

EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in August/September

- 23/08: Soil Sub-Group
- 31/08: Chemicals Management Steering Committee
- 04/09: Industrial Emissions Taskforce
- 18-21/09: Chemicals Management Autumn Week
- 19/09: Endocrine Disruptor Human Health Workshop
- 27/09: Risk Management Taskforce

Contents

COMMISSION.....	3
EU AGENCIES	4
EUROPEAN CHEMICALS AGENCY (ECHA).....	4
ECHA COMMITTEES	4
ECHA OTHER ACTIVITIES	4
EUROMETAUX CHEMICALS MANAGEMENT	4
CLASSIFICATION.....	4
RISK MANAGEMENT	5
INDUSTRIAL EMISSIONS.....	5
SOIL.....	6
COMMUNICATION.....	6
CALENDAR.....	7
GENERAL INFORMATION & ACRONYMS	7
CHEMICALS STRATEGY for ZENITUDE	8

Dear All,

The summer -independent of the weather conditions- allows one -once again- to spend time on activities that span all age groups and places, for example picking up shells. Walking towards a (rainy) beach in Normandy and noticing the silhouettes leaning forward, reaching out to the sand, left me wondering why we love collecting empty shells, dropped there by the water.

There is of course curiosity: a shell is a stranded animal, present at hand's reach, inviting you to understand how it functions but also where it figures in the overall evolution. But as much as there is the 'scientific approach', what will first catch your eye is most probably related to its aesthetics. The colours, the seemingly perfect shapes, the apparent softness of the nacre act as an invitation to pick up some loveliness. And younger (or less young) ones will not hesitate -as it requires only limited means- to transform it into a set that will embellish a necklace or a trinket. Presents from the sea, shells marry beauty and simplicity.

One will also refer to the feeling of admiration in front of nature's ingenuity, and its creation of the perfect spiral, which has been a source of inspiration, difficult to mimic by technology without a model. A touch of mystery, beyond the reach of humanity.

Mystery that can be tamed in some cases by rendering it symbolic, part of a religious story, as a way to touch the unknown. Think about the pilgrims' scallop shells. Claude Lévi-Strauss apparently collected shells where friction and wear have reformed the geometry, so to make its own museum of debris.

Depending on one's mood and the flow of life, you will see it as a remnant of a life once lived and as a symbol of a journey, a protective vessel to shield from danger, containing the protective energy of the ocean, displaying the imperfections of life (colours faded by the salt or cracks in the shell), adaptation to change and harsh environment.

A bit of eternity one will try to listen to by holding it close to our ear...

A way to be and remain connected, whatever way the wind and the current blow...

What about you?



Violaine Verougstraete

COMMISSION

CARACAL

The 49th meeting of the Competent Authorities for REACH and CLP (CARACAL) took place on 4 July in Brussels. Discussions on the REACH part did not take place on 5 July as initially expected, but a joint meeting of CASG-Information Requirements and Endocrine Disruptors was held in its place. This last meeting before the summer recess focused mainly on CLP-related issues, with a few Chemicals Strategy for Sustainability (CSS) initiatives updates taking place in the afternoon.

During the morning session the Commission provided a status update on the ongoing work at UN GHS level. The Commission is leading an informal working group (PHI-IWG) that is exploring the potential adoption of the new EU hazard classes into the UN GHS system. Work is now focusing on adopting a mandate for the OECD to review the science needed for classification and labelling of Endocrine Disruptors (EDs) and the 2023-2024 Workplan.

CARACAL also adopted the mandate for a sub-group CASG-Information Requirements and Endocrine Disruptors to start work on new information requirements.

Regarding the discussions for the harmonised classifications of silver and copper, EPMF and the Copper Alliance presented their arguments, to which some Member States reacted in writing and orally. The Commission will now draft the 22nd Adaptation to Technical Progress (ATP) on the basis of this input and will come back to CARACAL with a proposal in November 2023 to further discuss it. Comments in writing are welcome by 30 August to contribute to the drafting.

The day before the meeting, ECHA submitted a paper outlining its ideas to update ATP entries for metal and metalloid forms using the of Specific Surface Area (SSA) instead of the particle diameter (i.e., of 1 mm to distinguish powders from massive). The analysis done by ECHA was intended to be used as an additional element to discuss the copper entries and potentially the silver entries at CARACAL-49 and 50 but was not extensively commented on due to the narrow timeframe available for stakeholders to review the paper. A more generic discussion on applying the SSA approach to existing entries is foreseen for 2024.

The afternoon session focused on CLP/REACH joint issues, such as the presentation of the Commission's policy options for the ban on exports of hazardous substances. The proposal is expected for the beginning of 2024 and comments could be submitted [via the public consultation page](#) until 31 July. The Commission also provided two detailed presentations on the two legal proposals under One Substance, One Assessment (OSOA): (1) [Proposal for a regulation chemicals data](#), and (2) [Proposal for a regulation on reattribution of tasks to EU Agencies and cooperation among the Agencies](#). Both proposals are still being discussed by the Commission services internally and the items presented can still be subject to change. Member States reacted in support for the proposals but some raised concerns on ECHA resources in view of the expected increase in the committees' tasks.

Finally, the Commission presented some ideas on the SVHC/CLP process, which included a reflection on whether CLH and SVHC (Substances of Very High Concern) processes should be kept in parallel or rationalised (i.e., starting with CLH and following up with the SVHC process).

Comments on the topics presented and discussed can be submitted until 30 August. The next CARACAL meeting is scheduled to take place on 16-17 November. The REACH Revision proposal is still expected for Q4 2023 (more information: Ainhoa Gonzáles Pérez and Violaine Verougstraete).

CARACAL sub-group on information requirements: *comments to be sent by 30 August*

During the spring CARACAL meeting, Commission presented an overview of the planned amendments to the standard information requirements included in the REACH Annexes VII - X, with the aim to a) obtain more information on low tonnage substances and b) to require New Approach Methodology (NAM)-based information instead of animal tests where this is possible. They also proposed to delete some existing information requirements to reduce animal testing.

A CARACAL sub-group on information requirements (CASG IR) was set up to advise the Commission and ECHA on how to amend the REACH Annexes as part of the revision following the Chemicals Strategy for Sustainability. According to its mandate, the CASG-IR should in addition to its advisory role also stay aware of the activities of the CASG-ED group concerning modifications of the REACH

Annexes for information requirements on endocrine disrupting properties. The Commission will consider organising joint sub-group meetings of the CASG-IR and CASG-ED where information requirements need to be discussed that concern both groups. The text of the mandate was discussed in the CARACAL plenary meeting of 4 July and a first meeting of this sub-group was held on 5 July. Commission stressed that the proposals of changes to the REACH Information Requirements (IRs) for discussion at the meeting were those for which the internal discussions within the Commission are the most advanced. More proposals will be tabled later on.

The detailed notes of the meeting, kindly attended by Stijn Baken (Copper Alliance) and David Clerkin (Matthey) were circulated to the Registration-, the Human Health- and Environment Taskforces on 7 July with the request to check the possible implications and impacts of the proposed changes. Feedback will be compiled in comments to be submitted to CARACAL by 30 August (more information: Stijn Baken, David Clerkin, Ainhoa Gonzalez and Violaine Verougstraete).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC: new chair: call with regular stakeholders

The new RAC Chair, Roberto Scazzola, has organised a call with the regular/occasional industry stakeholders in the Risk Assessment Committee to discuss the functioning of RAC and explain the issues he plans to work on in the two coming years. For example, following the set-up of (new) Working Groups but also due to new ECHA tasks, the number of meeting days in 2023 has reached about 50 days, which raises concerns in terms of workload for ECHA's staff, but also the stakeholders whose attendance rules are strictly regulated. Still in terms of workload, the level of detail and extent of the RAC opinions will be considered. They should be fit for purpose, but some streamlining could be done. Finding RAC members is also a challenge, in particular considering the new tasks to come. Finally, the general perception of RAC is now also questioned: some stakeholders have stressed that RAC -in some cases- acts like a policy body while it should be an independent scientific committee.

The stakeholders were invited to make some proposals that could enhance the functioning of the committee. Eurometaux asked to have more flexibility in the alternates nominated in RAC (to also allow 'training and capacity building of the alternate'), to ensure RAC includes the range of expertise needed for its activities and that RAC members would be further encouraged/helped to participate in scientific activities/programmes (more information: Violaine Verougstraete).

ECHA OTHER ACTIVITIES

ECHA-Industry call: no progress made for now on Russian sanctions and updates issue

No update on the Russian sanctions topic was provided by ECHA during the monthly Industry-ECHA call on 28 July. ECHA restated that they are aware of the difficulties created. Hence, we are waiting for Commission's reply to the letter sent in June, explaining the issues and proposing some ways forward (more information: Lorenzo Zullo and Federica Iaccino).

EUROMETAUX CHEMICALS MANAGEMENT

CLASSIFICATION

Pb environmental classification: downstream sectors requesting further information on mitigation measures

The conclusion on the environmental classification of massive lead metal (as chronic category 1, M Factor 10) continues to trigger questions and concerns, mainly from downstream user sectors like recycling and

alloy sectors. Eurometaux responded to a series of questions and calls regarding possible mitigation measures that can be taken or planned for. As communicated to the membership, Eurometaux will, together with ILA, set up a Q&A but also facilitate the possibility of a Transformation Dissolution testing program to check the alloying or mixture properties, whose outcomes can be used in the MeClas tool.

A 'briefing package' will be circulated at the end of the summer allowing interested parties to plan or budget relevant actions for 2024 (more information: Steve Binks and Hugo Waeterschoot).

RISK MANAGEMENT

NeRSAP II: a most interesting exchange of experts in SEA and AoA

NeRSAP, which is an exchange network for REACH Socio-Economic Assessment (SEA) and Assessment of Alternatives (AoA) experts from authorities (ECHA, Commission, Member States), industry and consultants met for the 11th time, this time in Amsterdam and hosted by RIVM.

As NeRSAP promotes exchanges of experiences, it encourages experts to raise SEA or AoA issues for discussion, including on new concepts.

Eurometaux presented the main building blocks of the Critical Raw Materials (CRM) Act and mentioned what this could mean for metals volumes, recycling and primary material needs. Eurometaux also mentioned part of the MEED programme that focuses on regional exposures.

Commission complemented this with a presentation on the Battery Regulation, emphasising that metals risk management is part of it. Both items raised interesting discussions like how to balance longevity of materials with recycling and how strategic raw materials uses could change over time.

NeRSAP members were also informed that present estimates indicate that the additional emissions related to the new uses or increased volumes due to Green Deal applications of metals are estimated to remain minor compared to other sources.

Finally, Eurometaux announced it would co-host the next NeRSAP session in 2024, most probably in Ghent (more information: Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

Industrial Emissions Directive: Parliament adopts its position on the IED and trilogues kick-off!

On 11 July, the European Parliament voted in Plenary to adopt the ENVI Report on the Industrial Emissions Directive. The ENVI Report (MEP Radan Kanev, BG, EPP) was adopted with 396 votes in favour, 102 against and 131 abstentions.

The Report greatly improves the original Commission Proposal and tackles a number of issues, for example avoiding potential double regulation under Emissions Trading System (ETS), making Best Available Techniques-Associated Emission Limit Values (BAT-AEPLVs) and Emerging Techniques Emission Limit Values (ELVs) indicative, recognising the full range of BAT AELs when setting ELVs, and the impact of e.g., cross-media effects, it deletes a potential list of the '200 "most-polluting" installations in Europe', and notably, a large majority voted in favour of deleting the "reversal of the burden of proof", paving the way for trilogues to go in the right direction (towards the Council opinion). Hopefully, this sets a clear precedent for other environmental regulations (e.g., Ambient Air Quality Directive (AAQD), Water Framework Directive (WFD), etc.) where the same concept appears, and similar discussions are taking place. This report will constitute the official position of the Parliament during the trilogue discussions.

After the vote, rapporteur Radan Kanev (EPP, Bulgaria), said: "Better environmental protection does not need to lead to more bureaucracy. Innovation is key to achieving zero pollution and for this, we need a more competitive European industrial sector. EU policy must be realistic, economically feasible, and not threaten competitiveness. Our position provides breathing space for businesses by giving them reasonable transition periods to prepare for the new requirements, fast-track procedures for permits and flexibility to develop emerging techniques."

After the vote, the European Environmental Bureau published a press release on the Parliament Vote: stating that "Members of the European Parliament missed yet another opportunity to revolutionise industries, voting instead in favour of polluters' interests."

On 19 July, the first trilogue on the IED took place, this kick-off meeting is usually a ceremonial one without in-depth discussions. However, the message from the Council Presidency (Spain) was that the IED should be discussed mostly on a technical level. Therefore, two political trilogues are tentatively scheduled in mid-October and November, and in parallel, a series of technical meetings will take place starting early September (first one TBC, 7/8 September). These discussions will follow a cluster/topic approach (e.g., permitting, public participation, etc).

The next day (20 July), Eurometaux met with MEP Radan Kanev office (Rapporteur ENVI), his assistant Boris Gurov, together with Jana Dabbelt (Policy Advisor on Environment, Public Health and Food Safety for ENVI, EPP) to show support for their work, discuss the main areas of concern/priorities and how Industry can best support and assist them during trilogues. A number of points were discussed in depth and the channel is open for further discussions. Given the accomplishments of the ENVI Committee and the positive outcome of the Plenary vote at the European Parliament adopting the ENVI Report, it is a priority to safeguard the Parliament's position in trilogues – which is by far the most supportive of Industry.

Next steps: on 29 August the ENVI Committee will report back the Parliament on the trilogue negotiations. Technical discussions and negotiations will follow (more information: Lorenzo Marotti).

SOIL

Update: adoption of the New Soil Monitoring Law

The European Commission (EC) adopted its [proposal for a Directive of the European Parliament and of the Council on soil monitoring and resilience \(Soil Monitoring Law\)](#) beginning of the month (5/07/2023).

This adopted act is [open for feedback](#) through an open consultation on the "Have your say" portal until **27th September** (note that this date has been pushed back in the last few weeks).

This Directive aims to regulate soil health at EU level, focusing on the establishment of a monitoring framework and harmonisation for all soils across the EU, the assessment of soil health and contaminated sites, and the reduction of soil contamination to levels that are no longer considered harmful to human health and the environment, while leaving a large degree of flexibility to Member States (MSs) on how to achieve healthy soils by 2050.

The EC will have to review this Directive 6 years after its entry into force. Special attention is also given to the accessibility/transparency of all data collected through monitoring, but also on contaminated and potentially contaminated sites, to the public concerned and to the European Commission. The EC would be empowered to adopt delegated acts for most of the articles and annexes of this Directive. The monitoring framework will be defined by soil districts to be established by Member States (similar to river basins for the Water Framework Directive).

This proposal for a directive on soil monitoring and resilience will now go through the ordinary legislative procedure at the level of the European Parliament and the EU Council.

We will meet with the EM dedicated soil sub-group later this month to discuss the directive, the feedback consultations and future advocacy (more information: Lara Van de Merckt and Koen Oorts).

COMMUNICATION

Metals Academy update: survey sent to members

Due to the success of the last 2 editions -for which we thank you- and after collecting feedback from the participants, the Metals Academy concept will seemingly be evolving towards a more modular format.

The initial aims of the Metals Academy will remain the same, though: promoting networking within the membership in beautiful surroundings and providing a toolkit of information for members (of staff) in our sector of use in the day-to-day work.

The reason for this modular format would be to reach a wider audience in the sector (marketing, R&D, chemicals management, energy, etc.) and include all our members.

Therefore, to help us in our procedure and if you wish your feedback to be taken into consideration, you can fill in this Survey by the end of August: <https://www.surveymonkey.com/r/Y9MJ35Q>
The results will then be analysed to best organise the Metals Academy 3 and come up with an exciting programme for our future participants (more information: Ailsa Lee and Violaine Verougstraete).

GENERAL INFORMATION & ACRONYMS

Follow the logo and check out our Metals Gateway website.



This website is a one stop information source for regulators & risk assessors dealing with metals/metal compounds and is tailored to the specific needs of the metals industry sector.

A **continuously updated** list of acronyms is available under the Reach Metals Gateway (RMG)

CALENDAR

For meetings at Eurometaux

Most of our meetings will now be held as hybrid meetings, and **our members will be informed ahead of the meetings** (links to join will be sent ahead of the meetings).

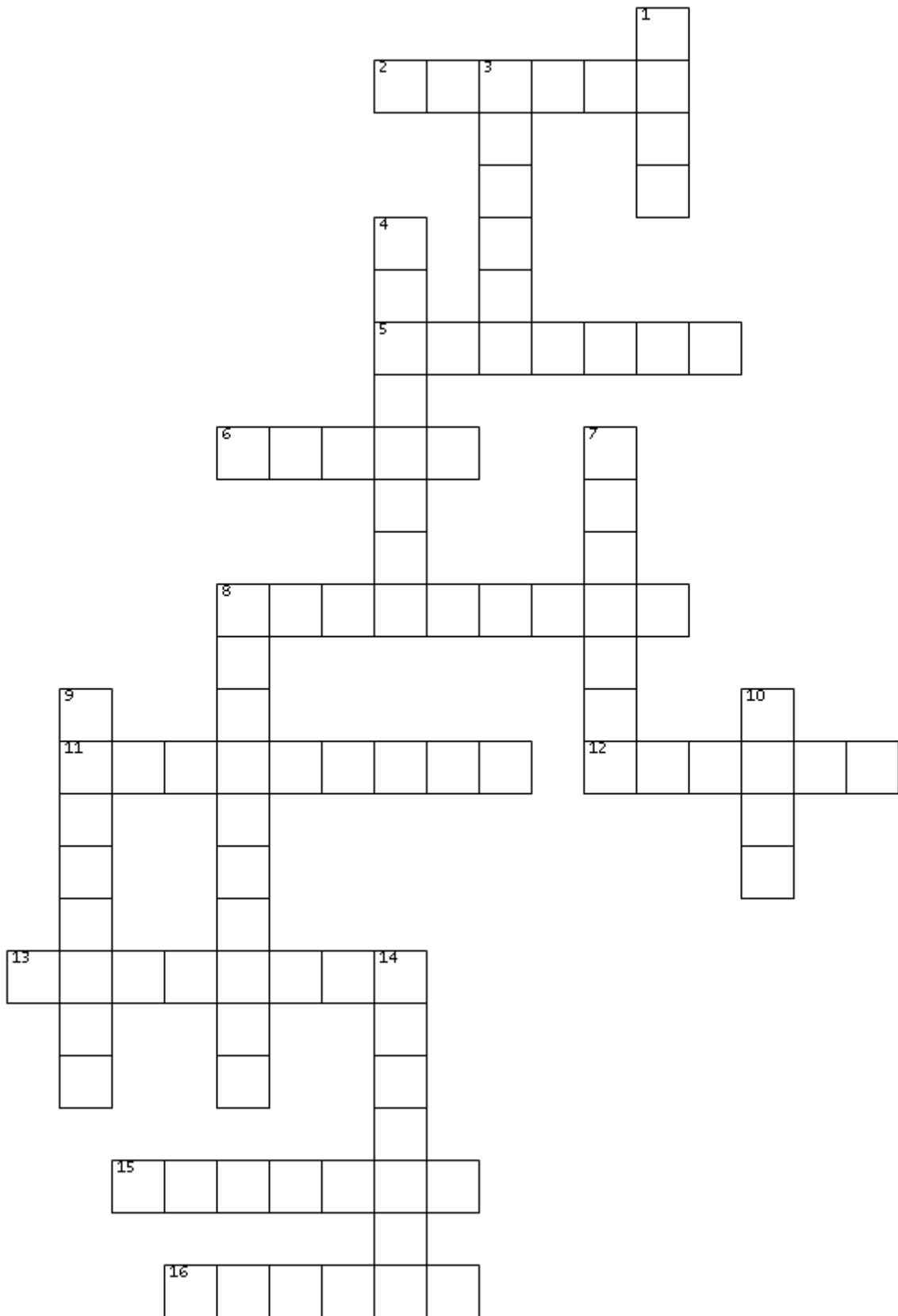
For meetings at ECHA: this information is published on ECHA's [website](#)

- 23/08: Soil Sub-Group
- 23-24/08: RAC-66 REST Working Group
- 31/08: Chemicals Management Steering Committee
- 04/09: Industrial Emissions Taskforce
- 04-08/09: SEAC-60
- 11-15/09: RAC-66 (Plenary) + SEAC-60
- 18-21/09: Chemicals Management Autumn Week
- 19/09: Endocrine Disruptor Human Health Workshop (morning during CM Week/Science Forum)
- 27/09: Risk Management Taskforce (Webinar)
- 28-29/09: ECHA Management Board
- 09-13/10: RAC-67 AfA Working Group
- 09-13/10: MSC-83 (Tentative)
- 23-27/10: RAC-67 CLH Working Group
- 07-09/11: RAC-67 REST Working Group
- 27/11 - 01/12: RAC-67 (Plenary) + SEAC-61
- 04-08/12: SEAC-61
- 14-15/12: ECHA Management Board
- 11-15/12: MSC-84 (Tentative)
- 19/12: Risk Management Taskforce
- 20/12: Chemicals Management Steering Committee

CHEMICALS STRATEGY for ZENITUDE



Game 1: Metals Crossword



ACROSS

- 2. Is named after Old Nick, a demonic spirit that lived underground
- 5. Used 30.000 years ago by melting its mineral ore into a red pigment
- 6. Compounds essential in soil for plants to grow healthily
- 8. Russian scientist at the base of it all
- 11. One aluminium can saves enough energy to run a TV for 3 hours
- 12. Named in honour of a couple of famous scientists
- 13. As strong as steel, but much lighter
- 15. (Alkali metal)so light it can float on water
- 16. Name a statue of Buddha with a thousand eyes

DOWN

- 1. Cobalt
- 3. When mixed with Zinc, used to make musical instruments
- 4. Element chemically bonded in a fixed ratio
- 7. Both metal & non-metal, with poisonous reputation
- 8. Gets its name from the Greek Word Molybdos
- 9. One of the rarest elements on earth
- 10. Essential in our diet
- 14. Element or compound bonded in an unequal ratio

Game 2: Metals Crossword

The CARACAL meeting room is full. Every regular participant (P) is accompanied by an expert (E) sitting next to him/her but not diagonally.

Place the experts knowing that two experts cannot sit next to each other even diagonally.

The values in the borders of the table (=meeting room) indicate how many experts sit in the designated row or column

	2	2	2	2	1	3	1	3
4				P				P
0	P		P	P				
4	P				P		P	
0	P							
3							P	
1		P	P					
2								P
2				P	P		P	

Game 3: Scientific/Metal Quotes – Place their author

Jane Goodall / George Carlin / Bob Marley / Kenichi Fukui
Carl Sagan / Carl Jung / Dan Gable / Maria Mitchell

1. Gold medals aren't really made of gold. There are made of sweat, determination and a hard to find alloy named guts	
2. Don't gain the world and lose your soul, wisdom is better than silver & gold	
3. The meeting of two personalities is like the contact of two chemical substances: if there is any reaction, both are transformed.	
4. What you do makes a difference, and you have to decide what kind of difference you want to make."	
5. We especially need imagination in science. It is not all mathematics, nor all logic, but it is somewhat beauty and poetry.	
6. Test of Metal: Will of Iron, Nerves of Steel, Heart of Gold, B... 😊 of Brass.	
7. Chlorine is a deadly poison gas employed on European battlefields in World War I. Sodium is a corrosive metal which burns upon contact with water. Together they make a placid and unpoisonous material, table salt. Why each of these substances has the properties it does is a subject called chemistry.	
8. Chemistry itself knows altogether too well that - given the real fear that the scarcity of global resources and energy might threaten the unity of mankind - chemistry is in a position to make a contribution towards securing a true peace on earth.	

Game 1: Metals Crossword
Across: 2/ Nickel, 5/ Mercury, 6/ Boron, 8/ Mendeleev, 11/ Recycling, 12/ Curium, 13/ Titanium, 15/ Lithium, 16/ Golden
Down: 1/ Blue, 3/ Copper, 4/ Compound, 7/ Arsenic, 8/ Molybdenum, 9/ Francium, 10/ Zinc, 14/ Mixture
Game 3: Scientific Quotes
 1: Dan Gable / 2: Bob Marley / 3: Carl Jung / 4: Jane Goodall / 5: Maria Mitchell / 6: George Carlin / 7: Carl Sagan / 8: Kenichi Fukui