARACAL 18 that the 3rd JRC report assessing and reviewing the 'EU' definition of nanomaterials will be released soon but that the impact assessment report and accompanying legislative proposal aimed at clarifying the information requirements applicable to nanomaterials in the REACH Annexes will not be released before autumn 2015. This report will be released together with the impact assessment report on the possible EU inventory of nanomaterials too. The deliverables will be presented at the next CARACAL subgroup on nanomaterials (CASG Nano) meeting in November 2015, followed by a public consultation until February 2016. Some Member States urged the Commission and ECHA to make sure the guidelines to report nanomaterials information in registration dossiers is ready before summer 2016, in time for the 2018 registration deadline. Eurometaux will participate in the CASG Nano meeting and liaise with the Eurometaux Nanomaterials Task Force to prepare the sector's input to the consultation in due course (more information: Caroline Braibant).

EUROMETAUX REACH activities: hot topics/issues

INTERMEDIATES

Further steps to address iUVCB SID challenges

In the context of ongoing discussions on inquiries and SID, Eurometaux has shared with the new Head of the ECHA Substance Identity Unit the SID chapter of the internal Guidance on iUVCBs assessment. Aim is ensure the continuity of the communication established in the past years. This document was also shared with DG GROW and the consultants working on the SIDC project, to encourage them to consider metal specificities in their project and suggesting that they use our experience when preparing the "ad hoc fact sheets" for the different sectors. The SIDC project consultants confirmed their interest in receiving Eurometaux's support and feedback in the development of the specific fact sheets. During the OECD taskforce meeting on hazard assessment which took place on 15-16 June, the efforts that the metal industry has devoted in developing a harmonized metal approach for iUVCB assessment were acknowledged. Upon ECHA's proposal, Eurometaux accepted to give a presentation at next year's OECD task force meeting to explain the proposed approach on the characterisation of the iUVCB and the link between composition and hazard/exposure (more information: Federica Iaccino and Violaine Verougstraete).

CLASSIFICATION

Support on CLP-classification: *Pb and Cu environmental classification dossiers setting precedence for metals in general*

Eurometaux provided continued technical, strategic and communication support to ILA and ECI in respect to the preparatory activities on the environmental classification endpoint for both metals. In the case of Pb, ILA submitted a summary of existing TDp and ecotox reference data sets promoting the Danish Rapporteur making a distinction between different physical forms and applying a correct M factor assessment. ECI submitted new evidence that would allow improving the recently adopted classification for Cu powder and selective compounds by filling the data gap identified by RAC that led to the application of the surrogate approach. Companies, ECI and Eurometaux, reviewed the different options to reopen the technical review by RAC, discussed them with Commission and ECHA and went forward on the updating of the documentation and input for the Biocide rapporteur. Both cases are most relevant due to their high precedent setting nature justifying close Eurometaux follow-up (more information: Steve Binks, Katrien Delbeke and Hugo Waeterschoot).

COMMUNICATION ACTIVITIES

Informa meeting: *lawyers focusing more and more on Dossier Evaluation (DE) and Substance Evaluation (SE)*

Eurometaux presented an update of Authorisation experience at a recent Informa conference in Brussels (23-24 June) focusing on legal aspects of REACH. The conference debated several legal aspects in detail confirming the shifting and growing interest of lawyer offices from testing proposal reviews to Dossier and in particular Substance Evaluation cases. The cases challenged at the ECHA-BoA level often focus on the annulment of SE testing/data gathering requests that go beyond Annex 9 and 10 standard conditions/information requirements. However, so far the success rate is not very high given REACH designed the Evaluation process in particular for non-standard requests. A presentation of Jones Day on CBI, interpretation and trends was well appreciated and also relevant for the metals sector. Eurometaux will check if and how this summary can be made available for the REACH members (more information: Hugo Waeterschoot).

Further outreach of REACH

OECD

OECD Taskforce meetings on hazard and exposure assessment: *dynamic exchanges and strive for harmonisation*

Eurometaux attended both meetings as part of the BIAC delegation. Both meetings were well attended with numerous inputs from the US, Canada, Japan, Denmark, The Netherlands, Commission and ECHA, confirming again that OECD can be and is used as a platform by authorities to either propose new scientific approaches or strive for harmonisation and exchange data, in particular REACH ones. The metal sector had prepared three presentations on OECD draft guidance on bioavailability based on the updated MERAG fact sheets, combined exposure to inorganic UVCBs at the workplace and fate modelling/UWM. The presentations were well received and follow-up actions have been agreed on. The sector has also been invited to present next year the way we characterize inorganic UVCBs and how we link composition and hazard/exposure. Canada expressed a strong interest in the REACH metal data and asked Eurometaux whether a discussion with the metal consortia could be set up. The meetings further allowed to provide metal-specific input in a number of discussions and consolidate exchanges on methodologies to approach e.g. combined exposure with Japanese authorities (more information: Ben Davies, Hugo Waeterschoot and Violaine Verougstraete).

Calendar

- **2-3 July:** Informal programme on clarifying intermediate status in complex specific cases, like matrix materials - MCC (Brussels)
- **8 July:** RMM REACH Forum Meeting - MCC (Brussels)
- **14 July:** Bioelution “Next Steps & Required Action” Working Session - MCC (Brussels)
- **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)
- **23-24 September:** Nordic REACH Conference (Copenhagen)
- **7-8 October:** ECHA/EFSA Topical Scientific Workshop on Soil Risk Assessment – ECHA (Helsinki)
- **26-30 October:** MSC 44 – ECHA (Helsinki)
- **17 November:** WS on AfA simplification – ECHA/Commission
- **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	MERAG: Metals Environmental Risk Assessment Guide
ATP: Adaptation to Technical Progress	MSC: ECHA Member States Committee
BIS: Business Impact Studies	NeRSAP: Network of REACH Socio-Economic and Assessment of Alternative Practitioners
BoA: Board of Appeal	OECD: Organisation of Economic Cooperation and Development
BOEL: Binding Occupational Exposure Limit	OEL: Occupational Exposure Limit
CARACAL: Competent Authorities for REACH & CLP	OSOR: One Substance, One Regulation
CBI: Confidential Business Information	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CHESAR: Chemical Safety Assessment & Reporting Tool	PEC: Predicted Environmental Concentration
C&L: Classification & Labelling	PROCs: Process Codes
CLH: Harmonised Classification and Labelling process	QALY: HALY that measures health gain
CLP: Classification, Labelling and Packaging Regulation	RAC: ECHA Risk Assessment Committee
CMR: Substances classified as Carcinogens, Mutagens or toxic to Reproduction	RMM: Risk Management Measures
CSR: Chemical Safety Report	RoHS: Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment
CTP: Coal Tar Pitch	SCOEL: Scientific Committee on Occupational Exposure Limits (EU)
DALY: HALY that measures health loss	SE: Substance Evaluation
DE: Dossier Evaluation	SEA: Socio-Economic Assessment
DNEL: Derived No Effect Level	SEAC: ECHA Socio-Economic Assessment Committee
ELV: Emission Limit Values	SID: Substance Identification
ESS: Endpoint Study Summaries	SONC: Statement of Non-Compliance
EUSES: EU System for the Evaluation of Substances	TDp: Transformation Dissolution Protocol
HALY: Health adjusted life Years	(i)UVCB: (Inorganic) Unknown or Variable Composition, Complex Reaction Products and Biological Materials (as listed in EINECS)
IUCLID: International Uniform Chemical Information Database	UWM: Unit World Model
	WTP: Willingness To Pay