



EUROMETAUX REACH PROGRAMME



Dear REACH Forum member,

Persistent sun in Brussels and the relative decrease in ECHA 'metals urgencies' must explain why I naively took up the challenge to have "cricket" as the theme for the July REACH News editorial. The enthusiasm to have additional REACH News readers would largely overcome my lack of spontaneous interest for any ball game and justify some time investment.

Indeed, being a scientist by education presents the inconvenience that before being able to express a glimpse of understanding or use terms like 'wicket maiden' or 'silly point', I need to collect enough information, grasp the rules, and make up my mind. It appeared that even the tranquillity of Normandy –despite being traditionally 'invading-invaded' by England- did not take me any further in my cricket knowledge than some ingestion of Calvados (with tea, dressed in white), rain and the quotation by Lord Mancroft "Cricket-- a game which the English, not being a spiritual people, have invented in order to give themselves some conception of eternity." Maybe an effect of the distilled apples, but I could not prevent myself to making the link with REACH. "Holy Cricket!" I think I got it after all!

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA MEETINGS

New ECHA criteria for Annex XIV prioritisation: Eurometaux submitted its views to MSC

At the last MSC meeting (June) ECHA presented its generic objectives and a couple of options to improve the prioritisation approach aiming at identifying the most urgent substances to be included in Annex XIV. ECHA invited the Member States and STO to submit their views by early July in preparation of a review workshop, which is planned for September (back-to-back with the next MSC). The workshop will identify the most relevant options and search for agreement on the new prioritisation scheme. The Eurometaux Authorisation and Restriction platform identified this review of the prioritisation scheme as a key priority to ensure more balance, given the present method focuses too much on metals and inorganics. Eurometaux managed –despite the tight deadlines- to submit a response to MSC and plans for further preparation of the ECHA workshop to promote a more balanced assessment of metals (more information: Hugo Waeterschoot and France Capon).

ECHA OTHERS

Science workshop on sediments: draft report under preparation

ECHA has prepared a first draft report on the outcome of the sediments science workshop held in May with support of the Nickel Institute and Eurometaux. This initial and extensive draft report was forwarded to the Scientific Committee for review and comments before end of July. Both Chris Schlekot and Hugo Waeterschoot are part of this group. The finalisation of the report should still take some months and will be published in the scientific literature. It will be the basis for the update of the risk assessment guidance on sediments by ECHA in 2014 (more information: Chris Schlekot and Hugo Waeterschoot).

PBT guidance update: Partner Expert Group (PEG) reviewed guidance update as proposed by ECHA, metals sections included

In follow-up of the consultation procedure, ECHA forwarded an updated version of the PBT, vPvB guidance for final review by the PEG. The metals' sector comments sent in by Eurometaux (PEG member), in particular on the definition of "organo-metallic compounds" as well as on other issues like the exemption of metals for the (temporarily) PBT-vPvB review were appropriately included in the updated version. ECHA is still updating the final sections of this guidance that should be published by end of the year. It is expected that the publication of the guidance will be complemented by a review by ECHA of industry's response to the PBT assessment registration requirements (more information: Hugo Waeterschoot).

CSR/ES roadmap published by ECHA: for a better understanding of CSRs and ES in the supply chain

ECHA published on 17 July the CSR/ES roadmap, which aims at improving the quality, understanding and use of chemical safety reports (CSRs) and the associated exposure scenarios in the supply chain by 2018. This roadmap has been developed by ECHA with EU Member States. It includes several areas of action: increase common understanding among stakeholders; improve information inputs for the chemical safety assessment; develop appropriate IT tools and standardisation; support formulators; and support end-users (more information: Guy Thiran and Violaine Verougstraete).

Commission REACH activities: hot topics/issues

REACH review: Eurometaux-Eurofer supports Commission, no need for a REACH review

Eurometaux and Eurofer drafted a position in preparation of the 27th June Stakeholder session on the REACH review, supporting Commission's view that "at this stage the REACH text does not require a legal update. Alternatively, improvements can be made through guidance and other tools and instruments". In parallel, Eurometaux made a strong plea for a balanced REACH implementation focusing more on unknown concerns rather than re-focusing on hazards and risks that are already managed. Eurometaux also asked for a more efficient use of the REACH data and assessment methods/concepts included in the Registration dossiers when data are required for other pieces of EU legislation (e.g. the environmental effects assessments under the WFD) (more information: Inneke Claes and Hugo Waeterschoot).

Ad Hoc CARACAL meeting: 2-3 July: discussion of the SVHC roadmap implementation and communication strategy

Eurometaux attended the ad hoc CARACAL meeting in Helsinki on 2-3 July. A report will be circulated soon. Highlights on the agenda were the presentations by ECHA and the Commission on the SVHC roadmap. A draft implementation plan was discussed with MSCA in closed session and will be presented for last discussion/endorsement at the next CARACAL (November). At stake for our sector are the RMO analysis and its communication modalities/transparency (more information: Inneke Claes).

European Commission consults on review of REACH Annexes for nanomaterials

The European Commission launched a public consultation on nanomaterials – potential modifications to the Annexes of REACH (http://ec.europa.eu/environment/consultations/nanomaterials_2013_en.htm). Stakeholders are invited to send feedback on the European Commission's definition of nanomaterials and on several policy options which were identified in the Nano support project managed by the Joint Research Centre (JRC) in close collaboration with ECHA: <http://ec.europa.eu/environment/chemicals/nanotech/#support>. Eurometaux is preparing input to be sent to the Commission by the deadline of 13 September (more information Inneke Claes).

EUROMETAUX REACH activities: hot topics/issues

REACH BUDGET

The mid-year budget overview has been sent to the consortia secretariats on 16 July and included, besides a summary of the function costs and expenses associated with REACH ECHA and OECD activities and projects, an overview of the different 2012 and 2013 projects. The Eurometaux REACH team will have a brainstorming session the second week of August to draft a work plan for the coming years and define the associated needs. The concerns and priorities of the different consortia are a key element in the discussion. If you have not yet shared them with Eurometaux (either at the last forum meeting or in follow-up), please do not hesitate to do so (more information: Violaine Verougstraete).

INTERMEDIATES

The meeting with ECHA to discuss the classification of UVCB REACH Intermediates initially planned for 3 July has been postponed to 3 October. It is currently being prepared and documents will be circulated soon to the Eurometaux Intermediates Taskforce before being sent to ECHA.

On 5 July, Eurometaux sent ECHA a note highlighting key information to look at when dealing with inorganic UVCB inquiries. This note was developed based on the discussion Eurometaux held in January on inorganic UVCB substance identification. The document aims at explaining the stepwise approach that metals consortia also undertake when dealing with sameness checks. To attain this scope, we provided ECHA with a decision scheme that explains how each level of information is checked and controlled to ensure sameness. Next to this, we completed the note with some relevant background and significant explanations on inorganic UVCB characteristics, in order to provide a complete picture and all necessary information to deal with complex inorganic inquiries. ECHA has just informed us that the documents are currently being analysed and we will get a reply at the end of August, after the holiday period (more information: Federica Iaccino).

AUTHORISATION

Refractory Ceramic Fibers (RCF): *public consultation on prioritisation for Authorisation*

On 10 July 2013, the European Ceramic Fibre Industry Association (ECFIA) met with representatives of RCF-using industries to examine the possible responses to the proposed prioritisation of (Zirconia-) Alumino-silicate refractory fibers. Key procedural and technico-economic arguments were developed which the various user industries may submit during the ongoing public consultation that closes on 23 September 2013. Eurometaux will send in its comments and will invite its members to participate in the consultation by supporting these arguments as well as by indicating the importance to their operations of the two fibers under consideration (more information Michel Vander Straeten).

EXPOSURE SCENARIOS

Exposure Scenarios Taskforce: *a next meeting planned*

The next meeting of the ES Taskforce has been scheduled for 23 September. Some of the items up for discussion: actions required in the context of the CSR/ES roadmap, the preparation of the next ENES workshop (do we want to present something on alloys or not?), and formatting aspects and tools (IUCLID sections 3.5-3.7), use of Chesar as recommended by some consultants etc.) (more information: Violaine Verougstraete).

REACH AND CRITICAL MATERIALS

REACH and critical raw materials: *an efficient summer brainstorming*

Early July, an ad-hoc taskforce has discussed the possible links between REACH and (being a) critical material on the Critical Raw Materials list, currently under revision. The metal commodities/consortia having metals on the CRM that are going through REACH programmes (CLH, restriction, substance evaluation, authorisation), like Be, Co, GaAs, borates have reflected together how to best bring criticality considerations in the REACH process (e.g. at the RMO stage) and which kind of data would be needed. A draft action plan has been drafted and contacts taken with ECHA to propose case studies to illustrate the links. The taskforce has also discussed on how to include a reference to regulatory burden and risk on supply/demand in the context of the CRM list. The secretariat of this taskforce is ensured by both the Sustainability and the EHS/REACH departments (more information: Annick Carpentier, Violaine Verougstraete, Hugo Waeterschoot).

METAL-SPECIFIC TOOLS AND CONCEPTS

MECLAS: *increasing interest from non-EU regulators*

In follow-up of ECHA, both OECD and Australia have demonstrated an interest to be informed on the possibilities that MECLAS could provide on the hazard identification and classification of complex inorganic mixtures. Briefing sessions were provided to the Australian government and attended in total by more than 40 federal regulators of all relevant departments. This demonstrates the interest the country has in this type of tools developed by the metals and mining sector. A briefing for the OECD will be planned. These information sessions fit within the strategy defined by the MECLAS steering team to increase regulatory buy-in and use of the MECLAS tool. A more detailed report will be provided to the MECLAS sponsors. (more information: Hugo Waeterschoot and Violaine Verougstraete).

Further outreach of REACH

OECD- UN

OECD CoCAM programme: *successful submission of Mo datasets*

Our sincere congratulations to IMOA who managed to submit early July their effects dataset to OECD CoCAM for its evaluation by OECD countries assessors. The SIDS Dossier (IUCLID i5z file), the SIAR and SIAP for molybdenum and molybdenum salts are now posted on the OECD Clearspace for electronic discussion. The documents will be further discussed at the next CoCAM meeting (CoCAM 5), which will take place in Washington on October 15-17. By doing so, IMOA illustrates their objective and willingness to make best use of the REACH generated data and their goal of 'mutual acceptance of data' status

CLP-GHS: *Eurometaux produced draft for updating the GHS guidance on the metals sections*

The agreement on the updated metals environmental classification guidance in the CLP was conditional to the update of the UN-GHS sections that formed the basis of the new chronic environmental criteria. Indeed, the specific metal sections (Annex 9 and 10) of the UN-GHS text related to the metals environmental classification strategy and the Transformation Dissolution protocol, had to be updated to be in line with the views of the metals sector as included now in the CLP. With this in mind, Eurometaux prepared an extensive revision of both sections and will consolidate support from UN countries to act as reviewer so it can be approved during the running biannual GHS update (see next point). It is expected that this version would be forwarded for UN review early August (more information: Hugo Waeterschoot).

GHS: *UN-GHS meeting took note of Eurometaux/ICMM initiative to update metals section*

Eurometaux attended the UN-GHS meeting in Geneva early July. While the "purple book" on the 5th edition was just published, the meeting reviewed the progress made with the status on the 6th biannual update of the GHS. Most sections presently under review concern physico-chemical endpoints. Of particular importance for the metals sector are the update of metals section on the Environmental classification and the Transformation dissolution protocol (see previous point) and the request for considering establishing a world-wide list of substance hazard IDs (classifications). The latter seems as an indicative guidance supported by most UN countries attending, as a way to save resources and making better use of existing evidence. Whilst the US would not block it they made it clear that they would not use it as a reference at national level (more information: Hugo Waeterschoot).

Calendar

- 3 September 2013: Brainstorming Session on Recycled substances and REACH Authorisation – MCC (Brussels)
- 4-5 September 2013: European Chemicals Policy & Risk Management – Informa (Barcelona)
- 10-13 September 2013: RAC 26 – ECHA (Helsinki)
- 11-13 September 2013: SEAC 20 – ECHA (Helsinki)
- 17 September 2013: REACH Forum – MCC (Brussels)
- 23 September 2013: Exposure Scenario Meeting – MCC (Brussels)
- 23-27 September 2013: MSC 31 – ECHA (Helsinki)
- 24 October 2013: Task Force on REACH Intermediates – MCC (Brussels)
- 12 November 2013: Authorisation & Platform Meeting – MCC (Brussels)
- 17 December 2013: REACH Forum – MCC (Brussels)

Webinars <http://echa.europa.eu/support/training-material/webinars>

- 11 September 2013: [ECHA webinar "How to bring your registration dossier in compliance with REACH - Tips and hints, part 4"](#)
-

Acronyms

CARACAL: Competent Authorities for REACH & CLP	MSCA: Member State Competent Authorities
CLH: Harmonised Classification & Labelling process	MSC: Member State Committee
CRM: Critical Raw Materials	OECD: Organisation of Economic Cooperation and Development
CoCAM: Cooperative chemicals assessment meeting	PBT: Persistent, Bio-accumulative and Toxic Chemicals
CSR: Chemical Safety Report	PEG: Partner Expert Group
ECFIA: European Ceramic Fibre Industry Association	RCF: Refractory Ceramic Fibers
ENES: Exchange Network on Exposure Scenarios	RMO : Risk Management Option analysis
ES: Exposure Scenarios	SIAP: SIDS Initial Assessment Profile (under OECD HPV Chem. Prog.)
GaAs: Gallium Arsenide	SIAR: SIDS Initial Assessment Report (under OECD HPV Chem. Prog.)
GHS: Global Harmonised System	SIDS: Screening Information Data Set (under OECD HPV Chem. Prog.)
ID: Identification	STO: Stakeholder Observer
IUCLID: International Uniform Chemicals Information Database	STOT-RE: Specific Target Organ Toxicity (classification endpoint) Repeated
JRC: Joint Research Centre	SVHC: Substance of Very High Concern
MeCLAS: Metals Classification (Tool)	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
	vPvB: Very Persistent, very Bio-accumulative chemicals

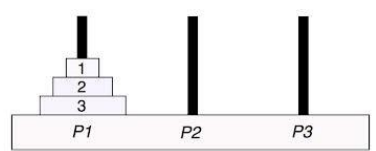
SUMMER SPECIALS

KEEP YOUR BRAINS ACTIVE DESPITE THE HEAT:

It's really hot and you have been sent to the fountain to bring back precisely 4 litres of water. You have two containers with you: one of 3 L, one of 5 L. How will you obtain 4 litres?



Hanoi tower enigma: move those three disks 1, 2 and 3 from P1 to P3 using as few moves as possible. There are two rules: you cannot move more than one disk at the time and you cannot put a larger disc on top of a smaller



Storyteller skills: best story sent in...by FI



Once upon a time, a brave **reindeer** called Rudolf was happy and delighted to be at Santas' service.

But Santa and his companions' life was about to change drastically. Finland agreed to host ECHA and that signified a hard time for Rudolf. In each and every packet Santa was making for Christmas, Rudolf had to check and double check the SVHC list and candidate substances. He badly needed to participate at the MSC, RAC and SEAC meetings. In the meantime the authorisation process was driving him mad, until the day he took part in the Authorisation and Restriction meeting at EM. In the **corridor** of the 5th floor he tasted a delicious **mignonette** and one after the other, he got a brilliant idea: he changed his identity into Dr REACH (Rudolf Emeritus **Anarchic** Chemist) and finally got the **opportunity** to follow the meetings! Needless to say, he built up a Manual of Decisions, saving messages from each mignonette package.