

EUROMETAUX REACH PROGRAMME



Dear REACH Forum Member,

Here is our second REACH Newsletter. We would like to express our thanks for all the supportive reactions we received last month, and hope to be able to continue to meet your expectations!

Several of the actions/activities mentioned below have been successful thanks to your quick input and ideas! Let's keep things like that, so that we can brave the last cold spells of this winter, whether in Brussels or Helsinki!

Enjoy the read, and have a good weekend!

Violaine Verougstraete, EHS Director Eurometaux

ECHA REACH Activities: Hot Topics

ECHA COMMITTEES

A CONSTRUCTIVE REACTION FROM ECHA AND MSC TO THE INCREASING FRUSTRATION OF THE STAKEHOLDER COMMUNITY

ECHA, and in particular the MSC, reacted constructively to the letters from Industry and NGOs requesting that more **attention be paid to STO involvement** in ECHA Committee meetings. The result was an open discussion at MSC level on how Stakeholders could contribute to the Testing Proposals and Dossier Evaluation review, for example. The comments will be taken forward to the Management Board review of STO involvement after one year of operation. The MSC also agreed to ensure that a formal STO debriefing session take place at the end of each MSC meeting (organized for the first time at MSC 22), and to involve industry and NGOs much more in the review processes.

MEMBER STATES COMMITTEE (MSC) INCREASING ACTIVITIES ON TESTING PROPOSALS REVIEW AND CONCLUDING ON CORAP

The 22nd meeting of the MSC (6-10 Feb) focused on a series of **Testing Proposals** and **Dossier Evaluation** reviews. Several important learning lessons were identified, particularly with regard to testing planning for the assessment of **reprotoxicity**. The **draft CoRAP list** was reviewed for the last time before publication, refining the objectives for review. Last year's priority setting for Annex XIV and the SVHC candidate list, together with last year's experience with Testing Proposals and Dossier Evaluations, were reviewed during a special session of MSC. Industry reiterated the importance of STO attendance and input, and confirmed this in a joint industry-STO letter to ECHA. A summary and extended minutes were circulated to the Eurometaux REACH membership on 27 February.

A CHALLENGING DISCUSSION ON THE CONCEPT OF "DEGRADATION OF METALS IN THE WATER COLUMN", FOR CLP GUIDANCE

The ECHA science unit, RAC, CLP unit and Eurometaux co-organized a **workshop session** on February 8 on the crucial concept of metals removal from the water column. This concept, equivalent to "rapid degradation" for organics, plays an important role in the CLP classification scheme for environmental endpoints and is the main outstanding issue in the "metals CLP guidance" (Annex 4). This needs to be solved, as all the Consortia and companies have to review the environmental chronic classification endpoint in 2012. Scientists' and Consortia input have helped to further the issue at technical level, but there is still significant resistance on the part of the Member States and Commission, which means that further extensive follow-up is required.

A QUICK REACTION FROM EUROMETAUX TO THE CLP INVENTORY AS PUBLISHED ON THE ECHA WEBSITE RESULTED IN SOME RECOGNITION OF THE ISSUES CREATED BY ITS PUBLICATION

The **Classification and Labelling Inventory** was made available on the ECHA website on February 13, provoking a storm of reaction from within the membership (Link : <http://echa.europa.eu/web/guest/information-on-chemicals/cl-inventory>), particularly because the “no classifications” for registered substances did not appear on the website, which generated confusion and questions from consortia and SIEF members, with concerns also being voiced from outside the EU. These concerns, together with other issues, were compiled in a letter sent out two days later with the efficient help of several members, which resulted in a response from ECHA and a clarification on the C&L website - see below:

This database contains classification and labelling information on notified and registered substances received from manufacturers and importers. It also includes the list of harmonised classifications.



Notifications and registrations which do not indicate a classification are not included in this release of the inventory (see C&L Inventory Q&A no. 2).

Further information:
[Dissemination website](#) to check if the substance is registered as non-classified.

POTENTIAL CANDIDATES FOR THE SVHC LIST: AGAIN, SOME METALS PROPOSED

ECHA has launched a **public Consultation on a new list of potential candidates for the SVHC** list, again including several metal compounds (diboron trioxide, boric oxide and an organo lead compound). The public consultation runs until April 12; further steps of the approval procedure include a first review at MSC 23 on April 26 and adoption at MSC 24 in June. In this connection, industry was asked to promote joint submissions of comments; Eurometaux will share experience in this respect with its member Consortia. Link: <http://echa.europa.eu/web/guest/proposals-to-identify-substances-of-very-high-concern>

CORAP PUBLISHED ON 29TH FEBRUARY: 4 METAL COMPOUNDS LISTED

The **first Community Rolling Action Plan**, listing more than 90 substances that will be extensively reviewed for Substances Evaluation in 2012-2014, was published on February 29; it includes 4 metal compounds (Ag, TiO₂ and SiO₂ mainly for nano reason concerns, and GaAs for CMR review and exposure considerations). Eurometaux informed the member Consortia concerned, and will provide the methodological support for the review.

Link: http://echa.europa.eu/documents/10162/17221/corap_2012_en.pdf

EUROMETAUX REACH Activities: Hot Topics/Issues

PLANNING FOR AN EXCHANGE WITH ECHA FOR AUTHORISATION APPLICATIONS

During a planning session on February 22, Eurometaux and CEFIC concordially shared input and experience to prepare a briefing and discussion session with ECHA on Authorisation applications, scheduled for March 8. The resulting agenda was presented and agreed by ECHA, enabling the Consortia involved in the various steps of the Authorisation process to request clarifications from ECHA staff *in vivo* on critical themes related to Authorisation Applications.

SHARING EXPERIENCES ON TESTING PROPOSALS SUBMITTED AS PART OF REACH REGISTRATIONS

A **first testing proposals platform meeting** on February 23, bringing together metals Consortia, consultants and Eurometaux, reviewed experience and learning lessons from ECHA-MSD activities on Testing Proposals & Dossier Evaluations, as well as testing strategies of metal Consortia. The Members agreed on the need to set up the “dos and don’ts”, and acknowledged the precedent-setting nature of several testing proposal reviews by the MSD Committee, irrespective of whether or not the substance was an inorganic. It was agreed to compile a Manual of Decisions for the metals sector based on the MSD reports and to keep each other informed on new relevant outcome and experience.

REACH FINANCING

The **REACH 2012 financing** collection exercise is now coming to an end. Thanks to the support of a number of metals, it will enable ECHA activities to be addressed more efficiently and less stressfully, and most of the prioritized projects to be carried out. Hugo Waeterschoot will start working for an equivalent of 0.75 FTE from March onwards, and the team will be joined for 0.5 FTE by Federica Laccino from ARCHE, who will focus in particular on backing up the activities of the ECHA Committees (preparing, communication with consortia) and compiling the learning lessons in an internal manual.

A meeting of the small task force held on February 13 in order to reflect on the procedures for **REACH financing beyond 2012** came up with some proposals, which are now being circulated for comments and reactions to the consortia/commodities.

Further Outreach of REACH

OECD

THE LONGER-TERM PLANNING AGENDA ON CHEMICALS MANAGEMENT OF THE OECD REVIEWED BY BIAC

Eurometaux and ICMM actively participated in the BIAC meeting of the Chemicals Management Group to prepare a vision and input for the annual OECD Joint Meeting on Chemicals, a high-level meeting of OECD member state representatives for this issue. The main item on the agenda was the “next 3-year planning of activities” for the various OECD chemicals management (CM) areas (PRTR, Exposure assessment, Effects assessment, etc.). Deeper insight into the strategy and planning of OECD CM would enable the metals sector to contribute and anticipate more efficiently before ECHA implements the OECD programme outcome for REACH and CLP purposes. A review for the membership is under preparation.

MEETING WITH OECD SECRETARIAT AROUND I-HPV SET UP FOR MAY

ICMM and Eurometaux will hold a meeting on May 3, with Anne Gourmelon from the OECD Chemicals Secretariat as a distinguished guest speaker. She will present the practical modalities for submitting the REACH metal effects files for CoCAM discussion, together with their benefits/limitations, and also answer your questions. A 2-hour session will follow, when a mapping of on-going OECD activities of relevance to metals will be presented. The aim is to identify and prioritise, based on members’ feedback, what should be followed up in 2012-2013 by ICMM and Eurometaux respectively.

ORGANISATION OF A CALL BY THE OECD EXPOSURE ASSESSMENT TASK FORCE

The aim of the call was to take stock of what remains to be done before the next task force meeting, scheduled for October 2012. Items of interest to the metals sector include SPERCs, combined exposure, occupational exposure assessment tools, and the identification of UVCBs.

Calendar

- **1 March:** Commission workshop on REACH and CLP enforcement (Brussels, attendance Joeri Leenaers (EM))
- **1 March:** Eurometaux SCC Task Force meeting
- **5-9 March:** RAC meeting (Helsinki, attendance Violaine Verougstraete (EM))
- **7 March:** Eurometaux Authorisation platform meeting
- **8 March :** Combined Industry meeting with ECHA on Authorisation applications
- **13 March:** Reach Forum meeting
- **12-16 March:** SEAC meeting (Helsinki, attendance Hugo Waeterschoot (EM))
- **28 March :** Meeting of GEHS Classification and Risk Assessment Working Groups

Acronyms

AA: Authorisation Application

BIAC: Business and Industry Advisory Committee

CLP: Classification Labelling Packaging

CMR: Carcinogen Mutagen Reprotoxicant

CoCAM: Cooperative Chemicals Assessment meeting of the OECD

CoRAP: ECHA Community Rolling Action Plan

iHPV: inorganic High Production Volume programme

NGO: Non Governmental Organisations

MSC: ECHA Member State Committee

RAC: ECHA Risk Assessment Committee

SEAC: ECHA Socio Economic Committee

SCC: Strictly Controlled Conditions

STO: Stakeholders Observers (Industry, Labour unions or NGO's)