



EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in January:

- 14-15: Endocrine Disruptors Workshop

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Dear All,

Were you -like me- relieved to bring 2024 to a close? Tired and somewhat disillusioned by the combination of bad news from around the world, the doomsday predictions and increasing uncertainties with the usual December features, i.e., high workload, short days flying by, the beginning of a flue peak and weather that evokes slippers rather than walking shoes? Were you also more than ready to wind down, take/make time for exchanges with others, refuel your curiosity for the expected and unexpected (starting with the end and new year celebrations!)?

I hope you were all able to enjoy a second of amazement, experience an instant of deep gratitude and take a deep breath of the air that's above the rainy clouds.

And maybe experience some of these learning moments that are often incompatible with our normal high-speed agenda!

I realised for example that my ability to see details has been blunted by the (necessary) flexibility of my (much-loved) multitasking job. The book 'Mona's eyes' describes a journey to 52 works of art, proposing to first look at them 10 minutes in silence before progressing to the description and reading the related stories. I dazzlingly missed most of the details of the first five paintings (although I could portray them in general) and literally felt the effort required by my brain to focus on the next ones. But progressively my gaze gained in sharpness.

Also, I grasped better what 'surprises' do to us. A Christmas tree is such a perfect setting to observe, half hidden in the fairy lights! To see 'on the spot' how someone is pulled into the present moment, with that absolute hijacking of his/her attention, to be able to catch that short moment frozen in time followed by intense emotions. And as for once there is the time to understand what's happening, be open to all the possible reactions, which can range from being pleasant to - sometimes- being a clear mismatch with one's expectations.

But also, take the time to indulge in friendship by taking a long walk together in the middle of the day, with work concerns dissolving in the landscape...

And what about you?

So, 2025 arrived. And true, it was a difficult start. The 'break' did not manage to change the world.

But before we see 2024 only as the prelude of what will happen in 2025, please allow me to make a wish for you.

I wish you to be happy in 2025.

Happy throughout everything, with happiness as urgency, resolution and absolute priority.

The philosopher Alain* wrote the following text in 1923 (!): "It is always difficult to be happy; it is a fight against many events and against many humans; it may be that one is defeated; there are undoubtedly insurmountable events and misfortunes stronger than the apprentice Stoic; but it is perhaps the clearest duty not to consider oneself defeated before having fought with all one's strength." And also: "I would even go so far as to propose some civic crown to reward human beings who have taken the side of being happy. For in my opinion, all these corpses and all these ruins, and these foolish expenses and these precautionary offensives are the work of men who have never known how to be happy and who cannot bear those who try to be so".

Happiness as resistance, as 'absolute' against foolishness and discouragement.

Violaine Verougstraete



*: *Libres Propos, Première série, Deuxième année, n°26, 31 mars 1923*

COMMISSION

CARACAL-53: busy last meeting of the year

The last CARACAL (53) of the year took place on 18-19 December in Brussels. Starting with the REACH Session, the agenda covered a wide range of topics, including general updates on essential uses, substitution planning, and ongoing research on the cost of PFAS pollution. Discussions also focused on the registration of recovered aggregates, microplastics restriction implementation, and the PFHxA explanatory guide. Furthermore, the session addressed several enforcement and clarification issues related to restrictions on C9-C14 PFCAs, chromium(VI), and PFAS. Finally, information was shared on various reports and briefings, including those from the European Ombudsman, and environmental organisations such as EEB and ClientEarth.

The Joint REACH and CLP Session included a key exchange of views with Commission ENV and GROW Directors on the outlook for the next College of Commissioners in the area of EU chemicals policy. This was meant as an initial discussion to gather first reactions from stakeholders, with the intention of coming back with more concrete points in the next CARACAL. Both Directors highlighted that feedback from stakeholders is instrumental and that the draft proposal must be ready by the summer, to then go through Interservice Consultation and be released by the end of 2025. The discussion showed that the Commission will stay on course on its Green Deal and chemicals overarching goals, but with a mandate for simplification and support to industry (which will not equate de-regulation). How this will be translated into the proposal is still under discussion in the Commission, reason why they are open to stakeholders' ideas. There will be no structured consultations, but "sub-groups" on technical issues could be set up before April 2025.

The CLP Session took place on the second day, addressing key topics related to the UN GHS revisions, the development of future ATPs for harmonised classification, including timelines, and discussed updates to CLP guidance documents.

The next CARACAL will take place only in person on 3-4 April 2025 and will include key topics for Eurometaux such as bioelution and a broad discussion of Specific Surface Area in the context of the classification of metals under CLP (following the discussions on the classification of Cu fine forms).

The general deadline to provide comments on any of the topics is 31 January 2025. The detailed notes will be circulated soon to the CARACAL Taskforce (more information: Ainhoa González Pérez).

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

MSC-88: prioritisation for authorisation-process to review criteria started

Every 2 years, the Member States Committee (MSC) proposes to the Commission a list of substances that are priority candidates for inclusion in the Annex XIV Authorisation list. However, recent recommendations were not picked up by Commission mainly because the suggested substances would lead to a too high number of Applications for Authorisation (AfAs) (e.g., Pb metal) or parallel risk management processes (mainly restrictions) that reduce the relevancy and need for an authorisation (e.g., Co salts). This resulted in tensions, with Member States and NGOs requesting that the Commission takes the priority substances forward to Annex XIV and ECHA and Commission noticing the difficulties when doing so. To overcome this problem, in October the MSC started a process to review the criteria, starting with a collection of concerns and suggestions. Eurometaux submitted written input proposing more attention upfront for the selection of the right Risk Management Measure (RMM), using the specificity of the RMM and to better consider exposure in the prioritisation criteria.

At MSC-88 (December), ECHA presented the comments received and suggested a set of changes to make the prioritisation more efficient and relevant. In view of the upcoming REACH revision, ECHA does not want to change the criteria at this stage but rather complement them with an assessment of the number of AfAs and of the impact of a parallel risk management process. In parallel ECHA asked Member States to assure the quality and in-depth assessment of the RMOa they perform. While those changes would most probably close the door for new metal(s)-compounds to be prioritised, ECHA does not want to use the potential of exposure/release as a key selection criterion, as asked for by

Eurometaux. However, this proposal received quite a large support from MSC participants, but was also contested by many usual hardliner countries stating that this would include policy elements into MSC's assessment. The discussion will continue at MSC-89 (February) and be concluded on at MSC-90 (June). So far, the 12th priority list recommendation (including a last borate compound) will be put on hold (more information: Violaine Verougstraete and Hugo Waeterschoot).

MSC-88: CoRAP 2025-2027 recommendation and some interesting legal and ongoing cases presented

ECHA presented its proposal for an update of the list of substances that would undergo Substance Evaluation (SE) (CoRAP) from 2025-2027. The proposal was published by ECHA on 10 December 2024 [ECHA - Draft CoRAP update](#)

The CoRAP contains substances suspected of posing (a) risk(s) to human health or the environment requiring the generation of non-standard information for clarification of such "potential" risks.

The draft contains in total 31 substances, including (only) 13 new ones. For many of those already on the list last year, the evaluation year was postponed. New was that some were withdrawn due to there being new information available, including voluntary updates by industry. The CoRAP (still) includes carbon black which was again postponed by France to 2027. Substance Evaluations have a high precedent setting value and not only on metals, given they are all based on clarifying risk concerns with non-standard data.

The ECHA lawyers provided an overview on running legal cases. Case A-001-2023 was an interesting one concluding that ECHA must motivate clearly why they rejected a dismissed testing by industry due to a tonnage downgrade. A lack of a proper motivation leads to an annulment of the request for testing. The ECHA lawyer also announced the upcoming judgement on the TiO₂ court case that challenged the interpretation by France on the interpretation of intrinsic property (hazard). It was stated that this case could set precedence depending on the court's conclusion (more information: Violaine Verougstraete and Hugo Waeterschoot).

MSC-88: concluding that the value of the Fish Sexual Development Test (FSDT) to check for ED is still unclear!

MSC conducted a meta-analysis of finalised and published FSDTs on Medaka (OECD TG 234) concluding that so far the test is unsatisfactory to be able to draw conclusions on the potential Endocrine Disruption (ED) properties of substances. This is an important conclusion also for the metals sector given the OECD TG 234 is a high-level test in the screening for ED properties of chemicals and several consortia/associations are considering the relevancy of conducting such a test. MSC further concluded that the problems are mainly related to specific technical aspects of the test protocol. However, MSC is still convinced about the value and relevance of the test and hence advises the OECD to update and strengthen the OECD TG 234 conditions and test specifications. Animal welfare NGOs and industry are of the opinion that asking for such test as a standard high-level ED test should be halted until these problems are overcome, whilst for ECHA and most Member States this suggestion is deemed intrusive given this would also halt the learning process. In any case, Eurometaux would recommend that for the moment consortia/associations be very careful (and it might be better to wait) if conducting this expensive test until MSC and OECD have clarified their difficulties with it (more information: Hugo Waeterschoot).

MB-76: adoption of ECHA's work plan for 2025-2027

The last ECHA Management Board Meeting for 2024 took place in Helsinki on 12-13 December, with industry being represented by Marko Mensink (Director General of Cefic). Eurometaux (Guy Thiran) has been engaged in the activities of the MB Strategy, Planning and Innovation (MB-SPI) sub-group, for which the last meeting dates from November (see newsletter 155). Guy Thiran will be replaced by Alexis Van Maercke (AISE) from 1 January 2025 onwards.

MB-76 adopted ECHA's work plan for 2025-2027 as proposed by the SPI. This extensive and detailed work plan (called Single Programming Document (SPD)) contains the human and financial resources by theme, the tasks to be performed as well as detailed Key Performance Indicators (KPIs).

For the first time the MB showed great interest in ECHA's new tasks, especially on the Drinking Water Directive (a specific briefing was held but we have not yet received a report on this from Cefic), while the SPD described when and how many resources it will spend on the other expected new tasks (RoHS, EQS, ELV, WEEE,...). This allows for industry to plan and anticipate this activity (cfr. ECaBaM for the Battery Regulation tasks) (more information: Hugo Waeterschoot).

ECHA OTHER ACTIVITIES

ECHA-Industry meeting: 9 December 2024

In December, Eurometaux attended the ECHA-Industry meeting with Cefic and Concawe and circulated highlights to the Registration Compliance Taskforce, while the official minutes will be shared after ECHA's review in January.

This full day meeting allowed participants to share technical issues and questions registrants face and to receive ECHA's observations on current practices and improvements under evaluation, as well as future e.g., REACH IT, dissemination platform developments. In particular, ECHA reported on some unexpected issues they faced with the new dissemination platform over the summer, the need to identify new EC numbers' structure, and changes to Classification and Labelling (C&L) notifications.

As of January 2024, the ECHA CHEM platform officially replaced the previous dissemination website.

In August 2024, an IT issue led to a data leak, revealing sensitive information such as constituent concentrations and site data. As a result, 1.360 substances were temporarily removed from the platform for further investigation, and the tool was suspended between 14 and 26 August. During the meeting, ECHA confirmed that the platform is expected to be fully restored by Q1 2025, including the re-inclusion of the affected substances. If a substance is currently unavailable on the dissemination website, it could be among those still under investigation and registrants are suggested to contact ECHA directly for more details. About the shortage of EC numbers, ECHA is seeking for industry's feedback on two options identified, i.e., (i) retain the current format but allow alphanumeric characters (e.g., 2XP-6AZ-7) or (ii) extend the format but keep a numeric-only structure (e.g., 123-200-001-5). Feedback is requested by 15 January 2025, to be compiled and submitted to ECHA by 17 January and an industry call is organised with Cefic and Concawe on Friday 10 January to exchange on the proposals. Lastly, a significant change will be arriving in July 2025 regarding C&L notifications linked to manufacturer/importer groups. Currently, C&L notifications submitted on behalf of such groups are not annulled when a registrant registers the same substance, but under the new rules, these notifications will be annulled if the lead notifier registers the substance or undergoes a legal entity change. ECHA will communicate with lead notifiers to advise on transferring notifications to other group members to avoid annulment (more information: Federica Iaccino).

EUROMETAUX CHEMICALS MANAGEMENT

Chemicals Management Steering Committee: *well-attended last meeting of the year*

The meeting kicked off with a tour de table, which was the opportunity to introduce James Watson, Eurometaux's new Director General, Martina Bassan, head of communication and Andrea Pellini, chemicals management officer. Eurometaux presented the final structure of the chemicals management department, that now includes the changes in the secretariat to pick up the files and the representation tasks (e.g., in ECHA) that have been managed by Hugo Waeterschoot for more than a decade. James Watson explained the new Management Board structure as well as its composition – a first meeting was held on 17 December.

This was followed by a discussion on topics and trends that are expected to require our attention (and resources) in the coming year(s), among others the move from substances towards (sustainable) products (e.g., through ESPR); the increasing number of substances being in the scope (from SVHC to SOCs), the need for speed and simplification of Risk Management (with the move from Authorisation towards Restrictions and its underlying trend of evolving towards safer & sustainable substitution).

References to speed & simplification are also to be found in the mission letters and hearings of the new Commissioners Stéphane Séjourné (Commissioner for Prosperity and Industrial Strategy) and Jessika Rosswall (Environment, Water Resilience and a competitive Circular Economy). What could be expected from these Commissioners for legislations like REACH was discussed, considering also a verbal exposé of the DG ENV and DG Grow Directors at CARACAL on 18 December (see above) and the note submitted by Sweden, supported by Denmark, Finland and Luxembourg to the Council. The latter will most probably have a big role to play in the REACH revision, requiring setting up advocacy at Member States' level. Regarding the EP, a first step may be the Strasbourg Metals' Day that will take place on 21 January. An update on the Transition Pathway was provided with a debate on the possible next steps as the Commission brought in some changes in the version that went for InterService Consultation deleting some key elements for industry. Comments were sent to DG Grow and the next steps will be to assess whether we can agree with the final document and support (or not) its publication. It remains -in the version that was submitted to Commission- a very good working document, providing a state of play that can be used as reference.

The status of the MEED projects and the TNO study was presented. The TNO study, which tested the hypothesis that 'future increased volumes (and new) uses of metals for critical supply chains for the Twin Transition (digitalisation and decarbonisation) by 2030, would not significantly increase the pressure/impact on the environment' has now been finalised and has demonstrated -despite the use of worst-cases- that the % increase is indeed very small.

A presentation was given on the Commission's innovation agenda and related funding instruments and the meeting ended with an update on the ECaBaM project, with a 3rd workshop to be organised in the MCC in April 2025.

The draft minutes were circulated on the 2nd of January (more information: Violaine Verougstraete and Ailsa Lee).

CARACAL Taskforce: *call to prepare the meeting*

A Taskforce call was organised on 16 December to go through the CARACAL agenda and documents made available (see also above). These preparatory calls are very helpful to identify items of interest of the members and to agree on possible interventions by the Eurometaux representatives at CARACAL (more information: Ainhoa González Pérez).

CHEMICALS STRATEGY FOR SUSTAINABILITY

STO Workshop: *on Safe & Sustainable by Design*

In December 2022, the Commission published a recommendation on “establishing a European assessment framework for ‘safe and sustainable by design’ (SSbD) chemicals and materials. The framework is at the end of a two-year testing process, prior to revision in 2025. The purpose of the workshop on 5-6 December was for the Commission to update stakeholders on progress on testing, and to summarise the main learnings and feedback received in 2024.

The main aspects of SSbD are still the same and are being reinforced by new case studies. The approach has some benefits – it is a holistic “whole lifecycle” iterative innovation approach that is broadly applicable to substances, materials and process, which can show sustainability “hot spots”. However – the framework is still far too burdensome to apply in industrial innovation processes due to very high requirements on costs, data and expertise, with no room for expert judgment and trade-offs. It requires data sharing in entire value chains, which brings further issues over confidentiality and intellectual property. There are no signs of the Commission making significant changes to the framework to reduce overall burden. There is some movement towards a more tiered approach and there were some references in the workshop to the OECD work on “safer and more sustainable” innovation, which is more pragmatic and includes the need for a “trusted environment” to facilitate data sharing. These signals are positive but minor.

SSbD criteria are expected in 2025 together with a new Commission recommendation on the assessment framework. It was clear from the overall tone of the workshop that SSbD is a core political objective of the Commission and is seen as a way to increase EU competitiveness. It will be applied broadly, for example in the Commission’s innovation strategy on advanced materials (more information: Simon Cook).

CLASSIFICATION

Li harmonised classification: *actions ongoing*

5 December was the deadline to submit comments on the RMOa carried out by ANSES. A joint position paper co-signed by fourteen associations was submitted to the French Ministry. A copy is posted on the ILiA website (www.lithium.org). Additional comments were submitted by associations like Recharge and of course the Li consortium. ANSES is expected to consider the comments and revise/finalise their document. Industry has requested a meeting with ANSES to be able to discuss its inputs but also the outcomes of the Industry RMOa. Authorities were also invited to submit comments on the French document, which was also discussed in RIME+. To note: it has been requested to do an assessment on whether the reproductive toxicity classification is justified for the wider range of Li substances outlined in the ECHA Assessment of Regulatory Needs, given the wide range of uses. The argument is that harmonised classification for these Li substances would ensure equal treatment and avoid possible regrettable substitution -even if it is acknowledged that there may be differences in bioavailability which may result in different classifications.

Li salts may also be substances discussed by the One Substance, One Assessment (OSOA) Working Group set up by Commission and involving Member States and Agencies.

All good reasons to continue working on the Expert Round Table on reproductive toxicity scheduled for March 2025, the updates of the REACH dossiers (in particular the environmental data) and to monitor/anticipate discussions on e.g., EQS, OELs etc.

2025 will be an intense year for the Li (technical) advocacy, also taking into consideration that the discussions on the entry in Annex VI of the CLP will begin (more information: Roland Chavasse, Francesco Gattiglio, Joeri Leenaers, Ruth Danzeisen and Violaine Verougstraete).

MERAG: *re-launching the work on the classification fact sheet*

Metals Environmental Risk Assessment Guidance (MERAG) aims at gathering and consolidating knowledge on the best ways to perform (risk) assessment of metals. The first fact sheets were published in 2007, as a result of a collaborative effort between industry, the scientific community and governments. These fact sheets, which outline the critical requirements for the appropriate environmental risk assessment of metals, are available via the metals’ toolbox (<https://metals-toolbox.com/>) and the ICMC and ARCHE Consulting websites.

These fact sheets were intended to be living documents, as the science would evolve as concepts were applied and refined, and new approaches emerged. In 2015, a project was launched to combine the MERAG fact sheet on classification of metal substances with other industry Guidance documents related to the environmental classification of inorganic UVCBs, ores and concentrates and alloys into one single “Family Fact Sheet”. The work was initiated, picked up again in 2019 and then put on hold (for COVID and resources reasons). On 13 December 2024, a group of volunteers interested in resuming this work met to discuss what needs to be done to complete the updates and the associated resources. This call was also the opportunity to reflect on the types of audiences interested in this fact sheet and the most appropriate format. It was agreed to finalise the fact sheet to have a state of the art, detailed, technical, reference MERAG document but to complement it with a more practical to use guidance for (less expert) companies and authorities, based on key recurring questions on classification. Members will be contacted to identify these key questions, and a contract will be signed with ARCHE to finalise the work on the fact sheet (more information: Dagobert Heijerick, Claudine Albersammer and Violaine Verougstraete).

RISK MANAGEMENT

Risk Management Taskforce: reporting on ongoing risk management activities and Hugo’s last Taskforce meeting

The December meeting provided updates to the members on a series of ongoing risk management activities. Further to the specific request from ECHA and Commission, members were reminded about the restriction process and which role stakeholders can/may play in it (including the timing and opportunities of the public consultations). The main learnings from the special U-PFAS session held on 13 November were reported as well as the updated planning of the ECHA Committees on the sectorial reviews (with energy, transport and fluorinated gases up for discussion in March) and for the finalisation of the restriction opinion. A recent letter from the 5 Member States Dossier Submitters indicated that a new (3rd) restriction risk management option, based on risk control, is under consideration for sectors like batteries, fuel cells and others. This is an important issue that requires follow-up.

Members were also informed about the proposals from ECHA to update the MSC biannual scoring process to identify priority substances for authorisation (Annex XIV candidates, see above). So far Eurometaux’s suggestions have only been partly recognised and further follow-up would be necessary before the criteria are adopted in June 2025.

A recent explanatory note released by Commission on the SAGA concept (Suitable Alternative Generally Available) was explained to the Taskforce: while the SAGA concept was originally designed for authorisations only, it now seems that it is also being considered for new restrictions and other future risk management legislation (RoHS, ELV, and maybe even the battery material restrictions).

Finally, looking into the future on the further development of the “safer alternatives concept”, the members were informed on the OECD definition that also includes exposure and risk considerations to prevent regrettable substitution and on the outcomes of a recent OECD workshop suggesting assuring that restrictions and substitution efforts are also more sustainable by including considerations like circularity and climate.

Finally, the participants thanked Hugo for his long-standing efforts for the Taskforce, and for heading the metals policymaking on risk management (more information: France Capon, Klaus Kamps and Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

Industrial Emissions:

The next Industrial Emissions Taskforce meeting will take place online in January (Exact date TBD), deadline to fill in the Doodle poll is 10th January 2025).

The following items will be discussed:

- BREF Guidance and future delegated act on Compliance Rules (Art. 15a of IED), for which Eurometaux sent feedback to the Commission on 8th December 2024.
- Request for information received by INCITE, the European Innovation Centre for Industrial Transformation and Emissions
- Internal Eurometaux survey on implementation of NFM BAT Conclusions
- Latest updates from ongoing BREF processes.

(more information: Eleonora Tosi and Andrea Pellini).

Mining (MIN) BREF: status update

Beginning of December 2024, Eurometaux Secretariat attended the Kick-off Meeting (KoM) of the Mining (extraction) of ores (MIN) BREF. During the 4-day meeting, representatives of Member States, European Industries Associations and NGOs exchanged their views on the scope of MIN BREF, key environmental issues for emissions to the environment, and decarbonisation, resource efficiency and circular economy.

From the KoM conclusions, decisions made on the scope and on gold leaching should be mentioned.

Regarding the scope, the TWG agreed to include the following mining activities:

- Activity listed in point 3.6 of Annex I to the IED (Extraction including on-site treatment operations, such as comminution, size control, beneficiation and upgrading, of the following ores on an industrial scale: bauxite, chromium, cobalt, copper, gold, iron, lead, lithium, manganese, nickel, palladium, platinum, tin, tungsten and zinc);
- Co-extraction, including on-site treatment operations, at industrial scale, of metalliferous ores associated with the activity listed under point 3.6 of Annex I to the IED;
- Extraction and on-site treatment of extractive residues (e.g., tailings, waste rock) for the purpose of production of concentrates of the metals listed under point 3.6 of Annex I to the IED.

For emissions to water, the TWG concluded to collect data on cyanide use and emissions to water in gold mining activities covered under the MIN BREF, through questionnaires. The TWG will decide at a later stage, based on the data collected, whether cyanide should be considered as a key environmental issue. To this regard, France and industry associations (Cefic, Eurofer, Eurometaux, Euromines, and FuelsEurope) disagreed with the conclusions to collect data on cyanide in gold mining activities covered under the MIN BREF since the gold leaching process is already covered by the NFM BREF. On 19th December 2024, EU-BRITE published in BATIS the conclusions of the KoM meeting. In addition to that, TWG sub-groups were created to work on the remediation steps and aftercare that should be covered and to identify relevant process chemicals and chemicals.

Next steps: EU-BRITE will circulate the KoM Report by end of January/beginning of February for comments (more information: Eleonora Tosi, Lighea Speziale and Lorenzo Ceccherini).

Industrial Emissions Alliance: Landfill BREF Working Group

The Industrial Emissions Alliance established an ad-hoc sub-group on the drawing up of the landfill BREF (LAN BREF). This sub-group includes several associations (Cefic, CEMBUREAU, Cerame-Unie, CEWEP, EURIMA, EUROFER, Eurometaux, FEAD, FuelsEurope, Glass for Europe and IMA-Europe). An initial meeting was held on 16th December 2024 and a second meeting will be held on Monday 20th January 2025. Key elements and topics will be discussed to see if the concerned associations have a common understanding and position (e.g., structure of the LAN BREF, landfilling operations and directly associated activities, potential key environmental issues, monitoring strategies etc.).

For action: if you wish to be involved in the process and be part of the Technical Working Group (TWG) of the LAN BREF send an email to Andrea Pellini or Eleonora Tosi by 13th January 2025 (pellini@eurometaux.be or iedsupport@eurometaux.be). Please specify whether you plan to participate actively (e.g., you operate a landfill that may be covered by the LAN BREF) or in an observing mode (more information: Eleonora Tosi, Andrea Pellini, Lorenzo Ceccherini and Lighea Speziale).

WATER

On the revision of the Water Framework directive (WFD):

1) **Vote on the European Parliament (EP) mandate:**

On 4 December the European Parliament [voted](#) on the decision to enter into interinstitutional negotiations. The ENVI Committee decided to enter trilogues, with 71 votes in favour, 2 against and 8 abstentions. The trilogues are expected to start mid-Q1 2025.

2) **Feedback on the status of the WFD legislative process:**

The file should not be an immediate priority for the Polish Presidency (as the soil and waste files have a higher priority), it is even possible that this file will not be finalised under the Polish Presidency (but this is unlikely at this stage). Knowing the Danish position on the WFD, one should hope that the negotiations will be finalised under the Polish Presidency. It will of course depend on the negotiations, we know that both the European Parliament and the Council of the EU have very different positions, therefore negotiations on some points are expected to take some time (more information: Lara Van de Merckt).

SOIL

Soil Monitoring Law: *trilogues*

Two official trilogue meetings were held on 22 October and 12 December to discuss the Soil Monitoring Law (SML). Several technical meetings on soil are planned for the beginning of 2025, as this file has a high priority (as far as environmental legislative files are concerned).

It has been reported that tensions have arisen during the trilogue negotiations on several important points of the SML, which could delay the negotiations, one of which is the definition of healthy soils (the EU Parliament proposes a 5-class ecological status approach, while the EU Commission and the EU Council propose a more pragmatic but more binary approach). To be continued... (more information: Lara Van de Merckt).

OUTREACH

OTHERS

EPMF General Assembly: *presentation by Eurometaux*

Hugo Waeterschoot was invited by EPMF to present an overview of expected trends in chemicals management, based on learnings from the past and known planning of future activities. His main conclusion is that -besides for low volume chemicals- the testing and assessment period is mainly over, and that risk management will be the main policy driver for the years to come. Exceptions are the endocrine disruption endpoint and Mixture Allocation Factor (MAF) related updates of the registration files. On the risk management horizon, Eurometaux believes that anticipative action from consortia/associations on RMOa and exposure trend mapping, as well as defining environmental footprints could help in minimising the impact of substitution moving it towards sustainable risk control (more information: Hugo Waeterschoot).

Metals Day: *in Strasbourg 21 January*

The Metals Day will take place in Strasbourg on 21 January 2025, bringing together 60 Eurometaux members and engagement with nearly 50 MEPs.

The event will include four panel discussions with the involvement/sponsoring commodities, and a high-level dinner with MEPs (1 representative per association, and 2 for the sponsors). Members are welcome to organise their bilateral meetings on the 22nd of January.

One of the four panels will address key topics for the Chemicals Management department, under the title "Sustainable Raw Materials in the Circular Economy Act and the Green Deal. There will be 4 MEPs (including Pascal Canfin, tbc). This panel is sponsored by EPMF & ICA. Company representatives will include Wouter Ghyoot (Umicore) and Inge Hofkens (Aurubis) (more information: Laura Fazio Bellacchio and Ainhoa González Pérez).

Raw Materials Week: *Chemicals Management attendance*

The Chemicals Management team attended the flagship Raw Materials Week that took place on 9–13 December in Brussels. This event gathered over 1.000 leaders from regulators, industry, research, and policy to discuss innovation, sustainability, and strategic partnerships.

Discussions included panels on derisking raw material projects with EU and EU countries' funding, technology and innovation through digital and cutting-edge solutions, boosting domestic supply, enhancing circularity with rare earth permanent magnets, markets trends, and maintaining high environmental and social standards. Cooperation with strategic international partner countries was also a key focus.

The event received a great institutional attention, with the new Executive Vice-President Stéphane Séjourné providing a keynote speech where he stated that raw materials are simply essential to our prosperity and transition. He mentioned as his top priority on raw materials a solid market at home, and stable collaboration with partners outside home. This will require, among other measures, making licensing faster and simpler, limiting the financial risks and creating a single market for waste products.

Mikael Staffas, President & CEO of Boliden, focused on competitiveness and resilience, emphasising the need for secure supply chains to meet Europe's strategic goals.

Nicola Beer, leader of the European Investment Bank, defended the urgent need for Europe to change its approach and reduce dependency on imports from a limited number of countries, particularly China (more information: Ainhoa González Pérez).

REACH cross-sector Workshop: at Cefic

On 6 December, Cefic invited other industry associations to exchange views on what the REACH simplification may mean. Participants were asked to reflect on a series of questions, i.e., a) how to understand/interpret simplification of REACH, b) whether sectors are already looking at ideas on how to improve REACH?, c) how sectors see the previous REACH revision thinking (CSS elements) aligning (or not) with the simplification and burden reduction?, d) what are the three main “pain points” in current REACH to be improved in the spirit of simplification and to share contacts with the EP on this topic. The discussion showed that all associations are debating (or will start soon) options for REACH simplification (ranging from better implementation to a change of core legal requirements). There were clearly some shared views across the sectors, e.g., on authorisation, the need for a better upfront preparation of regulatory risk management, the importance of enforcement and enforceability and the MAF/GRA. Detailed notes were circulated to the REACH 2.0 Project Group and outcomes discussed in the Risk Management Taskforce of 18 December. A follow-up workshop will be organised by Cefic on Friday 21 February, focusing on regulatory risk management (e.g., upfront preparation, authorisation/restriction, substitution), which gives us a timeline to have concrete proposals, which will be debated with the REACH Project Group (more information: Ainhoa González Pérez, Howard Winbow and Violaine Verougstraete).

KAMILA'S SUSTAINABLE CORNER

Changes for e-waste classification and shipments: under the Basel Convention and EU law

On 20 December 2024, two new delegated acts were published in the EU Official Journal amending the Waste Shipment Regulation (WSR) of 2006 and 2024. They result from the changes on e-waste codes under the Basel Convention that will be applied as of 01/01/2025 and will assume all e-waste shipments hazardous are subjected to the prior informed consent (PIC) procedure. Both acts will come into force on **9 January 2025**.

In practice, they bring the compliance with the Basel Convention as of 01/01/2025 but they also bring an important derogation for intra-EU green-listed e-waste shipments until 01/01/2027.

In case of intra-EU shipments:

- Shipments of hazardous e-waste will be subject to prior written consent and notification procedure.
- Shipments of non-hazardous e-waste will follow the green-list controls (i.e., compliance with general information requirements of Art. 18 WSR) until 1 January 2027, when the new electronic systems for exchange of information and documents related to waste shipments will be fully operational (Art. 27 WSR of 2024).

In case of extra-EU shipments:

- Shipments of e-waste (hazardous and non-hazardous) to OECD countries will be subject to the prior written notification and consent procedure.
- Shipments of e-waste (hazardous and non-hazardous) to non-OECD countries will be prohibited.

Both documents can be found under the following links: [Commission Delegated Regulation \(EU\) 2024/3229 of 18 October 2024](#) - amending WSR 1013/2006 and [Commission Delegated Regulation \(EU\) 2024/3230 of 18 October 2024](#) - amending WSR 2024/1157 (more information: Kamila Slupek).

COMMUNICATION

Metals Academy: short update

For the 4th edition of the Metals Academy (05 to 08 May 2025) a draft programme was circulated to the membership on 20 November with a link to register. We have received -to date- 36 registrations, most of them being newcomers, meaning that we will also organise the ½ day for newcomers.

The Organising Committee met on the 3rd of January and is currently finalising the programme & securing the speakers. As there are still a few places left, a reminder has been sent and the confirmed participants will receive shortly after 13 January more information (including the invoice).

An updated & more detailed programme will also be provided as soon as possible (more information: Ailsa Lee and Violaine Verougstraete).

CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for 2025.

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](#)

- 14-15/01: 2nd Endocrine Disruptor Workshop
- 28-30/01: RAC-72 CLH WG
- 29-30/01: Ad-hoc CARACAL (if necessary)
- 04-06/02: RAC-72 AfA WG
- 10-14/02: MSC-89
- 18/02: Chemicals Management Steering Committee
- 26-27/02: RAC-72 DWD WG
- 03-07/03: RAC-72 Plenary
- 10-12/03: Chemicals Management Spring Week
- 10-14/03: SEAC-66
- 18/03: Risk Management Taskforce
- 20-21/03: ECHA MB-77
- 03-04/04: CARACAL-54
- 07-08/04: 3rd ECaBaM Batteries Workshop
- 28-30/04: RAC-73 CLH WG
- 05-06/05: RAC-73 DWD WG
- 05-08/05: Metals Academy 4
- 07-09/05: RAC-73 AfA WG
- 11-15/05: SETAC Europe (Vienna)
- 20/05: Chemicals Management Steering Committee
- 26-27/05: RAC-73 REST WG
- 02-06/06: RAC-73 Plenary
- 09-13/06: SEAC-67
- 10-13/06: MSC-90-TENT
- 17/06: Risk Management Taskforce
- 17-18/06: ECHA MB-78
- 30/06-02/07: RAC-74 CLH WG
- 03-04/07: RAC-74 AfA WG
- 03-04/07: CARACAL-55
- 01-02/09: RAC-74 REST WG (Tentative)
- 03-04/09: RAC-74 DWD WG
- 08-12/09: RAC-74 Plenary
- 15-19/09: SEAC-68
- 23/09 (AM): Risk Management Taskforce
- 23/09 (PM): Chemicals Management Steering Committee
- 25-26/09: ECHA MB-79
- 06-10/10: MSC-91 (Tentative)
- 07-09/10: RAC-75 AfA WG
- 27-29/10: RAC-75 CLH WG
- 29/09-01/10: Chemicals Management Autumn Week
- 05-06/11: CARACAL-56
- 11-13/11: RAC-75 DWD WG
- 17-18/11: RAC-75 REST WG
- 24-28/11: RAC-75 Plenary
- 01-05/12: SEAC-69

- 08-12/12: MSC-92 (Tentative)
- 11-12/12: ECHA MB-80
- 16/12: [Chemicals Management Steering Committee](#)
- 17/12: [Risk Management Taskforce](#)

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)