



# EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in September:

- 03 September: Registration Compliance Taskforce
- 04 September: Chemicals Management Steering Committee
- 17 September: Risk Management Taskforce webinar
- 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,*

*I was sitting in a tram, with my backpack on the floor. 4 stops before I had to get off, a man entered and involuntarily blocked one of the straps on my backpack by putting his foot on it. I did notice this but didn't say anything, as the man was frantically messaging on his phone, and I did not dare interrupt him. I assumed that the jolts of the Brussels public transport would solve the issue by making his foot move. But a bit later on I started to worry. That guy was a rock! No reaction at all, even to the sudden braking that had made everyone else lose their balance, not even a frown on his face. People were getting in and out around him, and not once did he take his eyes off his screen. I started to feel a bit anxious: and what if he did not realise in due time that he was preventing me from moving, and what if when I had to ask him to release me, he would not understand me or would maybe not even listen and/or refuse? How would I react? Could it end up badly?*

*Of course, the whole thing turned out well - it was enough to stand up and point to the floor with a smile-but I was surprised that such a non-significant event could make me feel worried. This was not even an incident. So why was my brain envisaging worst case outcomes? Could I argue it was based on previous experiences, or attribute it to a twist of my imagination fuelled by the stories reported in media, or was it simply a coincidence because I was feeling vulnerable for whatever reason that day? Or -and I had to pose myself the question - was this irrational fear coming from elsewhere, an unknown I would rather keep unexplored, namely ageing?*

*As a kid, I was quite fond of visiting the elderly living in my neighbourhood. To genuinely observe them (and of course receive some biscuits!). I spotted over the years that their steps were becoming more cautious and their movements reduced, the gradual move to more comfortable chairs, the decreasing walking parameter compensated by increasing TV watching, their questions focusing gradually more on what I considered as small things. As if their universe was shrinking to what was around them. And this was paired with anxiety of having something happen.*

*Later I heard that drifting into a "smaller world" as we age is common (although I must state here that my parents are an exception, see further below). It has been attributed to the fact that lives often get simpler, or at least more predictable because of the comfort routine procures. With less luck, it is because of health or mobility issues.*

*I am part now of that age group where the conversations have shifted progressively from 'our kids' to 'our parents'. The underlying emotions are to some extent comparable to those we shared when we exchanged tricks & tips for our younger ones or compared our daily lives with teenagers. Meaning: loads of love of course, but also continuous concerns about small or to the contrary critical issues, an undisputable willingness to do our best but mixed with clumsiness and lots of (self-) interrogations. For the kids, the direction was clear: give them the means to hold the rudder of their own lives. With all the successes and failures this would entail.*

*But while you are waving goodbye to the young adults, wishing them good luck, you start to realise that time did not stop its course. You now look more like your parents did when you were leaving them, and your parents...well, they remind you of the image you had of your grandparents as a kid. How could that have happened so fast?*

*And you wonder: what do these unavoidable changes tell us? Indubitably, that you/we all have reached a different season and hence need to accept and adapt (because who loves to see spring or summer come to an end?). But how to best do this? How to take care of the more apparent fragility of those, who as young adults, once encouraged us to leave our safe harbour? How to avoid that your gaucherie and good intentions have consequences on their freedom? How to defy the reduction of their boundaries that you have come to anticipate? How to not become parents of our own parents? How to leave all of us as much as possible holding the rudder of our own life? This now feeds the discussions we have.*

*And I would like to express my good fortune for having parents who are quite definite about their journey in this part of their life. Up to now, they have not left me -and my doubts about their possible frailty- any margin to take control on their sailing direction or put them in a convenient and protective glass shape. They continuously reconsider -sometimes with some efforts and grumbles - how to enlarge their universe by looking it at it straight in the eye, trying to learn more and in different ways, to confront their questions and potential fears. A lesson for me in that tram, but that's without age. Someone said that growing up into*

*an adult is to keep an eye on the world as it is and an eye on the world as it ought to be. One should also add paying attention to filters such as time that may alter its understanding!*

*Violaine Verougstraete*

# COMMISSION

## CARACAL

On 19 August, Eurometaux submitted comments on the CARACAL Consultation on Chapter 3.11 and 4.2 on the Endocrine Disruption Guidance regarding the application of the CLP criteria. These comments raised previously stated concerns, requesting ECHA to consider the specificities of naturally occurring substances, to have a placeholder for the future development of a metal-specific guidance, and to ensure consistency with the One Substance One Assessment (OSOA) approach whilst making sure classifications are discussed in the right fora. The publication of the guidance is expected for 4 October 2024 (more information: Ainhoa González Pérez).

## Chemicals Strategy for Sustainability: *changes in DG ENV*

Paul Speight has replaced Cristina de Avila as the new Head of Unit for safe and sustainable chemicals (B2) in DG Environment. Cristina de Avila, who spearheaded and pushed for the development and implementation of an ambitious CSS and REACH revision, will now work on the international side of chemicals management. Mr. Speight has been DG ENV's director for compliance for several years. With a background in Law, he previously worked on agriculture, biotechnology, pesticides and health unit, as well as the revision of the Waste Framework Directive (more information: Ainhoa González Pérez).

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## EU AGENCIES

### EUROPEAN CHEMICALS AGENCY (ECHA)

#### ECHA COMMITTEES

##### **ECHA Management Board: *program planning circle started with a proposal for outcomes and indicators for the period 2025-2028***

The ECHA Management Board on Strategy and Planning (MB-SPI) received a proposed set of outcomes and indicators that would form the basis for the ECHA workplan (2025-2028) discussions later this year. The review of these management indicators is foreseen for September both in the MB-SPI and the full ECHA Management Board. The presented set of outcomes and indicators is the first one under the new Executive Director and built on the new Strategy Statement ECHA adopted last year. In addition, for the first time, ECHA proposed expected outcomes and indicators for the long series of new tasks they are ramping up for (Battery regulation, RoHS, ELV, IED, ...).

Eurometaux and Cefic therefore assessed with due care the new format and suggestions concluding that the present set of suggested indicators is extremely (too) long, too much oriented on quantitative numbers without a clear link on relevance and/or quality and not very consistent between the different goals they were designed for. Both the expected outcomes for 2026 and 2028 and the indicators to measure progress will be important and relevant to assure that ECHA focusses on the right aspects of their mandate and in a consistent, efficient and timely way.

Eurometaux will attend the MB-SPI whilst the executive director of Cefic will attend the Management Board meeting itself (more information: Violaine Verougstraete and Hugo Waeterschoot).

#### ECHA OTHER ACTIVITIES

##### **ECHA Trilogue meeting on CTAC-Sub2: *the largest authorisation upstream application ever***

ECHA received a new upstream application for a series of uses of CrVI, called the CTAC-Sub2 application. The applicant submitted a new application after the previous one was challenged in court on a case initiated by the European Parliament. Hence, there was legal uncertainty for most of the CrVI users in the EU who do not have their own authorisation application. The new application was debated in a trilogue at ECHA on 18 August, and Eurometaux and Cefic attended as observers. The application is very detailed and contains exposure profiles for every covered downstream user (DU) (hundreds), making it therefore really unique but also setting a precedent that such information may be needed for every user covered by any future

upstream application. This detail was much appreciated by the RAC Rapporteurs. On the other hand, the SEAC Rapporteurs questioned if the applicant had provided enough details on recent alternative technologies that hence would meet the technical feasibility criterion of substitutes. This was, in particular, the case for coil coating where the EU steel sector demonstrated that they substituted away from CrVI. As a result, the Rapporteurs are inclined to define a SAGA (safer alternative generally available) for this use, and will probably not grant an application for this use. The importance for the non-ferrous metal sector is that a user may request that a use not be granted. In addition, CrV coil coating is not limited to steel. It also seems to be used in the Cu and Al and probably even in the Zn sector. Questions can therefore be expected in the SEAC plenary meeting on the progress made with substitution in those sectors (more information: Hugo Waeterschoot).

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## EUROMETAUX CHEMICALS MANAGEMENT

### CHEMICALS STRATEGY FOR SUSTAINABILITY

#### *TNO study: on metal emissions from the Twin Transition*

TNO progressed well over the summer with their study that is estimating the additional emissions due to the steep progress of metals volume use in key Strategic Value Chains (SVCs) (e.g., EV batteries, solar, ...) for the twin transition on decarbonisation and digitalisation. They reported the status and first conclusions of their extensive investigations in a pre-draft report. The report selected 7 metals (Ga, Li, Ni, Cu, Zn and 2 Rare Earths) that act as “indicators” for the volume increase in the 5 SVCs covering a lifecycle approach. The study mapped the additional capacity and new projects that would be on steam by 2030 and estimated what additional emissions this could lead to, using models as well as monitoring data.

The emission contributions are expressed by value chain rather than by metal to respond to the concern of regulators and society on the impact of these new technologies on the EU environment. In general the data so far indicates that more than 80 % of the additional emissions are related to the EV battery chain, which on its own is predominantly driven by (new or increased) mining activity. Although the additional expected emissions seem to be very small compared to other sources and very much proportional to the benefits they create in respect to the Twin Transition.

In a last step Eurometaux helped by the Consortia will provide evidence to demonstrate the lack of relevance of these additional emissions. The case of Cu which was well demonstrated by scientific/technical work done by the sector demonstrated that these emissions are < 0,2 % of industry and diffuse contributions. The TNO study once finalised will stand on its own and be complemented by an Eurometaux summary report later this year summarising the conclusions and key messages from the independent study. All this material will be used in future advocacy towards the political and technical levels of the EU to demonstrate that metals are a real contributor towards a more sustainable economy and society (more information: Violaine Verougstraete, Simon Cook and Hugo Waeterschoot).

### REACH REGISTRATIONS

#### *Registrations: Ongoing challenges and the need for clarity in REACH Dossier Updates under Russian Sanctions*

Over the past two years, the industry has urgently sought clear guidance and a harmonised European approach for submitting REACH registration dossier updates, particularly in cases where co-registrants are subject to Russia sanctions. The current interpretation of the EU sanctions law could unjustly hinder legitimate dossier updates. To address these concerns, an official letter was sent to the European Commission, ECHA, and Member State Authorities in May 2023.

In response, the Commission published an updated [FAQ document](#) on 24 July 2024, with Questions 16 and 17 specifically aiming to clarify the handling of dossier updates. However, despite these efforts, significant uncertainties remain. While the FAQ provides some guidance on required actions, it falls short of enabling the actual submission of dossier updates. Additionally, concerns have been raised regarding potential competition law issues, particularly related to the suggestion to "encourage co-registrants to cease manufacture or import."

To prevent fragmented discussions and unclear responsibilities, Eurometaux, in collaboration with other industry associations, continues to engage in dialogue with the European Commission, ECHA, and Member State Authorities. We seek more precise instructions and anticipate further discussions, potentially at the next CARACAL meeting, to develop a harmonised approach that secures both legal certainty and the capacity to maintain essential dossier updates. It is crucial to establish clear responsibility to ensure REACH registrants can fulfil their obligations without being impeded from updating their registration dossiers, thereby protecting the integrity of the overall REACH process (more information Federica Iaccino or Lorenzo Zullo).

## WATER

### Update

Following the publication of the EU [Commission's proposal](#) to amend the Water Framework Directive (WFD) and the List of Priority Substances (PS) in October 2022, the European Parliament (EP) published its [opinion](#) in September 2023. The Council of the EU has voted on its [general approach](#) to the file on 19 June 2024 (for more details see the July issue of the CM news).

With these trilogue mandates in order, the trilogue negotiations are taking place under the Hungarian Presidency in autumn 2024. A first meeting of the Working party on the Environment (WPE) of the Council of the EU took place on the 3<sup>rd</sup> of September, the agenda included a discussion among the ministers on the EP opinion.

Eurometaux is preparing its advocacy messages and plans to interact proactively with the EU regulators within the next few months.

In parallel to this ordinary legislative procedure (OLP), the Commission had planned the next meeting of the Working group Chemicals for next 23-24 October. While the next SCG meeting will take place on the 14<sup>th</sup> of November. Both of which Eurometaux will be attending of course and sending feedback to the Water Taskforce members (more information: Lara Van de Merckt).

## SOIL

### Update

Following the European Commission's (EC) [proposal](#) for a new Soil Monitoring Directive in July 2023, the European Parliament (EP) published its [opinion](#) on 10 April and the Council of the EU has now voted on its [General Approach](#) (GA) on 17 June.

The trilogues are scheduled for autumn 2024 under the Hungarian Presidency, the four-column preparatory document is available [here](#).

Several WPE meetings are scheduled for the month of September, but the available draft agendas do not mention the Soil Monitoring Law at this stage.

Eurometaux is preparing its advocacy messages and plans to interact with EU regulators in the coming months.

In parallel to this OLP, the Commission has scheduled the next meeting of the Soil Expert Group for 4 October. The agenda will include the state of play of the Soil Monitoring Law and the overall implementation, present and future, of the EU Soil Strategy for 2030.

The 4<sup>th</sup> Stakeholder Forum of the European Soil Observatory (EUSO) (group led by the Joint Research Centre - JRC) will take place on 21-23 October, the agenda is available [here](#).

Eurometaux will attend both meetings and provide feedback to the members of the Soil sub-group (more information: Lara Van de Merckt).

## METALS ENVIRONMENT EXPOSURE DATA PROGRAM (MEED)

### MEED program: a 6-month planning review

The MEED program is gaining momentum and we are now in a phase where the selected relevant metals-metals mixtures and metals-organic mixtures are being conducted. The metals-metals mixtures are nearly finalised and their results will be presented at the annual MEED debrief workshop scheduled 18-19<sup>th</sup>



November. The metals-organics test works experienced some technical challenges (e.g., on the collection of natural relevant samples) but are now progressing well, with the hope to finish them by the end of the year. In addition MEED is implementing the Ecorelevance part which can now be fully deployed due to an important funding contribution of the Flemish authorities innovation program (VLAIO). This part will run in 2025 with the final results and toolbox made available to industry early 2026. Scheduling and conducting a relevant mesocosm study is a final research objective of MEED. The technical and financial impacts are presently under assessment so they can be presented to the sponsors. At the November workshop we further aim to start the discussion how the data from MEED can be used to update the Registrations (on the exposure parts) and in the future on the mixture parts. We further used the month of August to solicit support from key authorities (RIVM) and scientists (Prof. Backhaus Aachen University) to launch the discussion for a scientific alternative to the MAF in case such evidence is available. In this respect, we submitted a request for a Special Session at the next SETAC Europe conference (May 2025) and will schedule an EU workshop in the first half of 2025, to progress on this (more information: Hugo Waeterschoot, Violaine Verougstraete, Marnix Vangheluwe and Diana Dobre).

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## OUTREACH

### OTHERS

#### **ECETOC report on elevating exposure science in CSA: *developing recommendations for stakeholders***

In October 2023, ECETOC organised a workshop that brought together participants from regulatory bodies, chemical companies, trade associations, and academia to discuss advancing exposure science for chemical safety and sustainability. Eurometaux, EBRC and the NI were present and participated actively in the discussions.

The workshop, inspired by the EU Green Deal and the Chemicals Strategy for Sustainability, emphasised the need for reliable exposure data and hazard information to achieve comprehensive chemical safety assessments whilst minimising animal testing and improving protection levels. Key recommendations from the workshop included improving access to exposure information through better data quality protocols and shared platforms, enhancing exposure models with a registry and best practices, and addressing new needs related to circularity and sustainability. Additionally, the workshop stressed the importance of capacity building through educational programs and certification for exposure scientists. These recommendations aim to foster cooperation among industry, regulators, and academia, driving future initiatives to elevate the role of exposure science in chemical safety assessment and management across Europe.

The workshop report, kindly prepared by ECETOC, can be found here:

<https://www.ecetoc.org/publication/workshop-report-no-39-elevating-exposure-science/>

(more information: Daniel Vetter, Steven Verpaele and Violaine Verougstraete).

#### **Chemicals Management – REACH conference in Bratislava**

Eurometaux is supporting the organisation of the “Chemicals Management – REACH” conference organised by Ecotox yearly in Bratislava, on 14-16 October 2024.

Eurometaux will be presenting several topics, including substances in batteries (14 October) as well as the challenges to cope with the multitude of different legislations from the metals industry perspective (16 October). The agenda includes relevant presentations and panel discussions on the future of EU chemicals legislation, the transition towards new requirements for chemicals and products, chemicals management beyond REACH or Enforcement. This event is an opportunity to reach different audiences, with authorities from Central and Eastern European countries attending as well as local industry. Speakers include ECHA, the European Commission and Industry (more information: [Link to the conference website](#) (paid event)).

# COMMUNICATION

## Departure

End of August was also marked by Lorenzo Marotti's departure from Eurometaux, after 3 years of intense work and ...fun in Eurometaux! Contrary to the swallows, Lorenzo went to the North! He indeed (re-) joined the European Chemicals Agency. We wish him the very best for the future and this new challenge. A big thanks Lorenzo for the pleasure we had working with you, for the opportunity to get to know you and admire that intelligence you deployed from your artwork to the IED/Air Quality challenges. Take care!!

Lorenzo's tasks on IED are being taken care of by Seeds Consulting, and a dedicated email address has been set up ([iedsupport@eurometaux.be](mailto:iedsupport@eurometaux.be)) for your questions related to air quality or industrial emissions. On other topics, please contact Violaine.

## Metals Academy: going ahead for the 4<sup>th</sup> edition!

The survey that we launched over the summer months, proved very successful and showed the big interest of our members for the 4<sup>th</sup> edition of the Metals Academy, to be held from Monday 05 to Thursday 08 May 2025.

The Organising Committee met beginning of September and will now work on coming up with a coherent agenda that will suit both newcomers and those who intend to return.

The intention is to hold a first ½ day (Monday PM) for the newcomers only and then have 2 full days of "imposed" modules and on the 3<sup>rd</sup> day a choice of modules, out of which participants will have the opportunity to follow 2 (there will also be 1 of these module dedicated more towards newcomers).

This draft agenda will be sent out this autumn alongside a JotForm which would guarantee a firmer commitment, so we can organise the event as well as possible.

To guarantee optimal quality, the number of participants will be limited to 40, on a 1<sup>st</sup> come, 1<sup>st</sup> served basis, whilst ensuring a level-playing field between all our members.

We look forward to once again organising this event. If you need any further information in the meantime, please contact Ailsa at [lee@eurometaux.be](mailto:lee@eurometaux.be)

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## CALENDAR

**Please find here below a non-exhaustive list of the meetings already planned until end of the year.**

**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 - Cancelled~~
- 10-13/09 ETAP meeting in Montreal
- 16-20/09: SEAC-64
- 16-20/09: RAC-70 Plenary
- 23-27/09 OECD Working Party and Chemicals Management and workshop on substitution beyond safety
- 17/09 Risk Management Taskforce webinar session on substitution options (tbd)
- 24/09: RAC-71 DWD Working Group
- 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)
- 13/11: RMTF workshop on restriction of U-PFAS learnings and further anticipation
- 18-19/11: MEED Annual Workshop (Ostend) (Sponsors only)
- 18-19/11: RAC-71 REST Working Group
- 20-21/11: CARACAL (TBC)
- 25-29/11: RAC-71 Plenary
- 25-29/11: SEAC-65
- 2-5/12: SEAC-65
- 9-13/12: MSC-88 (TBC)
- 10-11/12: RAC-72 DWD Working Group
- 18/12: Risk Management Taskforce
- 19/12: Chemicals Management Steering Committee
- 19-20/12: ECHA MB-76

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## GENERAL INFORMATION & ACRONYMS

### **Metals Conference Centre/MCC: *state of the art meeting rooms***

Most of you are familiar with our nice Metals Conference Centre (MCC) situated at Avenue de Tervueren 168 (4<sup>th</sup> Floor), 1150 Brussels where you attend Eurometaux meetings.

But we would like to remind you that these state of the art rooms can be rented, with a discounted rate for members.

If you are curious, please check out our brand new website by clicking on our newly created logo



We encourage you to share your satisfaction with your colleagues & contacts and thank you already for using our facilities (more information: Natalya Oksanen - [bookings@metalsconferencecentre.be](mailto:bookings@metalsconferencecentre.be)).

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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)

# CHEMICALS STRATEGY for ZENITUDE



**Game A: To help get you back in the mood.....a few September quotes. Guess who wrote what (some of the links might help you guess ☺).**

1.	"It was a lovely afternoon—such an afternoon as only September can produce when summer has stolen back for one more day of dream and glamour."	<a href="#">Elizabeth Lawrence</a>
2.	"All the months are crude experiments, out of which the perfect September is made."	<a href="#">Jenny Wingfield</a>
3.	"Happily we bask in the warm September sun, which illuminates all creatures."	<a href="#">Winnie the Pooh</a>
4.	"September days have the warmth of summer in their briefer hours, but in their lengthening evenings a prophetic breath of autumn."	<a href="#">L.M. Montgomery</a>
5.	"September showed up right on schedule, and lasted a whole month."	<a href="#">Amit Ray</a>
6.	"Fallen leaves on the ground are the golden song of immortal creativity."	<a href="#">Henry David Thoreau</a>
7.	"Everyone must make time to sit and watch the leaves change."	<a href="#">Virginia Woolf</a>
8.	"It's the first day of autumn! A time of hot chocolatey mornings, and toasty marshmallow evenings, and, best of all, leaping into leaves!"	<a href="#">Rowland E. Robinson</a>

**Game B: more serious stuff.....True or False?**

1.	Palladium is not rarer than silver or gold	
2.	Has Ytterby in Sweden given its name to 4 elements?	
3.	Does Titanium get its name from Greek mythology?	
4.	Until the 20 <sup>th</sup> century was Silver extracted as a by-product?	
5.	Does Azurite blue paint come from a cobalt compound?	
6.	Is there a relation between emeralds and beryllium?	
7.	There is a link between Selenium and the Sun	
8.	Is Lithium found in foods?	

**Answers on the last page ☺**

**Answers Game A:**

1/ L.M. Montgomery - 2/ Virginia Woolf - 3/ Henry David Thoreau - 4/ Rowland E. Robinson  
5/ Jenny Wingfield - 6/ Amit Ray - 7/ Elizabeth Lawrence - 8/ Winnie the Pooh (my favourite 😊)

**Answers Game B:**

1/ False (it is much rarer, used extensively in jewellery) - 2/ True: Erbium, Terbium, Ytterbium, and Yttrium - 3/ True (the Titan gods, who were known for their exceptional strength) - 4/ False (it was then mostly mined as a native metal (e.g. the famous silver wires from Norway); now it is mostly extracted of a by-product from copper and lead-zinc mining) - 5/ False (it comes from the copper compound of the same name, and was widely used in classical antiquity) - 6/ True (the French chemist L. N. Vauquelin extracted the pure metal from emerald, which is a valuable form of the mineral beryl) - 7/ False (it is named after Selene, the Greek Goddess of the Moon) - 8/ True (in many, such as mushrooms, prawns, nuts & seeds)