

RE: Report of the CETS meetings in Paris (27+28/10/2016) + invitation meeting 2017 in Edinburgh (18+19/05/2017)

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Skickat: den 28 november 2016 10:53

Till: Stefan Wahlnersson

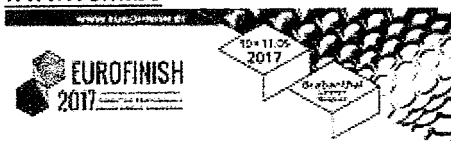
Stefan,

He was removed from the list (in August) but I got a mail that he was not joining us at the meeting in Paris. So for me it was an "apology for absence". I do not know how he get the information. Maybe from the CETS-website.

I will make sure that his name will not be related to SYF anymore!

Greetings,

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Van: Stefan Wahlnersson [mailto:stefan.wahlnersson@swedecote.se]

Verzonden: zaterdag 26 november 2016 11:13

Aan: Veerle Fincken

Onderwerp: SV: Report of the CETS meetings in Paris (27+28/10/2016) + invitation meeting 2017 in Edinburgh (18+19/05/2017)

God morning!

When I read the attached report I am once again very surprised to find that you list Lars Askengren as a representative of SYF!

I have made it clear that Mr Askengren is NOT IN ANY FORM A REPRESENTATIVE OF SYF! He is not speaking for SYF nor has any role as SYF closed the agreement with some years ago!

How do we get this issue final as in spite of many reminders it still shows up!???

How do you make sure that all mailing lists and other items are corrected!

Best regards
SYF
Stefan Wahlnersson

Från: Veerle Fincken [v.fincken@vom.be]

Skickat: den 24 november 2016 12:57

Ämne: Report of the CETS meetings in Paris (27+28/10/2016) + invitation meeting 2017 in Edinburgh (18+19/05/2017)

Dear CETS member,

We send you the final report of the CETS meeting in Paris on 27+28 October 2016. We have taken a decision on several topics. Please inform us about the actions you have done in the meantime as decided during this meeting.

We are happy to announce that association SEA invites us for the next CETS meetings in Edinburgh on 18th & 19th May 2017. We will use the same format as the Paris meeting and start with lunch around 12:30 to 13:00 on the 18th of May and finish with lunch around a similar time on 19th of May 2017. The meeting will be held at the Radisson Blu Hotel. See:

<https://www.radissonblu.com/en/hotel-edinburgh>.

Association SEA has reserved 20 rooms. **For practical reasons, please let us know as soon as possible if you will attend these meetings.**

Best regards,



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CETS MEETING
27 + 28/10/2016, Paris

Report of the meeting

1. Welcome

Anne Sophie Maez is presented as the new colleague of UITs who will take part at the CETS-meetings.

ASICC	Matteo	Chiri
AIAS	Carlos	Pertegaz
ASSOGALVANICA	Vito	Meggiolaro
ASSOGALVANICA	Gianluca	Michielin
NICKEL INSTITUTE	Marco	Vallini
SEA	Dave	Elliot
SGY	Jaakko	Kapanen
UITs	Denis	Théry
UITs	Anne Sophie	Maez
VECCO e.V.	Marita	Voss-hageleit
VERENIGING ION	Egbert	Stremmelaar
VOM	Veerle	Fincken
WIRTSCHAFTSKAMMER OSTERREICH AOT	Werner Heinz	Bittner

2. Apologies for absence

See list below:

AIAS	Elvira	Martin
HART MATERIALS ltd	Paul	Lansdell
HART MATERIALS ltd	Tony	Hart
NICKEL INSTITUTE	Veronique	Steukers
SEA	Diana	Blair
SPGPRINTS	Kees	de Kok
SYF	Lars	Askengren
SYF	Stefan	Wahlnersson
VOM	Marc	De Bonte
ZVO	Sascha	Jacob
ZVO	Malthe Matthias	Zimmer

3. Authorization of chromium trioxide

3.1. Actual situation: exposure scenarios in the workplace

All authorization dossiers: <https://echa.europa.eu/addressing-chemicals-of-concern/authorisation/applications-for-authorisation>

Dave refers to a press release 23/9/2016: ECHA recommends authorizing critical continued uses of chromium trioxide under strict conditions:

“The main recommendation of RAC to the Commission is that better defined exposure scenarios be developed and validated with further exposure measurements in the workplace, in order to ensure that the levels claimed by the applicants (less than 2 µg/m³ for most uses) are achieved.”

Opinion of the participants:

- UK: In the laboratories, the standard is 0.05 mg/m³
What will be the test method to measure the exposure limit.
Instead of measuring vapors and air, it can also be done by biological monitoring of the workers.
Highest exposure limits were measured by people in the maintenance department or in the lab.
At the moment, total chromium is measured! So more interest for urine samples.
In UK and Belgium they use NIOSH 7600
- BE: Test method is also NIOSH 7600, standard is 25 µg/m³
- IT: It is important to define when, how and how long to do the measurements. According to Vito, CETS have to define this.
- FR: CETS should insist that all countries use the same test method! CETS has to suggest an agreed standard monitoring in the air.

⇒ **Action CETS: FR & IT will give a summary of different test methods.**

There are changes in the supply chain of CrO₃. Atotech is no longer a supplier of raw materials but will be supplier of new technology and processes. Vopelius will be the approved supplier of CrO₃(=distributor). Lanxess is a producer in South Africa. In the meantime, ATOTECH (part of Total) is sold to Investors group Carlyle Group, (see Axalta Coating Systems brand)
Question: What is happening with the position of Atotech in CTAC sub? Vito will check this within the CTAC consortium.

- IT: Remarks about the recommendations RAC and SEAC on CTAC-dossier “functional chromium plating”.
See page 59 (PDF) or p.49 (report): *Therefore strict additional conditions and monitoring arrangements are proposed. RAC considers that the review period should be no longer than seven years.....*
This is not right in saying this. It is about the general use and not about the specific uses. Why 7 years instead of 12 years. There are too few measuring results in the dossier. Therefore uncertainty about the process.
- FR & IT: RAC & SEAC step out their “legal competence”.
Echa said that there is a REVIEW period. This is easier than the authorization phase up till now.
Echa asks support to help with the review of the reach process for new processes. (See report 16/9/2016).

⇒ **Action: CETS has to make a summary of the opinions and formulate a meaning to this. Not all the attendees agree on this.**

3.2. Publication in Holland by KMU, FME and ION + visit to ECHA Finland

FME (the largest employers organization in the Dutch technology industry), Koninklijke Metaalunie (the largest Dutch employers organization for SMEs in the metal industry) and Vereniging ION (the largest organization for Dutch surface treatment companies) are deeply concerned about the position of the surface treatment industry, and the technology companies that depend on it. A recent economic survey conducted by research and consultancy firm Panteia (accredited as studycenter by the EC) shows that there is a strong likelihood that hundreds of Dutch and thousands European companies will be forced to cease operations, resulting in the possible loss of hundred thousands of jobs. This study focusses on unemployment, environment + workers safety.
The study is executed in Holland with extrapolation to EU.

The industries involved are of the opinion that companies should replace Chromium VI if possible, but that authorization must be granted where necessary.

The 3 associations were invited in Helsinki to explain the study and the results.

Next action will be to ask for authorization period system light. The industry is asking for certainty.

See website: www.subsport.eu/substitutions-tools

3.3. Update from the meeting with the Bavarian Representation 12/07/2016

Subject: "Regulation by authorization: Is the objective of REACH feasible?"

Host was Markus Ferber, MEP

32 participants

Markus Ferber prepared written questions to the EC concerning the results of REACH so far. DE will send the questions to participants. These initiatives from the industry are very useful but they need to be followed up. Otherwise no effect.

3.4. Proposal for Directive Of The European Parliament And Of The Council amending Directive 2004/37/EC on the protection of workers from the risks related to exposure to carcinogens or mutagens at work (CMD): a workplace limit value of $25\mu\text{g}/\text{m}^3=0,025\text{mg}/\text{m}^3$ for all Cr-(VI)-compounds

Council: NL, BE, SE and DK: lower amounts (from 2 till $10\mu\text{g}/\text{m}^3$) are measured within the plating companies

UK: $50\mu\text{g}/\text{m}^3$, CMR as low as reasonable practicable: this means $5\mu\text{g}/\text{m}^3$ in reality.

Why $25\mu\text{g}/\text{m}^3$? This amount not based on a SCOEL recommendation. It is for all users of CrO_3 . Not only for platers.

⇒ **Action: Dave Elliot will write a letter of CETS addressed to Council and Commission. (before 12/11)**

Content: concerned about this proposal. Industry can do better. What is feasible and what is measurable?

Limit: $10\mu\text{g}/\text{m}^3$ and we give reasons because value=1 is the lowest level to measure. Current analytic techniques are not reliable.

3.5. Update from Malte Zimmer – See report concall 11/10/2016

List of key players: update and send it around to the members of CETS

4. Update of the Cross Industry Initiative by the Nickel Institute : update by Marco Vallini, NI, Member of CII

Objective: to contribute to the frame work of safe use of chemicals in Europe. & broad collaboration

Approach - RMOAs: The starting point

- ⇒ Tool developed under REACH to identify the best risk management option for a given case
- ⇒ Not a full risk assessment of a substance... but has to identify the risk(s) that need(s) to be addressed
- ⇒ To develop tools for safe workplace legislation in synergy with reach legislation.

REFIT platform: EC wants to have better regulations

Next steps:

- ⇒ Continue dialogue with European Commission, Member States and stakeholders
- ⇒ Launch of CII website to inform about our positions
- ⇒ Presentation of CII proposals at various conferences
- ⇒ Ongoing work being finalized on new policy recommendations on specific aspects of CII proposals

More info: see www.CII-REACH-OSH.eu

5. Meeting at the European Parliament (by Dave Elliot)

SEA organized for its members a one-day visit to the EC. They have met different MEP

This event is comparable to the breakfast-meeting but less expensive.

Is there an interest for CETS to organize similar events? Yes, EC is our target group to communicate with.

⇒ **Action Dave Elliot: contact with Klaus Berend to arrange this for CETS in the beginning of 2017 + meeting after the breakfast meeting.**

6. Innovative fibrous metal sorbent materials for liquid waste treatment

presented by Mrs Ekaterina Shilova, company AJELIS, member of UITS

New generation of metal sorbents for:

- Heavy metal treatment
- Radionuclides selective
- decontamination/storage/transport
- Rare Earths selective separation
- Customization of sorbent materials for other metals is available upon request

7. Cobalt CLH Taskforce & REACH:

Five cobalt salts have been proposed for prioritization for addition into Annex XIV of REACH. This means that certain uses of these cobalt compounds could become subject to authorization under REACH. The five salts that ECHA has suggested for prioritizing are: cobalt dichloride, cobalt sulphate, cobalt diacetate, cobalt dinitrate, and cobalt carbonate. The Registration of the five salts is covered by the activities of the Cobalt REACH Consortium as well as following the recent developments relating to the authorization process.

At the moment Cobalt metal is point of interest (Annex 15, REACH):

- Cobalt metal is treated in the way of nikkel.
- The Cobalt Institute is taking the lead.
- ION/CETS is part of the Cobalt CHP Taskforce.
- Cobalt is used in Surface Treatment. (p.e. gold plating, wending vapours, waste water, ...)
- Webinar October 25th.
- Seminar Brussels November 18th.

More info, see: <http://www.cobaltreachconsortium.org/home>

8. Boric acid & REACH

Borates are on the candidate list annex 15.

There is no information available by the participants about the actual situation.

Actually, to amend annex 14 for authorization, borate is postponed.

Boric acid is an important component (12%) in Cr3-baths. Also used in aerospace industry, degreasing, cleaners, ...

In the UK: authorities do not support the idea of authorization of Boric Acid. See IMA (industrial minerals associations Europe, incl. Borate association EBA). www.ima-europe.eu

9. BREF – IPPC: revision of papers

STS: Surface Treatment Using Organic Solvents

(including Wood and Wood Products Preservation with Chemicals)

Kick off meeting in SEVILLE, 16 – 19 November 2015

The BREF is a recommendation. The BAT-conclusions (translation in national legislation) are binding.

www.eippcb.jrc.ec.europa.eu

CETS must share information/techniques in improving the document.

It is not sure that CETS can have a representative in Seville. We have to make sure to have impact via other organizations (Orgalime, UEAPME, ...)

STM: Surface Treatment of Metals and Plastics

no official timetable, delayed.

10. Breakfast meeting 10 November 2016

Impact of REACH Authorization: Costs and benefits of REACH Authorization with MEP Ingeborg Grässle, EPP, Germany

Participants: Dave, Veerle, Egbert, 2 delegates of Vecco

11. Any other business

- Remark of IT: the effect of emission values of companies related to fatal cancer are lower than the emission values measured by governmental action to the local environment. This is a big problem to defend.

See opinion paper CTAC p. 43 of the PDF: Table 14.

Measuring points are 100 m from emission points.

There is nothing around a company and there is no Cr6 anymore. Totally wrong approach.

- Last DRAFT EN TC271 – WI 00271060 (2016): New standard for Electroplating and anodizing lines, chairman Martin Riester VDMA.

DE: Contact Martin Riester to ask for an update/actual situation.

12. End

On behalf of all members, Dave Elliot said a word of thanks to Denis Théry and his colleagues for the excellent organization of the meeting and for the lunches and the diner offered on Thursday evening.

Reporter: Veerle Fincken