



EUROMETAUX REACH PROGRAMME

Dear REACH Forum member,

We hope you are all doing fine. One of our highlights in this last, busy month has been -without any doubt- the REACH Forum meeting on 16 October, where besides the ongoing activities and alerts on REACH & substances, we had the possibility to discuss with you the further planning and set up of the REACH activities for 2013-2014. In these tough times, when ECHA's announced activities have to be carefully balanced with budget constraints, it was a real relief to have such an open discussion with the consortia. Thanks for the support you expressed, an essential element for the REACH team!

Among some of the messages we picked up in October are, definitely the need to further assort our technical activities with political and strategic messages (e.g. by preparing a communication on Risk Management Options, analyse some of the REACH processes looking at a broader picture), the continuously growing importance of downstream users sectors and finding ways to embark them 'on board', the further credibility the metals sector has built up with authorities during the different workshops -thanks also for your input. It also remains critical to explain within industry, within your consortia, to your supply chain the added value of the work we are doing in common. We are relying on you consortia, to also relay the achievements of the EM metals family, so as to ensure further growth and representation.

Thanks as well to John for the fantastic steering of the REACH Forum boat!

Many thanks

Violaine Verougstraete, EHS director Eurometaux

ECHA REACH activities: hot topics

ECHA COMMITTEES

MSC-26, OCTOBER 22-25

FOCUS ON SVHC, CoRAP AND THE 4TH PRIORITY LIST

MSC 26 met mid-October and reviewed the status of the CoRAP (see further), the outcome of the Public consultation (PC) on the 4th priority list substances and the SVHC list. MSC concluded that the PC had not brought any new information to the table that could change the substances selected for the 4th list (including arsenic acid and several new chromium compounds). The closure deadline of the PC on the SVHC list was too close to the MSC to allow the outcome being reviewed. However, ECHA noted a series of concerns raised on the Commission proposal to list the Lead compounds without proper RMO. Moreover, ECHA indicated that the quality of the input on the Lead compounds looked very high and directly useful for checking the relevancy of RMO when posted on the candidate list or as valuable info to put the prioritisation into the context and perspective of regulatory efficiency. (More information: Hugo Waeterschoot)

CoRAP UPDATE: NEW SERIES OF METALS LISTED

MSC discussed the CoRAP update, its Community Rolling Action Plan on Substance Evaluation and released a draft of its first update including four new metal (compounds): Beryllium and Zinc phosphate for 2013 (!), Tin and Aluminium sulphate for 2015. While a generic briefing was provided at the REACH Forum, the members concerned and Consortia were briefed on how they could prepare for the Substance Evaluation, timing, process and which interaction with the reviewing member state they could plan for. It is expected that the publication of the justification/motivation letters of the Member States in February 2013 would shed more light about the underlying reasons of their selection (More information: Hugo Waeterschoot)

ECHA MEETINGS

LEAD REGISTRANTS (LR) SEMINAR: EUROMETAUX COMMUNICATED LEARNINGS FROM TESTING PROPOSAL REVIEWS AND DOSSIER EVALUATIONS

ECHA organized a second workshop for Lead Registrants on 11-12 October. Eurometaux was invited as Sectorial Stakeholder to share its views and experience concerning the Testing Proposal review and Compliance Checks under dossier evaluation. The need for close follow-up of the guidance and motivation for the Testing proposals, read across and assessment factor derivation were underlined. Alternatively the workshop allowed Eurometaux to exchange with senior ECHA staff on critical aspects like intermediates assessment, sediment assessments and other ongoing Eurometaux programmes (More information: Hugo Waeterschoot). Slide deck can be downloaded from http://echa.europa.eu/en/view-article/-/journal_content/2b6c9ef3-b8c8-4ee1-a15d-bee72a3b47ea

CHROMIUM WORKSHOP ON AUTHORISATION APPLICATIONS (AA): A LEARNING LESSON ON DU CHALLENGES WHEN PREPARING FOR AA

ECHA requested Eurometaux and CEFIC to organize a follow-up workshop to reply to the specific concerns, questions and organizational matters related to Downstream Users preparing for Authorisation Applications. This workshop will take place on 12-13 November and will focus on DU sectors for Cr6+ salts like the plating, the electronic, the aeronautic and the automotive sector, a most interesting experience for the metals sector at large. Eurometaux and CEFIC hope that this workshop will provide a learning platform for DU's and other metal sectors for future Authorisation Applications. (More information: Inneke Claes and Hugo Waeterschoot)

ECHA ACTIVITIES

NEW SOIL TESTING: METAL-SPECIFICS CONSIDERED DUE TO ACTIVE INVOLVEMENT OF THE METALS SECTOR

ECHA presented the MSC with a critical review on Testing Strategies for terrestrial effects, based on data reported in the Registration files. They proposed specific test species (plants) and how to handle the uncertainty depending on the extent of the data set (under the form of assessment factors). Eurometaux member organizations provided metal experience and Eurometaux submitted technical input to ensure existing experience on metals soil testing strategies and uncertainty management would be recognized. Recent reactions from certain Consortia confirmed that ECHA is already implementing these extended terrestrial testing packages when responding to Industry Testing Proposals. ECHA also welcomed the metals (Ni sector) initiative on improving the sediments assessment guideline for metals. ECHA defined a steering team to organize an ECHA workshop and further guidance development and invited a series of sediment experts and metal industry representatives to guide ECHA as part of the steering team. (More information: Hugo Waeterschoot and Chris Schlekot)

ECHA INTENDS TO REMOVE THE CSR TEMPLATES FROM GUIDANCE DOCUMENTS

CARACAL was consulted on ECHA's intention to remove the CSR templates from the Guidance Document on Information Requirements and Chemical Safety Assessment – Part F. ECHA argued that with the release of the latest version of CHESAR and the IUCLID plug-in to generate a CSR from CHESAR, the templates in the guidance document became obsolete and needed to be removed. Eurometaux commented that in the case of a tool like CHESAR, the guidance document should reflect that it is recommended but not mandatory to use the tool. It would therefore be useful to keep a CSR template (more elaborate than what is given in Annex I of REACH) in the guidance for the registrants who do not use CHESAR. In addition, registrants have used the "old" template to structure their CSRs in the past. The guidance should therefore reflect that these registrants complied with the guidance provided by ECHA, possibly by keeping the old template as part of the guidance (More information: Inneke Claes).

EUROMETAUX REACH activities: hot topics/issues

INFORMATION SESSION READ-ACROSS CONCEPT

On 1 October, Eurometaux organized -on request of ECHA- an information session for ECHA and Member States Committee experts on how the read-across concept has been used in metals registration dossiers; its rationale and underpinning science. This session took place in the framework of the discussions ECHA and Member States had on the RAAF (Read-Across Assessment Framework), which will be used as the basis for evaluating dossiers, testing proposals etc. The generic

introductory presentation on the metals specificities and the main components of the read-across rationale, perfectly illustrated by cases presented by the Antimony, Molybdenum, Nickel, Cobalt and Vanadium consortia triggered extremely constructive discussions and comments from the participants. Several of the comments made, constitute useful hints for further work on e.g. bio-elution. A report has been circulated to the Risk Assessment Working Group. The quality of the input of the consortia, their transparency and pro-active attitude have greatly contributed to the success of this workshop and to further build the metals' sector credibility (More information: Violaine Verougstraete and Hugo Waeterschoot).

AUTHORISATION

SVHC LISTING: COMMISSION PROVIDED AN INSIGHT ON THE FUTURE

On 4 October, Eurometaux and CEFIC met with DG ENV and ENT following the surprising proposal from the Commission to list 37 chemicals for SVHC including 21 Lead compounds. The Commission confirmed this action was just the first step in the longer strategy to list all relevant CMR's, PBT's and Equivalent Concern (including Sensitization) substances before 2020. Industry was further informed about the Road Map initiative whereby COM will define the role and function of Risk Management Option analysis for potential SVHC substances or substances on the candidate list. (More information: Hugo Waeterschoot and Violaine Verougstraete)

THE ROLE OF RMO IN THE AUTHORISATION PROCESS: THE METALS INDUSTRY DEFINES A POSITION

The recent Commission initiative confirmed the need and importance of Risk Management Options analysis. Consortia involved in (potential) SVHC substances met on 17 October defining a view on the role and timing of RMO as being most effective very early on in the process of considering Authorisation, Restriction or other Risk Management Measures. As such RMO contributes to defining the need and selecting the best RMO if needed before any SVHC work would even start. In this way RMO analysis helps drive for an efficient chemicals management regulation. RMOs conducted later in the process would lose this perspective and only provide input for a choice between Authorisation and Restriction. Eurometaux was requested to define a position paper and advocacy strategy by November 1 (More information: Violaine Verougstraete and Hugo Waeterschoot).

INTERMEDIATES AND STRICTLY CONTROLLED CONDITIONS - MEETING OF OCTOBER 12

The Taskforce on Intermediates met in October and discussed ECHA's actions challenging intermediate registrations/PROCs as well as progresses in the UVCB assessment methodology drafting. ECHA recently screened registration dossiers, using specific PROCs as filters to spot inconsistencies with intermediate and/or SCCs compliance definition, requesting for further dossier updates. The Taskforce agreed on having EM react on behalf of the NFM sector, to ensure time & consistency for submitting relevant information, before ECHA takes further legal actions. On data sharing: in order to make progress it was proposed to agree on the principle of data sharing and then identify the set of data actually needed, by preparing e.g. pilot cases. A LtU type of agreement and its clauses will follow for comments and finalisation. The part of the UVCB guidance dealing with substance identification should be finalised by end of November and used as basis for a workshop with ECHA. On risk assessment, first drafts on for the environmental and human health assessment were presented and will be further discussed in November. The Taskforce will convene again second half of November (More information: Federica Iaccino).

REACH FORUM MEETING – MEETING OF OCTOBER 16

Two key topics were discussed:

- Work plan 2013 – 2015: The strategic planning for REACH for the upcoming years and the REACH financing proposal for 2013. The support for the REACH Financing structure by the members is a positive signal to the Eurometaux President and Steering Committee
- Intermediates – UVCBs: Suggestions are under way on how to deal with the observation letters on UVCBs which registrants of intermediates under SCC received and a good start was made with a plan for data sharing

Further topics discussed include: the proposal for the updated CoRAP 2013-2015; the latest developments regarding authorisation and restriction; the joint reclassification project for the update of Annex VI of the CLP Regulation for metals; nanomaterials and the delay in the REACH Review. A detailed report of the meeting and the agreed actions table were circulated to members on 26 October 26. The next meeting of the Eurometaux REACH Forum will be held on 19 December 2012 (More information Inneke Claes).

METAL-SPECIFIC REACH APPLICATION TOOLS AND CONCEPTS - REACH METALS GATEWAY

The one-pagers developed in 2012 to explain some technical issues ahead of the REACH Forum meetings. In the Members only section - these projects have been uploaded under:

http://www.reach-metals.eu/extranet/index.php?option=com_content&task=view&id=170&Itemid=269

ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY - EUROMETAUX AND IZA MET ARCADIS IN BRAINSTORMING

SESSION

Building on the outcome of the RIVM-SEAC workshop in May (see News-flash of June) Arcadis further developed the environmental Impact assessment methodology, for RIVM. This concept aims at bridging the gap between effects/exposure assessment outcomes and SEA development by ensuring the risk characterization is expressed in a way that can be directly used for SEA purposes. The Dutch framework starts from the presumption that "biodiversity impact" is quantifiable in a reasonable standardized way for all chemicals. They therefore requested Arcadis to further explore the concept by checking the RIVM examples (including Zn). Eurometaux and IZA noted the benefits of such an approach, but indicated significant areas of methodological concern and more specifically Zn data sets that required review and update. Eurometaux presented an alternative frame that recognizes the metal specificities and needs. This concept will be further explored with GEHS and the SEA platform. (More information: Frank van Assche and Hugo Waeterschoot)

POLAND ORGANIZED SCIENCE WORKSHOP - IN PREPARATION FOR THE RE-CLASSIFICATION OF BORATES

The Polish MSCA and Toxicological society organized a science workshop on the new toxicological evidence of Borates on 9-10 October in Warsaw. Poland placed several Borates on the ROI list for a review of the hazard ID and organized this 2 day session aiming for an independent discussion on new scientific findings on Borates. The meeting was well attended by the academic science community, several RAC members, scientists from industry (incl. Eurometaux) as well as a representation of ECHA and COM, manufacturers and Downstream User representatives. Many noted this type of workshop well in advance of the Annex XV submission date, as an excellent, transparent and open communication and exchange process to improve scientific knowledge and understanding and identifying outstanding challenges in respect to the hazard review of a substance (More information: Lara Hoadley or Hugo Waeterschoot).

Further outreach of REACH

OECD

OECD EXPOSURE ASSESSMENT TASKFORCE MEETING

On 4-5 October, Eurometaux attended the OECD taskforce on Exposure assessment (TFEA) meeting in Budapest. The participants reported on a number of exposure/emissions assessment-related issues like e.g. the progress made on Emission Scenario Documents (ESD), the link between those ESD and the REACH Specific Emission Release Categories (SPERCs), the OECD Toolkit, the identification of information on use-patterns and its application for exposure assessment. Also topics like combined exposure, children's health, occupational- and dietary exposure were addressed in order to identify possible next steps for the work to be carried out by the TFEA (More information: Violaine Verougstraete).

PREPARING INPUT FOR THE OECD-JOINT CHEMICALS MEETING: PRTR and Exposure assessment and Hazard assessment task Force activity most relevant for the metals sector

In preparation the upcoming yearly OECD Chemicals Joint Meeting (comparable to the REACH COM in Europe), Eurometaux assessed the activity and multi-year planning (MYP) for 2013-'16 of the PRTR, the Hazard Assessment Task Force (HATF) and the Exposure assessment Task Force (EATF) of the OECD. The plans on the PRTR MYP include more work on metal releases from products and diffuse sources as well as assessment of WWTP's efficiencies, both playing a crucial role in EUSES and Chesar default assumptions. The terms of reference of the MYP for the HATF focused on the technical focal point function of the OECD for the UN-GHS, the further extension of the eCHEMPORTAL and UVCB substance ID issues. The EATF will act in the future as a platform for sharing, disseminating, developing and harmonizing different exposure modelling/assessment methodologies for environmental, workers or consumer exposure assessment. ECHA follows these activities closely and uses these outcomes for improving its REACH models. Eurometaux has therefore asked the other sectors to raise attention for these outsourced work packs to ensure they remain consistent with the quality and relevancy expected for REACH. (More information: Violaine Verougstraete and Hugo Waeterschoot)

Calendar

- **9 November:** Exposure Scenarios Taskforce meeting- MCC
- **12 (pm)-13 (am) November:** Chromium Workshop on Authorisation Applications – MCC
- **14-15 November:** OECD Joint Meeting –Paris
- **15 November:** Taskforce on REACH Intermediates – Subgroup on Risk Assessment - MCC
- **20 November:** CASG- Nanos Brussels
- **20-21 November:** ENES III – Brussels
- **27-29 November:** CARACAL – Brussels
- **29 November:** REACH Enforcement Forum- Helsinki
- **27 November -2 December:** RAC –Helsinki
- **3-6 December:** MSC
- **19 December:** Eurometaux REACH Forum Meeting – MCC

Acronyms

AA: Authorisation Application	NFM: Non-ferrous metals Industry
CARACAL: Competent Authorities for REACH and CLP	OECD: Organisation for Economic Cooperation and Assessment Development
CHESAR: Chemical Safety Assessment and Reporting Tool	PBT: Persistent bio accumulative toxic chemical
CMR: Substances classified as carcinogens, mutagens or toxic to reproduction	PROCs: Process Codes
CoRAP: Community Rolling Action Plan	PRTR: Product Releases Transfer Registry
COM: EU Commission	RAAF: Read-Across Assessment Framework
CSR: Chemical Safety Report	RIVM: Rijksinstituut voor Volksgezondheid en Milieu
EATF: Exposure Assessment Task Force	RMM: Risk Management Measures
ESD: Emission Scenario Documents	RMO: Risk Management Options
EUSES: European Union System for the Evaluation of Substances	ROI: Registry of Intentions
GEHS: Group on Environment & Health Sciences of Metals (EM)	SEAC: ECHA Socio-Economic Committee
HATF: Hazard Assessment Task Force	SCC: Strictly Controlled Conditions
IUCLID: International Uniform Chemicals Information Database	SPERCs: Specific Environmental Release Factors
LR: Lead Registrants	SVHC: Substance of very high concern
MSC: Member State Committee	UN-GHS:
MSCA: Member States Competent Authorities	UVCB: Unknown or Variable Composition, Complex Reaction Products and Biological Materials
MYP: Multi-year planning	WWTP: Waste Water Treatment Plant