



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

This is absolutely the wrong moment for a wake-up call: I am running through slides summarising the EHS & REACH teams' achievements of the last year, desperately trying to fit these into my short presentation slot, on top of "mentioning" the challenges these same 8 individuals will face in 2016. From the time indicated on the computer I somehow know we are behind schedule. Time, I think, is a pitiless dictator who only can move in "fast forward"!

So, I try and pull myself together: "Go on slides-runner! Use and don't lose time". I string together a couple of slides, skip a paragraph or two to reach the end of the presentation, but wonder why my voice has started trembling. An acute feeling of doing something wrong overwhelms me with questions echoing in my brain. What am I actually trying to demonstrate here? That speed is fun and efficient? That recognition for the work done by the staff day-in day-out is entangled with the brevity and swiftness of the speech? Where is the time for the spark?

"This is it" I say to myself whilst going back to my seat: "time for a quality slow-down". In my mind I see the image of a door in an authorities' building we recently visited. It is written 'quiet room' on it. As I had immediately imagined an oasis of tranquillity behind this door, with natural light and time to reflect and chill out, I could not avoid asking whether and how it was used. Actually, the (small) room only contained a table and a PC and was devoted for conference calls in order to not hamper the efficiency of the other employees in the open space.

How the heck did we all become so fast and efficient? Why do we use every second to cross-out things on the to-do list? Why are we afraid to take and "lose" time? Is it maybe because our cultural perception of time is linear instead of circular that we go for a maximum amount of 'quick fixes' to be able to further move on? Is it because 'slow' is associated with 'low' performance? How can we bring the dream into the hectic rhythm and keep the kick without being speedy workaholics?

No ready solutions yet (of course... ☺) but ideas are welcomed.

A Belgian choreograph who passed away a couple of weeks ago decided to voluntarily speak slowly in interviews, as an ode to slowness, or as a revolution ...but also to be sure to be well understood. 'Time is an ocean but it ends at the shore' (Bob Dylan, 1976)

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

MSC-44: draft CoRAP update 2016-2018 published including three antimony and an iron compounds

On 28 October, ECHA published the draft CoRAP update 2016-2018 adding almost 50 more substances to the list, including 3 antimony compounds (metal, oxide and sulfide) and iron sulfate. Between now and December, MSC will review and check the risk-based motivation of the proposals and confirm or amend the selection. The draft CoRAP update is published by ECHA for transparency reasons, so no public consultation is foreseen. Comments can only be raised at the MSC in December through the Regular Stakeholders like Eurometaux. The Eurometaux Evaluation platform will check with the concerned consortia what action would be required (more information: Hugo Waeterschoot).

MSC-44: 7th list: metal compounds once more on the next priority list proposal for authorisation

ECHA prepared a draft list of substances for the next priority list for consideration and review by MSC. The proposal contains 12 substances including 4 important Pb compounds and 2 borates of lower relevance. Member States were divided in going forward with a short list (as is presently the case) or a longer list (like last year) and selecting substances

based on the outcome of the Public Consultation (PC). As last year, two parallel Public Consultations will be launched to solicit input to improve the prioritisation (ECHA PC) and estimate the socio-economic impact (Commission PC). The consultations are scheduled to start on 17 November to mid-February 2016. The MSC meetings of February and April will be crucial in defining an opinion including a debate on potential exceptions (e.g. existing RMM under Article 58 (2)), while voting can be expected by June 2016 (more information: Hugo Waeterschoot).

MSC-44: Eurometaux contested the new LAD scheme proposed by ECHA:

ECHA requested MSC to review a new scheme to set appropriate Latest Application Dates (LAD). The scheme suggests 18, 21 and 24 months as standards, using ECHA's workload, time on the candidate list and to a lesser extent the complexity of the supply chain as main criteria for grouping substances into the categories. The 4 lead compounds would fall in the 21 month category compared to 35 months for the chromates in the past. Eurometaux contested the proposal, stating that the LAD timings should be set on factual needs for industry to ensure a good quality AfA file. Eurometaux suggested an alternative recognizing the complexity of the supply chain, the number of expected applications and the overall complexity of the dossiers asking for a period ranging from 15-35 months. The chair invited the metals sector to prepare a proposal in writing for debate at the next MSC meeting. Eurometaux will circulate its proposal to the A&R platform for support and submit it in November to ECHA (more information: Hugo Waeterschoot).

MSC-44: recent legal cases that impact metals authorisation exemptions

Two recent legal cases will impact the metals authorisation cases: a first case concerns a recent EU General Court case (by VECCO representing the German Chromates plating sector). The court concluded that an exemption on authorisation based on existing EU-wide RMMs (Article 58 (2)) is only feasible when based on existing EU-wide Risk Management legislation specific for the substance (e.g. an existing binding OEL, a substance specific Risk Management Measure directive (batteries recycling, RoHS, ELV, WEE), ...). ECHA or Commission guidelines, national RMMs, generic RMM legislation without specifically listing the substance, or voluntary initiatives *cannot be seen as fulfilling the objectives for exemption* under Article 58 (2). The second case is a recent ruling on acrylamide, which contains a challenging conclusion on *when an intermediate USE could still fall under authorisation*. This case could actually affect examples like CTP-HT used as collar and ramming paste or other sealing agents where the real function is not to make the substance but rather give it a specific function (e.g. sealing). The Authorisation and Restriction platform will evaluate both cases at its next meeting in December to better understand and assess their consequences (more information: Hugo Waeterschoot).

AUTHORISATION

Chromates: non-ferro metal companies also submitted an AfA for a chromate compound

Boliden submitted an AfA for a specific use of sodium chromate where the substance acts as a process chemical in the zinc manufacturing. The Public Consultation did not result in alternatives being raised. The recent dialogue (28 October) - also attended by Eurometaux- demonstrated the robustness of the case. The questions of the RAC and SEAC Rapporteurs focused on details that would help in clarifying the presentations they will make to the RAC/SEAC Committees rather than substantially challenging the AfA. The company requested a 12-years Review Period for the use. The debates in SEAC and RAC are expected to take place in December (more information: Hugo Waeterschoot).

Waste-Recycling and Authorisation: finalisation of the company visits and selection of cases

A last company visit took place early October so as to complete the collected cases for the study on waste/recycling and authorisation. A case related to a precious metal plant was selected, which will allow to assess the impact of authorisation on different feedstock types (waste, recycling and complex materials) as well as the impact of lead used as a process chemical in the refining process. The companies involved are presently gathering relevant SEA data that will be used by the consultant to draft the business impact studies based on a comparison between an authorisation for the use and a non-use scenario. Potential mitigation measures to reduce or eliminate the risk for Authorisation are presently developed in parallel with the BIS-studies. A special workshop of the Authorisation and Restriction platform is scheduled for 10 November to discuss the first findings and potential mitigation measures (more information: Michel Vander Straeten and Hugo Waeterschoot).

INTERMEDIATES AND STRICTLY CONTROLLED CONDITIONS

SID iUVCB: discussions with ECHA SID unit planned

As inorganic UVCBs-related inquiry submission kept being a difficult exercise for the non-ferrous metals industry, over the summer Eurometaux shared an extract of the internal iUVCB Guidance note (on Substance Identification) with the ECHA SID Head of Unit. The goal was to provide them with the rationales leading to the identification and the way it was reported. ECHA provided some feedback on key points that in their view deviate 'unacceptably' from the formal SID Guidance but was very open to discuss it further, recognizing that the complexity and peculiarity of the iUVCB substances would require a face-to-face

meeting. The meeting should take place beginning of December and should ideally allow us to use real examples from submitted iUVCB dossiers, to show that identification and reporting are not in conflict with formal guidance principles and find some ways to fix remaining misunderstandings (more information: Federica Iaccino, Katia Lacasse and Violaine Verougstraete).

EVALUATION

ECHA-BoA defined Substance Evaluation justification need: *A legal case that will impact metals SE selection*

A recent ECHA Board of Appeal (BOA) case on CCl₄ defined that Substance Evaluation decisions should preferably not cover standard information requirements (see Annexes VII-X of REACH) given they must be preferably dealt with by Dossier Evaluations and defined with three steps to justify Substance Evaluations. In general, the BoA felt that the overall assessment should be more “plausible and real” than “potential and hypothetical”. MSC concluded that this would provide more support for a full Compliance Check in the year before the Substance Evaluation so that the standard data gaps could be filled before the SE starts. The BoA also indicated the conditions under which a standard information can be requested under a Substance Evaluation. The case also clarified that only registrants for whom the tonnage band corresponds with the (standard) data need could be liable for conducting and paying for the completion of the requested information. This case will be discussed at the Eurometaux Evaluation Platform meeting in December (more information: Hugo Waeterschoot).

ECHA MEETINGS

7th ECHA Nanomaterials Working Group meeting: *Defining ‘nanoforms’ and preparing ECHA Guidance updates*

The 7th ECHA NMWG meeting will take place in Helsinki on 11-12 November. It aims at discussing three documents that have been prepared in anticipation of the amendments to be introduced by the Commission to the REACH Annexes, and the need to adapt ECHA’s Guidance documents on substance identification and information requirements accordingly. The Nano Taskforce will discuss these three documents at their 30 October conference call, in order to compile collective comments that Christine Spirlet (IZA) can convey at the meeting on behalf of the sector. Among others, the draft documents include criteria to define groups of nanomaterials or “nanoforms” that need to be reported separately in a given registration dossier. According to the draft document, nanomaterials should be reported separately from other forms and each other in a registration Dossier if: 1) they meet the definition of nanomaterial (based on particle size or surface area data); 2) they have different particle shapes (high aspect ratio forms, two-dimensional, or approximately spheroidal); and/or 3) they have different surface chemistry characteristics (surface treatment and functionalisation). This does not preclude on the resulting number of nanoforms or on the approach to assess each identified nanoform covered in a registration dossier (more information: Christine Spirlet and Caroline Braibant).

ECHA Enforcement Forum Open Session: *Eurometaux invites REACH enforcement authorities to work towards a uniform implementation of complex intermediate uses across the EU*

In follow-up of the 2-3 July informal workshop with ECHA and the Commission, in which technical exchange discussions took place between manufacturing and using sectors around complex intermediate uses of relevance to the metals sector, several sectors are preparing technical summary papers that could act as internal guidance for the concerned sectors. The next step involves an informal commenting round by ECHA on the resulting papers, and the further recognition of the papers as reference documents for uniform implementation and enforcement. Having been accepted as a speaker at the 22nd Open Session of the ECHA Enforcement Forum (Helsinki, 5 November), Eurometaux will inform national enforcement authorities about the initiative and request whether and how they wish to participate in it (more information: France Capon, Hugo Waeterschoot and Caroline Braibant).

COMMISSION REACH & CLP activities: hot topics/issues

CARACAL

CARACAL 19: *Preparatory call on 3 November*

An annotated agenda for the next CARACAL meeting (CARACAL 19, 12-13 November) has been circulated to the REACH Alliance and the REACH Forum in order to prepare the inorganics’ industry position on the several items of direct relevance to the sector. Eurometaux will represent the inorganics sector during the meeting, and monitor the outcomes of the various discussions relative to the simplification and streamlining of Authorisation for bio-essential uses (cf. borates and cobalt), and the need for continued work at EU level to validate the protocol and draft guidance on the use of bioaccessibility results, among

others. We may also be invited to present the cross-industry initiative for better regulation in chemicals management, which has also been co-signed by many representatives of the inorganic sector (more information: Caroline Braibant).

Requirements for substances in articles: *2-week consultation period to comment the first of two updates of the finalised guidance*

Following the judgment of the Court (dated 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 has submitted a track-changed guidance document for comment by CARACAL members, as per the announced fast-track procedure. DG ENV has submitted comments on the changes proposed by ECHA which seem to align more faithfully to the conclusions of the Court than what ECHA has proposed. In light of this, and in agreement with its members, Eurometaux will not submit any additional comment on the proposed changes to the guidance on requirements for substances in articles. At the 20 October 'REACH and beyond' conference (see further below), participants recommended to develop guidance on how far up the supply chain the importers need to track SVHC content for, and to foresee for example SDS-like documents for articles too. Because such guidance will not be available before 2016, Eurometaux will prepare an intermediary briefing note clarifying the key changes and impacts, and will make this available at its next REACH Forum meeting (more information: Hugo Waeterschoot and Caroline Braibant).

REACH COMMITTEE

REACH Committee: *unanimous approval of Implementing Act on Data-Sharing – what's next?*

The Implementing Act on Data-Sharing was discussed and voted upon at the 21-22 October REACH Committee meeting. Though Cefic, Concawe and Eurometaux have repeatedly advocated to replace "unanimous" by "majority" consent when it comes to waiving the obligation to itemise cost items or include a reimbursement mechanism in the cost-sharing model, the latest version of the Act still includes these. The Act will likely enter into force in late 2015 or early 2016. We also requested that ECHA guidance on data-sharing be updated in order to manage future registrants' expectations in reading the Act, and to materialise the resulting requirements into practical examples that could demonstrate the right level of itemisation or the various possible reimbursement mechanisms. The update of ECHA guidance is foreseen in the October "Update on ECHA Guidance activities" document circulated to CARACAL, which indicates that roadmaps are being prepared for the updates, but because the final inputs for these updates will not be available before Q1/Q2 2016, the final publication of the resulting guidance updates is not likely before Q4 2016 i.e. less than 2 years before the 2018 registration deadline. Cefic, Concawe and Eurometaux will continue advocating for an update of the guidance, and prepare input that can be considered by ECHA (more information: Caroline Braibant).

NANOMATERIALS

Commission proposals on a revised definition and amendments to the Annexes of REACH: *still nothing...*

When we last addressed this item in our July edition, we anticipated no major deliverables before autumn 2015. A recent mail from the Commission informed us that while the Impact Assessment is almost concluded and has also been discussed in an inter-service group of the Commission, it still needs to be presented to the Regulatory Scrutiny Board (RSB, former Impact Assessment Board), who will meet in Q4 2015. There will be no draft Commission proposal available for comment (via the CASG Nano group in which Eurometaux participates), before the proposal has been assessed by the RSB. After the CASG Nano has been consulted (in February 2016?), the draft Commission proposal will still need to undergo a formal Inter-Service Consultation in the Commission, and an assessment by the WTO, before it can be formally submitted to the REACH Committee for discussion and vote (in Q1/2 2016?). In the meantime it is essential to contribute to the ECHA NMWG discussions (cf. ECHA Meetings item above). Eurometaux will continue to monitor any developments and keep the Nanomaterials Taskforce up to date (more information: Caroline Braibant).

OTHERS

C&L Platform pilot project: *results of the project and proposed next steps*

As mentioned in our June edition, 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 ECHA develops additional options to improve the display and usability of the C&L Inventory. A document has been prepared by ECHA and the Commission to report on the outcomes of the pilot project and the proposed next steps. Generally speaking, the outcome of the pilot project is both positive (total decrease in the number of diverging classifications for 97 substances) and negative (increase in the number of diverging classifications for more than half of the substances). The

idea of following up with a second pilot project as well as ECHA's intentions to improve the C&L Inventory's display will be discussed at the next conference call, scheduled to take place on 3 or 10 November. Eurometaux's continued involvement aims at contributing to the correct scoping of the follow-up project, and participating in the selection of ECHA's preferred options on how to improve the display and use of the C&L Inventory (more information: Caroline Braibant).

Consultation on a possible restriction of hazardous substances (CMR 1A and 1B) in textile articles and clothing for consumer use: *Commission invites comments on restricting 291 substances by 22 January 2016*

On 22 October the Commission launched a public consultation aimed at collecting information on the (likelihood) of presence of CMRs 1A and 1B in textile articles and clothing for consumer use, in order to prepare the scope of an EU-wide restriction in this area. This restriction would not be subject to the default procedure involving preparation of an Annex XV dossier, and opinion-making by RAC and SEAC, but be subject to a simplified procedure instead. Article 68(2) of the REACH regulation indeed allows such a shortcut for CMRs 1A and 1B that could be present in consumer articles. The list of CMR substances (individual substances or groups) covered by this possible restriction would be added as a specific appendix to Annex XVII to REACH and could be regularly updated, as appropriate. Around 35 metals and their compounds (As, Pb, Be, Ni, Cd, Cr, Co, Hg, Ni, etc.) are among the substances identified for inclusion in the restriction. The public consultation also aims to gather information on the concentration, function and available alternatives of these CMRs, and the potential socio-economic impacts and the enforceability of the possible restriction and can be accessed via: http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8299 (more information: Caroline Braibant and Hugo Waeterschoot).

EUROMETAUX REACH activities: hot topics/issues

AUTHORISATION

Cross-industry initiative (CII) for better regulation in chemicals management: *Outreach re-boost*

The CII held a strategy meeting in Brussels on 28 October. The streamlined and refocused version of the position paper was approved, as well as additional changes brought to the paper in order to address clarification needs identified during the various outreach exchanges. The paper will be published by 16 November. The CII has been presented to a number of fora among industry, national competent authorities, and the Commission. Next presentations are foreseen to take place in November, to the Enterprise Policy Group (confirmed) and CARACAL (awaiting invitation) in order to reach a wider audience of EU representatives. The feedback collected so far indicates that support for the various elements of the initiative varies from Member State to Member State; but generally speaking there is a trend to support the principles behind the initiative, but Member States prefer to apply these on a case-by-case basis. Follow-up outreach towards the Commission DG will explore how the various papers were received by the involved DGs and identify follow-up questions that may have arisen from their reading. The co-signatories of the CII are particularly interested in the outcomes of the REFIT of OSH legislation, which will inform on the next steps and further proposals that the CII can elaborate. The CII is and will remain an *ad hoc* coalition. There is no intention for the CII to become a standing entity. However, in order to increase the visibility of the CII, a dedicated website is planned to be set-up soon, provided that sufficient voluntary contributions of signatories are made (more information: Kai-Sebastian Melzer and Caroline Braibant).

METAL-SPECIFIC TOOLS

Amending the Transformation Dissolution protocol to allow assessing "degradation": ETAP, NRCAN and EM brainstorm

Eurometaux and ETAP met Natural Resources Canada in Ottawa to develop a strategy to amend the present Transformation Dissolution protocol (TDp) allowing it to measure "degradation of metals in the water column". 'Degradation of metals', although included in the GHS and the EU CLP as a concept that can be used to adapt the classification for rapidly degrading metals, still lacks a tool to apply it. Whilst the Unit World Model is predictive, the ECHA RAC experts did not accept the model as main level of proof when assessing the Cu compounds in 2014. The brainstorming meeting in Ottawa discussed a practical approach where the TDp step is completed by a second step where sediment material is added (to allow metals to rapidly degrade from the water column) and by a third step where the potential for re-dissolution is checked. NRCAN's practical experience was most helpful to define a generic outline for such a test. The proposed outline for the test will be debated by colleagues from the science centres of the commodities along the upcoming SETAC meeting in North America, followed by the design of the test and set up test programme in the weeks to come (more information: Emily Garman, Hugo Waeterschoot, and Violaine Verougstraete).

5 October meeting on bioelution/bioavailability: *technical boost*

Early October Commission organised a follow-up meeting of the April expert discussions on the consideration of bioavailability in the CLP framework. In addition to Commission, several Member States, ECVAM, ECHA and Cefic were represented at the meeting and debated issues like conservatism, feasibility and validation of the proposed approach for the classification of alloys. Over the summer Eurometaux prepared a package of material (industry note, one-pagers on specific issues, revised SOP) that constituted the thread of the technical discussions and that allowed very constructive exchanges/suggestions. A key item remains the validation of the bioelution protocol/use of results. As no Member State volunteered to support industry in bringing the concept to OECD, Commission has discussed with ECVAM and ECHA the possibility that they would take over this role. However, to give such a mandate to ECVAM and ECHA, Commission needs to have political support at the next CARACAL meeting (see below) (more information: Adriana Oller, Katrien Delbeke, Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

Call bioelution: *organise support for Commission on bioelution at the forthcoming CARACAL*

The Pb SCL Taskforce and the bioelution July workshop participants were invited to participate in a call on 26 October to organize advocacy towards Member States so that they would support Commission's proposal to further work on bioelution at the forthcoming CARACAL meeting (12-13 November). At CARACAL, Commission will provide a debrief on the 5 October meeting (see above) and will propose to mandate ECVAM and ECHA to prepare guidance on the generation (protocol) and use of bioelution results. Commission needs to have support expressed by several Member States to move forward. Key messages were prepared and circulated to the taskforce. Thanks a lot to all members who kindly volunteered to re-contact the MSCA authorities. To be noted is the fact that at this stage the focus is strictly on bioelution and the classification of alloys. The lead metal SCL issue will not be discussed at CARACAL but at the December REACH Committee meeting (with Commission's proposal for the 9th ATP) and require separate advocacy efforts (more information: Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

Mixture toxicity workshop: *bringing academic-, regulators- and industry scientists together*

In 2014, industry submitted to ECHA inorganic UVCB dossiers containing a placeholder to further account for combined toxicity assessment as well as a roadmap identifying short term, mid- term and long term actions to address the issue. Keeping this in mind, on 20 October Eurometaux organized a workshop aiming at developing a generic approach that would allow performing the environmental assessment of complex materials considering combined environmental toxicity. Regulators, academics and industry were invited to participate and share regulatory experience/their research as well as identifying remaining (data)gaps. A possible stepwise approach was lively debated and will be further crystallized with respect to scientific arguments and regulatory requirements, to be finally tested on specific cases (more information: Koen Oorts, Federica Iaccino, Hugo Waeterschoot and Violaine Verougstraete).

COMMUNICATION ACTIVITIES

Presentations on REACH Forum activities and REACH learning lessons: Aluminium consortium and IMnI Symposium

Eurometaux was invited by the Aluminium consortium to present an overview of the 2016 REACH key/anticipated activities and upcoming ECHA programme. Such exchanges with consortia are extremely useful for the REACH staff to identify the main issues at stake and areas of interests for a consortium. At the same moment, the International Manganese Institute (IMnI), in partnership with the University of Ottawa and Risk Sciences International (RSI) hosted a Manganese Showcase Symposium in Canada. The symposium, which brought together researchers, regulators, Mn industry professionals involved in the health and environmental impacts of manganese at the global level, focused on recent studies on Manganese (e.g. reproductive toxicity, neurotoxicity, BLM, life cycle assessment etc.) and fostered lively discussions in the audience. Eurometaux was invited to give a presentation on Challenges in Metals Risk Assessment under REACH: Lessons Learned (more information: Caroline Braibant, Hugo Waeterschoot and Violaine Verougstraete)

Chemwatch Asia: *the metals sector invited to exchange experience on recent EU metal learning lessons*

Eurometaux was invited by Chemwatch at the Chemical Watch Asia summit on Chemicals Management in Singapore to share its experience with recent EU-chemical management on metals. Eurometaux provided an update on the metals/alloys classification experience, the UVCB hazard assessment and several risk management experiences. Eurometaux emphasised the importance of tools like MeCLas to standardise and harmonise hazard assessment of complex inorganics and encouraged Asian countries to build on the expertise of the metals sector REACH experience and tools. The presentation was well received testified by the request of China to check the readiness of the EU-metals sector to explain MeCLas and the UVCB assessment approaches in 2016 in China with the central government responsible for Chemicals management (more information Hugo Waeterschoot).

REACH and beyond – challenges and possible options for improvements: *takeaways from the conference*

Several Member States (AT, BE, DK, FR, DE, LX, NL, NO and SE) behind the “REACH-UP” initiative coorganised a conference in Brussels on 20 October 2015 aimed at identifying recommendations to improve REACH and its implementation, including in the context of Resource Efficiency (using the right substances correctly) and Circular Economy. Three issues appeared to be particularly critical to the organisers: i) the quality of registration dossiers, ii) imported articles, and iii) substitution. On the quality of the dossiers, it was recommended for ECHA to be more transparent on checks with positive outcomes, and generally to ensure a better enforcement that would encourage Industry to improve existing dossiers and keep them up to date. As regards imported articles, a better implementation of restrictions (where an EU-wide risk is demonstrated), and enforcement were again seen as a key improvement much needed in this area. When it comes to substitution, downstream users were identified as the actors holding the biggest innovative strength, and it was proposed to develop the EU Guidance on Assessment of Alternatives that could accompany companies in their assessment and facilitate their decision-making (beyond what is in the current Authorisation related Guidance documents). An additional discussion related to ‘making better use of REACH data for the implementation of other legislation’ and ‘identifying conflicts and synergies between REACH and other EU legislation’. One recommendation was that a Platform should gather input on the conflicts and synergies, with a view to making proposals for a better alignment. Finally, as regards resource efficiency and Circular Economy, it was suggested to provide incentives for companies to recycle. The presentations and notes of the conference are available upon request (more information: Kai-Sebastian Melzer, Clémence Siret, Dorothea Steiger and Caroline Braibant).

Further outreach of REACH

OECD

Meeting with Environmental Canada on REACH data: ...and much more

In the context of its Chemicals Management Plan, Canada needs to address about 1500 substances, including 40 inorganic moieties between 2016 and 2020. Environmental Canada invited Eurometaux mid-October to discuss how data sharing/gathering between industry and the Government of Canada could be facilitated. It was proposed to organize a webinar to which consortia contact points would be invited and where Canada could make a presentation regarding the objective of the data-sharing and data that would be handled, with a possibility for participants to pose specific questions. To ensure this webinar is efficient, it was suggested that Canada would clarify upfront the data sharing needs, formats, legal terms they would like to suggest. Such a webinar could take place early 2016 (after Canada’s priorities have been defined). This exchange on data on data was also an opportunity for Eurometaux to update ENV Canada on topics like MeClas, PRTR, classification of alloys, metal fate modelling and discuss the OECD environmental risk assessment guidance (more information: Hugo Waeterschoot and Violaine Verougstraete).

OECD-PRTR: *publications by the Nordic Council and industry*

The Nordic Council submitted recently a significant contribution to update the OECD guidance on Release Estimate Techniques (RET) to estimate releases from products. These documents are scheduled to be discussed and subsequently approved by the OECD at the meeting of the PRTR Taskforce starting on 23 November. The proposed update now includes a large section on “*Nordic experience for PRTR releases from the Use of selected Product categories like Cu from boat treatments, metals in plastic packings, metal releases from tyre wearing, ...*”. The Nordic updates are, as could be expected, very worst case assessments often far from today’s reality. It is most relevant to try to correct these given the OECD release documents are also used by ECHA as reference materials for the regional input calculations. Eurometaux informed the Consortia immediately and provided them with the concerned documents. A meeting/call will be set up to collect comments and suggestions for the texts to be raised at the OECD meeting (more information: Hugo Waeterschoot).

OECD-PRTR: diffuse sources paper on metals, progress

The extensive metals experience with diffuse sources data collection under the ESR and REACH data gathering programmes was gathered for series of metals. The aim is to publish this generic experience in a collective way in a peer review journal aimed at proposing an assessment strategy on how data on diffuse sources has to be used properly (based on emission drivers), how to screen the quality and most importantly to put the overall contribution of releases from products into perspective with point source emissions and other regional exposure contributors. The draft publication was reviewed together with the zinc sector to ensure a broad coverage of metals and critical view on the interpretation and presentation of the results. The paper will be updated in the weeks to come aiming for a publication (more information: Patrick Van Sprang and Hugo Waeterschoot).

Calendar

- **2-6 November:** WPNM Meeting – OECD (Paris)
- **4 November:** Information session on changes in Registration process (Brussels)
- **5-6 November:** ENES 9 (Brussels)
- **9 November:** RMOa Workshop – MCC (Brussels)
- **10 November:** Authorisation & Recycling/Waste workshop – MCC (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)
- **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

AfA: Application for Authorisation	OEL: Occupational Exposure Limit
BIS: Business Impact Study	OSH: Occupational Safety & Health
BoA: Board of Appeal	PC: Public Consultation
CARACAL: Competent Authorities for REACH & CLP	RAC: Risk Assessment Committee
CII: Cross Industry Initiative	REFIT: Regulatory Fitness and Performance Programme
CLP: Classification, Labelling and Packaging Regulation	RMM: Risk Management Measures
CMR: Substances classified as Carcinogens, Mutagens or toxic to Reproduction	RoHS: Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment
CoRAP: Community Action Rolling Plan	RSB: Regulatory Scrutiny Board
CTP-HP: Coal Tar Pitch High Temperature	SDS: Safety Data Sheet
ECVAM: European Centre for the Validation of Alternative Testing Methods	SE: Substance Evaluation
ELV: Emission Limit Values	SEA: Socio-Economic Assessment
ETAP: Environment Toxicity Advisory Panel	SEAC: ECHA Socio-Economic Assessment Committee
GHS: Global Harmonised System of classification and labelling of chemicals	SETAC: Society of Environmental Toxicology and Chemistry
LAD: Latest Application Dates	SID: Substance Identification
MeCLas: Metals Classification Tool	SOP: Standard Operating Procedure
MSC: ECHA Member States Committee	SVHC: Substance of very High Concern
NMWG: Nanomaterials Working Group	TDp: Transformation Dissolution Protocol
NRCan: Natural Resources Canada	(i)UVCB: (Inorganic) Unknown or Variable Composition, Complex Reaction Products and Biological Materials
OECD: Organisation of Economic Cooperation and Development	WEE: Waste from Electrical and Electronic Equipment
	WTO: World Trade Organisation