



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

While for most of you, the Registration deadline now lies 2 years behind you, it is becoming obvious that the metals sector will remain (extensively) in the picture of REACH activities. Metals appear in the different ECHA REACH programmes and many other dossiers, such as classifications and authorizations will be discussed over the coming months.

In this context, quick, streamlined transparent communication and experience exchange is key!

At its last meeting, the REACH Forum suggested to re-activate the REACH newsletter we launched in 2011 and were unable to follow up due to the workload. We are most happy to introduce herewith the new Eurometaux REACH News whose format has been revised to make it more sustainable on a long-term basis, in spite of the pressure and workload.

Our News will be issued monthly. It will focus on the Eurometaux REACH activities and issues. Please note that it will not report on the aspects as published in the ECHA newflash. It is complementary reading! Do not hesitate to comment on the format, the structure and content of this new REACH News. Our aim is to meet your needs and present useful information in an understandable way! Help us to make it your monthly favorite!

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES - RAISING FRUSTRATIONS OF THE STAKEHOLDER COMMUNITY

Formal letters from Industry as well as a combined letter from NGO's labour representatives and industry were forwarded to ECHA to complain about the **decreased attention for STO's involvement** possibilities in the ECHA Committee meetings. The lack of feedback on closed sessions, difficulties to attend the RAC meetings and the limited consideration given to input catalyzed these combined reactions from EM, CEFIC, CONCAWE & ECETOC. ECHA management noted these concerns and explained that most of them resulted from the sharply increased workload and change in Committee heads.

A meeting alongside the next Member State Committee with all the STO will be organized to search for solutions.

INTERMEDIATES AND STRICTLY CONTROLLED CONDITIONS – EUROMETAUX UPDATED ITS EXAMPLES

Short examples highlighting the metal specificities in the design of Strictly Controlled Conditions during metals manufacturing and use were recently submitted to ECHA. These short examples are based on the detailed appendices 3 that were developed by the consortia in September 2011. The objective is to have a further discussion with ECHA on those metal specificities. ECHA is presently reviewing this submission and a quick reaction from their side is expected.

ECHA MEETINGS – WORKLOAD AND ACCESS ISSUES

The agenda and meeting file for **MSC 22** (6-10 February 2012) points to a heavy workload on Dossier evaluation and testing proposals (including a ferro-compound). It will also focus on the planning for Authorization processes. A specific session of the meeting will be devoted to the evaluation of last year's priority setting for Annex XIV and the SVHC candidate list aspects. The draft meeting agenda including Eurometaux's proposed positioning for the meeting was circulated to all members.

RAC replaced its January meeting by a Webinar. Access to the Webinar for STO was refused by ECHA despite the fact that the agenda indicated preparatory discussions for GaAs and two biocides. Interventions from the Commission allowed industry to participate under strict conditions.

AUTHORISATION – ECHA PROCESS PLANNING IN EXCHANGE WITH INDUSTRY

Eurometaux actively participated in the conclusion setting of the *ECHA-COM-industry exchange* on preparatory activities for the *Authorisation activities (28th November 2011)*. The debate included the way on how to call for public consultation on the AoA (Assessment of Alternatives) and industry information needs on the Authorisation processes and requirements. The minutes will be circulated as soon as they are finalized by ECHA

EUROMETAUX REACH activities: hot topics/issues

RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES – REQUEST FOR SUPPORT

A **REACH Financing meeting** with most Consortia/Commodities on 13 January 2012 recognized the growing REACH agenda and agreed to prepare a “combined funding package” to address the resources and project execution issue at Eurometaux level. Additionally it recommended efficiency measures and better reporting structures. A funding request in line with the conclusions of this meeting was circulated to all metal Consortia on the 27th of January 2012. A taskforce has been set up to reflect on how to further structure and finance REACH activities beyond 2012.

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS

MECLAS: Eurometaux and ARCHE conducted a review of the MECLAS needs and priorities for 2012 in preparation of a written Steering Team review process. Adapting MECLAS to the 2nd ATP, including the GHS requirements are suggested as main objectives for 2012.

RICOG: A second version of the RICOG tool is currently tested by a small number of members of the SCC taskforce. The tool will be presented at the next meeting of the SCC taskforce.

COMMUNICATION ACTIVITIES - OUTREACH AT LEAD REGISTRANTS WORKSHOP

Eurometaux prepared input for the *Lead Registrants workshop* (2nd of February 2012). The main key message is the need for LR's to recognize the complexity of metals/inorganics Risk Assessment/Risk Characterization and Exposure scenarios. Eurometaux will stress the metal specific tools it developed to help Consortia in meeting these challenges.

Further outreach of REACH

OECD

Eurometaux / ICMM prepared input on *OECD metals activities* for the BIAC (industry organisation) meetings in preparation of the OECD Joint Chemicals meeting taking place early in February.

A package to promote Consortia participation in the *OECD- Inorganics High Production Volume programme* was prepared by the OECD secretariat and circulated to the REACH Consortia members. This programme allows Consortia on a voluntary basis to allow OECD member states to review and buy-in the effects assessments prepared under REACH

Calendar

- **February:** OECD-BIAC Chemicals meeting (Paris, attendance: Hugo Waeterschoot (EM), Ben Davies (ICMM))
- **7-10 February:** OECD Chemicals Joint meeting (Paris, attendance: Ben Davies (ICMM))
- **6-10 February:** ECHA- MSC 22 (Helsinki, attendance Hugo Waeterschoot (EM))
- **23 February:** Eurometaux: Testing Proposals Platform meeting
- **24 February:** Eurometaux: Brainstorming on the HERAG non-threshold project
- **1 March:** Commission workshop on REACH and CLP enforcement (Brussels, attendance Joeri Leenaers (EM))
- **1 March:** Eurometaux SCC taskforce meeting
- **5-9 March:** RAC meeting (Helsinki, attendance Violaine Verougstraete (EM))
- **12-16 March:** SEAC meeting (Helsinki, attendance Hugo Waeterschoot (EM))
- **7 March:** Eurometaux Authorisation platform meeting