

# EUROMETAUX CHEMICALS MANAGEMENT NEWS



Enjoy the summer & then please join us in September:

- **03 September: Registration Compliance Taskforce**
- **04 September: Chemicals Management Steering Committee**
- **24 or 25 September: Risk Management Taskforce webinar session on substitution options**
- **30 September-02 October: Chemicals Management Autumn Week**  
(30/09-1/10 am: Regulatory Forum, 1/10 pm-2/10 : Science Forum)

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*Dear All,*

*He could have waited for a romantic sunset, a moment when there would have been just the two of them looking at the sea, with the kids sleeping in the background, an instant of peace and ease. Achieving the perfect setting for a marriage proposal, with 2 glasses of bubbles popping up at the right moment. The scene would look like something out of a movie and be easy to post and disclose.*

*But instead, he buried the engagement ring in the sand, too late in the day as the weather was turning grim and the children were tired, and hence needed encouraging to dig into the sand in a last effort to reveal the treasure to his partner/their mother.*

*While the proposal did not come as a surprise to me, its story moved me.*

*Because these days, it can be challenging to imagine and create your own story. Already, a lot has been said, set and arranged, thus one might want to go for easier, predefined solutions. Because you might need some inspiration to reveal beauty under a cloudy sky, since it is not always obvious anymore how to pose our own steps, not necessarily tailored to fit in existing schemes. Because keeping a story's authenticity and experiencing happy airiness may require quite a lot of agility and willingness to believe in its worth.*

*This last thought popped up again whilst I was admiring the lightshow and fireworks that traditionally end Belgium's national day (21 July). This year, before the fireworks started to colour the sky, drones played the prima ballerinas in an ode to the country highlighting the 'all together' motto (which is not a luxury after the last elections!). Their dance was captured by thousands of phones raised simultaneously in the air.*

*However, the music supporting this show left me somewhat perplex. They had selected a song by Mylene Farmer that says: "Everything is chaos, next to (me). All my ideals: words, damaged...I'm looking for a soul, who can help me. I am of a disenchanted generation, disenchanted".*

*Really, ...for a national day, when you are (trying to) bring all these people together to sell them the asset of a united (and functioning) country?*

*So I looked around and to be honest, the people did not seem to care about the possible mismatch between the lyrics and the messages in the sky. But admittedly they didn't seem surprised either by/or even notice the much bigger drones that were carefully observing our movements or by the extensive security system that was limiting the walking possibilities, or even by the fact that so many of them were not really looking at the magic, but were too busy capturing the same images at the same time, ... to be posted?*

*I wondered: did they ever feel reckless, hopeful, free to trace their own way or was the song a good reflection of their state of mind?*

*And if it is the latter, how to bring back enchantment? Would it not be an urgency to ensure, besides defence, security, competitiveness, prosperity, that we bring back inspiration and imagination? Would inspiration to dare do things differently, would associating images to imagination not help in avoiding that the world would become only pure and flat visibility, disappointingly predictable? Should we not set up ministries and guidelines for the imagination, which would not propose long action plans, but rather tools and playing fields, enough time and good companions, to become (once again) familiarised with enchantment & beauty?*

*Wishing you an excellent summer full of loveliness...and inspiration,*

*Violaine Verougstraete*



# COMMISSION

## *CARACAL-52: light agenda focusing on REACH & CLP*

The 52<sup>nd</sup> meeting of the Competent Authorities for REACH and CLP (CARACAL) took place on 1-2 July. This meeting had a light agenda and focused on both REACH and CLP related issues.

Competent Authorities endorsed the updated Restrictions Roadmap, discussed on the status of recovered aggregates from construction and demolition waste under REACH (to be continued in November), and debated on the review and future of the Integrated Regulatory Strategy (IRS) and Joint Evaluation Action Plan (JEAP). With respect to the update of the CLP guidance, the Commission presented its progress and announced the opening of the consultation of the draft for CARACAL members (for Endocrine Disruptors until 18 August), followed by an agreement (Q3 2024).

With regards to the joint REACH and CLP issues, the Commission presented how it intends to proceed to deal with the interlinkages between ESPR (Ecodesign for Sustainable Products Regulation) and chemicals legislation, with stakeholders broadly supporting having it as a recurrent agenda point in CARACAL with ad hoc meetings to discuss specific issues that arise. Participants also agreed on the suitability to establish a CARACAL sub-group on Test Methods. Finally, the Commission explained how its work on the Roadmap towards phasing out animal testing will proceed, with a call for evidence expected soon and a workshop planned for 25 October 2024.

Comments on the topics presented and discussed can be submitted until 04 September, except for the ED guidance (for reminder deadline 18 August).

The next CARACAL meeting is scheduled to take place on 20 - 21 November 2024 (more information: Ainhoa González Pérez).

## **REACH in the new Commission**

Ursula Von der Leyen has been re-elected with a strong majority as President of the European Commission for a second term. Ahead of the vote, she presented her political priorities for the next five years, with a stronger focus on competitiveness, simplification and increased investments and less emphasis on environmental legislation.

These guidelines are not an exhaustive work programme but aim to steer the common work. The proposals made include: a new Clean Industrial Deal in the first 100 days of the mandate, a European Competitiveness Fund for investments in strategic technologies, a new Circular Economy Act, to support the creation of a market demand for secondary materials, **and a new chemicals industry package, aiming to simplify REACH and provide clarity on “forever chemicals”, or PFAS. This key proposal has not been further clarified and there are no details available on what it would entail.**

The Member State heads of state or government are now in the process of putting forward their candidates for European Commissioner posts. The Parliament will then organise nominee hearings in the relevant committees in September/October, and the full college of Commissioners then needs to be endorsed by Parliament around October. Each Commissioner will get a more specific mandate from the President through the “mission letters” (more information: Ainhoa Gonzalez Perez).

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# EU AGENCIES

## EUROPEAN CHEMICALS AGENCY (ECHA)

### ECHA COMMITTEES

#### **RAC-70: CLH Working Group**

The RAC Working Group meeting of 1-3 July aimed at discussing in depth some harmonised classification dossiers to come up with recommendations for discussion (and most probably endorsement) at the RAC Plenary meeting. Of direct relevance to the sector: the debates on silver nitrate and on talc. Starting with the latter, RAC reviewed the available data on ovarian cancer in humans. In June, RAC had already agreed to propose a classification as STOT-RE 1 (lungs, inhalation) and agreed, regarding carcinogenicity, that there was only limited evidence for lung tumours in female rats but also that data on pheochromocytomas should not be used as supporting evidence. The Working Group evaluated the existing case-control and cohort studies as well as meta-analyses. RAC considered that the meta-analyses consistently demonstrate a moderate and statistically significant positive association of perineal talc use and risk of ovarian cancer with some additional evidence for dose-response. The data on the mode of action, as well as the Bradford-Hill criteria to support the causality of the association were subsequently discussed. RAC acknowledged that epidemiological studies cannot firmly establish causality, that limited data is available clearly demonstrating dose-response and temporality and, furthermore, that specificity remains uncertain to some limited extent. They will propose the findings as limited evidence for the carcinogenic potential of talc after perineal use. Industry made several very good interventions, highlighting the limitations of some of the data but also proposing to consider the inflammation of the ovarian tissue as target effect under STOT-RE.

Regarding silver nitrate, RAC discussed the physico-chemical properties, the environmental classification and toxicokinetics/read-across. Regarding the environment, RAC will propose in September that silver nitrate does not meet the criteria for bioaccumulation, is not rapidly transformed to non-bioavailable forms and is to be classified as Aq. Acute 1 (M-factor 1000) and Aq. Chron 1 (M-factor 100). These latter conclusions are in line with the EPMF self-classification. For grouping and read-across, there was a consensus that grouping and read-across between soluble silver compounds was justified. The Rapporteurs will now work on the human health endpoints over summer (more information: Roger Doome, Jelle Mertens and Violaine Verougstraete).

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## EUROMETAUX CHEMICALS MANAGEMENT

### CHEMICALS STRATEGY FOR SUSTAINABILITY

#### **CSS: Transition Pathway for the Metals Industry**

The fourth 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. Drafts of two sections of the TP (Transition Pathway) were discussed: building blocks (BBs) on Investments & Funding, and on Regulation & Public Governance. The latter covers EU policy on chemicals management and how it relates to metals. These drafts were shared with the Commission in advance and forwarded to the participants by DG GROW with no edits or changes. Content sections on Implementation and Key Performance Indicators (KPIs) were also discussed.

All stakeholders had the opportunity to give verbal feedback on the drafts, and written feedback can also be submitted as follow up. Participation was a little lower than the previous meeting in April, probably due to the July timing. Again, there was some useful and constructive feedback from the group on the content produced (mainly from the trade unions), but input from the Member States was completely lacking. DG GROW (and echoed by others) commented on the high quality of the draft text to date and the good job on these 2 BBs and the sections on Implementation and KPIs. The main learning for Eurometaux was that

messages on the importance and relevance of chemicals policy to metals are still not being received and understood by the Commission DGs, including DG GROW.

The sub-group is a formal Commission group established in August 2023 with a one-year mandate. The group will most likely not meet again. The next steps foreseen by the Commission for completing the drafting process are:

- Consolidated draft of all BBs including stakeholder comments – by 19<sup>th</sup> July
- Consultation with sub-group on consolidated draft – ending 30<sup>th</sup> August
- Presentation of draft TP to Industry Forum – in early September
- COM interservice consultation...
- Publication of TP by Commission - late October/early November

(more information: Simon Cook).

### ***Impact assessment of increased use of metals in supply chains critical for the Green deal: TNO coming close to the delivery of the report***

The Transition Pathway refers to the ongoing TNO study as a key tool to demonstrate the (hopefully lack of) impact of the significantly increased use of metals due to the Green Deal uses in sectors like energy storage, windmills, electronics, ... . TNO is close to finishing its independent report whereby it assessed the impact of scheduled new activities and metals volume increases on the main water basins in the EU for 5 indicator metals. In addition, the estimated increases are compared to the existing regional backgrounds and compared to main other source contributions (e.g., agriculture, fossil fuel use, ...). Eurometaux hopes that this cornerstone study will respond to and put an end to the concerns expressed by policy makers and society, on the important potential metal emission contribution resulting from the Green Deal. The draft report expresses the view of TNO and is presently undergoing internal quality verification before it is presented to the contributing metals. The final report is expected for Eurometaux's General Assembly that will take place on 23 October (more information: Simon Cook or Hugo Waeterschoot).

## **RISK MANAGEMENT**

### ***DG GROW released tender covering 3 key studies on Substituting Chemicals: a key interest by the metals sector***

DG GROW progressed with a key action point listed in the CSS roadmap: establishing a Substitution Centre. In order to stimulate and coordinate substitution activity for key hazardous chemicals, the EU authorities have been exploring how a future Substitution Centre can contribute actively to this. In order to define the modalities of such a centre, the Commission released a Tender ([EU Funding & Tenders Portal \(europa.eu\)](#)) covering several lots including the modalities for such a substitution centre, and 3 pilot studies, including one on the substitution of PFAS in batteries and one on CrVI in hard chrome plating.

Eurometaux believes that having such a centre makes sense if it is focussed on identifying and assessing the technical feasibility, hence preventing any policy bias, and if a “safer chemicals approach” (comparing hazards and exposures of alternatives) are part of it. The study -once granted later this year- will run for 30 months and impact the REACH 2.0 but also other chemicals and product legislation like RoHS, ELV, ... The Risk Management Taskforce will include this DG GROW project on its agenda at its next meeting (more information: Kamila Slupek or Hugo Waeterschoot).

### ***PFAS discussion: seems to be everywhere including uses in the metals and mining sectors***

In last month's Chemicals Management News, we reported on the outcome of the ECHA SEAC and RAC discussions on the restriction of PFAS use in the metals manufacturing sector. This discussion demonstrated that PFAS is not only included in materials we use, but also that the sector uses PFAS compounds in electrolysis baths or formulations. ECHA has now confirmed that the next sector to be reviewed for its PFAS use will be the mining sector. Hence, Eurometaux contacted Euromines ensuring representation at the ECHA meetings in September and foreseeing training on how to raise their interest in the best way. While the EU Universal-PFAS restriction is driven by the 5 countries who submitted it, the Commission is contributing in parallel with its tender on the Substitution project (see above) including checking for an approach to substitute the use of PFAS in batteries, if feasible.



Lastly, we received the confirmation that the use of PFAS in materials (piping, valves that are widely used in the sector), the electronics and the energy sector will be scheduled for the first part of 2025.

A metals capacity building workshop will be held on 13 November aiming at learning from the sectors that have been reviewed and helping other metal sectors in building their case to justify derogations when relevant. In practice, PFAS will be on our agenda for quite some time (more information: Violaine Verougstraete and Hugo Waeterschoot).

### **OECD progressing with its definition of Safer Substitution: *the metals sector providing active input***

Two years ago, the OECD produced a milestone report defining “the safer substitution concept”. Contrary to the EU REACH system, it promoted comparative risk assessment (including attention for hazard and risks of the substance of concern and its substitute). The Nickel Institute and Eurometaux were instrumental in this. The OECD is presently progressing by further reviewing what additional/other factors could play a key role ‘beyond safety’. The OECD has aspects like climate, circularity, longevity management, essentiality, ... in mind and based on this is putting together an international workshop program for the end of September in Paris. Eurometaux is invited to present its integrated Risk Management Option framework that covers risk control, based on a balanced view on the 4Cs (Chemicals safety, Climate, Circularity and Criticality). Given these assessments are based on a lifecycle approach, one of the concerns relates to the **risk control of restricted/banned/legacy substances in waste and recycling**. The focus of several countries is therefore on the “risks of exposure associated with waste and recycling” (e.g., plastics recycling) so a rather “negative angle” lacking a favourable view on recycling.

Eurometaux is evaluating on how to balance this with “a positive case/perspective related to recycling” for example on *how metals recycling process can manage and risk control on unwanted restricted or legacy hazardous substances* like PCBs, Dioxins or PFAS compounds. Hence, besides recycling valuable materials, we contribute already to the cleaning/elimination of such legacy materials (more information: Hugo Waeterschoot).

## **INDUSTRIAL EMISSIONS**

### **The new Industrial Emissions Directive is published on the Official Journal**

On Monday 15 July, the new Industrial Emissions Directive (IED) was published in the Official Journal of the European Union (OJ). Please, find the new text of the Directive here: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202401785](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401785)

Member States will bring into force the laws, regulations and administrative provisions, delegated and implementing acts necessary to comply with this Directive by 1 July 2026 (more information: Lorenzo Marotti).

### **LVIC BREF Progress**

On 19 July, the EU-BRITE provided a data collection update reporting the total number of reference plants proposed for the data collection and the number of questionnaires already submitted. For what concerns the sulphuric acid process, the data extraction is progressing with the aim to develop the Large Volume Inorganic Chemicals (LVIC) Qlik Sense Application for the assessment of data and information shared via questionnaires. This step is crucial to establish a solid data basis for the derivation of sound Best Available Techniques (BAT) conclusions for the LVIC.

### **Next Steps:**

The EU-BRITE is planning to organise a first Data Assessment Workshop in the form of a web-based meeting early December 2024 (tentatively). However, the exact timing will depend on the progress of the data extraction, the development of the visualisation tool and on the overall EU-BRITE work planning. During the first Data Assessment Workshop, the aim would be to have an informed discussion on key issues related to the preparation of Draft 1 (D1).

For the Draft 1 of the LVIC BREF, any additional bulk information/contributions considered useful for the drawing up process of the LVIC BREF are more than welcome until 30 September. Collaboration with ESA and CEFIC is ongoing to update the descriptive section of the LVIC BREF related to the sulphuric acid process, including process-specific techniques considered BAT and possible emerging techniques. The aim is to send common feedback to BATIS before the end of the updated deadline provided by the EU-BRITE.

Eurometaux, together with CEFIC and ESA recently uploaded on BATIS a common feedback on the optimisation of feed gas concentrations in metallurgical plants.

Finally, the European Commission's Joint Research Centre (JRC) targeted consultation on 'Hydrogen production by water electrolysis - Information on key potential environmental aspects' has been extended until 30 September (more information: Lighea Speziale, Eleonora Tosi, Lorenzo Ceccherini, Lorenzo Marotti).

## **METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)**

### **MEED program: *VLAIO confirmed support for the Ecorelevance project***

Based on a dossier submitted by the University of Ghent, ARCHE and Eurometaux, the Flemish authorities agreed to provide a significant amount of subsidies for the Ecorelevance part of the MEED program under the program run by the Vlaamse Agentschap voor Innoveren en Ontwikkeling (VLAIO).

This MEED project that will run by the University of Ghent and ARCHE, covers the assessment of the potential biodiversity impact of mixture releases, e.g., from emission points into river systems, while linking it to all the other knowledge projects on mixtures (combined) toxicity.

It was highly valued by the sponsoring authorities given that the toolbox that will come out of this project can be rolled out to allow industry to assess their impact on biodiversity of local emissions, which is very useful information for environmental permits, REACH safe use demonstration and maybe even water quality standards.

As a consequence the MEED project will run for the entire 2025 year without additional costs for the industry sponsors than those already defined and providing even more practical output than originally scheduled (more information: Hugo Waeterschoot and Violaine Verougstraete).

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## **KAMILA'S SUSTAINABLE CORNER**

### **EU waste shipments rules and Basel convention changes: *for e-waste codes***

The European regulatory landscape for the shipment of waste is now in the transition phase from the Waste Shipment Regulation (WSR) agreed in 2006 and the new 2024 one. In the meantime, there will also be a significant change appearing at the international level with the amendments on e-waste codes under the Basel Convention entering into force on 01/01/2025. After this date, both hazardous and non-hazardous e-waste transboundary movements will be subject to the Prior Informed Consent (PIC) procedure according to the Basel Convention. It will cover the whole e-waste but also components stemming from dedicated e-waste recycling plants, needing further treatment, such as printed circuit boards, electric motors, compressors.

The mandatory notification of all e-waste shipments will result in a significant administrative burden for both industry and Competent Authorities. Since the EU is still lacking its official electronic system for the exchange of documents and shipments information, Eurometaux, EuRIC and other e-waste stakeholders are trying to reason with the European Commission that the application of Basel Convention requirements should be delayed until May 2026 when the EU e-system would be in place (more information: Kamila Slupek).

# COMMUNICATION

## **Metals Academy: *survey sent***

As announced in the previous Newsletter, the [Survey](#) has been sent to all Eurometaux members and participants of the last 2 Metals Academy.

We look forward to receiving your precious feedback before the end of August, to be able to come up with an exciting & informative programme that will satisfy all our members.

More precise information will be available in September, after analysis of the survey results by the Organising Committee who will be meeting on the 2nd of September (more information: Ailsa Lee).

## **Outreach: *a key contributor in Eurometaux's Chemicals management policy***

Outreach on key metal sector programs and study results is a cornerstone of the Chemicals Management communication activities. Examples include: building international support and interest for the outcome of the MEED program and awareness raising of the Battery Regulation with EU countries for which this sector is a key contributor to their economy.

MEED resulted in long series of high-quality data and assessment approaches for metal mixtures most relevant and useful for permits, standards, market access, etc. Given the worldwide nature of open commercial trade in metals, we also actively respond to requests for capacity building on metals mixtures assessment in other jurisdictions outside of Europe, if they can contribute to a more level playing field. We received such an invitation from the Canadian metals and mining sector (MAC) that has set up an exchange session on metal mixture learnings from MEED for 9 September in Ottawa when metal consortia will attending their annual Environmental Experts panel (ETAP) locally.

The second example covers an outreach to inform local battery manufacturers and Original Equipment Manufacturers (OEMs) and national authorities of Eastern European countries to raise awareness for the Battery regulation and ECaBaM program of the EU to facilitate a pragmatic implementation. This workshop is now scheduled for 14 October am in Bratislava (more information: Ainhoa González Pérez and Hugo Waeterschoot).

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## 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)

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# CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for Q3 & Q4 2024.

**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](#)

- 03/09: Registration Compliance Taskforce (online call)
  - 04/09: Chemicals Management Steering Committee
  - 09-10/09: RAC-70 REST Working Group
  - 10-13/09 ETAP meeting in Montreal
  - 16-20/09: SEAC-64
  - 16-20/09: RAC-70 Plenary
  - 23-27/09 OECD WP and Chemicals Management and workshop on substitution beyond safety
  - 24 or 25 /09 Risk Management Taskforce webinar session on substitution options (tbd)
  - 24-25/09: RAC-71 DWD Working Group
  - 24-25/09: RAC-71 DWD Working Group
  - 26-27/09: ECHA MB-75
  - 26-27/09: ECHA MB-75
  - 30/09-02/10: Chemicals Management Autumn Week
  - 08-10/10: RAC-71 AfA Working Group
  - 07-11/10: MSC-87 (TBC)
  - 28-29/10: ECaBaM workshop (ECHA premises)
  - 28-30/10: RAC-71 CLH Working Group
  - 30-31/10: EPAA NAM workshop (Helsinki)
  - 06-07/11: RAC-71 REST Working Group
  - 13/11: RMTF workshop on restriction of U-PFAS learnings and further anticipation
  - 18-19/11: MEED Annual Workshop (Ostend) (Sponsors only)
  - 20-21/11: CARACAL-53
  - 25-29/11: RAC-71 Plenary
  - 25-29/11: SEAC-65
  - 2-5/12: SEAC-65
  - 9-13/12: MSC-88 (TBC)
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# CHEMICALS STRATEGY for ZENITUDE



## A. Find these words in the circle

AGENDA  
BREAK  
URSULA  
WATER  
COMMISSION  
TELEWORK  
ECHA  
PFAS  
RESTRICTION  
PAPER  
OUTLOOK  
STAFF  
AMENDMENT  
PARLIAMENT  
REACH  
ESPR  
VOTE  
HOLIDAYS  
DEAL

G H H  
V P G O U N K J U  
P Y E B G K O J D E K B P  
D J V I Q S K H W T G U O O O W L  
G A F N S E O G W I D E A L R A W T Z  
I M S Z L Q O N I J B K V M G R Z H T B L  
C Y O R A L H O L I D A Y S D E E U C B D  
F G S M L T Z T J P Q N A I E A H  
S D F B U I A Y F Z D Z D B P K O  
D Y R R O I Q Q L R B E F Z R T L T E O A A H P U  
T N E M A I L R A P X U A Y V Z D P J T P M R A S  
M A T V X R H U G J K H V H M G U K C V R E P A P  
B K B X J J Q C O M M I S S I O N R D E W T N V P B F  
H S E B J V Z A G J X F W E K D Q S V E A B D J O E G  
M L Y F K B H E Z O V G L W H M Z U M W J B M L L P G  
K C J E F R U N X L Y I M E X L D I S E T O V  
U N Q C G S Y S C K L Y S T A F F N J Q T  
J O O M Z B A F O C P W W J R X M T C Y H  
T E I T M C G X O Q  
J P R T Y Y I S E R W J  
O E X C Z M T E L E W O R K J K H V A T P  
G M R D I V T L J B B P W Y B R S A F P O  
M N F Z R C W Y V B K I I Q P C W H G  
X T A V T B P J F N L P B S S H G  
L P R S J C F B A Z Z E I  
D L E C N D K S V  
R F R

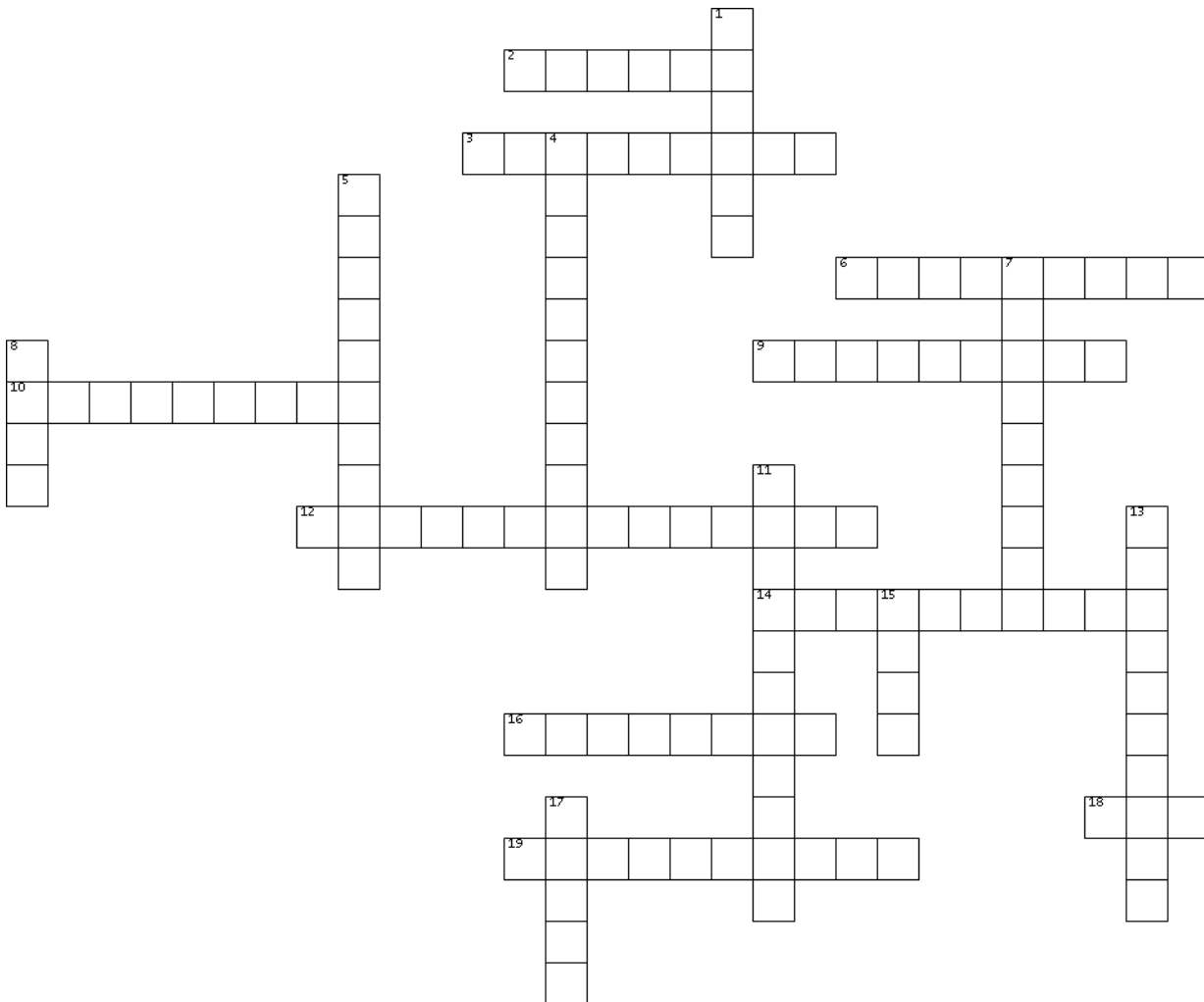
**B. Crossword Puzzle**

**Across:**

- 2. happening all the time
- 3. our speciality
- 6. more and more are electric
- 9. the action or process of converting waste into reusable materials
- 10. in charge of creating and releasing hormones
- 12. meeting the needs of the present without compromising the future
- 14. a new one since June 2024
- 16. the .....union of 27 countries
- 18. Classification, Labelling & Packaging (acronym)
- 19. a rule or directive made and maintained by an authority

**Down:**

- 1. our management world
- 4. doing our best to protect
- 5. umbrella association
- 7. trying to reduce
- 8. located in Paris
- 11. getting the most we can from the material during its use, and then recovering to make new products
- 13. natural resources or sources of energy that are not depleted by use
- 15. project that just received extra funding
- 17. waiting for 2.0



**Answers:**  
**B: Crossword:**  
**Across:** 2/ change; 3/ chemicals; 6/ batteries; 9/ recycling; 10/ endocrine; 12/ sustainability;  
14/ Commission; 16/ European; 18/ CLP; 19/ regulation  
**Down:** 1/ metals; 4/ environment; 5/ Eurometaux; 7/ emissions; 8/ OECD; 11/ circularity; 13/  
renewables; 15/ MEED; 17/ REACH

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