



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

I have a liking for the December days that immediately follow the last meetings and end of year receptions. Once the sound of the 'have a good holiday' and 'Merry Christmas' emails' jingles has vanished, the offices become more conducive to contemplation. It then turns out, that I am the one switching the Christmas tree lights on and off in the corridor, eating the remaining pralines, breaking the reigning silence by making copies in the printers' room and pondering...

Looking back at 2015, one can of course not ignore the questions generated by what the world went through, the threats and the uncertainties caused by both human acts and the mistreatment of nature, but also by the congestion of information and the range of feelings we all faced. 2015 has been overwhelming all over the place and paraded from worst to best... an exhausting year when it comes to understanding its (dispersed) sense.

Although on a totally different scale, the word 'scattered' also popped up in my mind when considering the last 12 months of REACH activities. The variability and the complexity of the REACH issues have been augmenting, with burgeoning workshops to discuss the interpretation of the texts and taskforces on efficiency aiming at reconciling ideas with some level of feasibility (i.e. 'streamlining' or 'fit for purpose'). One has now to keep an eye on substances and dossiers whilst anticipating possible concerns, addressing risks, identifying hobbyhorses, understanding processes, predicting algorithms and IT screening. Another eye shall scrutinise the horizon for new requirements and refit-ting exercises, data sharing modalities and emerging scientific issues. A third one is reading at night to increase its capacity on SEA, AoA, WTP, DALY etc. jargon and on legal aspects. And ideally, a fourth eye should keep a fifth one on the coordination and the overall vision. This may be too much of a good thing for a single individual? Or look slightly shambolic?

Fortunately, at this period of the year, there are solutions within reach:

- 🔦 The easiest one is the Christmas tree!!! Christmas balls can all be different, originate from different providers and have different formats: yet they confer a simple conifer its majesty. Create a superb tree with all REACH issues- balls and ornate it with a single light string to benefit from a coherent lighting*
- 🔦 As an alternative, find your New Year's resolution in analytical psychology: Jung said it: "In all disorder, [there is] a secret order"*
- 🔦 Or "make a wish" for a simpler 2016? Easy to dream and we would all benefit from it. Thanks for your generosity!*

Looking forward to further enjoying work with you all in 2016 ☺

Violaine Verougstraete, EHS director Eurometaux



ECHA REACH activities: hot topics

ECHA COMMITTEES

RAC-35 B: 30 November-4 December: *classifications for cadmium compounds and silver zinc zeolite (SZZ)*

In its second week of meetings, RAC discussed classification proposals made by Sweden for silver zinc zeolite and for cadmium carbonate, cadmium dihydroxide and cadmium dinitrate. As the proposed classifications for silver zinc zeolite were mainly focusing on the possible effects of the Ag ion, this dossier has been closely monitored by both the Precious Metals and Eurometaux to avoid precedent-setting. RAC agreed not to classify silver zinc zeolites for STOT-RE and germ cell mutagenicity (inconclusive based on the lack of reliable studies). No classification was proposed for carcinogenicity while Sweden had proposed a category 2 classification, in view of the statistically non-significant differences between control and treated animals (number of tumours per animal). For reproductive toxicity, RAC decided on a category 2 classification instead of the proposed category 1B after a long debate mainly centred on observed pup effects in the second generation rat study, which can arguably be explained as secondary effects. With regard to the cadmium compounds, Sweden had proposed separate entries in Annex VI for each compound, extracting them from the group entry with the classifications for acute toxicity and aquatic toxicity transferred from the group entry to the new individual entries without reassessment by RAC (no data in CLH reports), and classifications as Mutagenicity 1B, Carcinogenicity 1B and STOT RE 1 (kidney, bone) to be added to each new entry in accordance with the Dossier Submitter's assessment. Despite the differences in water solubility between the compounds, RAC considered that even the less soluble substances would be systemically available, based on a 1972 bioaccessibility study. Based on human cases, RAC concluded that classification as STOT RE 1 with effects on bones and kidneys was justified. RAC concluded on Mutagenicity 1B for the three Cd compounds considering that even limited bioavailability of Cd²⁺ would present a mutagenic hazard to germ cells, in particular "as there was no basis to assume that low concentrations would lack this hazard". Based on the overall evidence in animals and humans, RAC concluded on Carcinogenicity 1B (H350) for the three cadmium compounds and proposed a SCL of 0.01% for cadmium nitrate, because its bioavailability and carcinogenic potency were considered to be comparable to the other very (water) soluble cadmium compounds for which this SCL had been established. This SCL was not extrapolated to the less soluble cadmium carbonate and hydroxide (more information: France Capon, Katrien Arijis, Mark Raffray, Noömi Lombaert and Violaine Verougstraete).

RAC-35 B: *environmental classification of silver zinc zeolite (SZZ): RAC showed a first small opening towards "degradation assessment" but also a lack of knowledge on the environmental classification scheme for metals*

As regards the environmental classification of silver zinc zeolite, RAC opened somewhat to the concept of degradation, acknowledging the quick reaction of Ag ions with sulfides to form a non-available form in the water column. While the arguments (challenged by industry) of the Rapporteur indicating potential for risk were not followed, RAC felt that the dossier contained insufficient evidence/demonstration that such degradation would always occur under reasonable conditions and at EU-wide scale. RAC left the potential for such a demonstration open for when other Ag-based dossiers would be tabled in the future. Far less positive was the discussion on the environmental hazard categorisation for Ag releases from the SZZ where the lack of metal-specific expertise for environmental classification in RAC was again highlighted. RAC did not recognise the absence of transformation dissolution as a trigger for a default classification (chronic 4) and classified Ag releases from the SZZ as a soluble substance. The EU Commission and ECHA were surprised about this RAC conclusion. ECHA suggests to build more expertise and proposed solutions to tackle the situation, such as adding metal-specific concepts and tools (e.g. MeClas) in the ECHA Guidance, bringing REACH and Biocides experts together, training Member States experts on inorganic-specific concepts, etc., an issue we should discuss and prepare for at Eurometaux level (more information: Mark Raffray, Hugo Waeterschoot and Violaine Verougstraete).

SEAC-29: 30 November to 3 December: *Authorisations on chromates dominating the discussion in SEAC*

A series of authorisation applications were debated at SEAC including the first large joint application on chromates by CTAC, a large consortium of companies from different sectors and supply chain levels (importers up to downstream users). In general, SEAC was not pleased with the overall quality and robustness of the CTAC dossier quoting the lack of evidence on the demonstration of technically and/or economically available alternatives, the way that the costs for companies were investigated (loss of employment) and other basic concerns. This, in combination with the conclusion of RAC on the weak exposure assessment would not allow SEAC to conclude on the proportionality of the case in the same way it was done for previous dossiers. SEAC therefore raised a third set of questions for the applicants to allow a neutral assessment of the case, based on provided evidence. SEAC became however concerned that this repeated opportunity for the applicants to complete the application dossier could lead to a different level playing field for large top down applications compared to smaller applications and therefore set a firm deadline by the Christmas holiday. The difference in quality and rigor compared to smaller more downstream authorisation applications became obvious when a couple of smaller independent cases were also debated, including one for the use of a chromate compound in the zinc sector. At least the discussion gave a good insight on how SEAC handles large upstream AfA and the difficulties that these applicants have to demonstrate safe use, the lack of alternatives and

cost/impact to allow continued use along the supply chain. These were learning lessons taken forward by Eurometaux to the A&R platform session of 16 December (more information: Hugo Waeterschoot).

SEAC-29 30: SEAC closed difficult restriction cases on organic substances some also affecting metal uses

The very busy agenda of SEAC-29 also included a series of quite controversial and difficult restriction cases on elements like Methanol, PFOA and Bisphenol A. The discussions were difficult due to the large number of often opposing comments received during the Public Consultation, including large numbers of requests for exemptions by industry due to lacking alternatives and different views of SEAC members on how to (not) recognise(ing) them. Several of those requests for longer derogations or exemptions concerned the metals downstream user sectors: for example, the exemption for the use of PFOA in the portable battery sector was rejected by SEAC because the sector did not provide motivated evidence for a search for alternatives. SEAC refused concluding exemptions based on statements that “alternatives were generally lacking”. Another point of principle was the consideration raised by several SEAC members who requested to exempt the recycling of materials containing PFOA in one way or another (longer exemption period, higher concentration trigger, ...). In the end, this consideration was not withheld given industry did not ask for such an exemption during the Public Consultation (although SEAC had raised this with the sector). Both cases clearly demonstrate the importance for industry to take the Public Consultation seriously as the opportunity to provide requests and evidence for derogations and exemptions, including for the recycling phase (impurities issue) (more information: Hugo Waeterschoot).

MSC-45: 7-11 December: the outcome of recent AoA and EU-General Court appeal cases impacting MSC reviews

MSC received a quite extensive briefing from the ECHA lawyers on the outcome of recent Board of Appeal (BoA) and EU-General Court appeal cases that would affect activities of MSC. They covered cases that affect the authorisation process as well as evaluation and CoRAP listing. The most relevant conclusions were based on: the BOA appeal case on hexyl salicylate confirming the competence of ECHA and the evaluating Member State (eMS) to address concerns NOT initially identified in CoRAP, the EU General Court VECCO case confirming that an exemption for authorisation based on REACH Article 58 § 2 (alternative EU RMM legislation) can be granted in case a substance is listed with a specific OEL under the Carcinogens and Mutagens Directive but that this was not the case on chromates, the EU-General Court case on acrylamide indicating that an intermediate may be up for authorisation if its use is not directly related to the intermediate status of the substance (e.g. use as a cover, ...). The above listed conclusions were immediately taken forward during the MSC deliberations on substance evaluations resulting in more emphasis to be placed on the compliance check the year before the Substance Evaluation, and MSC having to each time carefully consider if the request for further information/testing was sufficiently “non-standard”, risk-based and able to eliminate the risk. The main conclusions of the most relevant court cases were discussed and taken forward to the A&R and the Evaluation platform meetings of 15 and 16 December 2015 (more information: Dorothea Steiger, Kai Melzer and Hugo Waeterschoot).

MSC-45: limited discussions on the CoRAP update and the 7th prioritisation list review

A short status report was provided at MSC-45 on the progress made by the Rapporteurs on the CoRAP review. The rapporteurs are revising the risk based motivation of each proposed substance newly listed for the CoRAP update, checking whether the proposals are sufficiently motivated, clear and based on both hazard and exposure concerns and if a Substance Evaluation would be the best way to clarify the concern. The latter is clearly a direct impact of the outcome of recent appeal cases. The rapporteurs already identified a short list of substances that would require a more in-depth investigation. So far no questions were raised on the 3 Antimony substances listed for the CoRAP update, making it highly unlikely that they would not be included under the Substance Evaluation programme for MSC vote in Q1 2016.

The Rapporteurs on the 7th priority list for authorisation refrained from providing technical insights into their deliberations given the ongoing Public Consultation. They confirmed that on the four lead substances, industry should only provide new evidence given all previously submitted information provided under last year's Public Consultation would be fully recognised. Additionally they invited the lead sector to reconfirm if the latter remains relevant (more information: Hugo Waeterschoot).

MSC: new Substance Evaluation cases resulting in new learning lessons for the metals sector

Despite no metal (compound) being listed for MSC debate under Dossier or Substance Evaluation (SE), several of the Substance Evaluation cases that were discussed included imported learning lessons of relevance to the metals sector. The most important ones were as follows: 1) a SE decision may include more than one data submission deadline in case the relevance for the second test depends on the outcome of the first information delivery. Each deadline includes a requirement to update the registration dossier, 2) a registrant would not be required to conduct long term reproductive toxicity testing (inhalation route) in case he restricts the use of his product to SCC-like conditions thereby eliminating all other consumer or professional uses as well as non SCC-like industrial uses of the substance, 3) a registrant will not receive a guarantee that the evaluating Member State would grant him to not conduct a non-standard test (in this case on non-albino rats) based on a robust study summary only (given the registrant refused to buy the underlying raw data from the data holder). MSC further confirmed the importance of the recent Ombudsman case triggered by a request of animal welfare NGOs. The Ombudsman concluded that registrants always have the legal obligation to assess alternatives to animal testing (e.g. read across, softer testing measures, ..) even if the testing request results from a Compliance Check or Substance Evaluation decision. MSC confirmed the importance of

section III of the decision where indications for such alternatives are often provided and urged companies to consider those seriously. The conclusions of the Ombudsman inspires NGOs and enforcement authorities in some countries to check if industry made such efforts (more information: Hugo Waeterschoot).

ECHA MEETINGS

ECHA Management Board 16-17 December: Industry representative from Cefic and Eurometaux comments

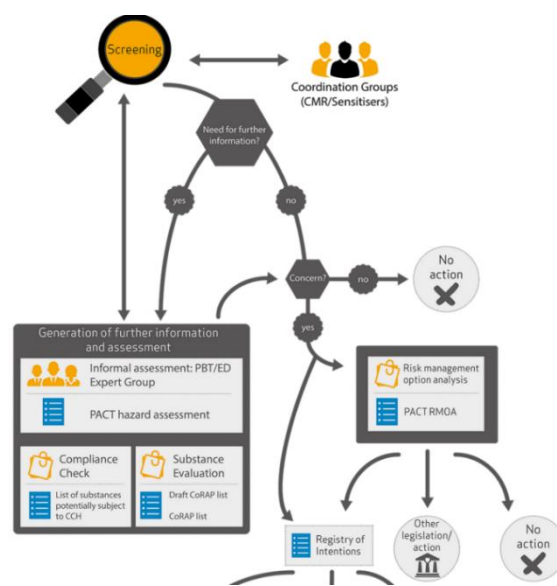
Eurometaux was informed by Cefic that Peter Smith from Cefic will, from 2016 onwards, represent industry in ECHA's Management Board. Eurometaux had also postulated for the function and is committed to support Peter in his representation function, for the benefit of the whole industry (including inorganics). The December Management Board was prepared during a conference call with the different industry organisations focusing on 1) the report of the Executive Director, 2) the update of the 2016 ECHA work plan and the 2017-2019 activity plan & budget for ECHA 3) the planning of activities on chemicals management beyond 2018. The report of the Executive Director made explicit reference to the Eurometaux and Cefic initiative to clarify the Intermediate status for SVHC substances in complex matrix applications, referring to it as a constructive way to prevent issues of non-compliance. He also mentioned the outcome of the third Topical Science Workshop on Soil hazard and risk assessment with a much valued contribution from the metals sector. In its comments, Eurometaux valued the ECHA topical workshops as an excellent demonstration of ECHA delivering on its overall objective to remain on the top of the regulatory science agenda, but felt that ECHA had lost some independence this year vs. other EU institutes with somewhat different objectives (e.g. EFSA) and therefore encouraged ECHA to maintain focus on the chemicals management objectives. The report on ECHA's 2016 work plan made reference to the SCOEL-ECHA pilot interaction case, an initiative supported by industry. Industry asked to make full use of existing OEL and workplace legislation under the authorisation scheme. The ECHA MB also decided in the work plan to scale the number of identified SVHC down from 50 to 20, aligned to the reality of the capacities of the system. Industry expressed some hopes that this would be complemented by an increased investment in the RMOa phase for a better selection of the most appropriate RMMs where needed. ECHA also started the planning for its activities to develop a strategy on chemicals management beyond 2018 embedded in the millennium sustainability criteria. Eurometaux invited the other industry partners to launch this discussion also within industry in 2016 to align vision and ensure our voice will be heard (more information: Hugo Waeterschoot and Guy Thiran).

ECHA OTHERS

ECHA-EM-Cefic-Concawe Evaluation workshop 14 December:

On 14 December, industry representatives from all sectors had the possibility to discuss the ECHA Evaluation activities with Claudio Carlon, head of Evaluation Unit II. The discussions addressed a number of topics identified beforehand as agenda items (outcomes of the letter campaign, ACROSS, the interpretation of section III of the Draft Decisions on Compliance Checks, the consequences of the Ombudsman decision on the obligation for registrants to assess alternatives to testing, the communication of substances up for potential compliance checks and technical aspects like the EOGRS and dossiers updates) along questions and concerns raised by the industry participants among others on duplication of regulatory activities, lack of clarity resulting in significant workload and difficulties in planning resources. ECHA explained the aimed consistency and coherence of the activities referring to the following scheme :

A short report with the main outcomes should be circulated soon in 2016 (more information: Hugo Waeterschoot and Violaine Verougstraete).



SID UVCBs: discussion with ECHA and resulting actions

On 2 December, a small delegation of the REACH Intermediate Taskforce met representatives of the ECHA SID Unit to discuss issues linked to the identification of the iUVCBs. Eurometaux explained the specificities of the iUVCB cases that back up the iUVCB characterisation and the reporting of the substance identification in the REACH Dossiers, ECHA indicated where deviations from the guidance and/or templates become problematic for compliance and evaluation. The meeting was constructive and promising in the sense that ECHA was open to further discuss the cases, with as objective a harmonisation of the inorganic iUVCB approaches and the possible development of a recognised common methodology for substance identification. The REACH Intermediate Taskforce will meet on 20 January to define a work plan on possible related actions.

The Taskforce will also discuss the outcomes and next steps of the combined toxicity workshop of 20 October (more information: Katia Lacasse, Federica Iaccino, Frederik Verdonck and Violaine Verougstraete).

Testing IUCLID 6 and assessment entity: *a possible way forward for our complex cases*

ECHA is working on the reporting of 'complex cases' in IUCLID and Chesar, so as to enhance the clarity and transparency of the approaches and data used in complex dossiers like the ones found in our iUVCBs, but also in case of transformation products, different forms/uses associated with different hazards. ECHA has invited volunteers to test the current versions of the tools and the proposed 'assessment entity' concept and to provide feedback on its current features and possible improvements. The follow-up of this work is key to ensure a better understanding of the metal-specific aspects in our complex dossiers, among others the link between composition, uses, risk assessment and risk management (more information: Maxime Eliat, Federica Iaccino, Daniel Vetter and Violaine Verougstraete).

ECHA Guidance on data-sharing: *Invitation to Cefic, Concawe and Eurometaux to provide specific examples by end January*

In preparation of the entry into force of the recently approved Implementing Regulation on Data-Sharing, Cefic, Concawe and Eurometaux had asked ECHA to prioritise the update of the ECHA Guidance on data-sharing; and to consider real industry examples of the types of itemisation and reimbursement mechanisms that are possible within existing SIEFs and consortia. In response to this request, ECHA invited the three associations to provide this input in January 2016. ECHA will then be able to use it when preparing the Guidance update that will be reviewed by a dedicated Partner Expert Group (including Industry) later in 2016. This offer was welcomed by the REACH Forum, who agreed to gather available examples for submission to ECHA. A dedicated meeting to discuss the collected input will take place on 18 January 2016. Anonymous examples and extracts will then be submitted to ECHA, jointly with Cefic and Concawe (more information: Caroline Braibant).

From 'complex' article to 'composing article': *check communication duties and REACH restriction requirements*

The 10 September 2015 judgment of the European Court of Justice (ECJ) ruled that for 'complex' products made from a number of articles, the duty to communicate about the presence of Candidate List (CL) substances applies as from the moment at which the concentration threshold of 0.1% w/w is achieved or exceeded in each component or composing article, and not in the whole, overall or entire article. Since, ECHA has been updating its relevant Guidance (in two tiers, to allow for a quick 'legal' update finalised in December, and a more in-depth improvement of the Guidance in 2016), and some Member States representatives have been discussing the possibility to develop a standardised communication format, a centralised Materials Information Platform (MIP), and a CEN standard method to measure the concentration of substances in articles. Clémence Siret (SAFT) participated in a workshop organised by ECHA and Okopol on 5 December, where the MIP was discussed; no major support was obtained for the initiative. While Eurometaux monitors the development and possible inclusion of the standardised communication format in the improvement of ECHA Guidance, companies are invited to ensure that they implement the latest/legal interpretation of the 0.1% w/w threshold both in terms of communication duties and of REACH restrictions (more information: cf. briefing note or contact Clémence Siret and Caroline Braibant).

COMMISSION REACH activities: hot topics/issues

REACH COMMITTEE

Discussion Pb SCL and Cu compounds classification at the REACH Committee: *mixed feelings*

The REACH Committee met on 10-11 December to discuss a range of topics, including the 9th ATP proposal issued by Commission. On Pb metal, it seems that the REACH Committee has moved towards some consensus with support for a split entry for the concentration limit (SCL of 0.03% for powder, GCL of 0.3% for massive, with the cut-off powder/massive defined at 1 mm). Some Member States expressed concerns with regard to the created precedent (difference according to physical form) and stressed that Annex VI entries should be based on intrinsic properties, science and the RAC Opinion rather than on policy issues.

On copper compounds, however, the Commission's proposal met with strong opposition from some Member States. Commission had proposed to proceed with the environmental classification recommended in the 2014 RAC opinions but to leave out the proposed M-factors since those require further assessment by RAC in view of new available scientific data on aquatic toxicity. The 9th ATP is now up for consultation at WTO level. ECI and the copper consortia, supported by Eurometaux, are now preparing further advocacy to be launched before the vote of the 9th ATP, scheduled for the next REACH Committee meeting on 3-4 February 2016 (more information: Caroline Braibant, Hugo Waeterschoot and Violaine Verougstraete).

OTHERS

C&L Platform pilot project: *Scope of second project open until 15 January 2016*

Following a partially successful first pilot project, ECHA and the Commission have informed Industry that they would launch a second pilot project aimed at improving the convergence of the C&L Inventory (i.e. achieving one classification entry per substance). Industry, ECHA and REACH Enforcement authorities have been invited to identify substances for the scope of this second project. Besides complying with Article 41 of CLP, there is benefit in participating in such a project for substances for which new data relevant for classification has recently become available, for substances which suffer from the misuse of the classifications reported in the Inventory, or cases under regulatory scrutiny related to classification. Ten substances have been volunteered by the molybdenum and tungsten sectors already. The Commission has extended its deadline to submit substances for the second project to 15 January 2016 (more information: Caroline Braibant).

EUROMETAUX REACH activities: hot topics/issues

REACH FORUM ACTIVITIES

Evaluation platform meeting: 15 December: *Further understanding the CoRAP process and continuous learning*

The Evaluation platform focused on a further understanding of the ACROSS selection and CoRAP processes and on the practical learning lessons from Consortia's experience with Compliance Checks, Substance Evaluations and Testing proposals. Particular emphasis was put on the outcome of the recent ECHA workshop on Substance Evaluation (searching for areas for more efficiency and efficacy of the SE programme), especially the aspects that could impact on industry (interaction and more emphasis on compliance checks the year before the SE). The outcome of recent BoA cases defining when a Substance Evaluation is preferable to a Compliance Check (CCI4 case) and what the right conditions are under which an eMS or ECHA can extend the investigated concerns under a Substance Evaluation beyond those agreed on the CoRAP also drew attention. The platform agreed in this respect to add the review of recent legal Board of Appeal or EU-General Court cases to the regular agenda of the platform. The platform further reviewed recent learning cases from MSC on Compliance Checks and Substance Evaluation of relevance for the metals sector (see MSC meeting report here above) and agreed to include them in the KnowMe database. As a last point the platform defined the dates for the next meeting as well as the main programme items for 2016. The report of the platform was circulated to the attendees and is available on request (more information: Kate Belska, Noömi Lombaert, Violaine Verougstraete and Hugo Waeterschoot).

Authorisation and Restriction platform meeting: 16 December: *focus on project status and ECHA authorisation processes*

The busy agenda of the platform provided a status update of the different authorisation processes running in parallel, the status of the activities on Applications for Authorisation (AfA) simplification and fit-for-purpose and Consortia activities to prepare/respond to public consultations on authorisation listings (RCFs, Pb compounds). Special attention was provided to the outcome and learning lessons from the Commission workshop on authorisation streamlining that was refocussed to an assessment on the pros and cons of upstream versus downstream AfAs and how upstream applications could be made more useful. The latter was stimulated by the recent large Chromates application that put challenges on the system for both industry as well as ECHA and Commission. After taking stock of most recent cases, the platform further agreed to include a legal assessment of recent BoA and EU-General Court cases relevant to Authorisations and restrictions as a regular agenda item for the platform. The platform further reviewed the status made with its 3 main projects (RMOa guidance, Recycling and authorisation and SEA and SIA capacity building (SETAP)) focusing on the next steps. While there are still some challenges to resolve, the research and development phase of the first 2 projects will close early 2016 moving them forward towards advocacy and communication with ECHA, Commission and Member States. The SETAP project will be kick-started in 2016 by an internal meeting to set up the aims of the project and establish the experts' panel. A review session will be organized to assess the effectiveness of the project-after a year of activity (more information: France Capon, Klaus Kamps, Michel Vander Straeten and Hugo Waeterschoot).

REACH Forum meeting: 17 December: *2016 Budget, Bioelution, Authorisation & Recycling, Circular Economy, and much more*

At its last 2015 meeting, the REACH Forum discussed and agreed to work on the development of a validated bioelution protocol, and on a couple of outreach events aimed at authorities in order to promote the Risk Management Option analysis Guidance and template prepared by Eurometaux, as well as to present to them the outcomes of the Authorisation & Recycling project. It was furthermore agreed to monitor and discuss the outcome of legal cases related to Evaluation or Authorisation in the respective platforms. Quick updates were given on the status of IUCLID 6, REACH-IT 3, the Implementing Regulation on Data-

Sharing, Nanomaterials, and an upcoming ECHA workshop “REACH(ing) the WSSD 2020 goals, among others. Participants were furthermore alerted on the content of the Circular Economy package released on 2 December, which will require monitoring and follow-up by REACH experts on a couple of matters. Finally, the REACH Forum consortia and associations were also asked to confirm their participation in the 2016 activities before end of January 2016. The budget 2015 overview and project status will be circulated early January, as soon as the last 2015 invoices have been processed (more information: Caroline Braibant, Ailsa Lee and Violaine Verougstraete).

Intermediates guidance: *excellent cooperation by many downstream users and timing for discussion with ECHA fixed*

As a follow-up of the workshop in July on the theme of metals and intermediates, several downstream user groups (including, frits, inorganic pigments, batteries, aluminium production, alloy manufacturing and the graphite sector) took up the challenge to develop user guidance to demonstrate the intermediate status of the SVHC substances they use in often complex materials. The downstream users agreed on a voluntary basis to forward the draft guidance texts to ECHA in preparation of a last combined review session now scheduled for 25 January. This would allow to recommend them to their sectors as a solid guidance for companies. Besides a last technical discussion, the session with ECHA would also aim for steps to formalise some of the cases through either Caracal or ECHA’s compendium of examples. Other sectors recently raised interest for the programme suggesting to repeat this exercise in the second half of 2016 (more information: Hugo Waeterschoot and Michel Vander Straeten)

Pb SCL

Preparatory call before the REACH Committee: *finalisation of the key messages*

The Pb SCL taskforce had a call on 7 December to reach agreement on a position paper that could be used in communication with Member States Competent Authorities ahead of the 10-11 December REACH Committee. One metal sector had indeed expressed strong concerns with the draft prepared by Eurometaux, which was supporting Commission’s ‘compromise’ proposal to go for a SCL of 0.03% (powders) and the GCL of 0.3% (massive), associated with a firm commitment of Commission to support the bioavailability work. The sector welcomed Commission’s support on bioelution but is concerned that there is still no clear regulatory framework to include a bioelution correction in classification and define how data will be handled. A final position paper, integrating some additional wording suggested by the sector could be circulated ahead of the REACH Committee. The challenge at this stage is to find the right balance between what has been achieved and what could still be achieved or get lost at the REACH Committee vote early February, between the impacts of the Pb concentration limits and the applications of bioelution, with most regulatory authorities keen to find a solution but not all aligned with Commission’s proposal. A careful ‘navigation’ considering all issues at stake is therefore recommended with some further actions towards ECVAM to ensure the bioelution work is launched (more information: Steve Binks, Hugo Waeterschoot and Violaine Verougstraete).

Further outreach of REACH

OECD

OECD SEA/SVHC symposium 6-8 July 2016: *exchanging experiences on SEA for chemicals management in preparation of SAICM targets*

OECD and ECHA plan to hold a joint symposium on SEA experience in July to define potential common understanding on what are best SEA techniques for chemicals management and encouraging exchange of such methods but also assessments on a global scale. As already clear in the EU, OECD believes that chemicals management will also move globally more and more in the direction of RMMs and would like to provide instruments to ensure proper assessment for such evaluations. Eurometaux was appointed by BIAC as one of the two industry representatives for the steering team of the conference. The steering team already developed an outline for the (on invitation only) workshop. Industry requested focus on SEA quality and method recommendations to prevent OECD’s efforts going into the exchange of existing SEAs on reviewed chemicals. As an alternative they suggested presenting “regional best quality/method cases” rather than promoting regional assessments being used in other jurisdictions. Industry was invited to propose high level/experienced assessors from industry to ensure a good balance at the workshop (more information: Hugo Waeterschoot).

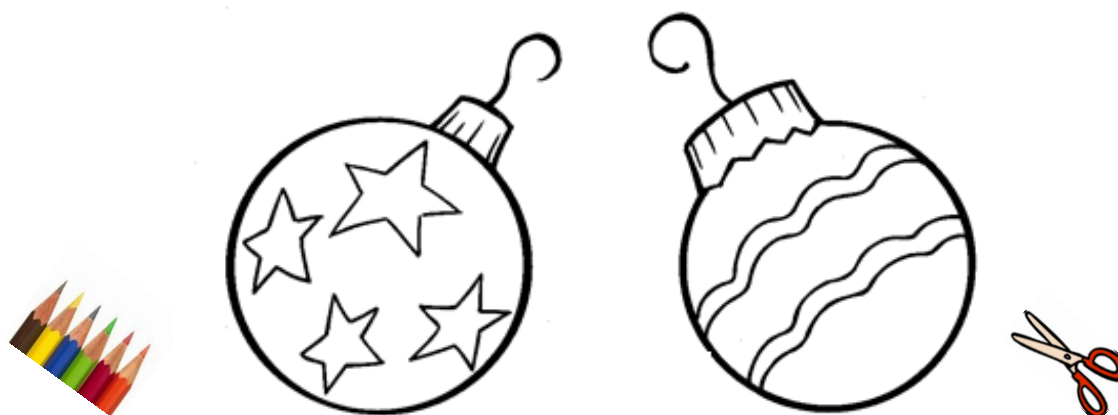
Calendar

- **11-13 January:** ICMM CMWG (Paris)
 - **18 January:** ES/CSR Roadmap Coordination Group meeting (Brussels)
 - **19 January:** Exposure Scenarios Taskforce – MCC (Brussels)
 - **20 January:** Intermediates Taskforce –MCC (Brussels)
 - **25 January:** Workshop with ECHA on Intermediate Status for SVHCs – MCC (Brussels) (on invitation only)
 - **1-5 February:** MSC 46 – ECHA (Helsinki)
 - **3-4 February:** REACH Committee
 - **8 February:** BIAC (Paris)
 - **16 February:** Bioelution workshop
 - **18-19 February:** CASG nanos
 - **29 February – 4 March:** RAC 36 A – ECHA (Helsinki)
 - **7-11 March:** RAC 36 B – ECHA (Helsinki)
 - **7-11 March:** SEAC 30 – ECHA (Helsinki)
 - **16-17 March:** REACH Committee
 - **17-18 March:** Management Board – ECHA (Helsinki)
 - **17 March:** REACH Forum – MCC (Brussels)
 - **17 March:** Authorisation & Restriction Platform – MCC (Brussels) (2hours - after the REACH Forum)
 - **18 March:** Authorisation & Restriction Platform – MCC (Brussels)
 - **19-20 April:** 4th ECHA Topical Science Workshop on OMICS in Chem. Man. – ECHA (Helsinki) (on invitation only)
 - **25-29 April:** MSC 47 – ECHA (Helsinki)
 - **10 May:** Evaluation Platform – MCC (Brussels)
 - **11 May:** Authorisation & Restriction Platform – MCC (Brussels)
 - **18 May:** MeClas Training for new EU countries – (Prague)
 - **23-27 May:** RAC 37A – ECHA (Helsinki)
 - **30 May – 3 June:** RAC 37B – ECHA (Helsinki)
 - **30 May – 3 June:** SEAC – ECHA (Helsinki)
 - **6-10 June:** SEAC – ECHA (Helsinki)
 - **6-10 June:** MSC 48 – ECHA (Helsinki)
 - **22-23 June:** Management Board – ECHA (Helsinki)
 - **23 June:** REACH Forum – MCC (Brussels)
 - **6-8 July:** ECHA-OECD symposium on cost –benefit impact assessments for chemicals management – ECHA (Helsinki)
 - **5-9 September:** RAC 38A – ECHA (Helsinki)
 - **12-16 September:** RAC 38B – ECHA (Helsinki)
 - **12-16 September:** SEAC – ECHA (Helsinki)
 - **13-15 September:** MSC 49 – ECHA (Helsinki)
 - **28-29 September:** Management Board – ECHA (Helsinki)
 - **28 September:** Authorisation & Restriction Platform – MCC (Brussels)
 - **29 September:** REACH Forum - MCC (Brussels)
 - **24-28 October:** MSC 50 – ECHA (Helsinki)
 - **16 November:** Authorisation & Restriction Platform – MCC (Brussels)
 - **17 November:** Evaluation Platform – MCC (Brussels)
 - **21-25 November:** SEAC – ECHA (Helsinki)
 - **28 November – 2 December:** SEAC – ECHA (Helsinki)
 - **28 November – 2 December:** RAC 39A – ECHA (Helsinki)
 - **7-9 December:** RAC 39B – ECHA (Helsinki)
 - **12-16 December:** MSC 51 – ECHA (Helsinki)
 - **13-14 December:** Management Board – ECHA (Helsinki)
 - **22 December:** REACH Forum - MCC (Brussels)
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Acronyms

ACROSS: Integrated Substance Screening Tool	RAC: Risk Assessment Committee
AfA: Application for Authorisation	RCF: Refractory Ceramic Fibres
AoA: Analysis of Alternative	
BIAC: Business and Industry Advisory Committee to the OECD	RMM: Risk Management Measures
BoA: Board of Appeal	RMO(a): Risk Management Options(analysis)
CEN: Centre for European Standardization	SAICM: Strategic Approach to International Chemicals Management
CHESAR: Chemical Safety Assessment and Reporting Tool	SCC: Strictly Controlled Conditions
CL: Candidate List	SCL: Specific Concentration Limit
C&L: Classification and Labelling	SCOEL: Scientific Committee on Occupational Exposure Limits
CLP: Classification, Labelling and Packaging Regulation	SE: Substance Evaluation
CoRAP: Community Action Rolling Plan	SEA: Socio-Economic Assessment
CTAC: Chromium Trioxide Authorisation Consortium	SEAC: ECHA Socio-Economic Assessment Committee
DALY: Disability-adjusted life year	SIA: Substance In Article
ECJ: European Court of Justice	SIEF: Substance Information Exchange Forum
eMS: evaluating Member State	STOT-RE: Specific Target Organ Toxicity (classification endpoint) - Repeated
EOGRTS: Extended One-Generation Reproductive Toxicity Study	SVHC: Substance of very High Concern
IUCLID: International Uniform Chemicals Information Database	SZZ: Silver Zinc Zeolite
MSC: ECHA Member States Committee	(i)UVCB: (inorganic)Unknown or Variable Composition, Complex Reaction Products and Biological Materials
OEL: Occupational Exposure Limit	WTP: Waste Treatment Plant

And now for some fun! Make your REACH tree



Name your REACH issue: for example

