

EUROMETAUX CHEMICALS MANAGEMENT NEWS



Please join us in April:

- 07-08: ECaBaM Workshop
- 23: ED Workshop
- 29: Registration Compliance Taskforce

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I was waiting to cross the road when my attention was drawn by whispers at the level of the small grassy area next to me. I first saw a brand-new daffodil, stretching its immaculate petals towards the morning sun, agitating its leaves, yawning and praising its own glory. Next to her, a daisy. Everything but a glorious new one: her petals were crumpled and the extremities dried out, her stem looked more greyish than green, and it seemed to take some efforts to raise her head to the sun. Was she one of the courageous remainders of last summer who got through autumn and winter? I discreetly tried to hear what they were discussing.

In my childhood stories, often ending with a moral (warning), the young daffodil would have been arrogant, mocking the old one's faded appearance, listening to nobody until a March shower suddenly occurred, damaging its heart, hail piercing its petals. The old one would have tried to warn the younger one, to remain prudent during these first days of March, to not completely expose her beauty but rather capitalise on the length of the flowering time. And depending on whether the author aimed at a happy or traumatising end, the younger one would have survived the last frosts of the winter and spent an appeased spring with the older daisy. Or not! In the latter case, as a child, I would have categorised the story as 'not necessary to read it again'.

In these current times, one could also imagine an even more upsetting one: at the instant the new daffodil pops up and realises that there is already another flower in the park, she announces with an outraged face that she will make the park great again, renaming it and allowing only her congeners to stay. Could such a story have worked with children though?

But it was not the case here. The young daffodil looked at the old daisy and asked: "what's up"? The old one started to tell that last summer had been rainy and grey, leaving the pedestrians a bit downhearted during the autumn months. She had decided at that time that her quota of sunny days had been too short as well and had taken the risk of remaining despite her companions leaving the park. As a result, she saw some sun but also lived through some freezing temperatures that browned her once bright petals and covered her with the leaves falling from the trees. Oddly enough, the winter did not seem to really have control on what it was doing; alternating snow with some hotter temperatures that had made her worry that the daffodils and daisies would wake up too early. "Climate change!" she heard the people say while they were waiting for the green light. She also overheard discussions about wars, invigorating armies, and rights that were once but no longer considered.

Only a small fraction of the humans around had noticed her presence during the cold days whilst she had made so many efforts to show up, bravely allowing them a glimpse of the spring that would come back. Was it not amazing, she asked the younger one, how some humans – in the end only representatives of a single species – do seem to forget again and again where they come from and where they are heading to? Should they not cherish the present and future, without compromising it? The daffodil smiled, hugged the daisy in her fresh and strong leaves and...

... select your end of the editorial on the last page!

Violaine Verougstraete

PS warning: we are the 1st of April! There are some pranks and jokes in the text (and we included a list on the last page to avoid any turbulences!)

COMMISSION

Meeting with Jessika Roswall: REACH, Circular Economy and Water Resilience

On 19 March, an industry delegation composed of the European Precious Metals Federation, Albemarle, Umicore and Eurometaux met Commissioner Roswall for an exchange on Circular Economy, REACH and Water Resilience. The meeting, held the same day as the publication of the Commission's Steel and Metals Action Plan, allowed us to reiterate the importance of all non-ferrous metals to achieve the EU goals and to explain the specificities in their management that render them different from other chemicals.

On REACH, Eurometaux mentioned the 10 proposed actions to increase the efficiency of risk management and make it fit for purpose for an EU based competitive industry, highlighting the importance of coherence between different objectives (for example, chemicals management and the Critical Raw Materials (CRM) Act). On Circularity, a plea was made to have a single waste market and smart policy to avoid export of materials that could be better recycled here. On Water, the Eurometaux scheme showing the interrelations of the Zero Pollution Ambition with other EU policies ('spaghetti slide') was used to stress the importance of having water policies supporting green transition and raw materials supply chains, prioritising implementation of the existing directives rather than new legislation. To further explain the specificities of metals vs. organics, the Eurometaux staff was wearing a pin on which one could read: "naturally occurring, cannot be destroyed, manage me".

The Commission underlined the importance of circularity and evoked the possible legal instruments to keep the materials in the EU without penalising global sourcing of EU based industries. The Commissioner confirmed that the REACH proposal can be expected at the end of the year as well as her close cooperation with Commissioner Séjourné on the file. On Water, Commissioner Roswall agreed that making use of existing rules may be more efficient than proposing new legislation but insisted on the importance of striving to better water quality and to continue considering water as a critical resource. Eurometaux left several position papers (REACH, Water Resilience, Metals Action Plan) with the Commissioner, hoping to continue the dialogue on these key topics (more information: James Watson and Violaine Verougstraete).

DG Environment: organigram changes

DG Environment has officially reorganised some of its key units and portfolios as of March. Unit B2, which was responsible for the revision of REACH and was part of Directorate B on the circular economy, will join Directorate C on "zero pollution", under the leadership of Veronica Manfredi. Meanwhile, the previous C4 unit, dedicated to industrial emissions, will take its place under Directorate B, headed by Aurel Ciobanu-Dordea. This reorganisation should have the effect of rebalancing the missions of the two directorates with regard to the upcoming legislative initiatives. In particular, Directorate B is preparing the circular economy legislation for the end of 2026, whilst the chemicals unit is immersed in the revision of REACH until the end of the year. Within the Zero Pollution Division, it will be working more closely with units dedicated to water management. See the new organigram [here](#).

Additionally, Florika Fink-Hooijer is stepping down as Director-General of DG Environment and be taking over as head of the Health Emergency Preparedness and Response Authority (DG Hera). Pending the appointment of her successor by Commissioner Jessika Roswall, Patrick Child, Deputy Director General of the Directorate General for the Environment (DG ENV), will act as interim Director General. Florika Fink-Hooijer had been head of the department since 2020.

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

RAC-72: plenary meeting

The Risk Assessment met for a plenary full week early March. Key items included the finalisation of the silver nitrate classification harmonised discussions but also the restriction on the use of PFAS in the energy, transport and F-gases sectors. But also the discussions on the Occupational Exposure Limits (OELs) were quite interesting, as they confirmed that the work on the Li salts OEL would only start in the second half of this year, and the setting of exposure limits for bisphenol A triggered a series of discussions on how to address the effects seen in the immune system, in the mammary

gland, on the metabolism and on the neurodevelopment after in utero and early in life exposure. But also the existence or not of a threshold for Endocrine Disruptor (ED) properties and the mechanisms of actions were debated in detail. The draft opinion will be finalised in June.

The discussion on silver nitrate aimed at addressing the open endpoint remaining, i.e., carcinogenicity. The reason for the non-inclusion of this endpoint in the earlier RAC discussions was the finalisation of a two-year carcinogenicity study with silver acetate end 2024. This study is relevant for silver nitrate via a read-across approach, and it was agreed to wait for this data and go beyond the original deadline for a RAC opinion to allow a best-possible assessment of this endpoint. The RAC members unanimously agreed that the findings trigger a classification as carcinogen category 2 (in line with the self-classification that has been agreed upon within industry). Findings in the testes in the carcinogenicity study were considered as relevant by the RAC and in support of the already agreed Repro 1B (fertility & development) classification (industry agreed that these findings rather trigger a STOT-RE2 self-classification). The findings in some neuronal tissues in the carcinogenicity study (spinal cord, sciatic nerve, brain) were considered relevant for hazard assessment by the RAC. More specifically, these findings were considered relevant in support of the already agreed STOT-RE1 (nervous system) classification. On synthetic amorphous silica (SAS), RAC confirmed the agreement made by the RAC CLH Working Group, i.e., STOT RE1 for the respiratory tract.

On the PFAS, RAC reached provisional conclusions on the applications for fluorinated gases, transport and energy applications. In its stepwise assessment of the restriction, RAC is supposed to evaluate the alternatives to PFAS from a hazard and risk perspective, ahead of SEAC. However, the Annex XV often contains only limited hazard information on the alternatives, without further assessment or consideration e.g., of the whole lifecycle, which also limits RAC's assessment whether an alternative is "safer". The PFAS Rapporteurs proposed a pragmatic alternative that could allow them to also highlight some concerns they may have if e.g., alternatives contain some hazardous additives/impurities. RAC also discussed the possible in person industry/NGOs expert participation in harmonised classification discussions. Since COVID, experts participate online. A letter was sent by Eurometaux, Cefic and CropLife Europe to ECHA's Executive Director to ask for the possibility of coming back to physical attendance as it facilitates capacity-building of all actors but also allows the experts to read the dynamics in the room. Overall, most RAC members were supportive of the proposal to allow experts in the room, provided it is both for industry and NGO experts, but it was agreed to do a trial period of 1 year, limited to CLH processes, and to evaluate the additional workload for the RAC secretariat before extending to other processes. A second heated discussion was about the coffee breaks and the quality of the coffee served, whether it facilitates decision-making or not. The conclusions will be posted on the ECHA website (more information: Violaine Verougstraete).

SEAC-66: chromates authorisation cases continue

The flow of Authorisation for Application (AfA) cases for chromates continues and is expected to continue until mid-2026. Discussions on the large CTAC-Sub2 upstream AfA were finalised by concluding on one remaining small part of sub-use 12 (coil coating) which was held over from SEAC 65. Several downstream user AfAs were also covered, some new and others with addenda made since previous discussions. Clearly, for SEAC there are challenges in obtaining the level of granularity and quality of the information provided by applicants, necessary for decisions to be made. The process for gathering this is not efficient, often what is sent by the applicant is not the right type or quality of data. This means that several rounds of written information exchange can be needed. In some cases consultants act as facilitators but this does not always help. Issues include: language barriers, lack of understanding by the applicant on what is needed; incomplete analysis of alternatives and / or substitution plan. However – with a good quality AfA it is possible to achieve a long review period (12 years). Within these different AfA cases there are many examples of regrettable substitution e.g., Cr^{VI} to Cr^{III} + borates. For companies to make this switch is not simple, quick or easy and requires significant investments in pilot plants and new production lines.

This situation should be improved by the recently updated technical guidance for Rapporteurs on "Functionalities and performance requirements". These provide further clarity on the definitions of *substance function* (e.g., Cr^{VI} for plating), *functionalities provided by a substance* (e.g., hardness, corrosion resistance) and *level of performance provided by a substance and required by customers* (e.g., hardness > benchmark value) (more information: Simon Cook).

SEAC-66: U-PFAS restriction, further sectoral reviews were started

The universal PFAS restriction (a generic ban introduced 18 months after the Entry into Force unless derogated for a temporary period of 5 or 12 years) in SEAC fully discussed a new sector, fluorinated gases (F-gases), and included introductory discussions on transport and energy sectors. For F-gases the overlap between the proposed restriction and

the recently updated F-gas Regulation (already in force) is extremely high, with only two small sub-uses being outside the F-gas Regulation. The scope and goals of the two pieces of legislation are not completely aligned (F-gas relates to global warming), but the ultimate result is the same i.e., a ban on placing on the market. Under the F-gas Regulation there is already a ban for many uses. SEAC's view of the proposed restriction is that the dossier submitter did not take this overlap properly into account, costs and benefits should be assigned to the F-gas Regulation where appropriate, which they are not. A restriction is not needed where legislation already exists. Alignment between F-gas Regulation and the restriction is therefore needed e.g., to include derogations under REACH that are compatible with continued use of substances under F-gas – which does not foresee a complete phase-out where safety considerations are in play. SEAC noted however that such alignment on costs and benefits also presents significant challenges and problems, and the information available to date may not be of sufficient granularity for a robust and meaningful assessment.

To produce the draft opinion on F-gases required extensive work from the Rapporteurs, meaning that for the transport and energy sectors, only a first reading was possible prior to the meeting, hence discussions were introductory only. For both of these sectors there exists a third restriction option (RO3) set up by the dossier submitters in addition to RO1 (full ban) and RO2 (full ban with derogations). RO3 proposals are in response to information submitted by stakeholders in the Public Consultation, and allow continued use of PFAS in some specific industrial situations (e.g., batteries), contingent on additional conditions. Both sectors will be further discussed in the June meeting. At this early stage, SEAC considers that, for both sectors, to conclude on costs by sub-use and also sector-wide is likely to be difficult due to lack of data.

The meeting finished with a discussion on breakfast habits in various EU Member States. SEAC concluded conclusively that to have two eggs for breakfast in France is not proportionate, because one egg is “un oeuf”.
(more information: Simon Cook).

ECHA OTHER ACTIVITIES

ECHA Management Board: participation in the preparatory meetings

Although Eurometaux is no more Cefic's formal back-up in the ECHA Management Board meetings and in particular the sub-group on Strategy Planning and Implementation (SPI), we are still participating in the preparatory calls and contribute by raising key points for the metal sector. For example, Alexis Van Maercke (AISE) highlighted in the SPI meeting the importance of capacity building for the Drinking Water Directive, the Packaging and Packaging Waste Regulation, batteries and other files using the ECaBaM as good practice example. ECHA acknowledged and stressed that sufficient transition time in future legislation is needed but they support the principle (more information: James Watson and Violaine Verougstraete).

Others: ECHA Announces New "Easier Than Ever" Registration Process

After years of advocacy and reporting of issues, ECHA has embraced industry's plea to simplify the registration process, with the intention to facilitate timely updates and reduce the help desk interaction with registrants. This simplification will be introduced with the new IUCLID release announced for 26th May 2025 (<https://iuclid6.echa.europa.eu/bg/planned-releases>). All details will be duly published, but in a nutshell each registrant will be able to submit registration and updates by filtering and applying the appropriate submission indicator(s) (SIs). SIs are an extensive list of about 30 visual pictures (i.e., emojis), from which a short selection is given here below:

- Select 🙋 for any voluntary update on technical information not triggering additional information requirements
- Select 🔥 for any voluntary update triggering additional information requirements or reporting additional information
- Select 💧 for any voluntary update including new data (e.g., update literature), but not changing any hazard conclusion
- Select 😬 for any update submitted as follow up of a SEV or CCH decision
- Select 😊 for any voluntary update on a dossier that has already undergone a SEV or a CCH and which updates were already assessed by regulators
- Select 🌍 for a new registration and define the tonnage band by using 🏠 (<10 ton), 🏢 (10-100 ton), 🏭 (100-1000 ton), 🏭 (1000 ton), 🏭 (>1000 ton)
- Select 🙄 for a second-time submission (i.e., following a first TCC failure)

The SIs will be available for testing in the IUCLID 6.9 beta version by April 1st. ECHA welcomes users' feedback on the procedure and the completeness of the SIs by mid-June. Please share your input with the Eurometaux team by June 10th or directly with ECHA helpdesk by 15 June, by using the formatting text '👉 SIs feedback' (more information: Federica Iaccino).

EUROMETAUX CHEMICALS MANAGEMENT

Chemicals Management Spring Week: Regulatory Forum

Day 1: The first day of the Regulatory Forum was brilliantly chaired by Brian Abrams (Vale) and Lisa Allen (International Lead Association). The agenda included topics such as data checking and validation (OECD IUCLID Project): Cu₂O under REACH, BPR, PPPR; European Innovation Centre for Industrial Transformation and Emissions (INCITE) and data-sharing; REACH 2.0 and RMOa, diving into Cefic's and ASMoR perspectives; and the proposed classification of Talc, how to assess impacts and set up advocacy, with a wide range of institutional and industry actors presenting.

Federica Iaccino from ARCHE presented the OECD IUCLID project, using the assessment of Cu₂O and its classification under REACH, BPR, and PPPR as an example. This was followed by a session on the new INCITE Project presented by Nicolas Bellomo from the JRC. In the context of the new Industrial Emissions Directive (IED 2.0), the new INCITE (the Innovation Centre for Industrial Transformation and Emissions) is designed to assist industries in identifying solutions for pollution reduction and control.

This was followed by a joint discussion on a key industry priority in the upcoming REACH Revision: how to improve the current system through RMOa-like processes (Risk Management Option Analysis). This session dived into the perspectives of Cefic and ASMoR (The Alliance for Sustainable Management of Chemical Risk) on the REACH revision and their concept of how RMOa should work and be introduced in the legal text. An RMOa would help to focus resources on what matters and structure how the EU determines its priorities before work on dossiers begin. Steven van de Broeck presented Cefic's proposals on the topic, while Clemens Rosenmayr from WKO presented ASMoR's, with clear similarities in their proposals and room for common action and coordination.

The first day of the Regulatory Forum closed with Florence Lumen from Eurotalc, highlighting concerns over the EU's proposed carcinogen classification for Talc. Eurotalc is responding through regulatory engagement, scientific analysis, and industry coordination.

Day 2: The second day kicked off with an insightful presentation from Paul Speight, the Head of Unit within DG Environment in charge of the REACH Revision, on what the new simplification angle will mean in terms of concrete proposals for REACH. He confirmed that the Revision will be published in Q4 2025 together with a Chemicals Package that will come with more clarity on PFAS, market measures for a level playing field, and an initiative on critical molecules (following the initiative of France). Mr Speight confirmed they are always interested in receiving short, targeted papers on technical/niche/operational topics (not political) in order to improve the proposal.

Wouter van Kootwijk from Ecomatters, in collaboration with Ligia Da Silva Lima and Patrick Van Sprang (ARCHE) presented their work on LCA and PEF within EU Policy and different regulations. Lifecycle Assessment (LCA) and Product Environmental Footprint (PEF) are tools rapidly becoming central to EU environmental policy. Alexandre Affe from BusinessEurope followed with a presentation on their work regarding simplification. BusinessEurope has highlighted how regulatory burden remains a barrier to productivity and growth in a recent report that brings 68 concrete proposals to the table to reduce regulatory burden at EU level, where they highlight that sometimes changes can be done through implementing legislation. Their paper includes 11 areas covered from sustainability to fiscal policies, with a good part being on sustainability (30%, not fully about the Green Deal).

The Regulatory Forum closed with Veronica Manfredi's (European Commission) presentation on the Zero Pollution Action Plan, which has evolved from a vision to specific legislative requirements, affecting various sectors and emphasising the collective responsibility to act on emissions, pollution, and the broader impact on climate adaptation. Since its adoption in 2020 until now, a lot has happened at EU level to tackle these challenges, with a new a fresh focus on water coming for this mandate. She also presented the findings of the 2nd Zero Pollution Monitoring and Outlook and Zero Pollution Dashboard ([link here](#)), mainly that significant progress has been made: nearly half of the 2030 targets are within reach, particularly on pesticides, antimicrobials, and beach litter. But air pollution still exceeds safe levels in many areas, plastic

pollution continues to rise, while microplastics and 'forever chemicals' like PFAS pose growing health and environmental risks (more information: Ainhoa González Pérez and Andrea Pellini).

Chemicals Management Spring Week: Science Forum

Day 1: The Science Forum started with a presentation by Elisabet Berggren & Andrew Worth from the Joint Research Centre (JRC) on managing the change towards the phasing out of animal testing in the regulatory safety assessment of chemicals. This was followed by a session on combined exposure, with Marnix Vangheluwe & Charlotte Nijs (ARCHE Consulting) under the heading of "combined toxicity", who presented the state of play and the possible ways forward to address the non-merited, awkward, and frantic Mixture Allocation Factor (MAFMAF) in the aquatic environment under the MEED project. Daniel Vetter (EBRC) complemented the talk by using the example of welding at the workplace as example of combined exposure.

Then biodiversity was discussed, with first Emily Garman (NiPERA) who outlined the importance of biodiversity globally and the impact it is having on international laws & agreements, the EU Green Deal initiatives, etc. She introduced Hugo Rainey & Sarah Banet-Eugene from The Biodiversity Consultancy, who carried out a project on biodiversity for ETAP/MERA (Metals Environmental Research Associations) and proposed to provide a structured approach to help in addressing key priorities such as risk management, economic opportunities, regulatory compliance. Simone Mazzola from 3Bee/XNatura, a nature-tech company in biodiversity protection provider, concluded the session by providing 3Bee's perspective on the scientific/technical aspects of the biodiversity assessments they are conducting.

This most interesting day was followed by a very enjoyable Social Event & dinner, in which many participants joined in. The aim of the event was to explore the 'true you and find your totem animal during an immersive trip'. Your CM staff emerged but did not recover from the trip as testified by 'wolves/lions/tigers' t-shirts it is wearing.

Day 2: started with a staple of the Science Forum, Martin Wieske (WVMetalle) and his OEL tour wherein he took participants through the Working Party Chemicals (WPC) mandate for the coming 3 years and the timeline/status/priorities of the CMRD wave numbers and the substances in the Occupational Safety Health (OSH) spotlight.

Next followed the Endocrine Disruptor (ED) session, which was kicked off with Julian Fabre from the EU Commission, who gave a state of play of the CLP Revision and presented the 3 pillars of the upcoming REACH Revision. He provided an overview of the proposed ED-information requirements additions. The second part of this session, started with a presentation by Eurometaux of the results of a survey organised ahead of the Forum about ED developments, followed by a discussion for the organisation of the work to come and the main topics of relevance and how/by whom they can be handled.

The session ended with Panos Panagos (JRC) who gave an update on the state of soils in Europe regarding soil pollution, metals being the most frequently studied pollutants. He explained LUCAS and how it contributes to this monitoring and gave some results of the extensive LUCAS Soil Survey (more information: Violaine Verougstraete and Lara Van de Merckt). The draft minutes and presentations for both the Regulatory & Science Forum sessions will be sent in the coming days.

CHEMICALS STRATEGY FOR SUSTAINABILITY

Zero Pollution: stakeholders 7th platform meeting

The Zero Pollution Stakeholder Platform (ZPSP) event was held in Brussels on 3 March. At the meeting, the 2nd Zero Pollution Monitoring and Outlook and Zero Pollution Dashboard for regions and cities was launched ([link here](#)) following a keynote speech by Commissioner Roswall, where she highlighted that the zero pollution agenda should not be considered as a burden and a threat, but an agenda that can bring benefits to all. The dashboard shows that significant progress has been made: nearly half of the 2030 targets are within reach, particularly on pesticides, antimicrobials, and beach litter. But air pollution still exceeds safe levels in many areas, plastic pollution continues to rise, while microplastics and 'forever chemicals' like PFAS pose growing health and environmental risks. More specifically, Member States should step up efforts on noise pollution, nitrogen deposition, and waste. The meeting also provided a platform for stakeholders to exchange views on the Zero Pollution agenda in light of the European Commission's 2024-2029 Political Guidelines (more information: Ainhoa González Pérez).

CLASSIFICATION

Lithium: Experts Round Table organised by ILiA and discussion at CARACAL in April

The International Lithium Association (ILiA) hosted on 4-5 March an international expert roundtable to discuss the potential causal relationship between lithium exposure and reproductive/developmental toxicity. The event took place at King's College London in the UK. Observers were able to follow the debates virtually. The experts raised interesting scientific perspectives which could contribute to ongoing regulatory assessments. A detailed summary will be produced shortly.

In the meantime, CARACAL will rediscuss the Li salts entry in Annex VI, based on the latest RAC opinion on 4 April. The outcomes of the discussion will be shared with the Lithium Taskforce in follow-up and if/where relevant comments will be prepared (more information: Roland Chavasse, Francesco Gattiglio and Violaine Verougstraete).

RISK MANAGEMENT

Risk Management: Taskforce meeting

The meeting on the 18th started with a very interesting and constructive discussion on how to improve risk management in REACH 2.0. Both Cefic and Eurometaux shared their latest ideas on how to improve the predictability and data availability in a revised system. The Taskforce recommended to focus Eurometaux's advocacy on key metal-specific issues and to support the joint industry advocacy on common issues, building on the clear presentation made by Amaya Jànosi (Cefic). Calls of the cross-industry group are scheduled to take place before the CARACAL REACH session on 3 April and Eurometaux will prepare submissions in follow up.

The Taskforce also reflected on what could be possible criteria to prioritise substances of concern for restrictions, e.g., in the context of batteries, to prepare the ECaBaM workshop.

This was followed by a debrief of the PFAS discussions held in RAC and SEAC, focusing on the learning lessons, with Eurometaux proposing to go for Finnish pastries to get into the mood.

Finally, Apeiron kindly provided an update on the Substitution study carried out for the Commission.

The draft minutes and identified actions will be circulated soon to the Taskforce. The next meeting will take place on 17 June (more information: France Capon, Klaus Kamps, Simon Cook, Diana Dobre and Violaine Verougstraete).

WATER

Updates:

1) Water Resilience Strategy

a. European Union (EU) Commission consultation:

The EU Commission had launched [a call for evidence](#) on the Water Resilience Strategy with a deadline set for the 4th March. Note that a [second call for evidence](#): Water Efficiency First – Guiding Principles, was also launched but linked to the first call when submitting input.

Eurometaux responded to the call for evidence. The EU Commission plans to publish the Water Resilience Initiative before the summer. Last week, on 27 March, Commissioner Roswall held a stakeholder roundtable on "Water and Industry" with a very limited number of participants at the table for discussion. Eurometaux was not invited, but it was apparently mentioned that the focus of the Water Resilience Initiative will be to completely dismantle the Water Framework Directive (WFD) and start afresh with transparent scientific discussions, a risk-based approach, a clear and transparent process and deadlines to ensure the WFD's objective of good status of EU waters in a coherent way.

b. The Stakeholder event:

On **6 March**, during the Ocean Days, the Commission organised a roundtable consultation with stakeholders to discuss the Water Resilience Strategy.

One of the major themes that emerged at the roundtable was water pricing, where the Commission emphasised the need to address gaps in national implementation of Article 9 of the Water Framework Directive (WFD). A significant point of discussion was the potential application of the polluter-pays principle, which could ensure that those responsible for water pollution bear the costs of mitigation.

Water quality was highlighted as an integral aspect of water quantity management. Several challenges remain in ensuring effective implementation across Member States and addressing these will be essential to achieve the objectives of the WFD.

The discussions introduced the possibility of a hierarchy like the waste hierarchy, advocating a systematic approach: saving water first, increasing efficiency, reusing water, and only then expanding supply.

The possibility of setting sector-based benchmarks for water efficiency was raised, alongside further support for circular economy initiatives. Water reuse, particularly across different sectors, was acknowledged as a key component of sustainable water management, and extending this practice more broadly is under consideration.

In terms of water management, the focus was on improving water restoration efforts and enhancing infrastructure. The need for dedicated funding was also underscored, with recommendations to include specific financial support for water resilience under the new Multiannual Financial Framework (MFF) post-2027. Additionally, consumer incentives were discussed, aiming to encourage water-efficient choices through increased transparency on water footprints.

Agriculture emerged as the sector receiving the most attention, given its significant water use and the impact this has. The European Commission clarified that its upcoming strategy, expected before summer 2025, will not introduce new legislation but will prioritise supporting the effective implementation of the existing framework.

For industry, key concerns included the Commission's approach to the polluter-pays principle, potentially through Extended Producer Responsibility (EPR) schemes, and the intersection between sectoral water efficiency benchmarks and Best Available Techniques (BAT) under the revised Industrial Emissions Directive (IED 2.0). However, the specifics remain uncertain at this stage, and further clarity is awaited as discussions evolve.

2) [Next Working Group \(WG\) Chemicals meeting](#)

The next **WG Chemicals meeting** is scheduled for **1 April from 10:00 to 17:00**, fully in person with lunch included which has not happened since COVID times. Eurometaux has also been granted a slot for a presentation to explain how bioavailability and background concentration can be considered when deriving Environmental Quality Standards (EQS) for metals, the use of bioavailability modelling has been made mandatory by next summer!

Several discussion items are of interest to us, including updates on the negotiations of the WFD proposal, some of the EEA projects on antimicrobial resistance (AMR) in surface waters and on the risk of mixtures of chemicals in water. An update on the Effect Based Methods (EBMs) project will also be provided by the Joint Research Centre (JRC) and the appointment of experts to work on the copper EQS is also on the agenda. Of course, our presentation on bioavailability will be the highlight of this WG Chemicals meeting 🗣️.

3) [Revision of the Water Framework Directive - Legislative update](#)

As you know, the **Water Framework Directive is still under revision**, it is now in the final stage of the ordinary legislative process, the trilogues. The second main trilogue **meeting was scheduled for 7 April but seems to have been postponed**. The next one could be 20 May. Time is running out and it seems that the negotiations will also be on the **agenda of the Danish Presidency...**

In the meantime, we are still actively engaging with EU regulators on our key concerns (more information: Lara Van de Merckt).

SOIL

Update

The new Soil Monitoring Directive has also reached the final stages of the legislative process and has been in the trilogue phase for several months. However, it seems that the negotiations have come to an almost complete standstill due to concerns raised mainly by the agricultural sector. The viability of the Directive could be at risk and this is not even an April Fool's joke! (more information: Lara Van de Merckt).

INDUSTRIAL EMISSIONS

Industrial Emissions: Updates

BREF Guidance

On 31st 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 2nd 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 IE Taskforce members on Friday 21st February 2025 asking for feedback.

For action: the deadline to submit additional comments to Eurometaux Secretariat has been extended until **15th April 2025**.

Next step: Comments to the BREF Guidance will be also discussed in the next plenary meeting of the Industrial Emissions Alliance (for more info see IEA paragraph).

IED Transformation plans

On 17th 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.

Eurometaux Secretariat sent the feedback received from the members to DG ENV on **14th March 2025**.

Internal Eurometaux survey on implementation of NFM BAT Conclusions

On 26th February 2025, Eurometaux launched its internal survey to assess the implementation of NFM BAT Conclusions. To the members of the IE taskforce, we remind you, for those of you who have not already done so, to forward the questionnaire to the operators represented by your associations. The assessment of gathered info will be performed in Q2 2025 and all results will be kept confidential and shown only as aggregated data. For any assistance during this process (e.g., supporting operators in the exercise of compiling the questionnaire), you can contact iedsupport@eurometaux.be. For action: please submit the fill in questionnaires to Eurometaux Secretariat by **28th April 2025**.

Industrial Emissions Alliance

The last meeting of the Industrial Emissions Alliance was held on 14th March 2025.

As regards INCITE, the first sectoral workshop will concern the Iron and Steel sector and it is organised by EU-BRITE in collaboration with Eurofer (the European Steel Association). The meeting will be held in Sevilla from **13th to 15th May 2025** (online participation is also possible). Registration should be done by using this [link](#). The next sectors that will organise workshops are the Cement and Lime sector (foreseen Q4 of 2025) and the Non-ferrous metals sector (first half of 2026).

In addition to that, in **October 2025** Sweden and EU-BRITE will organise an event to present the outcomes of the 1st year of activity for the INCITE project.

For IED 2.0, the Industrial Emissions Alliance invited DG ENV for a workshop on clarification questions related to the implementation of IED in practice and interpretation of certain articles. DG ENV agreed to participate and the meeting will be organised by FuelsEurope on **8th May 2025**. A report of the outcomes will be sent to the IE Taskforce.

For the BREF Guidance, general remarks were made by the associations (e.g., on better definitions required for Emerging Techniques and Deep Industrial Transformation, on partial review of BREFs, on a clear methodology on how to derive BAT-AELs and BAT-AEPLs etc.). More comments will be shared by the IEA members in order to also build a common position supported by all industrial associations. To this extent, the BREF Guidance will be discussed in more detail during the next plenary meeting of the IEA, which will be held on **25th April 2025**.

Next steps: Eurometaux Secretariat will share the final version of comments with the IE Taskforce after the IEA meeting of 25th April and ask for approval. Final set of comments will be sent to DG ENV by **2nd May 2025 EOB** (more information: Andrea Pellini and Eleonora Tosi).

IED 2.0

This month, the European Commission made the announcement of proposing to remove the widely used acronym "BAT" (Best Available Techniques) from the Industrial Emissions Directive (IED). The move was triggered by concerns within the Commission that the acronym unintentionally evokes imagery of a nocturnal animal, the bat, causing unnecessary confusion and associating European environmental policy with darkness rather than transparency.

In a press conference, a spokesperson stated: "Europe must fly in the light, not dwell in the shadows. Although bats themselves are ecologically beneficial animals, they symbolise darkness, night-time, and even mystery, values not aligned with our objectives of clarity, openness, and sustainability." The spokesperson also emphasised, "our future must be represented by an animal known for its clarity, daylight activity, and clear vision."

According to leaked Commission documents, extensive discussions were held about suitable replacement acronyms. After heated debates, the initial favourite, "CAT" (Cleanest Available Techniques), was quickly dismissed due to potential confusion with pet care regulations. Similarly, "DOG" (Development of Optimal Guidance) was rejected following internal disagreements between cat and dog enthusiasts within the Directorate-General for Environment.

Currently, the Commission is evaluating three promising alternatives:

- **EAGLE** (Environmentally Advanced Guidelines for Lowering Emissions): Symbolising clarity, sharp vision, and leadership.
- **TIGER** (Techniques Implementing Green Environmental Responsibility): Representing strength, agility, and decisive environmental action.
- **RACCOON** (Regulatory Actions and Controls for Cleaner Operations and Optimal Nature): Known for resourcefulness and adaptability in diverse environments.

A confidential source indicated a strong leaning towards "RACCOON," humorously highlighting that these "trash pandas" possess exceptional skills in managing waste, sorting efficiently, and achieving better environmental outcomes.

Mining BREF

EU-BRITE finalised the kick-off meeting report (available on the [EIPPCB website](#)). Most of the comments made by Eurometaux were not taken into consideration in the revised version of the meeting report. This means that the potential issues linked to the complex interface between NFM and MIN BREF (especially for what concerns leaching processes) will have to be monitored carefully.

In parallel, the collection for contextual and bulk information (e.g., applied processes and techniques, techniques to consider for the determination of BAT, emerging techniques etc.) has started. The Technical Working Group (TWG) is invited to upload relevant information on BATIS.

EU-BRITE requested to the TWG to provide proposals for well-performing reference installations. The deadline to propose and post them onto BATIS was **28th February 2025**. However, to date members of the TWG are still uploading their proposals. Eurometaux will not propose any list of well-performing reference installations.

Moreover, the TWG received a first invitation for site visits in Finland and Sweden during the period **19th-23rd May 2025**. The proposal includes a total of 5 mine sites that are located in the northern part of Finland and Sweden. More information can be found on BATIS. Only about 25 TWG members can participate to this site visit. Eurometaux will not participate.

Next steps: Eurometaux Secretariat will participate to the questionnaire development phase.

(more information: Violaine Verougstraete, Lighea Speciale, and Eleonora Tosi).

Landfill BREF

On Monday 17th 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.

Next meeting of the sub-group will be held on **1st April 2025** to finalise the frontloading survey, which has to be posted in BATIS by Eurometaux by the deadline of **16th of April 2025 EOB**.

Main issues related to the information requested by EU-BRITE are the following ones:

- Define the boundaries for the scope of the LAN BREF (e.g., on-site transport, decarbonisation and emission of GHG, closure and after-care phases etc.);
- Emissions to water: identify Key Environmental Issues (KEIs) and indirect releases.
- Gather information on "other than normal" operating conditions.
- Confidential Business Information should be addressed properly.

Eurometaux secretariat is also part of the Industrial Emissions Alliance sub-group for the LAN BREF. As regards to the frontloading survey, coordination with other industrial associations will be key to convey common messages. Next meeting will be held on **3rd April 2025** (more information: Andrea Pellini, Lighea Speciale, and Eleonora Tosi).

CARACAL

CARACAL-54: *preparations*

The CARACAL Taskforce met on Monday 31 March 2025 to prepare for the next CARACAL (54th) meeting, scheduled for 3-4 April. The REACH session will be dominated by a long discussion on key REACH Revision elements, for which Eurometaux shared a position paper in advance on the CIRCABC platform for all CARACAL stakeholders to be able to access it. On Tuesday 1 April, we will discuss the possibility for a joint industry presentation with other associations to present common areas of agreement. Other key issues in the agenda will be a discussion on Bioelution as well as the classification of Lithium salts (more information: Ainhoa González Pérez).

MEED

Mesocosm: *first discussion on the feasibility with core team*

In follow-up of the MEED sponsors call held in February, a meeting to discuss the ‘feasibility study’ that aims at finetuning the design of the mesocosm study took place on 12 March, after the Science Forum meeting. The “core team” presented at the meeting provided very interesting inputs and recommendations that allowed to refine the feasibility study, whose results will be discussed in SETAC Vienna before being shared with all MEED sponsors. Minutes of the meeting were circulated to the industry experts present including academics from the Universities of Antwerp and Ghent (more information: Diana Dobre and Marnix Vangheluwe).

TOOLS

Bioelution: *new discussion in CARACAL and publication accepted*

Commission has included a brief item on bioelution (metal release) on the CLP part of the CARACAL agenda. In view of this, EURL ECVAM, NiPERA and Eurometaux prepared several documents, including a recap of the history of the protocol, a table tracking the changes and improvements in the method, starting from the protocol used in the Round Robin Test in 2010-2011 (and published in Henderson et al. 2014) up to the latest version (2025) posted on TSAR, a one-pager on the main applications of the metal release results and their relevance today (including grouping and read-across, including for ED endpoint; classification of complex metal-containing materials), and a list of available materials discussed previously in the CASG Bio or ECHA Bioelution Expert Group (e.g., a guidance note on sampling, on grouping and decision trees). The actual discussion in CARACAL will take place in July. Industry experts will prepare for it by organising a boat tour on the Lake Maggiore.

In the meantime, the paper on the ‘Influence of particle size on metal release from a cobalt- and nickel-containing alloy powder in an *in vitro* surrogate gastric fluid’ has been accepted for publication by Archives of Toxicology. Congrats to Adriana Oller who has led the work magnificently! (more information: Violaine Verougstraete).

OTHERS

OECD

OECD BAT: *sub-group meeting*

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 was held on 17th March 2025 to discuss and decide upon an agreed scope for this study.

During the meeting, OECD proposed three different perspectives for addressing the role of BAT in sustainable materials and waste management and asked for a decision on the direction of the study:

1. Sustainable resource management
2. Value chain of batteries – production and waste management
3. Sustainable resource recovery (SRM)

After a consultation, it was decided to proceed with the third option. Further follow-up in the coming weeks for the consolidated scope of this BAT project’s activity (more information: Andrea Pellini).

KAMILA'S SUSTAINABLE CORNER

Batteries: update on the secondary legislation

The European Commission is progressing with various initiatives related to the Battery Regulation. Below is a quick update of two recent developments:

- **Black mass classification as hazardous waste** – on the 5th of March, a delegated act was forwarded to the European Parliament and the Council for the 2-month scrutiny. It classifies waste from different stages of the batteries' lifecycle, including back mass, as hazardous. Both institutions have 2 months to respond only "Yes/No" to the proposal without the possibility of adding amendments. If no objection is raised, the updated List of Waste will be published in the EU Official Journal.
- **Recycled content in batteries (Art. 8)** – JRC will conduct another stakeholders' workshop on the 3rd of April to discuss the traceability options and to finalise their report on the proposed recommendations for calculation methods and verification rules. In the next steps, the European Commission will start drafting a delegated act (more information: Kamila Slupek).

COMMUNICATION

Metals Academy: moving towards finalisation of organisation

Looking forward to the Metals Academy that will be held from 5 to 8 May 2025, participants received a completed draft programme on the 19th of March, announcing the knowledgeable speakers who have enthusiastically agreed to contribute of this 4th edition, along with other practical information. Invoices have also been sent to firmly confirm participation.

We will be further in touch in the coming weeks to ensure that this Academy runs as smoothly as the precedent editions and to make sure that all the participants are able to benefit from the added-value this event will bring to them in terms of understanding better the world of metals and also creating solid social links with their colleagues from all (metal) horizons (more information: Ailsa Lee and Violaine Verougstraete).

REACH Metals Gateway: consortia information update

The yearly update of the [Consortia Factsheets](#) is being carried out on the REACH Metals Gateway. For those who have not yet sent in their updated information, reminders have been sent.

Please note that we launch a yearly update, but information can of course be updated at any time, you just need to send us an e-mail (more information: Ailsa Lee)

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)

CALENDAR

Please find here below a non-exhaustive list of the meetings already planned for Q2 & Q3 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](#)

- 03-04/04: CARACAL-54
- 07-08/04: ECaBaM 3rd Batteries Workshop
- 23/04: ED 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)
- 20/05: Chemicals Management Steering Committee
- 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

1st APRIL

Please find herewith the list of the practical jokes that were included in this edition: did you identify them all?

Page 3: the Eurometaux staff was not wearing a pin on which one could read: "naturally occurring, cannot be destroyed, manage me" as the pins were not ready in due time for the meeting with Ms Roswall

Page 4: The heated discussion in RAC was indeed about the coffee breaks (concluding before or after a coffee break) but unfortunately NOT about the quality of the coffee served (although it would require a decision)

Page 5: Instead of concluding that having two eggs for breakfast in France is not proportionate, because one egg is "un oeuf", SEAC launched a new AoA (champagne and croissants)

Page 5: ECHA Announces New "Easier Than Ever" Registration Process ...We definitely propose Federica to design the REACH 2.0 Registration process

Page 7: the MAFMAF ...because Commission feels that "MAF" sounds more scientifically credible ("te veel van het goede" as we say in Flemish)

Page 8: Eurometaux proposing to go for Finnish pastries to get into the mood. Nothing against the Finnish delicacies but the risk management discussions may benefit more from the virtues of chocolate cake

Page 8: the Water Resilience Initiative would start afresh with transparent scientific discussions, a risk-based approach, a clear and transparent process and deadlines, to ensure the WFD's objective of good status of EU waters in a **coherent way**. Sorry...no...Alas

Page 9: The Working Group Chemicals meeting will unfortunately again take place online and we will again need to fight for the consideration of bioavailability and background concentration when deriving Environmental Quality Standards (EQS) for metals

Pages 10-11: whole para on IED 2.0: what would be your favourite acronym?

And wondering if your CM staff is wearing t-shirts with 'wolves/lions/tigers' t-shirts and/or whether a boat trip helps to prepare bioelution discussions? Please come and check 😊

And choose or write the end of the editorial:

- ... promised the daisy to stay with her for better or for worse
- ... took the daisy to a flowerchiatrist, to have her administered some flowereptics for "acute inadapation to the current MADAGA world" (MAke DAffodils Great Again)
- ... booked a (swallow)flight to sunnier places with no humans around
- ... boycotted the traffic lights so that pedestrians would wait long enough to see both of them
- ...