



EUROMETAUX CHEMICALS MANAGEMENT NEWS



No Eurometaux meetings in May, so please join us in June:

- 18/06: Risk Management Taskforce
- 24-25/06: NeRSAP
- 27/06: Chemicals Management Steering Committee

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Dear All,

“Sweet and sour” is a generic term encompassing many styles of sauce, cuisine, and cooking methods. It has a long history in China but also apparently in England, with recipes for sweet and sour meat and fish seen in a 1390 cookery book. I discovered that in Italy, a traditional sweet and sour sauce is named ‘agrodolce’, made by reducing sour and sweet elements, with sometimes, additional flavourings that are added, such as wine, fruit, or even chocolate.

A good description of my April agenda I thought, while I was reviewing it to prepare this News issue.

The sour note that dominated this month is the end of the Metals Release Test Guideline drafting at OECD, which was decided by the leads of the project, after exhausting all imaginable ways to overcome some egos and individual drivers. The cessation of the project was formalised in a meeting that I was able to attend and where I tried to keep ‘bella figura’ by all means...Because the floor was given to the countries that had teared down the project and my replies had to remain technical and “well behaved”, despite the range of feelings (disenchantment, resentment, sadness, anger etc.) I was experiencing.

I thought about all the ‘tricks’ I have alluded to in this same editorial over the years: wearing heels and something other than my eternal jeans, shining with metal jewels to illustrate the risk vs. hazard paradigm, actively applying some communication tricks to appear to be listening empathically, focusing on the positive (not the least, the immense value of the involved Nipera, Commission and EURL ECVAM colleagues), extirpate my crystal ball to finally understand the others’ (real) agendas, but also visualising the country representatives spilling their morning cereals on the ground, prescribing crazy Placebos for suffering bad faith, and finally imagining that the moment was only the dramatic peak of a fairy tale that would in any case end well thanks to Prince(ss) Charming!

Not that all this changed the outcome, but I left the meeting with my head held up high.

But enough of the “sour”, because the rest of April added a variety of flavours and sweet notes to this HCl pH 1,5 (dis)solution.

To mention for example, the trip to Helsinki with the consortia/associations to meet with ECHA Directors (the fun to be together elsewhere!), the first ECaBaM workshop (see descriptions below for these two items) and the third edition of the Metals Academy.

The motivation of the Metals Academy participants in particular, their enthusiasm to meet each other and to leave their comfort zone, but also the visible willingness to learn, the respectful atmosphere, acted as strong reconciliating agents with the cooking. All elements that added flavour and demonstrated that any cuisine always has more up its sleeve than a single dish!

Shakespeare said it before, right? Let me embrace thee, sour adversity, for wise men say it is the wisest course (Henry VI, Part III, Act III, sc. 1).

So, now, that the appetite is back, it just needs a way to (once again) find amateurs for the “metal” gastronomy.

Violaine Verougstraete

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-69: CLH Working Group: *talc and lung overload*

The RAC Working Group on harmonised classifications met on 23-24 April. Talc was on the agenda, for a discussion on carcinogenicity and STOT-RE effects following inhalation. The Dossier Submitter's proposal is STOT RE 1, H372 and Carc 2, H351. The discussions on talc are directly relevant for the inorganic sector at large as aspects like lung overload, impaired clearance at doses exceeding the Maximum Tolerated Dose (MTD), tumour relevance, reversibility of effects play a central role in the discussion.

Industry's position as submitted to the Public Consultation is that unspecific lung particle overload is responsible for the observed effects in the lungs, that rats are particularly sensitive to overload and that the observed tumours are not relevant for humans. RAC discussed the overload concept, considering the publications by Morrow (1988, 1992) and Oberdorster (1995), and also presented a summary of existing human studies. A key question is whether a STOT-RE 1 classification is not sufficiently protective for the lung effects and if it requires a second entry as carcinogen Cat 2.

This will be further debated by RAC in Plenary early June and at the next RAC CLH Working group meeting early July (together with the possibility of ovarian cancer). A debate to monitor (more information: Roger Doome, Hugo Waeterschoot and Violaine Verougstraete).

SEAC: *ECHA-SEAC secretariat reviewing submitted info on a potential restriction on CrVI use*

ECHA's call for evidence that aimed at collecting information to help define the scope of a potential restriction on some CrVI compounds uses lasted until early February. More than 500 submissions to ECHA's website were uploaded, many by industry. The final aim of the restriction would be to replace the present authorisation scheme by a restriction to manage the risks at the workplace and following the environmental releases, at EU level. ECHA is presently scanning the received information with the aim to present, after summer, a document suggesting the best scope and potential options for the restriction. Eurometaux had an informal meeting with the team, stressing that workers control could best be assured under Occupational Safety Health (OSH) and that there does not seem to be robust evidence for an environmental EU-wide concern. ECHA explained that while they received lots of information regarding plating on metal, the information about plating on plastic was limited. Moreover, they got some indications that this was more and more outsourced by Original Equipment Manufacturers (OEMs) to non-EU countries for cost reasons (more information: Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

ECHA's Strategic Statement: *discussion with consortia/associations/Eurometaux on long-term vision for chemicals management*

On 10 April, in the margins of the Helsinki Chemicals Forum event, Eurometaux and several metal associations met with Ofelia Bercaru and Peter Van der Zandt, Directors of Hazard and Risk Management at the European Chemicals Agency (ECHA), to discuss ECHA's and the metal sector's longer-term strategy on chemicals management. ECHA presented its recently published [Strategic Statement 2024-2028](#). Eurometaux reported on the outcomes and recommendations of the Denton's strategic survey - to which ECHA had participated- making concrete proposals on how these would be taken forward in a long-term vision for the association. Consortia and associations present highlighted their key challenges and planned actions for the coming years. The exchange was appreciated by all participants and a report was circulated to the Chemicals Management Steering Committee on 19 April (more information: Violaine Verougstraete).

EUROMETAUX CHEMICALS MANAGEMENT

Human Health Taskforce: *status update on HeTAP projects, OEL tool, Bioelution etc.*

The Taskforce was invited for a very dense call on 29 April, to get a status update on a series of projects. The participants were first informed about the latest activities on the 'particles/PSLT issue' and on the dermal exposure database set up by BAuA, RIVM, EM and EBRC. The aim of this database is to collect dermal exposure data and to make data available for research projects and model developments. Both activities are covered by a HeTAP budget.

On Endocrine Disruptors (Human Health), some key messages were provided to follow-up and complement the presentations made during the Science Forum meeting of 21 March. Among these messages: start planning the work (e.g., identify consultants, review existing data from reprotox and repeated dose studies for indications of hormonal effects, screen published literature etc.) as the timeline is tight. It is proposed to share experiences on ED-HH assessments over the coming year via the HH Taskforce but also to have a workshop on the learnings in 2025.

An important item for discussion was the "carcinogenic potency guidance". In follow-up of the work done by the ECHA Carc. Expert Group, Commission has appointed **FoBIG** to further provide scientific background information and analysis for setting specific concentration limits for carcinogenicity by comparing the T25 methodology with the Benchmark Dose (BMD) modelling one, using the databases developed by the Expert Group, and to propose possible options for setting Specific Concentration Limits (SCLs) for carcinogens in general, and the validity of the proposed methods with applicability domain and on different types of cases. Comments on the draft final report can be submitted until 8 May. One important issue for metals is that the project was not able to provide clear methodology/clearcut criteria for site of contact carcinogens. The outcomes of this report shall be further discussed and commented on as metals appear -partly due to some of the limitations of the methodology- as highly potent, which may have consequences on some Generic Concentration Limits.

Metal release is referred to in the metals section of the updated OECD Guidance 194 on the Grouping of Chemicals draft, but on the other hand, at the level of the OECD Testing Guidelines Group (WNT), the Commission and EURL ECVAM have decided to withdraw the draft Test Guideline (TG) project. While a lot of information and data have been generated over the last years in the context of the OECD discussions, the possible finalisation of the TG is opposed by two countries (Canada and UK). Despite many exchanges and repeated attempts, it does not seem that the group will be capable of finding a path forward that could result in unanimous approval of this draft TG -condition for its adoption. Possible reactions and way forwards were evoked.

Finally, EBRC gave a live presentation of a possible OEL multi-metallic compliance cost tool.

The slide deck included some further slides on the status of the EWA-Eurofer and EM welding paper for information. The draft minutes will be circulated next week. Learning lesson: 2 hours are really too short considering the range of human health issues we have. A longer meeting will be organised this summer (more information: Kate Heim, Ruth Danzeisen, Daniel Vetter and Violaine Verougstraete).

BATTERIES

Exchange & Capacity-building Group on Battery Materials project (ECaBaM): *first workshop.*

The Batteries Regulation states that the European Chemicals Agency (ECHA) must define a list of chemicals of concern used in batteries and their manufacturing and develop restrictions upon the European Commission's demand. As Eurometaux, we have set up a capacity-building programme to facilitate the contact between the industry sector and ECHA to ensure that they have the necessary knowledge and network for the completion of the allocated task(s).

The 2023 Batteries Regulation Article 6(5) states that the European Commission, assisted by ECHA, should prepare a report on substances of concern (SoCs) in batteries and submit it to the European Parliament and Council by 31 December 2027. The report shall cover substances present in batteries or used in their manufacturing and contain considerations on follow-up measures, including restrictions.

ECHA will define the list of chemicals of concern used in batteries and their manufacturing, along a 2- step study: i) mapping of substances and processes, investigation on use in batteries of Hg, Cr (VI), Cd, Pb (already restricted for some batteries); ii) compilation of the list of substances of concern and prioritisation delivered to the Commission.

The first workshop, in the context of the ECaBaM programme, was held on 16-17 April 2024. It aimed at bringing together ECHA, Commission and industry representatives to define the relevant necessary information and to share the related expertise and experience on materials and regulatory processes. It was a first occasion to get to know each other and set the basis for future co-operation as well as to discuss a draft questionnaire prepared by Ramboll for the phase 1 of the study (mapping).

The attendance was limited to technical experts working on the batteries in scope (e.g., metal associations providing materials for those, battery manufacturers and recyclers). This to keep a level playing field for the companies and avoid conflicts of interest. However, a debrief call for a larger audience was set up on 22 April to explain the key outcomes of the workshop. A comprehensive report of the workshop will also be shared with participants and other members expressing interest.

As next steps, Eurometaux will circulate an updated questionnaire by Ramboll to collect all information needed to conclude the mapping and organise a next workshop in the autumn, to discuss the outcomes of the information gathering, among others (more information: Ainhoa González Pérez, Hugo Waeterschoot and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Commission: publishes the Essential Use Concept Communication document

On 23 April, the European Commission published the Communication document ‘Guiding criteria and principles for the essential use concept in EU legislation dealing with chemicals’.

In this much-awaited document, the Commission clarifies that the overall aim of the essential use concept is to facilitate decision-making and increase regulatory efficiency to achieve a fast phase-out of the most harmful substances in non-essential uses, while allowing uses still essential for society and continued availability of products serving human and animal health needs. Hence, they provide more certainty that substances otherwise targeted for phase-out can continue to be used to fulfil societal needs, until alternatives are available, with conditions to minimise the risk. It is key to understand that this is considered from the societal point of view.

This Communication is not legally binding. The implementation of the concept will not apply until it is introduced in various legislations, including the REACH revision and other sector-specific legislations, which will further define how the concept will apply for specific cases (more information: Ainhoa González Pérez, Simon Cook, Hugo Waeterschoot).

European Parliament: adopts CLP Revision

The provisional agreement resulting from interinstitutional negotiations on the revised CLP was adopted by the ENVI Committee on 11 January and by the European Parliament’s last Plenary session on 23 April 2024. Coreper endorsed the agreement on 22 December 2023 and the file will now have to be formally adopted by a Council configuration to be finalised.

The adopted text is not available yet, but it is not expected to differ from the provisional agreement, which conferred new powers for the Commission (in addition to Member States and industry) to identify hazardous substances and make the necessary CLH proposals. As regards substances with more-than-one constituent (MOCs), the deal includes a 5-year derogation for MOCs extracted from plants or plant parts and tasks the Commission to present a scientific report regarding their classification within the five years following the entry into force of the regulation. The agreement also enshrined the need for clear scientific reasoning for the grouping of substances for harmonised classification and labelling and included measures to ease access to information on chemical hazards and simplify labelling rules, it sets minimum dimensions in millimetres of labels, pictograms and font size found on packaging. It also introduces rules on voluntary digital labelling, as well as bans on the use of ‘Green Claims’ for substances or mixtures classified as hazardous (more information: Ainhoa González Pérez and Violaine Verougstraete).

CSS: Transition Pathway for the Metals Industry

The third meeting of the sub-group of the High-Level Expert Group on Energy Intensive Industries (EIIs), established by the Commission to facilitate discussion on the pathway amongst a range of stakeholders, took place on 25 April. In the meeting, drafts of two sections of the Transition Pathway (TP) were discussed: building blocks (BBs) on Sustainable Competitiveness, and on Infrastructure. The BB on Sustainable Competitiveness is a key one, as it contains all topics relating to energy, climate, and trade (amongst others). These drafts were shared with the Commission well in advance of the meeting and forwarded to the participants by DG GROW with no edits or changes. Eurometaux and Eurofer made a second request to the

Commission for an early discussion on implementation of the metals TP (also covering Key Performance Indicators (KPIs)) and this was accepted for this meeting (after being refused in December).

In the sub-group meeting, all stakeholders had the opportunity to give verbal feedback on the drafts, and written feedback can also be submitted as follow up. There was some useful and constructive verbal input and feedback. However, input from the Member States was again lacking, and input from Commission DGs other than DG GROW was limited and was given via the DG GROW representatives. The relevance of greater circularity in improving the long term competitiveness of the sector was raised – this topic is covered in a different building block which was shared with the group immediately after the meeting (Access to Primary and Secondary Raw Materials). Discussions on Implementation and KPIs were useful in guiding the drafting, and there was a valuable contribution on learnings for both from the DG GROW unit that owns the Transition Pathway for the Chemical Industry.

The next meeting of the sub-group is expected to be towards the end of May. The drafting of the transition pathway is nearing completion, in collaboration with Eurofer (more information: Simon Cook).

ZERO POLLUTION ACTION PLAN

ZPAP: Platform meeting

On 18 April, Eurometaux attended the 6th Zero Pollution Stakeholders Platform Meeting at the Committee of the Regions. The meeting focused on the 8th Environment Action Programme (EAP) and its mid-term review and progress towards its implementation, focusing on the Zero Pollution Action Plan.

Other relevant topics discussed were the implementation of the Zero Pollution Stakeholder Platform (ZPSP), the European Circular Economy Stakeholder Platform (ECESP) and its better integration/possible synergies with the ZPSP (more information: Lara Van de Merckt and Lorenzo Marotti).

RISK MANAGEMENT

Industry Risk Management Option (RMO) guidance: the update to include criticality section is progressing well

Michel Vander Straeten developed some years ago an industry guidance to support a Risk Management Options analysis, with a double aim: a) exploring the best risk management options to anticipate regulatory actions and b) defining what generic information may be lacking to be prepared for the different risk management options. The Risk Management Taskforce had tasked Eurometaux to update this guidance (available on the [REACH Metals Gateway](#)) with a module on the criticality of metals. The aim was to expand the “3Cs” (chemicals management, circularity and climate) included in the present guidance to a “4Cs” concept (+ criticality). While the concept is broader, this would allow to emphasise in the guidance how to consider the objectives of the Critical Raw Materials Act and Strategic Autonomy to define the most suitable Risk Management Option (RMO).

The Taskforce agreed during its last meeting (February) to develop the 4th C as a self-standing add-on, to be conducted after the best options were selected from a 3Cs perspective. Eurometaux and the co-chairs received a pre-draft of the proposal and commented on it. The proposal was also peer-reviewed by another consultancy. The aim is to circulate a proposal mid-May to the Taskforce in preparation of the next meeting (18 June 2024) (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

Industrial Emissions: Taskforce Meeting

On 8 April, Eurometaux attended the Industrial Emissions Alliance (IEA) Plenary Meeting. The discussions and the exchanges with the other industrial associations focused mainly on the results and outcomes of the Commission/UBA Workshop on the updated IED, and on strategies in preparation for the next IED Article 13 Forum. An update on the status of the BREFs currently undergoing review was provided by the responsible associations' industry experts.

On 10 April, Eurometaux held its Industrial Emissions Taskforce Meeting to discuss in-depth the latest developments and finalisation of the IED review process (e.g., the outcome of the European Parliament plenary vote, the Council adoption of the compromise text, etc.), including its timelines. An overview of the main changes of the IED adopted text was provided. Eurometaux also reported on its exchanges with the Joint Research Centre (JRC) and the input provided in the context of the launch of INCITE (Innovation

Centre for Industrial Transformation and Emissions). Other topics discussed included the UBA/Commission Workshop on the new IED & BREF Process and, a recap on the LVIC BREF activities (more information: Lorenzo Marotti).

Industrial Emissions Directive: *Article 13 Forum Meeting*

On 29 and 30 April, Eurometaux participated in the Article 13 Forum meeting at the European Commission. The Forum provided its opinion on the final draft BAT Reference Document for the Smitheries and Foundries Industry (SF BREF). Comments and feedback were discussed during the meeting.

Following this, the Commission and the JRC provided an overview of the main changes in the new industrial emissions directive and how this will affect the process. The main findings and action points agreed on during the aforementioned Commission/UBA workshop on the evolution of the Sevilla process were presented by Germany (the workshop host MS) and discussed. On the second day of the Article 13 Forum, discussions focused on the INCITE, the new working programme for the exchange of information under the IED and the results of the study on the prioritisation for the chemicals BREFs series review. More detailed information was shared with the Industrial Emissions Taskforce (more information: Lorenzo Marotti).

LVIC: *status update*

The data collection for the Large Volume Inorganic Chemicals (LVIC) BREF is approaching its deadline. The final submission of completed and quality-checked questionnaires and associated documents is 3 May 2024. The EIPPCB was consulted by some delegations to provide clarification and suggestions on how to fill-in specific sections of the questionnaire. Eurometaux members were supported in the exercise of filling in the questionnaires, and it seems, according to the preliminary feedback received that the data collection seems to be progressing quite smoothly.

For the bulk information collection, some preliminary contributions for the drawing-up of the new LVIC BREF were provided. However, at this moment limited inputs were uploaded on BATIS. As up-to-date bulk information will be of outmost importance for advancing in the developing of the descriptive chapters of the BREF, the EIPPCB extended the possibility to submit contributions until 31 May 2024 (previously, end of March). Before the deadline, a document with the contributions of Eurometaux's members regarding the descriptive part of the sulphuric acid process will be published online on BATIS.

Any additional information/contributions are welcome even before this deadline. In addition to that, Eurometaux is working on analysing and collecting information on a new candidate BAT proposal from Member States for H₂SO₄ production.

Workshop on 'EU Hydrogen production'

The European Commission's Joint Research Centre (JRC) targeted consultation on "Hydrogen production by water electrolysis – Information on key potential environmental aspects" is almost ready to be launched. This survey aims to address hydrogen production projects, including plant/installation size, technology maturity and potential key environmental aspects (e.g., water and energy consumption, energy source, etc.), as well as current challenges that operators with experience in scaling-up such projects might encounter. An invitation to contribute to the survey will be sent to the TWG shortly. As the survey is open access, the invitation message can be forwarded to those who wish to provide any relevant input. The information collected and its major findings will be part of the discussion during the first workshop on 'EU Hydrogen production', planned by the end of 2024 (TBD) (more information: Eleonora Tosi, Lighea Speziale, Lorenzo Ceccherini, Lorenzo Marotti).

AIR

Update: *new Ambient Air Quality Directive endorsed by the European Parliament*

On 24 April, the European Parliament Voted in Plenary to adopt the compromise agreement on the Ambient Air Quality Directive (AAQD). The new rules set stricter 2030 limits and target values for pollutants with a severe impact on human health: particulate matter (PM_{2.5}, PM₁₀), NO₂ (nitrogen dioxide), and SO₂ (sulphur dioxide). Member States may request that the 2030 deadline be postponed by up to 10 years, if specific conditions are met. If the new national rules are violated, those affected by air pollution will be able to take legal action, and citizens may receive compensation if their health has been damaged as a result of such violations. More air quality sampling points will be set up in cities, with increased attention towards monitoring and modelling and for data to be clear and publicly available.

Next steps

The compromise agreement has now also to be adopted by Council, before being published in the EU Official Journal and entering into force 20 days later. EU countries will then have two years to apply the new rules (more information: Lorenzo Marotti).

WATER

Updates

1/ Update on the revision of the Water Framework Directive (WFD)

This dossier is subject to the ordinary legislative procedure (OLP). The EU Parliament has already voted on its opinion in September 2023. The file is still being worked on at the level of the EU Council, with very few meetings (once a month since the BE Presidency took over) of the Working Party on the Environment (WPE). From the information we have gathered, it appears that :

- Most of Articles 16 & 17 have been reintroduced.
- The replacement of OLP by Delegated Acts for the prioritisation process should be dropped for most processes.
- The non-deterioration, one out all out principle and Article 4.7 of the WFD (not part of the original proposal from the EU Commission) is a point of discussion at the WPE.
- The General Approach is not expected before October 2024 (therefore trilogues would probably take place early 2025).
- This file is still a medium/low priority at the moment (much more focus on the Soil Monitoring Directive).

2/ Next SCG & WG chemicals meetings

The next Strategic Coordination Group (SCG) meeting will be held in hybrid mode on 23 May and the next Chemicals Working Group meeting will be held online on 16 May.

3/ Next Water Taskforce meeting

More information and discussion on the WFD, the non-deterioration principle, future advocacy and Effect Based Methods (EBMs) for metals will be on the menu at our next Water Taskforce meeting on 20 June from 13:00, please join us for this last "hourra" before the summer 😊 (more information: Lara Van de Merckt)

SOIL

Updates

1/ The EU parliament

The European Parliament voted its [opinion](#) on the European Commission's [proposal](#) for a new soil monitoring law in Plenary on 10 April (full voting results can be found [here](#)). The vote was 336 in favour, 242 against and 33 abstentions. Members of Parliament (MEPs) are generally supportive of the ambition to achieve healthy soils and to establish a harmonised soil monitoring framework across the EU. The assessment of soil health is rather left to the national authorities of the Member States, using soil descriptors that best illustrate the soil characteristics of each soil type at national level. The EP proposes a five-level classification to assess soil health (high, good, moderate ecological status, degraded and critically degraded soils). Soils with either good or high ecological status would be considered healthy. The European Parliament's opinion is rather patchy, with amendments that could contradict each other. Soil health is to be left to Member States (MS), but some amendments call for the EU Commission to establish a Watch List and a priority substances list with EU-wide environmental quality standards (EQS) for soil (just as there are for the Water Framework Directive).

Further analysis is needed to understand how the assessment of the ecological status of soils will be carried out in practice and where the concentration of metals in these soils will be addressed.

2/ EU Council

This file has been discussed extensively in the EU Council during several Environment Working Party (WPE) meetings held per month under the BE Presidency. According to the information we have gathered, the 'main' work on this file is considered to be over and the general approach is expected for the Environment Council meeting scheduled for 17 June.

It seems that the text being prepared by the Belgian Presidency focuses very much on having a monitoring law, leaving the rest (health assessment) to the Member States, taking into account the natural/anthropogenic background for metals and changing the method for assessing metal concentrations in soil to the one most commonly used in the EU (i.e., *aqua regia* method instead of the one proposed by the EC using diluted nitric acid).

The trilogues are expected to take place in the autumn, once the new Parliament is in place (more information: Lara Van de Merckt).

METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

MEED Workshop: Progress reporting on test program and Ecorelevance project

A MEED program progress webinar was organised for the MEED sponsors on the 19th of April. ARCHE/University of Ghent updated the attendees on the outcome of the algae and daphnia metals-metals testing program and the ongoing work on the metals organic testing program. The outcome of the test work that complements the literature review conducted last year, so far confirms the conclusion drawn from the literature work namely that the concentration addition model is conservative for mixtures combined toxicity on metals expressed by a positive Mixture Interaction Factor (MIF). This means that the combined effect do not seem to indicate synergism, but more an independent toxicity mode of action. This is an important conclusion to develop as an alternative to the scheduled introduction of the MAF default value. The sponsors were also informed of the financial results of the MEED program in 2024 and the budget situation for 2024 and 2025. Invoices for the 2024 participation will be send in May (more information: Marnix Vangheluwe, Violaine Verougstraete, Diana Dobre and Hugo Waeterschoot).

MEED: Ecorelevance Project and VLAIO funding request – U Gent

The Ecorelevance project is a key project under MEED aiming for the development of a users' toolbox to determine the additional impact of metals emissions on biodiversity and ecosystem functioning, both at the local and regional scale. The draft toolbox was finalised covering 3 tier levels including DNA barcoding to identify the local biodiversity.

The University of Ghent (UG) presented suggested sites in Flanders for the pilot check of the toolbox and invited companies to cooperate (post meeting info: a visit was organised on 22 April and received good support from the local Aurubis, Nyrstar and Umicore sites selected for the pilot). The sampling was launched, and the outcome and interpretation of the data analysis would be available in Q4. ARCHE and UG have also prepared a project proposal to receive financial support for the VLAIO project by the Flemish government given its innovative nature and potential for widespread use by the metal sector. If accepted this would allow to support further validation work. The submission proposal was submitted end of April and the final decision on this is expected within 2-3 months (more information: Marnix Vangheluwe, Violaine Verougstraete, Diana Dobre and Hugo Waeterschoot).

MEED: preparing for the SETAC Europe meeting

Presenting the stepwise progress made with the MEED program to the scientific community, is a clear objective of MEED. The SETAC Europe meeting each year gives us such an opportunity given it allows for good discussion on the mixtures theme and is attended by a very wide audience of researchers but also scientific institutes advising authorities and authorities including ECHA and the Commission.

To further publicise the MEED project, we have prepared 5 posters and a presentation covering both the mixtures part of the research program as well as the exposure part, which includes the outcome of the Sewage Treatment Plant (STP) program.

Parallel briefing and exchange sessions with ECHA and a Japanese governmental agency are also scheduled (more information: Marnix Vangheluwe, Violaine Verougstraete, Diana Dobre and Hugo Waeterschoot).

OUTREACH

OECD

Metal release at OECD: project stopped at OECD WNT level

The Commission, actively supported by EURL ECVAM industry, had, in 2018, taken the lead on an OECD project aiming at drafting a Test Guideline for the determination of *relative* metal release in a simple simulated gastric fluid at pH 1.5. Regulatory applications are the support of grouping and read-across of effects via the oral route and the assessment of the presence of matrix effects in metal containing materials that would increase or decrease relative release of the metal ions (CLP, GHS but also possibly waste classification). The method proposed by the Commission has been under discussion with authorities since 2016 during which time it was reviewed and scrutinised by -among others- ECHA's bioelution expert group, EURL ECVAM, PARERE and ESAC and is based on the 'bioelution test' that was developed by industry. Progress has been made on the project since 2020 (which corresponds to its inclusion in the OECD Working Group of the National Coordinators of the Test Guidelines Programme (WNT) program), with several commenting rounds and meetings, including very interesting testing work on the effect of particle size on metal release. Unfortunately, in June/July 2022, a new round of comments was raised by Canada that questioned many aspects of the protocol already discussed and resolved previously. Canada raised aspects regarding the validation of applicability domain, the adequacy of the acidic content in assay, excessive sample loading and missing validation data. Several bilateral discussions have been held with Canada hoping to find a way forward, but the proposed solutions were never accepted by Canada.

Finally, earlier this year, Canada and the UK sent a new series of requests. As the leads of the project felt that these requests were unjustified and would negate the purpose and usefulness of the TG, it was agreed to withdraw the TG from the WNT program. Solutions are currently being sought for to make the best use of the data and science that have been produced over these last years. We would like to thank our EURL ECVAM and Commission colleagues for the huge efforts they made to make it happen (more information: Adriana Oller, Kate Heim and Violaine Verougstraete).

OTHERS

Toxic-Free Forum: organised by NGOs

On 10 April, a group of NGOs held the first Towards Toxic Free forum: "Together for zero pollution". Participants included civil society, industry and political decision-makers with the objective to "lay the foundations for a zero-pollution generation".

The sessions focused on the Sound Management of Chemicals and Waste, on Prevention of Pollution and Health, and what still needs to be done to achieve zero pollution. During the event, the European Environmental Bureau (EEB) and Hazardous Waste Europe (HWE) presented [a joint statement](#) that defended that the transition to a toxic-free economy requires multi-stakeholder partnerships to minimise the industry's environmental impacts whilst ensuring its development, job creation and sustainable competitiveness.

During the event Aurel Ciobanu Dordea, Director in the Commission's DG Environment, provided some useful insights into the current sustainability/competitiveness debate. He claimed that we have lost the political steam for an ambitious REACH and that we need to reflect on the lessons learnt from policymaking - to better deal with labels, alarm bells, reactions, sequencing, as well as pedagogy with external stakeholders. The next college of Commissioners will decide whether there will be a REACH revision and its scope, so it will be important to hear calls from industry for a REACH revision.

Strategic autonomy and reindustrialisation now occupy the minds of many. It is in the interest of the business environment to support continuity of the Green Deal beyond the remit of this mandate of the Commission and Parliament since businesses need stability and have already adapted their investments. In order to reap the benefits from these efforts, this logic needs to continue, and we will need to pay attention on how we implement regulations. The next mandate will have less regulatory interventions but there will be a lot to do in operational terms. **We have an opportunity to marry competitiveness with sustainability** with the change in morphology of the regulatory measures - with end of life to lifecycle in batteries, automotive, textiles - and ESPR being the main illustration of this. This will be a major framework allowing them to combine and embed sustainability requirements in the product requirements (more information: Ainhoa González Pérez).

Helsinki Chemicals Forum 10-11 April: *several interesting panels*

The Helsinki Chemicals Forum (HCF) is a long-standing initiative aiming to facilitate discussions between regulators, industry and NGOs on key topics related to chemicals management. Since the end of Covid, it has been organised as a 2-year cycle, alternating between being held one year in Asia (2023) and the next in Helsinki (2024). Eurometaux is, as Cefic and DUCC, part of the organising committee with authorities and NGOs.

Besides the panel discussions, the HCF is a good networking opportunity. The participation was good this year even though Member States representatives mostly attended remotely.

The opening speeches of this HCF were ensured by Kirstin Schreiber (Director DG GROW) and Sharon Mc Guinness (ECHA Executive Director). Kirstin Schreiber emphasised among others, the need for a pragmatic implementation of the future new REACH requirements, recognising that more balance will be required between the environmental objectives and the competitiveness of the EU industry, to prevent outsourcing the risk. Sharon McGuinness informed the participants on the updated ECHA mission and vision (see ECHA's Strategic Statement 2024-2028) and the timeline for ECHA's new tasks (e.g., WFD, RoHS, ELV etc.)

Two of the five panels were very relevant for the metals sector: the panel on the Transition Pathways where Simon Cook (Eurometaux) presented the metals TP, highlighting the learnings from previous TPs, including the need for KPIs to measure progress. The Cefic presentation on the TP for chemicals made it clear that the follow-up (implementation) of the TP allows for good progress but requires resources from industry (as for the planning phase).

The second panel that triggered specific attention related to the potential benefit of financial instruments in managing risks of hazardous chemicals. It provided interesting proposals that could reduce the red tape and administration of risk management implementation by using financial instruments. The panels can be viewed on the HCF website [Helsinki Chemicals Forum 2024 | Ilmo \(messukeskus.com\)](https://helsinkichemicalsforum.com) (more information: Simon Cook, Violaine Verougstraete and Lorenzo Marotti and Hugo Waeterschoot).

COMMUNICATION

Metals Academy: *successful 3rd edition*

Aging like good wine, the Metals Academy seems to get better every year!

Once again, starting with a dinner and a most enjoyable introductory evening on 23 April until Friday 26 April, the Metals Academy proved to be very interesting for all participants, both the newcomers and those who had attended 2 or even all 3 of the previous ones.

For the first 2 days, aimed at “Responsible Sourcing & Due Diligence” on day 1 and “A decarbonised non-ferrous metals industry” on day 2; all participants were reunited in one group to listen to most interesting & thought-provoking presentations given by the numerous speakers, be they newcomers (Ilse Schoeters (Glencore), Jomme Desair (INBO), Caroline Ciuciu (Consultant), Bart Blanpain (KU Leuven), Jan Mertens (Engie), Nicholas Agon (Umicore), or returning ones such as Staf Laget (Organising Committee), Mark Mistry (Nickel Institute/Organising Committee), Howard Winbow (IZA), Hugo Waeterschoot (EM) and Sabina Grund (IZA).

And on the last day, in the morning participants were able to follow one of the three modules of their choice: i) Communication & Advocacy with Heinrich Pecina (WKO) and Annalisa Bortoluzzi (Consulting & Change); ii) Future Applications of non-ferrous metals with Mark Mistry and Christian Hagelüken (Metals Industry Expert); and iii) Allocation and recycling in Lifecycle Assessment with Staf Laget, Benedetta Nucci (EA), Johannes Drielsma (Drielsma Consulting) and Lígia da Silva Lima (University Ghent/Arche Consulting); and in the afternoon Guy Thiran delivered a conclusions speech and handed out the much awaited certificates.

And it was not all focused on academic learnings, we all shared plenty of fun, energetic, delicious and restful moments, ideal for being introduced to the new people and getting to know each other more deeply in the beautiful and apt surroundings of La Grande Abbaye de La Ramée.



So once again, we warmly thank all of you who help create the fantastic momentum of the Academy and we hope to be able to organise a 4th edition next year based on the outcome of the conclusion session and more specific requests & ideas that we are always pleased to receive (more information: Ailsa Lee and Violaine Verougstraete).

CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for Q2 & Q3 2024.

For meetings at Eurometaux: most of our meetings will 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](#)

- 05-09/05: [SETAC 2024](#)
- 07-08/05: RAC-69 AfA Working Group
- 16/05: [IUCLID updated with new CLP hazard classes - webinar](#)
- 21-22/05 RAC-69 DWD Working Group
- 27-28/05: RAC-69 REST Working Group
- 03-07/06: RAC-69 Plenary
- 03-07/06: SEAC-63
- 10-14/06: SEAC-63
- 10 -14/06: MSC-86 (TBC)
- 18-19/06: ECHA MB-74
- 18/06: Risk Management Taskforce
- 24-25/06: NeRSAP
- 27/06: Chemicals Management Steering Committee
- 01-02/07: CARACAL
- 01-03/07: RAC-70 CLH Working Group
- 04-05/07: RAC-70 AfA Working Group
- 04/09: Chemicals Management Steering Committee
- 09-10/09: RAC-70 REST Working Group
- 9-13/09: SEAC-64
- 16-20/09: SEAC-64
- 16-20/09: RAC-70 Plenary
- 24-25/09: RAC-71 DWD Working Group
- 26-27/09: ECHA MB-75

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)