Eurometaux
European Association of Metals

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EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

The opening keynote lecture at the last Eurotox Conference was about public understanding of risks. Identifying it as one of the necessary ingredients for political decisions in our democratic societies, the speaker (A. Tiedtke Quintanilha) started his talk by depicting the fundamental changes in our society that led to increases in individual freedom, tolerance and respect in parallel with the challenges brought by instability, scarcity of resources and climate changes. These –timing - congruent elements result in a "two sides of the coin" appraisal of the world surrounding us: we may see it as a 'best possible' world where risking is worthwhile or as 'much to be improved' where risking is dangerous. This vision will also impact on what we will consider as 'enhancement vs. therapy', or brought back to our sector 'prevention vs. remediation'. I assume here that I'm not the only one who has been oscillating between two sides of the coin depending on how the day started, the energy level or the issue at stake.

More specifically, three factors will be backing our understanding of risk (and kept at hand on post-it notes during the discussions):

- *Our current knowledge and statistical literacy (e.g. on questions like: can very low exposures be beneficial to increase defence and repair mechanisms? Are a system's properties equivalent to the sum of the ones of the components?)*
- *A robust versus fragile version of the world (e.g. on health do you first think about vaccines and antibiotics or resistance to microorganisms, risky lifestyles and ageing?)*
- *Trust in institutions and people, with a note that this one is the most fragile, taking decades to be built up and only a couple of seconds to disappear. Elements that influence it are our education and information level, what is perceived as voluntary vs. imposed and equitable vs. benefits.*

By the time you read this news, I will be 'on heels' again with the "bioelution fellows" to discuss with authorities how integrating bioavailability in an existing classification system can be an enhancement that does not further fragilise the world but further increase our capacities. Knowledge is building up and stretching the existing answers. The empathy and trust that we will be able to build up in the meeting room will be crucial.
But maybe tomorrow, on my way to Beaulieu, the wind will mix my carefully prepared post-it notes and I will only find the Richard Rorty one when the meeting starts: ''The world does not speak. Only we do. The world can, once we have programmed ourselves with a language, cause us to hold beliefs. But it cannot propose a language for us to speak. Only other human beings can do that.''. Could it be that understanding and truth are somewhere in between?

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

Management Board- 39

On 24 September, Guy Thiran represented Industry during the 1st day of the 39th ECHA Management Board in Luxemburg. The 2nd day of the Management Board was attended by the regular industry representative, Dr Hubert Mandery, Director General of CEFIC. In its opening address, Mr Camille Gira, the Secretary of State for Sustainable Development and Infrastructure of Luxemburg underlined that ECHA would have an important role in the implementation of the forthcoming circular economy policy. He also called for solving a number of pending issues, including effect of mixtures. Commenting on the report on ECHA's

activities, Industry underlined the benefits for industry, in particular SMEs, of guidance produced by ECHA. Industry also supported the continuation of the work on the simplification of authorisation procedure as well as the engagement with SETAC on development of RAAF for environmental endpoints. With several comments by Member States on the importance of addressing the nanomaterials issue properly, the Management Board adopted the proposed work programme for 2016. Several administrative issues (nomination to committees, board of appeal procedures, and simplification of reimbursement procedures, …) were addressed. The Management Board also took note of the termination of the term of the representative of the three accredited stakeholders (Industry, NGO, and Unions) and the opening of the procedure for the nomination of new representatives. The next meeting of the Board is scheduled to take place from 16 to 17 December 2015, in Helsinki (more information: Guy Thiran).

MSC

MSC 43- 7th priority list delayed but debate on prioritisation started: *updates of dossiers*

The main item of the September MSC meeting focussed on reviewing the prioritisation scorings applied to the substances listed on the Candidate List. All substances were reviewed and scored except those that entered the Candidate List in December 2014 and August 2015. ECHA reviewed the scorings for registrants who updated their REACH registrations in due time, in particular when volume by use data had become available or if the selected use descriptors had been modified (e.g. uses motivated against). Eurometaux discussed the updates with the concerned sectors (cadmium, lead and borates). These updates somewhat improved those metals' situation. Some remaining issues were raised by Eurometaux at the MSC meeting: a) ECHA's request that every individual registrant should have updated its registration file in line with the Lead Registrant file before a modification could be accepted and b) that a scoring could raise significantly by a very limited consumer or professional use non-proportional to the overall use portfolio. The MSC chair requested MSC members to consider these points raised by industry in a written follow-up of the MSC. ECHA will now define the draft 7th list before the next MSC meeting in November (more information: Hugo Waeterschoot).

MSC 43- CoRAP planning and update schedule clarified: *50-60 Substance Evaluations/year*

The ACROSS tool that aims at identifying substances of potential concern resulted - in late spring - in the selection of almost 200 substances for manual review by Member States and ECHA. These reviews were conducted in May and June and assessed in particular if the substance concerns fitted with the selection algorithms (that are only partly known by industry). This allowed Member States Competent Authorities to select by 15 August (as every year) the substances for which they would like to take 'responsibility' in the 3 coming years. The draft update 2016-2018 CoRAP list compiled the substances that are already listed with the newly selected ones during a closed session of the MSC meeting. Industry stakeholders were informed that ECHA would release the draft CoRAP update at its November MSC meeting, including the listed concerns for MSC review. ECHA further declared that almost 60 substances were selected by the MSCAs, bringing the running number of Substance Evaluations to 55-60 substances/year (more information: Hugo Waeterschoot).

MSC 43- Dossier Compliance Check: *unclear on how MSC agreed on an inorganic UVCB*

ECHA selected "Slimes and sludges from the steel sector" for a dossier compliance check (CCH) to investigate for any data gaps specific to Annexes IX and X. ECHA suggested that the MSC agree with a (first step) testing proposal on the UVCB itself, instead of applying the strategy based on the constituents' approach that had been agreed between the metals sector and ECHA. It is however expected that MSC would indicate in section 3 of the Decision that *alternative approaches can be followed as long as the Lead Registrant (LR) can satisfy the data gaps in the registration file by the fixed deadline*. While this UVCB is covered by the steel sector, the outcome is most relevant for the metals and inorganic sector at large. Eurometaux therefore provided technical support to the involved LR and raised some principles of the concern with ECHA in advance of the MSC meeting. Unfortunately the administrative ruling does not allow the STOs to know the outcome of the decision when it has been concluded in written procedure before the MSC meeting. Eurometaux is therefore fully dependent on the willingness of the LR to share information on the outcome whilst this is a critical issue on data compliance and waiving strategy relevant to large numbers of high volume inorganic UVCBs. In addition, the decision would not explain the detailed reasoning followed by MSC. Eurometaux raised this during MSC and the Committee agreed with the Chair's proposal to allow industry to raise cases of high methodological relevance for (a) broad sector(s) in advance of the meetings, thereby making it possible to orient the debate to the plenary discussion rather than to the written procedure (more information: Hugo Waeterschoot).

RAC

RAC 34- running from classification to risk assessment: *a hurdle race for the RAC members*

RAC came together between 7 and 11 September to address a well-packed agenda composed of CLH proposals, restrictions and authorisation applications. Interesting technical learning lessons will be fed into KnowMe. To note were the CLH proposals on salicylic acid and nicotine and the resulting methodological debates on developmental toxicity and acute toxicity estimates. RAC discussed and agreed with the proposed RAC-SEAC Framework to check conformity and develop opinions on restriction proposals, implementing thereby the recommendations made by the Restriction Efficiency Taskforce (e.g. clarifying the role of

Commission services, evaluation of alternatives etc.). Threshold and derogations as well as their practicality were extensively discussed in the context of a restriction on the marketing and use of perfluorooctanoic acid and its salts as substances or constituents, components of a mixture or in articles above certain levels. RAC agreed in principle with the first opinion on the restriction of methanol in windshield washing fluids and denaturated alcohol, pending some clarifications regarding the alternatives. The Public Consultation on this restriction, which primarily aims at reducing the incidence of severe methanol poisoning following deliberate ingestion or accidental abuse was still ongoing at the time of the RAC meeting. Moving to Authorisation, RAC discussed the conformity of applications for authorisation for uses of chromates, identifying key needs for further information, which will be transmitted to the applicant. Opinions on AfAs for a trichloroethylene and lead chromate use were finalised. Finally, RAC was updated on the status of the cooperation between RAC and SCOEL in solving the differences in derivation of DNEL-OEL for NMP. Discussions are still ongoing and STOs should be updated at the next RAC meeting. RAC will meet for two consecutive weeks before the end of this year: the first week will be devoted to Authorisation and Restrictions, while the second week will discuss the CLH proposals for silver zinc zeolite and some cadmium compounds (more information: Violaine Verougstraete).

SEAC

SEAC-28- series of applications for authorisation reviewed: *first conformity check on a large chromates application*

The SEAC agenda was very much (over)loaded with a series of Restriction cases and Authorisation Applications. Most relevant for the metals sector was the conformity check on the first (large) batch of Chromates AfAs. In general, SEAC was unhappy and concerned by the quality and relevance of this large joined submission quoting amongst others the lack of transparency on the selection of alternatives (in general none) and how calculations were made (no insights provided by the consortium) as well as the use of SEA impact factors deviating from the guidance (e.g. focus on jobs lost instead of impact on net profit). For some other applied uses, the situation was slightly better. SEAC was informed that RAC also raised concerns about the application dossiers. While a NGO asked whether the application could not be considered as not in conformity, the dossier was felt "administratively" in conformity by RAC and SEAC. The sector will receive critical questions from the Rapporteurs during the trialogue, which is expected to take place end of October or early November. It already seems clear that a lack of an appropriate response of the submitting consortium could lead to a significantly reduced Review Period compared to the requested 12 years. This case is critical in view of its "ice-breaker function as a top-down joined submission" for many other cases under preparation for this set of chromate substances and uses. The actual content of the application will for the first time be discussed at the December meeting (more information: Hugo Waeterschoot).

SEAC-28- Restrictions: *the new RAC-SEAC Framework*!

The Commission-ECHA-SEAC-RAC Restriction Taskforce provided its report and recommendations to streamline and harmonise the conformity check and opinion development in the context of Restrictions, improving thereby as well the transparency for the STO and the public. Recommendations addressed for example how Rapporteurs should consider comments received under the Public Consultation from NGOs, Member States and Industry: those should all achieve the same standard to ensure a "level playing field". This was supported by Industry. On the other hand, Eurometaux and some SEAC members expressed disappointment on the refusal to consider toxicity studies submitted during the Public Consultation for an endpoint not assessed by the Dossier Submitter. This was mainly a RAC request, worried by the workload. SEAC, on the contrary, remains open for new AoA and SEA information (more information: Hugo Waeterschoot).

SEAC-28- A first in-depth debate on exempting recycling from a Restriction: *the DecaBDE case*

SEAC also finalised its opinion on the restriction case on DecaBDE. The relevance of this case for industry relates to the potential impact on recycling if no exemption is granted. However, SEAC rejected a derogation on recycling given neither the plastic sector nor the Public Consultation provided evidence that the suggested maximal concentration limit would result in a loss of material available for recycling. In addition, the sector did not provide evidence of increased costs for additional separation efforts and no evidence that DecaBDE content in recycled material would be above the concentration level. The case clearly demonstrated that a derogation in restrictions for recycling is not a given if it cannot be justified by supporting measured concentration and cost/impact data (more information: Hugo Waeterschoot).

ECHA MEETINGS

Process chemicals workshop: *Eurometaux's request for a broader approach got recognition*

Cefic, BAUA, ECHA and Eurometaux co-organised on 23 September a discussion forum with industry on how the Applications for Authorisations (AfAs) for process chemicals could be simplified. The well attended event was organized in follow-up of a paper from the German authorities defining "process chemicals" within very strict boundaries ("used exclusively at the workplace, in closed systems and no residuals of the process chemical in the manufactured product). The Eurometaux Authorisation & Restriction Platform thought-starter drafted in preparation of the workshop challenged this interpretation and

suggested an alternative "fit-for-purpose" approach for all industrial chemicals on Annex XIV, allowing to simplify the Exposure Scenarios, SEA and AoA depending on the lack of exposure or risk potential. Eurometaux, together with REACHLaw, presented this approach to the workshop participants, using the learning lessons from the As_2O_3 AfA cases. The proposed approach was supported by the participants (more information: Hugo Waeterschoot).

Registration process update meeting: ***only 200 seats!***
In 2016, ECHA will release new versions of the IT tools used for creating (IUCLID) and submitting (REACH-IT) registrations. The main changes will be an updated completeness check process (TCC) and an improved system to make sure that all registrations for the same substance are made with a single joint registration. ECHA, Cefic, Eurometaux, Concawe and FECC are organising an information session on 4 November to provide stakeholders with an overview of the upcoming changes in tools and processes involved in the registration of substances under REACH. Target audiences for the session are Registrants and consortia (including consultants), Member State authorities, sector associations and other stakeholders with interest in REACH registration. The meeting, which will take place in Brussels and is limited in size. If you are interested, please register via http://echa.europa.eu/news-and-events/events/event-details/-/journal_content/56_INSTANCE_DR2i/title/information-session-on-new-registration-process (more information: Maxime Eliat, Caroline Braibant and Violaine Verougstraete).

ECHA OTHERS

CSR/ES Roadmap coordination group meeting: ***need to remain aware about developments***
The Coordination Group composed of ECHA, Member States and industry representatives came together on 3 September to discuss the progress on Roadmap actions and the deliverables, the planning of the next Exchange Network on Exposure Scenarios meeting (see below) and the possible marketing of the Roadmap project/products. While most of the developed tools target the 2018 Registrants 'at large' (with active involvement of downstream users), some discussions remain linked to the content of the 2010-2013 registrations such as the volume/use information, common understanding on scaling, interface REACH/OSH (how to match information available on both sides), SPERCs best practices and update of the ECHA Guidance Documents, justifying thereby their follow-up (more information: Federica Iaccino and Violaine Verougstraete).

9th Meeting of the Exchange Network on Exposure Scenarios: ***improve ES and communication***
The next meeting of ENES, which will take place on 5-6 November in the Sheraton Brussels airport hotel, aims at providing registrants, downstream users and Member State authorities with details on the tools developed under the CSR/ES Roadmap to improve information on use and exposure under REACH and explain why those tools are necessary and how they can be used. It will be structured by themes: starting with a session on tools designed to help registrants get realistic information on downstream uses to generate useful information in their CSR (for authorities) and ES for communication (for their customers), a second session on providing data on existing conditions of use to registrants, followed by working sessions on a) Connecting existing risk management guidance / practice for workers to the REACH chemical safety assessment, b) Industry taking up the Roadmap's products and c) Exemplification of use description, and finally a session on Tools for formulators and users of mixtures. The meeting is limited in size and as a first step, authorities, industry and participants at previous ENES events will be invited to register. If you would like to attend and did not get an invitation, please contact echa_enes@echa.europa.eu (more information: Violaine Verougstraete).

Substances Brief profiles and Infocards*: the metals/UVCB information will be disseminated but with some 'fixing'*
Further discussions have taken place with ECHA on how to reflect metal specificities in the disseminated information, more specifically for our inorganic UVCB dossiers for which we have reported information on several constituents (e.g. several DNELs). This information can hardly be differentiated when automatically extracted and resulted in 'confusing' messages in the mock-ups of the Brief Profiles. Whilst a better solution will be provided by IUCLID 6.1 and the assessment entity in particular, ECHA has found a temporary fix by referring to the registration dossiers in case several DNELS/PNECs etc. are reported (more information: Caroline Braibant and Violaine Verougstraete).

AUTHORISATION

Consortia anticipating being listed on the Annex XIV proposal of the Commission
As a follow-up action of the intermediates workshop early July, Eurometaux proposed to critically review the sectorial draft guidance written by Consortia and Downstream Users to demonstrate intermediates uses. In parallel, Eurometaux asked ECHA to continue supporting industry in clarifying outstanding uncertainties and defining a way forward to encourage harmonized interpretations by enforcing Member States, which would be in line with industry's knowledge and views. A review session will be planned in November. In addition, several consortia and users- including metal companies- started preparations for

advocacy actions on the upcoming Commission proposals to update Annex XIV (more information: Caroline Braibant and Hugo Waeterschoot).

COMMISSION REACH activities: hot topics/issues

CARACAL

CARACAL 19: Agenda and background documents becoming available
The Agenda for the next CARACAL meeting (CARACAL 19, 12-13 November) includes many items of direct relevance to the metals sector. The REACH Session includes a discussion on the simplification and streamlining of Authorisation for bio-essential uses (cf. borates and cobalt) and the agreement on guidelines on Pb and Pb compounds in consumer articles. The CLP Session includes discussions on bioavailability in the context of Article 12(b) of CLP, and on the C&L Inventory pilot project; and the endorsement of quality requirements for physical hazard tests, and CLP exemptions for feed additives. An update on ATPs to CLP is planned in the very first version of the draft Agenda too (more information: Caroline Braibant).

Requirements for substances in articles: *2-week consultation period to comment the first of two updates of the Guidance starting soon*
Following the judgment of the Court (dd 10 September 2015) concerning the duty to communicate information on substances contained in articles in accordance with Articles 7(2) and 33 of the REACH Regulation, ECHA will update its Guidance on requirements for substances in articles. The update will be done in two steps, starting with a quick update aimed at correcting the parts which make reference to the 0.1% limit so they become consistent with the outcome of the judgement. CARACAL members will have two weeks to comment on the proposed updates. The Court judged that in the case of a 'complex' product made up of a number of articles, the duty to communicate information on the substances contained in that product applies as from a concentration threshold for a SVHC of 0,1% weight by weight in each composing article. This may significantly impact existing restrictions and potentially trigger Authorisation requirements also (on the use of SVHC to manufacture an article) and should be looked at carefully by Industry (more information: Caroline Braibant and Hugo Waeterschoot).

CLP REFIT: *an opportunity to pinpoint at the need for legislation referring to CLP to also consider exposure and likely risk when regulating substances*
DG GROW has launched a study evaluating the legislative framework for chemicals, in particular the CLP Regulation and related legislation. This is one of the main studies included in the Commission's Regulatory Fitness and Performance Programme (REFIT). Eurometaux and other associations have been contacted by the appointed consultant (RPA) for a screening exchange, aimed at identifying key items which will guide the preparation of a formal consultation. Preliminary feed-back confirms that the CLP Regulation is functioning well; it however pinpoints at the 'downstream legislation' which refers to the CLP Regulation to define its scope or applicability and which should also consider exposure and risk provisions to ensure a proportionate and efficient regulatory impact overall (more information: Violaine Verougstraete, Hugo Waeterschoot and Caroline Braibant).

EUROMETAUX REACH activities: hot topics/issues

REACH Forum meeting: *2016 budget proposal presented and discussed in a refreshed meeting format.*
The most recent REACH Forum meeting took place on 23 September. The Agenda was composed of two main sections: one containing discussion and decision items and the second containing key update items. This refreshed format aimed at focussing the meeting content while distinguishing more clearly between items which require REACH Forum members' steering and decision from more informative or brainstorming items. The 2016 budget proposal, which has not been increased compared to 2015, was supported in principle by all participants present. Representatives of the REACH Forum members will now revert to their respective memberships to confirm their support at the next meeting. The key update item for this meeting related to CLH processes currently taking place for various metals and their compounds. In the three cases presented during the meeting, there is a risk of setting an incorrect precedent on the read-across and/or the environmental classification of metals. Members were also updated on the latest development regarding the current and next Priority Lists and Annex XIV updates, as well as on ongoing projects under The Risk Management Framework. The borates sector informed the Forum on a Restriction-based approach they are currently building up as alternative for Authorisation. They will discuss this possibility with

Commission on October 5. The Forum raised questions e.g. on the scope and impact on users of such a restriction, because it would also impact on intermediates whilst an OSH approach would not be feasible due to the lack of a EU-wide OEL or even an initiative for that (more information: Caroline Braibant).

EVALUATION

ECHA questionnaire on Substance Evaluation (SE): *a moment of retroactive reflection of the metals sector*
Over the summer ECHA launched an extensive questionnaire on Substance Evaluation experience by the different stakeholders to feed into a MSC review workshop scheduled for later in November. Eurometaux collected the experience of the sector along with that of the Consortia who already went through or started the SE process; additionally defining recommendations for improvements. In general this experience was (very) positive (GaAs, ZnPO4, Ag-nano, …) when the sector agreed to apply a pro-active attitude towards the SE-reviewing country (eMS) by collecting voluntary (anticipative) data that could lift or focus the concern triggering the CoRAP selection. Identified areas for improvement were as follows: 1) the formality of the reporting steps, 2) the lack of potential to review the draft decision before sending to ECHA for follow-up and 3) the need for countries to better communicate their conclusions in case no new information is requested (Be case), 4) need for a better synergy between EU regulatory and research tools. The Al-salts CoRAP listing raised another very relevant issue of an SE potentially impacting the Al-sector at large through potential DNEL setting or hazard identification while the case would be handled between the eMS and the chemicals sector (the salts belong to the chemical sector Consortia management while most of the scientific knowledge is with the Al Consortium). Eurometaux completed the questionnaire including the suggestions made and will use the collected experiences and input for the MSC workshop to come (more information: Christine Spirlet, Katrien Arijs, Birgit Müller, Eirik Nordheim and Hugo Waeterschoot).

Contribution to Eurotox Symposium: *further science to go along with further learnings and communication*
Eurometaux was invited by ECHA to share industry's experience with the REACH Evaluation activities during the recent Eurotox Conference in Porto, which brought together more than 1500 participants. The main message from Eurometaux was that Dossier and Substance Evaluation processes under the EU REACH programme can drive further refinement of data and approaches, contributing to the development of science regarding its R&D side, its consistency or its communication. This however requires that Evaluation activities remain balanced and further invest in communication and sharing its learning lessons (more information: Hugo Waeterschoot and Violaine Verougstraete).

AUTHORISATION

Meeting Authorisation & Restriction Platform: as main items: progress reporting on RMM projects and status of the Authorisation lists and a new co-chair, *Welcome Klaus!*
Klaus Kamps, from ECFIA was selected as co-chair to team up with France Capon to lead the A&R platform. The September meeting of the Authorisation and Restriction platform traditionally focuses on the coordination of advocacy and strategy for the upcoming Annex XIV update. The delay in the launch of the 7th list by ECHA and of the 6th list by Commission allowed to focus on the preparatory activities for the simplification or streamlining of AfAs. The A&R debated the view of the sector "on process chemicals", which was reflected in a thought-starter used for the workshop held on 23 September (see above). The platform suggested broadening the relevance of simplification to all industrial chemicals and designed a fit-for-purpose strategy based on exposure and risk potential. The A&R platform further reviewed progress with "the Recycling and Authorisation project". The first series of company visits confirmed that Authorisations can hit selective steps and processes of the recycling sector. They also allowed to define first potential horizontal mitigation measures that would prevent that mixing of "secondary materials" to optimize recycling processes and the treatment of UVCBs could be impacted. In follow-up, the meeting agreed to somewhat change the selected cases to better accommodate the needs for the project and the participating companies' situations. Finally, the platform defined dates for specific discussions on RMOa (9 November pm) and the Recycling and Authorisation project (10 November) so as to define key industry messages for the 17 November Commission session on the future of the Authorisation process) (more information: France Capon, Klaus Kamps, Michel Vander Straeten, Caroline Braibant and Hugo Waeterschoot).

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

Submission preparatory material for Commission meeting on article 12(b) CLP: *night work but impressive results*
A package of preparatory material was submitted mid-September in view of the second expert meeting on biological availability in the framework of art. 12 (b) of the CLP Regulation N° 1272/2008, scheduled for 5 October. This package reflects the work carried out over the summer by the bioelution experts on issue of concern raised by authorities over the last month. It includes

a revised industry note on how we propose to classify alloys for human health endpoints, one-pagers addressing e.g. conservatism and safety net, reference material, enforceability; a revised SOP and a completed OECD Standard Project Submission Format. Key objective for this second meeting is to convince Member States that the technical evidence is now available and sufficient to start drafting guidance at EU level. The actual decision on whether Commission will give the mandate to ECHA or ECVAM to draft such guidance will be taken at the next CARACAL meeting in November (more information: Federica Iaccino and Violaine Verougstraete).

COMMUNICATION ACTIVITIES

Outcome Nordic Council REACH workshop: ***the start of a mind-set change on RMMs also in the Nordic Countries?***
DHI organized a Nordic Council REACH seminar in Copenhagen on 24 and 25 September. Eurometaux was invited to contribute to the session on Authorisation, to share its views/experience on how industry could anticipate applications once on Annex XIV. The Danish Competent Authorities emphasized the relevance of RMOas, confirming that non-REACH measures like OSH or WFD could also be selected. They further supported the change in focus towards PBTs, vPvBs and Equivalent Concern (Sensitizers and Endocrine Disruptors). The subsequent panel debate focused on the relevance of substitution whereby industry underlined that REACH allows technical AND economic feasibility reasons to maintain a substance being used. The agenda and presentations are available on request (more information: Hugo Waeterschoot).

Further outreach of REACH

OECD

UVCB at the workplace: ***participation to OECD call on combined exposure***
Eurometaux and EBRC have been invited by the OECD taskforce on combined exposure to make a presentation on how combined exposure at the workplace could possibly be tackled by refining the exposure assessment term in the overall risk characterisation equation. This presentation, based on examples of UVCBs in Precious Metals recycling, proposes to investigate whether workers are indeed exposed to 90th percentile exposure levels of all constituents of the UVCB at the same time/workplace? This reasonable worst case could be further refined and e.g. consider the use of a P75 rather than P90. The presentation was well received by the subgroup with some questions from countries on the type of refinements the sector would like to bring on the hazard side (more information: Daniel Vetter and Violaine Verougstraete).

Calendar

- **30 September-1 October**: ASIAN CHEMWATCH summit on Chemicals Management
- **7-8 October:** ECHA/EFSA Topical Scientific Workshop on Soil Risk Assessment – ECHA (Helsinki)
- **20 October:** WS on the Combined Toxicity of Metals in the Environment - MCC (Brussels)
- **26-30 October**: MSC 44 – ECHA (Helsinki)
- **2-6 November:** WPNM Meeting – OECD (Paris)
- **4 November:** Information session on changes in Registration process (Brussels)
- **5-6 November:** ENES 9 (Brussels)
- **17 November**: WS on AfA simplification – ECHA/Commission (Brussels)
- **19-20 November**: ECHA WS on improving the Substance Evaluation Process - ECHA (Helsinki)
- **23-24 November:** PRTR Meeting (Madrid)
- **23-27 November**: RAC 35a – ECHA (Helsinki)
- **30 November – 4 December**: RAC 35b – ECHA (Helsinki)
- **30 November – 4 December**: SEAC 29 – ECHA (Helsinki)
- **Tbc November**: ECHA WS on improving the Substance Evaluation Process - ECHA (Helsinki)
- **7-11 December**: MSC 45 – ECHA (Helsinki)
- **15 December**: Evaluation Platform – MCC (Brussels)
- **16 December**: Authorisation & Restriction Platform – MCC (Brussels)
- **16-17 December**: ECHA Management Board 40 - ECHA (Helsinki)
- **17 December**: REACH Forum – MCC (Brussels)

- **18 May 2016**: MeCLAS Training for new EU countries – (Prague)

Acronyms

ACROSS: Integrated Substance Screening Tool	**OECD: Organisation of Economic Cooperation and Development**
AfA: Application for Authorisation	**OEL: Occupational Exposure Limit**
AoA: Analysis of Alternative	**OSH: Occupational Safety & Health**
CARACAL: Competent Authorities for REACH & CLP	**PBT: Persistent, Bio-accumulative and Toxic Chemicals**
CCH: Compliance Checks	**PNEC: Predicted No-Effect Concentration**
CII: Cross Industry Initiative	**R&D: Risk & Development**
CLH: Harmonised Classification and Labelling process	**RAC: Risk Assessment Committee**
CLP: Classification, Labelling and Packaging Regulation	**REFIT: Regulatory Fitness and Performance Programme**
CORAP: Community Action Rolling Plan	**RMM: Risk Management Measures**
CSR: Chemical Safety Report	**RMOA: Risk Management Option Analysis**
DecaBDE: Decabromodiphenyl ether	**SCOEL: Scientific Committee on Occupational Exposure Limits (EU)**
DNEL: Derived No Effect Level	**SE: Substance Evaluation**
ENES: Exchange Network on Exposure Scenarios	**SEA: Socio-Economic Assessment**
eMS: Evaluating Member States	**SEAC: ECHA Socio-Economic Assessment Committee**
ES: Exposure Scenarios	**SOP: Standard Operating Procedure**
IUCLID: International Uniform Chemicals Information Database	**STO: Stakeholder**
LR: Lead Registrant	**TCC: Technical Completeness Check**
MSC: ECHA Member States Committee	**UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials**
NMP: 1-Methyl-2pyrrolidone	**vPvB: Very persistent very bioaccumulative chemicals**