



EUROMETAUX REACH PROGRAMME

Dear REACH Forum Member,

The sun seems to have finally emerged from its winter sleep! We hope you can enjoy it! Even Helsinki manages to get a summer look with blue sky, red and white-coloured boats on a blue sea, and people enjoying the terraces.

In the ECHA premises, discussions were at least as “hot” and essential as the vitamin D. Be it on Exposure Scenarios’ communication and use, on the development of approaches for the inorganic UVCBs’ assessment and characterization, on read-across, or on authorization and evaluation; the significant input by the consortia/commodities and by the REACH staff over these last weeks allowed us to get a better grip on areas where we either need to take a step back to reflect strategically (e.g. how do we see REACH after 2013, how to make the link between risk assessment and authorization applications), or where we need to address some soft spots (SEA, combined ‘exposure’, communication). It also demonstrated – nicely - where the credibility of our sector lies. To further build on... though keeping the balance between pro-active enthusiasm and required resources!

Congrats to All of you!

Violaine Verougstraete, EHS director Eurometaux



ECHA REACH activities: hot topics

[ECHA EXCHANGE NETWORK ON EXPOSURE SCENARIOS \(ENES\) WORKSHOP \(21-22 MAY\) – HOW TO MOVE FURTHER, AND SPECIFIC ATTENTION FOR METALS AND INORGANICS](#)

The deadline for Downstream Users (DUs) to report “uncovered uses” is now over, so manufacturers and importers can fully focus on ensuring the Exposure Scenarios (ES) contain realistic risk management measures which can be met by DUs. The attention will therefore have to pass to the next level(s) in the supply chain by focusing on the compilation of ES for mixtures and further transmission of this information. Jack De Bruyn, ECHA director for risk management, reiterated the requirement for manufacturers and importers to maintain the ES up to date (including the changes of the CLP) reminding the national inspection programs about this. The 2nd ENES meeting further focused on sector specificities (e.g. metals and inorganic) ES, the compilation of realistic environmental ES and how scaling could be applied. ENES 3 is planned for November and will focus on mixture ruling, scaling and updates for smaller volumes (< 1000 tons) (*more information: Hugo Waeterschoot*).

[INORGANIC UVCB DISCUSSION – A FRAMEWORK FOR HAZARD AND RISK ASSESSMENT](#)

On May 21, a small delegation from the metals sector met ECHA representatives from the Evaluation and the Substance Identification Units, as well as ECHA’s Scientific Adviser, to discuss methodological aspects related to substance identification and assessment of UVCBs. The exploratory discussion allowed us to highlight the issues we are facing when assessing UVCBs and to have a first exchange on the possible ways to address them. An additional objective of the meeting was to explore the possibility of a technical workshop later this year, where approaches could be presented at length and in presence of the consortia experts. The discussion was open and targeted at finding pragmatic and scientific solutions. It highlighted the importance of substance identification. It is now up to the sector to contact ECHA with a proposal for a date and an outline

for such a workshop. This workshop shall cover human health and environmental risk assessment, substance identification, how to meet data needs, explanations and justification/format of reporting, weight of evidence and data access. This will be further discussed in the SCC technical taskforce meeting on June 6 (*more information: Violaine Verougstraete*).

23 MAY, ECHA STAKEHOLDERS' DAY - REACH IS IN EFFECT ONLY STARTING WITH THE SUBMISSION OF REGISTRATION – FIRST SHARED AUTHORISATION EXPERIENCE

ECHA stakeholders' day (23 May) was very much focused on the upcoming REACH registration deadline as well as on first experience exchange with the next steps of REACH. ECHA explained the importance of updating Registration files and requested due attention for the recommendations summarized in the Evaluation under REACH – Progress Report 2011. REACH starts rather than stops with the submission of the registration! The third theme of this well-attended meeting focused on “preparing for Authorisation Applications”, with ECHA and industry (Eurometaux) sharing recommendations and first experiences with the attendants. Overall, this session concluded on the very strict timing and need for experience building and data gathering to ensure a successful Authorisation Application. The experience and knowledge of Eurometaux was well recognized through the presentation and subsequent discussions (*more information: Hugo Waeterschoot*).

AUTHORISATION – ECHA PROCESS PLANNING IN EXCHANGE WITH INDUSTRY AND PREPARING THE 4TH LIST

ECHA organized a tripartite discussion (NGO's –Industry and ECHA) on the Broad Information of Uses. This critical and early step in the Authorisation Application procedure forms the principle basis for the Public Consultation on the information request on alternatives. Brigitte Amoroso and Caroline Braibant representing Eurometaux made a plea for maintaining flexibility (broad or detailed description) based on the opinion and proposal of the applicant (industry).

ECHA is presently preparing its proposal for the 4th Authorisation prioritization list, which will be reviewed at the MSC meeting in June before being posted for Public Consultation over the summer. Eurometaux closely followed the preparatory activities and informed the Consortia involved on the pre-selection. It seems that mostly remaining chromates and some organics used in degreasing agents may affect the sector again, while others like Borates, Hydrazine and Refractory Ceramic Fibers all widely used in the sector, would most probably be postponed (*more information: Hugo Waeterschoot*).

TESTING PROPOSALS - EXPERIENCE IS GROWING AND EMPHASIZED NEED FOR COMMUNICATION ON READ-ACROSS

The Eurometaux REACH team supported several metal Consortia in their response to ECHA on Testing proposals. The Read-across issue for chronic health endpoints of metal compounds of the same element (testing proposals, waiving and Read-across motivation) was extensively raised in a review session between Co and ECHA's evaluation unit. The need to organize a briefing session for Member States on the read across concepts for metals was identified as a very high priority. Eurometaux will organize this briefing session with the Consortia involved (*more information: Hugo Waeterschoot*).

EUROMETAUX REACH activities: hot topics/issues

RESOURCE MAPPING TO RESPOND TO REACH / ECHA CHALLENGES – NEED FOR A STRATEGIC REFLECTION

2013 will bring additional REACH-related challenges, stretched resources and heavy agendas. To anticipate these in due time, we would like to take the opportunity this summer to take a step back and reflect both strategically and technically on a number of challenges like e.g. prioritization for Evaluation and Authorization, the translation from a risk assessment to assessment of alternatives under authorization, involvement of DU/awareness of DUs, etc. We would all benefit from defining together common strategic goals and an overall framework, focusing, prioritizing and supporting our actions. Dates for such brainstorming sessions will be provided on June 19 but your reflections and ideas are continuously welcome (*more information: Violaine Verougstraete*).

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS – A BROADER CONSULTATION PLANNED ON SCALING

Further to the discussions around “**scaling**” that took place beginning of this year, and the numerous comments from both Member States and industry addressing this same issue in the Practical Guide for Downstream Users that will be published soon, ECHA has decided not to include the scaling section in the Guide. Instead, ECHA will address scaling (when, how, limitations) via an update of other relevant ECHA Guidance documents like the Guidance for Downstream Users. This will involve a broader consultation process, which the metals’ sector will certainly use to further defend the opportunity to adapt environmental ES to local conditions and the use of measured data. Given the time needed for the consultation and the foreseen moratorium on guidance -which will begin 6 months before the next registration- deadline, the updated guidance document will not be finalised before 1 June 2013.

ARCHE and EBRC are still actively involved in activities either assessing the linking of the metals tools (**MEASE, SPERCs**) to CHESAR or validation of the tools. These activities involve ECHA, experts from Member States and other industry sectors. The ES taskforce follows this up.

Progress has been made on ES for **waste**: standard phrases to include in your ES and a one-pager summarising where and how to report the information on waste in IUCLID, CSR, ES is available (*more information: Violaine Verougstraete*).

MULTI-METALLIC DATABASE – REQUEST FOR PARTICIPATION LAUNCHED

On May 8 the Eurometaux multi-metallic database template was circulated. REACH keeps on posing new challenges and this database will be crucial to face these and prevent additional. Discussions will take place on how to protect the data, ensure its best use and allow a legal access to it. This database should be seen as a living tool - new data can efficiently be uploaded. Ways to provide us with the data and reduce the workload for consortia were explained in the cover letter (*more information: Federica Iaccino*).

SHORT NEWS

Eurometaux participated in a discussion on a tool currently under development at IOM which aims at addressing ingestion exposure at the workplace. This tool, which will be based on modelling, lab experiments, literature data and field observations, may allow - in the future - to cover this ‘inadvertent source of exposure’ as well (*more information: Violaine Verougstraete*).

CEFIC invited both EM and CONCAWE to attend a meeting of their Evaluation taskforce where Wim De Coen, ECHA Head of Evaluation Unit III, replied to a number of questions on the Testing Proposals/Evaluation/Targeted Compliance Checks processes. Key driver in those processes is the quality of the dossiers. Wim De Coen stressed the importance to have an in-depth look at the recommendations included in the 3rd Evaluation under REACH –Progress report ECHA published end February. Headlines from the report and other useful elements from the discussion will be presented to the REACH Forum on June 19 (*more information: Violaine Verougstraete*).

ENVIRONMENTAL IMPACT ASSESSMENT WORKSHOP MAY 30 - A NEW TECHNIQUE ACTING AS A TRANSLATOR BETWEEN RC AND SEA

RIVM developed a Tiered Assessment Technique to derive Environmental Impact Assessments in such a way that they are more helpful for SEA and AoA assessment under REACH. The technique was applied to 3 pilot cases, including Zn in gutters, allowing to express the output in “% of biodiversity affected” at EU & Dutch level. The technique was debated and reviewed on May 30 with representatives of RAC, SEAC and industry, concluding that the approach provides *the potential for a translator tool between REACH registration dossier RC’s and SEA/AOA assessments* used in Restriction and Authorisation. The metals industry represented by Frank Van Assche and Hugo Waeterschoot further insisted on a level playing field comparison and inclusion of the metal specific methodological concepts agreed so far under REACH. ECHA invited RIVM to update the methodology and to present the outcomes at the upcoming RAC and SEAC meetings for more formal consideration (*more information: Frank Van Assche or Hugo Waeterschoot*).

Further outreach of REACH

OECD

On May 3, ICMM, metals consortia/commodities and Eurometaux met the OECD secretariat to discuss the CoCAM program and in particular the initiative on voluntary submission of metals REACH effects files under this program. Anne Gourmelon, OECD, provided us with very clear and detailed explanations on the practical modalities for participating in the CoCAM process. This session was followed by a brainstorming exercise with the participants: on-going OECD activities in the EHS field were briefly reviewed, their relevance and their timing compared to our agendas to prioritize input and resources. This exercise will be pursued at the next ICMM MMTWG meeting (*more information: Violaine Verougstraete*)

Events Calendar

- **1 June:** EC to release communication on REACH review
- **4-5 June:** Workshop on Substance Evaluation (CoRAP) - ECHA Helsinki
- **6-8 June:** MSC 24 - Helsinki
- **11-15 June:** RAC & SEAC - Helsinki
- **15 June:** REACH-IT/IUCLID Industry user group – Helsinki
- **17-20 June:** EUROTOX 2012 - Stockholm
- **19 June:** Eurometaux REACH Forum Meeting - MCC
- **25-29 June:** ECHA REACH Enforcement Forum – Helsinki
- **26-27-28 June:** CARACAL Meeting – Brussels
- **5-6 September:** European Chemicals Policy-REACH – Barcelona
- **24 September:** Stakeholder Event on the review of REACH
- **25-27 September:** Eurometaux B2B Autumn Meetings - Brussels
- **1-3 October:** Workshop for Authorisation Applicants– Helsinki
- **2 October:** Eurometaux REACH Forum meeting - MCC
- **3 October:** CE (DG EMPL) – ECHA Workshop Occupational Health (tbc) - Brussels
- **3-4 October:** ECHA-MSD discussion on Testing Proposal issues & Read-across WS CEFIC LRI (tbc)-Helsinki
- **19 December:** Eurometaux REACH Forum Meeting - MCC

Acronyms

AOA: Assessment of Alternatives	MMTWG: ICMM Minerals and Metals Technical Working Group
CHESAR: Chemical Safety Assessment and Reporting Tool	MSC: Member States Committee
CLP: Classification, Labelling and Packaging	RAC: Risk Assessment Committee
CoCAM: Cooperative Chemicals Assessment Meeting	RC: Risk Characterisation
CSR: Chemical Safety Report	RIVM: Rijksinstituut voor Volksgezondheid en Milieu
DU: Downstream User	SCC: Strictly Controlled Conditions
ENES: Exchange Network on Exposure Scenarios	SEA: Socio-Economic Assessment
ES: Exposure Scenario	SEAC: Socio-Economic Committee
IOM: Institute of Occupational Medicine, Edinburgh	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials