



# EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in March:

- 10-12: Chemicals Management Spring week
- 18: Risk Management Taskforce

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*Dear All,*

*The turbulent times we are in challenge, among others, the values and goals that steer chemicals management (with emphasis on management) and exacerbates sensitivities. It is obvious that the narrative in the EU bubble has changed over the last months, adding security or defence to the transition discourse, offsetting the Union's relevance and national interests, depicting more crudely the difficulties faced by sectors, including industry. This gloomier reality influences the tone, brings in more extreme resonances and charges speeches with "buzz words" like simplification, competitiveness and reduction of the burden hoping these are the start to finding a solution.*

*Read in this context: "For the next few years, the guiding lodestar of European Leaders, the Commission and many MEPs will be "competitiveness, competitiveness, competitiveness", and likely with a large dose of European self-interest. If you can't re-position your case into language that reflects this agenda, you are likely going to find the next 5 years very lonely and may even want to consider hibernation" (Aaron McLoughlin).*

*What about the environmental project?*

*Without falling in the trap of those who claim that simplification equals deregulation, one needs to acknowledge that "environment and its protection" are only briefly or vaguely evoked in the recent Commission documents and the associated media outbursts.*

*Does this mean that nothing is questioned, and the "Zero Pollution" continues or to the contrary that it has tumbled down the list of priorities to a space where some parts may easily shy away to preserve the limelight of the abovementioned lodestar? In both scenarios, it may become difficult to find an audience (and supporters) for technical actions to (risk) control pollution but also to solve some of the incoherences between the environmental legislation pieces, key elements we have been defending over the last years.*

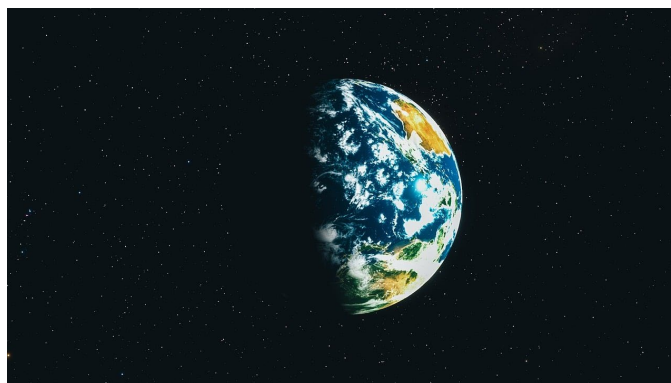
*But maybe, as argued by another lobbyist, only the language and values used to communicate to a given audience change and not the central message. And while it is hard to let go of phrases and language that reflect values and goals, maybe "it's only temporary and gives a better shot at influencing how politicians we don't agree with think and behave". Reframing our case to the decision-maker in front of us, highlighting why our case is fully aligned with the prevailing political currents...to avoid 'political irrelevance'?*

...

*Beyond the politics, the uncertainties and the doom, the only way forward in destructive times is to focus on construction towards the longer-term. Keeping that direction and nurturing the small and big steps on the way. We still don't own this world; we remain its caretakers.*

*And maybe close with Marie Curie's words: "Nothing in life is to be feared, it is only to be understood. Now is the time to understand more, so that we may fear less"*

*Violaine Verougstraete*



# COMMISSION

## **Commission Work Programme 2025: *moving together***

On 12 February the European Commission published its 2025 Work Programme, including a communication titled “Moving forward together: A Bolder, Simpler, Faster Union” (see [here](#)) and annexes listing the Commission's upcoming legislative and non-legislative actions for 2025 (see [here](#)). There are no surprises in the Chemicals Management arena apart from what had been anticipated in the Competitiveness Compass the previous week.

On the REACH revision, the document only confirms the expected publication for Q4 2025 and that it “*will contribute to simplifying rules for the chemicals industry without compromising on safety and environmental protection*”. On water resilience (Q2 2025), the Commission “*will take a source to-sea approach and consider the widely different challenges in our regions and in sectors to ensure that sources of water are properly managed, scarcity and pollution are addressed, and to increase the competitiveness of our water industry.*” Nevertheless, there is no reference to the ECHA Founding Regulation that we were still expecting for 2025 and could have been released with the REACH simplification (or before).

The Steel and Metals Action Plan (2025) announced by the [Competitiveness Compass](#) last week is absent in the 2025 Work Programme, but is still planned. There is no reference to the RoHS Revision that did not materialise in the last mandate.

In addition, 3 simplification "omnibus packages" are planned, the first and second in Q1 2025 focusing respectively on sustainability requirements and investment simplification, followed by one more in Q2 2025 that will address small mid-caps & removal of paper requirements.

This work programme shows that there are quite a few new initiatives that can keep us busy, with a focus on competitiveness rather than on sustainability like in the previous mandate. It should nevertheless be noted that many of the new initiatives are non-legislative, probably white papers or Communications (more information: Ainhoa González Pérez).

## **CARACAL: *CARACAL sub-group on Information Requirements on Endocrine Disruptors***

A CARACAL sub-group was established in 2022-2023 to discuss the possible information requirements related to the ED endpoint in REACH 2.0. This sub-group was reconvened on 18 February. The meeting started with a presentation by Commission providing some context for their work on the REACH revision and their thoughts on how to introduce the foreseen requirements for both human health and environment in Annexes VII, VIII to X (including triggers, follow-up requirements and adaptations). Four *in vitro* assays are currently proposed covering estrogen, androgen and steroidogenesis modalities. Thyroid assays (currently omitted) are not validated yet but will be added in the future. A weight of evidence (WoE) analysis based on all available information (including the 4 *in vitro* assays, and literature data would be included in Annex VII. The discussions were intense as documented by the minutes circulated by Commission but also in the report prepared by ARCHE Consulting that was circulated to the participants to the 14-15 January ED workshop. Comments on the Commission proposal can be sent by 11 March. A cross-industry call was held before the 18 February meeting to identify the concerns and positions, and it is proposed to also check with the other industry sectors whether common messages can be reinforced (more information: Guillaume Richer, Andreas Fettweis and Violaine Verougstraete).

# EU AGENCIES

## EUROPEAN CHEMICALS AGENCY (ECHA)

### ECHA COMMITTEES

#### **RAC-72 DWD Working Group: *roadmap, checklists and capacity-building***

The RAC DWD Working Group virtually came together for 2 days, bringing together DWD experts and RAC members to discuss a packed agenda. 2025 is indeed devoted to preparing the tools required for the notifications, submissions and opinion-making by RAC. These tools include RAC opinion templates per material type (organic, metallic, cementitious and inorganic materials), decision trees, checklists which RAC rapporteurs can use to go through and assess an IUCLID-based application, and later in the year, some documents establishing other methodological aspects, e.g., justification for proposing expiry dates.

ECHA is also establishing the IT requirements because 2026 will see the development and testing of IT tools to support the processes. The first applications (and RAC opinion-making) are expected at the start of 2027. Very interesting discussions took place around the intended use checklists for metallic, cementitious and inorganic materials, the update on the genotoxicity checklist for all material types and how risk acceptance and/or additional conditions can be agreed upon. The quality of the applications submitted by industry will be crucial to avoid the use of defaults and overconservative opinions. Considering this but also the complexity of this (still) new process, Eurometaux proposed once again to support/contribute to capacity-building workshops. ECHA noticed this and indicated that they plan a hybrid workshop in autumn to demonstrate an application/notification and maybe additional webinars. We will follow-up to ensure the specificities of metallic/inorganic materials are addressed as well. Learnings of the meeting will be communicated to the Eurometaux DWD sub-group (more information: Lara Van de Merckt).

#### **MSC-89: *new hazard classes from Candidate List to Annex VI, ELOC, CORAP, SVHCs...***

The 89<sup>th</sup> meeting of the MSC was held virtually. A presentation was given including the timelines regarding the new CLP hazard classes, reminding the MSC members that those cases included on the Candidate List before 11 June 2026 may be transferred directly to Annex VI of CLP via a delegated act VI. It was also clarified that non-harmonised hazard properties (e.g., T property of a PBT substance on the Candidate List) will not be automatically transferred to CLP Annex VI but would require a CLH proposal. ECHA provided a recap on the Equivalent Level of Concern (ELOC) principles, reminding the participants that it is always a case-by-case assessment. The discussion focused on examples of emerging hazards that could potentially be addressed under REACH Art. 57(f) in the future, like immunotoxicity, neurotoxicity (including behavioural outcomes) and metabolic disorders (for both human health and environment). Several MSC members and observers supported the importance of including specific testing requirements related to these emerging hazards in any REACH revision.

Three proposals had been made by ECHA in 2024 for a revision of the Annex XIV prioritisation approach. The first proposal, which was to consider the risk of a too high number of applications for authorisations (AfAs) was not overall supported and hence the ECHA proposed to not continue with this proposal but to still explore options for improved data collection in this regard and where relevant, communicate the results to Commission. The second proposal referred to the scenario where there would be parallel work done towards a restriction (intention to prepare a restriction on the RoI or a mandate provided to ECHA, or a REACH restriction case under opinion-making or decision-making, or there is an entry in pool 1 of Commission's Restrictions Roadmap). This proposal was supported and ECHA will include some further refinements in their proposal to address the comments received. The third proposal to stop scoring extra points for service life was not objected to by MSC, however it was agreed not to continue with this proposal as it has only very limited impact on the final selection of substances in a recommendation round. In the discussion, it was emphasised that the functioning of the AfA process should be further debated in other forums, such as Rime+ and the OSOA Working Group, as well as in the context of the REACH revision. Regarding the draft 12<sup>th</sup> recommendation of priority substances for Annex XIV, a 6-month delay was announced following the discussions above on the prioritisation approach.

MSC also discussed its opinion on ECHA's draft update of the Community Rolling Action Plan for (CoRAP 2025-2027), which includes 13 new substances for evaluation (no metals). The opinion will be published together with the annual CoRAP update on 25 March 2025.

An overview of the pending appeal and court cases and recent judgements on Evaluation and SVHC identification was provided by the ECHA secretariat, and the relevant learnings will be discussed at the next Registration Compliance Taskforce meeting (29 April). And finally, there was an announcement made by ECHA that they are reflecting on whether observers could have access to the Manual of Decisions. Eurometaux commented that this would be very useful to facilitate capacity-building (more information: Violaine Verougstraete).

## ECHA OTHER ACTIVITIES

### **ECHA decisions: on new EC numbers formatting**

As previously reported, ECHA informed industry associations that the possibility to generate EC numbers was coming to an end, because of the exhaustion of the numerical possibilities. Eurometaux, together with the other industry associations provided feedback to ECHA, demanding to not change the existing EC numbers structure, when moving to the new system. ECHA confirmed this and lately communicated the decision taken on the new format: the current EC number format (XXX-XXX-X) is maintained, but there will be a change from a strictly numerical to an alphanumerical format for new entries. This approach aligns with the option that was overall most favourable to industry (more information: Federica Iaccino and Lorenzo Zullo).

### **ECHA Industry associations: *monthly call (February 28.02.2025)***

ECHA opened the call with an overview on the January submissions statistics (excluding CLP notifications): submissions have been overall 10% below the forecast, with an increase in number of Product and Process Orientated Research and Development (PPORD) notifications. As previously noted, when considering all types of submission, the higher percentage (92%) comes from CLP notifications, which further supported the urgent need to implement the new EC format to generate new EC codes.

Industry associations have reported to ECHA the intention to update REACH-updates communication and good practices, such as improving the reasons for updates of IUCLID dossiers (and link with REACH IT), updating the industry guidance referred to in Article 22 that was previously developed (following up on BoA decisions on tonnage downgrade and cease manufacture ongoing), and preparing short factsheets for member companies to easily review/update registration information. On IUCLID 2026 developments, a call with the ECHA IUCLID team will be organised prior to the summer ECHA-Industry meeting to ensure best alignment and understanding on future updates.

Robust Study Summary (RSS) reporting was discussed with the ECHA Evaluation support team to understand regulatory requests: ECHA explained that RSS must include sufficient detail for risk assessment and future regulatory action (processes evaluations, risk management and CLH), summarising the essential details and providing data, considering that the study reports are rarely included. ECHA agreed that they need to be clearer in their requests, to allow registrants to address them efficiently. As first input, ECHA suggested to closely follow OECD guidelines when preparing RSSs.

Finally, Eurometaux reported on the Russia Sanctions status (see Russia Sanction news) and ECHA reported on the EC inventory update with the use of the new alphanumerical codes (see ECHA decisions on new EC numbers formatting news).

The next ECHA-Industry face-to-face meeting in Helsinki is confirmed for 17th and 18th of June. More details will be shared with the Registration Compliance Taskforce during the monthly call and during the Helsinki meeting (more information: Federica Iaccino and Lorenzo Zullo).

# EUROMETAUX CHEMICALS MANAGEMENT

## **Environment Taskforce: *from MERAG to Hyalella...not forgetting EDs and NAMs***

The Environment Taskforce met on 6 February to discuss, under the lead of David Boyle (CI) and Jelle Mertens (EPMF) (co-chairs), the update of the MERAG classification factsheet (and a simplified version), how to tackle the technical multi-metallic actions identified during the January ED workshop, the potential issues associated with ECHA's proposal to replace the Fish Bioaccumulation test (TG 305) by the OECD TG 321 HYBIT (Hyalella Azteca bioconcentration) test and finally, the outcomes of the interaction with JRC on moving away from animal testing.

On HYBIT, ECHA thinks the Hyalella test is a good alternative solution given a strong correlation between fish and Hyalella BCF data has been demonstrated whereby both tests were  $\pm$  equally sensitive. The ECHA Member States Committee agreed last autumn that the HYBIT test, now it is published as OECD TG, can be requested both under Dossier Evaluation (DE) and Substance Evaluation (SE) in case of substances for which aqueous exposure test is feasible, noting that this change will also contribute to the aim of REACH to conduct vertebrate studies only as a last resort. Jelle Mertens presented the silver case, showing that this test may lead to a very conservative assessment in absence of fish data.

Ways forward have been agreed on the different items of the agenda and draft minutes will be circulated soon (more information: Lara Van de Merckt).

## **Chemicals Management Steering Committee: *from a strategic plan for CM...up to REACH 2.0 and water resilience***

The meeting started with the overview of the chemicals management elements included in Eurometaux's draft strategic plan, to be soon approved by the Eurometaux Management Board. This plan outlines the key activities that will influence advocacy. The key objectives for CM will be: continuing to promote the metals sector's assets and specificities in chemicals management, focusing on the legislative initiatives possibly impacting the license to operate, market access, access to finance and shareholder value (compliance). This was followed by a short status update on the CM Projects for 2025. A reference to Commission's 2025 Work Programme introduced the discussion on the REACH "simplification", including the potential timeline and the upcoming advocacy opportunities. Eurometaux is currently finalising both a position paper and a high-level advocacy paper, including 10 action points/high-level messages.

Endocrine Disruptors (ED) assessment activities are high on the agenda, following the CLP classification deadline for substances and the discussion on the REACH ED Information Requirements. Technical work is ongoing, and an Action Plan will be presented at the Science Forum (in March).

The CMSC was also updated on the Transition Pathway: following the latest draft received from Commission, the finalisation of the TP appears as a feasible target. The current draft of the TP includes a reference to the TNO study, which was subsequently discussed but mainly from a communication perspective.

Eurometaux also provided an overview of the Water Resilience Strategy -whose aim is to ensure water security and resilience across the EU- the EC Consultations and timings and the sector's position and key policy recommendations.

Several high-level advocacy actions carried out at EM level are also highly relevant for the chemicals management activities: for example, the Eurometaux annual event planned for 25 June that includes a panel related to Zero Pollution, but also the highlights of the Strasbourg Metals Day (21 May).

Finally, updates were given on the outcome of the brainstorming session on the link CM and sustainable finance/reporting and on the status of the MEED project and its next steps. Kamila Slupek (Sustainability Committee) explained the proposed revamping of the PEF Metals Taskforce to deal with lifecycle assessment/Usetox issues. The draft minutes will be circulated asap (more information: Violaine Verougstraete and Ailsa Lee).

## **REACH 2.0 Advocacy Project Group: *position papers***

The REACH 2.0 Advocacy PG met on 14 February jointly with the Risk Management and Registration Taskforces to discuss the Eurometaux draft Position Paper on the REACH simplification and the 10 high-level asks that stem from it.

The group had previously provided numerous rich comments that have helped refine the Position Paper. The call focused on providing feedback on the high-level asks and finding agreement on the key outstanding

issues from the longer paper. The resulting high-level, stronger-toned one-pager will be used for general advocacy and will be accompanied by a detailed Position Paper that will be progressively complemented and used depending on the more technical discussions, acting as a “message house”. The PG will receive the revised position paper in the coming days for approval (more information: Ainhoa González Pérez).

### **Human Health Taskforce: *ED, particles, welding and a phoenix***

A Taskforce call took place on 26 February, very efficiently led by the 3 co-chairs, allowing to catch up with a variety of topics. At the ED workshop mid-January, several issues were identified for technical follow-up by the Environment and Human Health Taskforces. First proposals on how to address these and how they should now be further refined, considering the comments by the participants, before being presented to the Science Forum on 12 March. EBRC provided a very interesting update on particle issues and the recent learnings from TiO<sub>2</sub>, SAS, talc classification cases. Further discussions should take place to agree on the best strategy and forum to ensure the most crucial features, like the assessment of adversity and severity and the guidance values do not further impact metal particles dossiers.

Commission has included bioelution on the April CARACAL agenda, to assess whether it could become an EU test method (after the OECD Test Guideline work was stopped in April last year) and whether it would be possible to have more formal guidance on the applications (i.e., read-across and grouping, classification of alloys). This will require some work to be carried out before mid-March, including a call to the sector to indicate how/when/if metal release is used.

New Approaches Methodologies (NAMs) and reduction of animal testing are hot topics on the regulatory agenda: information was provided on discussions held with the EU JRC, the EPAA (European Partnership for Alternative Approaches to Animal Testing), on conferences (to be) attended by Eurometaux. It was suggested to provide input to the JRC’s compilation of transitional initiatives (i.e., any initiative contributing directly or indirectly to the replacement or reduction of animal use in regulatory assessments) to promote our non-testing inorganic UVCB approach, metal release, QICARs (quantitative ion character-activity relationships) etc.

Finally, EBRC presented the finalised welding guidance (see also below), and authors were thanked for this great achievement. The draft minutes of the call will be circulated asap (more information: Ailsa Lee and Violaine Verougstraete).

## **CHEMICALS STRATEGY FOR SUSTAINABILITY**

### **REACH Revision: *Cross Industry Group***

The Cross Industry Group on the REACH Revision met on 21 February to discuss and share industry intelligence and positions on the upcoming REACH Revision.

According to some of the participants, the Commission is aiming at May 2025 for submitting the draft proposal to the Interservice Consultation, which leaves a tight timeframe for industry to feed its ideas into the drafting process (by April 2025). There could be a presentation of the draft already during the 3-4 July CARACAL. So far, some associations have learned that there is an ongoing debate on whether to still include the “big” CSS items in the proposal and a political decision needs to be taken on this front. For example, when it comes to the GRA, as a non-negotiable minimum, it will apply to consumer uses, ED cat 1 (but potentially may have a bigger scope). Tentatively, the Commission will just amend the existing text (previous draft proposal) unless at political level it is stated otherwise.

Regarding the different industry positions discussed, Cefic has finalised its 10-point action plan. They will start an advocacy campaign at EU and national levels and would like to exploit synergies with other trade associations. They presented their proposal for a “front end loading” system (RMOa revisited) and there was wide support for the idea by other trade associations. It was agreed to prepare a joint industry presentation on including an RMOa-like process in REACH (whatever name/acronym we put on it) for the next CARACAL. Eurometaux presented its draft 10 recommendations as well and it was agreed that there is an alignment between the EM and Cefic proposal. Most trade associations have not finalised their positions yet and presented their previous asks from 2022, which mostly still stand. There were many common points raised: there was wide support for an RMOa-like system, a revamp of authorisation, no

pushback against enhanced targeted data requirements from Downstream Users, and clear opposition to GRA, EUC, wide grouping and the hazard-based approach.

As next steps, the next 4-5 weeks will require industry to reach out to policymakers with ideas. The group will reconvene ahead of the next April CARACAL, where it will aim to agree on a joint industry presentation on including an RMOA-like process in REACH (more information Ainhoa González Pérez).

## CLASSIFICATION

### **Lithium Classification Taskforce: *update call***

The call was held on 6 February to provide the Taskforce with the outcomes of the meetings with ANSES & the Commission. For the latter, industry provided a status update on the Industry RMOa, sharing some key outcomes and views on the proposed risk management measures. The Commission was also invited to participate as observer at the Experts Roundtable that will be held on 4-5 March in London. The aim of the Roundtable is to further clarify/refine hazard assessment/identification and independent experts will be asked to deliver their evaluation. Commission confirmed that the entry based on the last RAC opinion will be discussed at the next CARACAL meetings, with a Commission decision after summer, then scrutiny by EP & Council and a publication planned end 2025/early 2026.

Regarding ANSES: ILiA, Albemarle, Imeris and Eurometaux met them to exchange on both ANSES & industry's RMOas and the next steps. ANSES is working on a revised report, considering the comments submitted along the public consultation held in December 2024. They aim to finalise their report before the summer, which will afterwards go to RIME+ as Li salts have already been discussed there.

Regarding the industry RMOa, the proposal is to translate the recommendations into an action plan/Manifesto for which the proposed structure could include, after an intro on the Li classification, some RMO suggestions and reflections on restrictions & uses/analyses of alternatives.

Besides the classification issue, work is ongoing on the environmental data and a potential EQS. A status update was provided. The draft minutes have been circulated to the Li CLH Taskforce members and the next meeting will be organised in view of the evolution of the situation (more information: Francesco Gattiglio, Joeri Leenaers, Violaine Verougstraete and Ailsa Lee).

## REACH REGISTRATIONS

### **Russia sanctions: *conclusions on registrants' due diligence***

On 12 February, Eurometaux, together with CEFIC and Concawe, held a productive meeting with ECHA and Commission (DG FISMA and DG GROW). Our Eurometaux Registration and Compliance Taskforce Chairs actively participated in the call, emphasising the need for clear assurances regarding the process of updating REACH dossiers without the risk of breaching Russia sanctions. ECHA and Commission clarified the limits of responsibility for lead registrants and SIEFs and outlined the procedure the industry is expected to follow. Specifically, they emphasised the need to inform both the REACH and Sanctions National Competent Authorities about the findings of the Russia sanctions screening exercise, for substances intended for dossier updates. This requires contacting both the Lead Registrant and any likely-sanctionable co-registrants Member State authorities. Commission further stated that if registrants face difficulties in engaging with national authorities, they can report these issues directly to Commission for support. Additionally, ECHA committed to providing direct feedback upon receiving such messages from the Lead Registrant.

This topic was also raised by Eurometaux at the ECHA Enforcement Forum on 27 February, where REACH enforcement authorities welcomed the clarifications. They also encouraged registrants to engage with them directly only when enforcement actions are initiated, ensuring timely follow-ups, such as during ongoing enforcement proceedings or necessary updates from registrants in response to ECHA decisions. (more information: Federica Iaccino and Lorenzo Zullo).



# INDUSTRIAL EMISSIONS

## Industrial Emissions

### ***BREF Guidance***

On 31<sup>st</sup> January 2025, DG Environment circulated the [draft revised BREF Guidance](#) (publicly accessible). DG ENV sent a letter to the Members of the IED Article 13 Forum asking for feedback by 2<sup>nd</sup> May 2025.

Eurometaux Secretariat has prepared a Word document with preliminary comments to the revised version of the BREF Guidance. The document was circulated among the IED Taskforce members on Friday 21<sup>st</sup> February 2025 asking for feedback.

For action: the deadline to submit additional comments to Eurometaux Secretariat is **21<sup>st</sup> March 2025**.

### ***IED Transformation plans***

On 17<sup>th</sup> February 2025, DG ENV sent a letter to the Members of the IED Article 13 Forum asking for feedback by mid-March 2025 on two studies commissioned in relation to the Art. 27(d) of IED 2.0 and transformation plans.

The first study aims to identify the investment gap for transforming IED installations to meet carbon neutrality, zero pollution, and circular economy goals. The second one will support the European Commission DG ENV in the development of the content of transformation plans in line with IED 2.0 Art. 27d.

The first study will:

- collate and synthesise information on key technologies for decarbonisation, zero pollution and circular economy objectives applicable to IED 2.0 sectors;
- develop transformation scenarios which project the necessary uptake of technologies to meet environmental ambitions, and estimate their costs;
- review funding options for IED 2.0 installations to finance the take-up of technologies, comparing this to the costing of sectoral transformation plans to assess the investment gap.

The second study will:

- support the European Commission with the development of the content of the transformation plans which will be set out in the delegated act. The Commission shall adopt the delegated act by 30 June 2026 (Art. 27d para 5);
- establish the ideal contents for transformation plans based on the IED 2.0 as well as wider EU policy objectives;
- review similar requirements under other EU legislation to ensure consistency and avoid duplication.

Based on this analysis, a draft content will be developed and shared with stakeholders to gather feedback. The draft will then be refined accordingly to support the finalisation of the delegated act.

For action: Eurometaux Secretariat circulated on 21<sup>st</sup> February 2025 a draft Word document to provide feedback on these projects. The deadline to submit comments to Eurometaux Secretariat is **10<sup>th</sup> March 2025**.

### ***Internal Eurometaux survey on implementation of NFM BAT Conclusions***

On 26<sup>th</sup> February 2025, the internal survey to assess the implementation of NFM BAT Conclusions within Eurometaux's membership has been launched. The main objective is to evaluate the "distance to target" of the updated permit requirements of NFM installations and lay down the basis for Eurometaux's strategy for the future revision of the NFM BREF.

The survey will specifically look at the following aspects:

1. Status of BAT implementation in the NFM sector;
2. Key challenges and issues related to compliance;
3. Sector's readiness for the future NFM BREF revision.

Eurometaux Secretariat circulated the questionnaire to the IED Taskforce members which shall be forwarded to the operators of NFM installation. The assessment of gathered info will be performed in Q2 2025. For any assistance during this process (e.g., supporting operators in the exercise of compiling the questionnaire), you can contact [iedsupport@eurometaux.be](mailto:iedsupport@eurometaux.be).

For action: The filled in questionnaires shall be submitted to Eurometaux Secretariat by **28<sup>th</sup> April 2025**.

### **OECD BAT sub-group**

Eurometaux Secretariat will be part of the sub-group of the OECD's BAT project's activity on *the role of BAT in sustainable materials and waste management*.

To this end, a first meeting of the sub-group will be held on **17<sup>th</sup> March 2025** in order to discuss, refine and decide upon an agreed scope for this study.

Possible elements for the scope will be the following:

- Regulatory Frameworks and existing BAT Reference Documents (BREFs)
- Value Chain Considerations for BAT in Sustainable Resource and Waste Management
  - a. BAT in sustainable resource management: Resources (raw materials) extraction, processing and manufacturing, product use and consumption, and end-of-life.
  - b. BAT role in waste management: waste strategies, types, reduction-recycling, treatment and disposal.

BAT approaches in sustainable battery production and waste management: BREFs available, environmental concerns in battery manufacturing and disposal and existing BAT approaches for sustainable battery production (more information: Andrea Pellini and Eleonora Tosi).

### **Mining BREF: update**

EU-BRITE circulated among the Technical Working Group (TWG) of the Mining (MIN) BREF the draft meeting report of the Kick-off meeting (KoM). This draft includes conclusions taken during the KoM as well as a summary of the discussions in order to understand the context in which the decisions were taken. TWG members are invited to submit comments by 28<sup>th</sup> February to EU-BRITE. Afterwards the finalised KoM report will be made publicly available on the EU-BRITE website.

For action: Eurometaux Secretariat prepared comments to the draft KoM report related to leaching processes, in particular gold leaching process (discussed under the sections "Mining operations" and "Emissions to water") to be sent to EU-BRITE by the deadline on **Friday 28<sup>th</sup> February 2025**.

Next steps: Eurometaux Secretariat has been working internally to gather more information on leaching processes. In addition to that, coordination with other industrial associations will be key to develop better strategies in view of the coming questionnaire and data collection phases (more information: Violaine Verougstraete, Andrea Pellini, Lighea Speciale, and Eleonora Tosi).

### **Landfill BREF: update**

On Monday 17<sup>th</sup> February 2025, EU-BRITE launched the frontloading survey for the LAN BREF. With this survey, EU-BRITE invited TWG members to "frontload" the information exchange for the preparation of the LAN BREF. They requested to provide information, comments and views on 18 areas relevant for the landfill sector. Among the most relevant aspects that are tackled in this survey:

- EU-BRITE proposed to cover not only activity 5.4 from IED, Annex I related to landfills but also activity 5.6 ("underground storage of hazardous waste with a total capacity exceeding 50 tonnes");
- For the scope, EU-BRITE proposed to cover different operations/phases such as closure phase and after-care phase;
- A structure of the LAN BREF was also proposed in the survey and for the chapter on applied processes and techniques landfills were divided in three main categories (i) Hazardous landfills, (ii) Non-hazardous landfills: municipal landfills, and (iii) Non-hazardous landfills: other than municipal landfills.
- Recommendations on emerging techniques are included in the chapter of the BAT conclusions.

TWG inputs on these initial proposals will lay down the basis for EU-BRITE to prepare the Background Paper (BP) for the Kick off Meeting, foreseen for October 2025.

Eurometaux has established a LAN BREF sub-group and on 25<sup>th</sup> February 2025 the first meeting was held. The sub-group will work together with Eurometaux Secretariat to collect all the relevant information.

For action:

- LAN BREF subgroup to provide feedback and views to Eurometaux Secretariat on the frontloading survey by **20<sup>th</sup> March 2025 EOB**.

The next meeting of the sub-group is foreseen for **beginning of April 2025**.

The Eurometaux secretariat is also part of the Industrial Emissions Alliance sub-group for the LAN BREF which is having regular meetings (more information: Andrea Pellini, Lighea Speciale, and Eleonora Tosi).

## TOOLS

### **Welding and REACH guidance: *updated version including use maps***

In 2010, the European Welding Association (EWA), Eurofer and Eurometaux published a paper on “REACH and the Welding of Metals and Alloys”. This paper has now been updated to provide an integrated approach of risk assessment and communication under REACH and facilitate compliance with legal requirements for registrants and downstream users under REACH. The updated guidance, which covers ‘Welding+’ processes (i.e., welding and allied processes including laser cutting, flame cutting, brazing, gouging, etc. and fumes generated from welding or allied processes) includes a risk management measures catalogue and employs use maps as main tool to facilitate communication under REACH. These use maps include a comprehensive use description and define conditions of use relevant for welding+ processes. The use maps have been submitted to ECHA and should be downloadable soon. A big thanks to EBRC, EWA, Eurofer, Nipera, Tony Newson and Martin Wieske for this achievement! The guidance will be circulated to the Human Health Taskforce with the draft minutes of the 26 February call (more information: Daniel Vetter, Jutta Schade, Dennis Döhlich (EBRC) and Violaine Verougstraete).

### **Inorganic UVCB assessment methodology: *preparing a publication***

Mid-January saw the first meeting between EBRC, ARCHE, and Eurometaux to discuss the upcoming publication on the methodology followed to evaluate inorganic UVCB substances under REACH. The main goal of the meeting was to define the structure and table of contents for what will become a scientific journal article. During the discussion, several potential journals were proposed and the publication possibilities were evaluated (more information: Andrea Pellini and Federica Iaccino).

### **IUCLID release May 2025**

The next IUCLID release, including format changes that was initially foreseen for April, will occur on May 26<sup>th</sup>.

In this version, the technical completeness rules (TCC) have not been updated, but a business rule (BR369) has been introduced to ensure that in case an IUPAC name is claimed confidential, a public name is published. This was introduced as ECHA noticed about 350 registrations without name published. The BR 369 will be highlighted by the validation assistant, but also by REACH IT. (For more information: Federica Iaccino)

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## OTHERS

### **Brainstorming Workshop: *Links reporting /sustainable finance and chemicals management***

On 5 February, following the request made by two companies end of last year, a brainstorming was set up with interested members to discuss the impacts of some chemicals management decisions on compliance with other legislations, reporting obligations and access to finance. The focus was more specifically on EU taxonomy and the EU Corporate Sustainability Reporting Directive (CSRD). Possible areas of action were identified, like on the Omnibus legislation to be published on 26 February and the Simplification Roundtable organised on 6 February, on REACH 2.0 (e.g., ask for the delisting of SVHCs after risk management has been implemented), on the CSRD (e.g., have thresholds and avoid double counting), taxonomy, etc. It was agreed that the main aim of the advocacy to be conducted would be to reduce the burden of reporting requirements and gain adequate recognition of Raw Materials’ role. One of the immediate actions was for Eurometaux to discuss the set-up of a special Taskforce with interested members across the 3 departments (Trade, Sustainability & Chemicals Management) to help coordinate actions across different committees on the different files (CS3D, CSRD and EU Taxonomy) and identify the key messages to share on each legislation. The invitation to participate in this Taskforce was sent on 26 February with the Omnibus I Simplification Package (more information [here](#) & [here](#)) that contains a proposal for a Directive amending the Directives: Accounting, Audit, CSRD, and CSDDD, a proposal postponing the application of some reporting requirements in the CSRD and the transposition deadline and application of the CSDDD. The draft minutes of the brainstorming meeting as well as a proposal of comments to submit in follow-up of the Simplification

Roundtable were circulated on 11 and 13 February (more information: Kamila Slupek, Laura Fazio Bellacchio, Sounia Mourabit, Carmine Carinci, Ainhoa González Pérez and Violaine Verougstraete).

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## KAMILA'S SUSTAINABLE CORNER

### Export of EU non-hazardous waste to non-OECD countries

In the course of implementing the provisions of the Waste Shipment Regulation (WSR, 2024), the European Commission (DG ENV) has proceeded with coming up with agreements with the non-OECD countries that would like to import non-hazardous EU waste.

The non-OECD country authorities were invited to notify the European Commission of their willingness and demonstrate their ability to treat this waste environmentally soundly, as per Annexes VIII and IX of the Regulation. The deadline to submit their request to the Commission was 21 February 2025.

So far, the following countries (24) requested to be able to import non-hazardous waste from the EU: Bangladesh, Bosnia and Herzegovina, Egypt, El Salvador, India, Indonesia, Kazakhstan, Malaysia, Moldova, Monaco, Morocco, Nigeria, North-Macedonia, Pakistan, Philippines, Saudi Arabia, Serbia, Singapore, Taiwan, Thailand, Togo, Tunisia, Ukraine and Vietnam (more information: Kamila Slupek).

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## CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for Q1 & Q2 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](#)

- 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: ECaBaM 3<sup>rd</sup> Batteries Workshop
- 28-30/04: RAC-73 CLH WG
- 29/04: Registration Compliance Taskforce
- 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)
- 19/05: 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

## 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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