

Implementation of REACH in the EU steel industry

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IISI workshop on REACH
Ruukki Head Offices, Helsinki
2nd October 2008

Content of the presentation

- Presenting EUROFER
- EUROFER REACH Implementation
- Study on data gap analysis for iron
- Pre-registration and pre-SIEF strategy
- REACH and steel related issues
 - Sameness iron & pig iron
 - Iron oxide, pellets and sinter
 - Carbon in steel
 - Steel scrap
 - Borderline preparations / articles for steel products
- Content updated EUROFER REACH guidance
- EUROFER REACH website

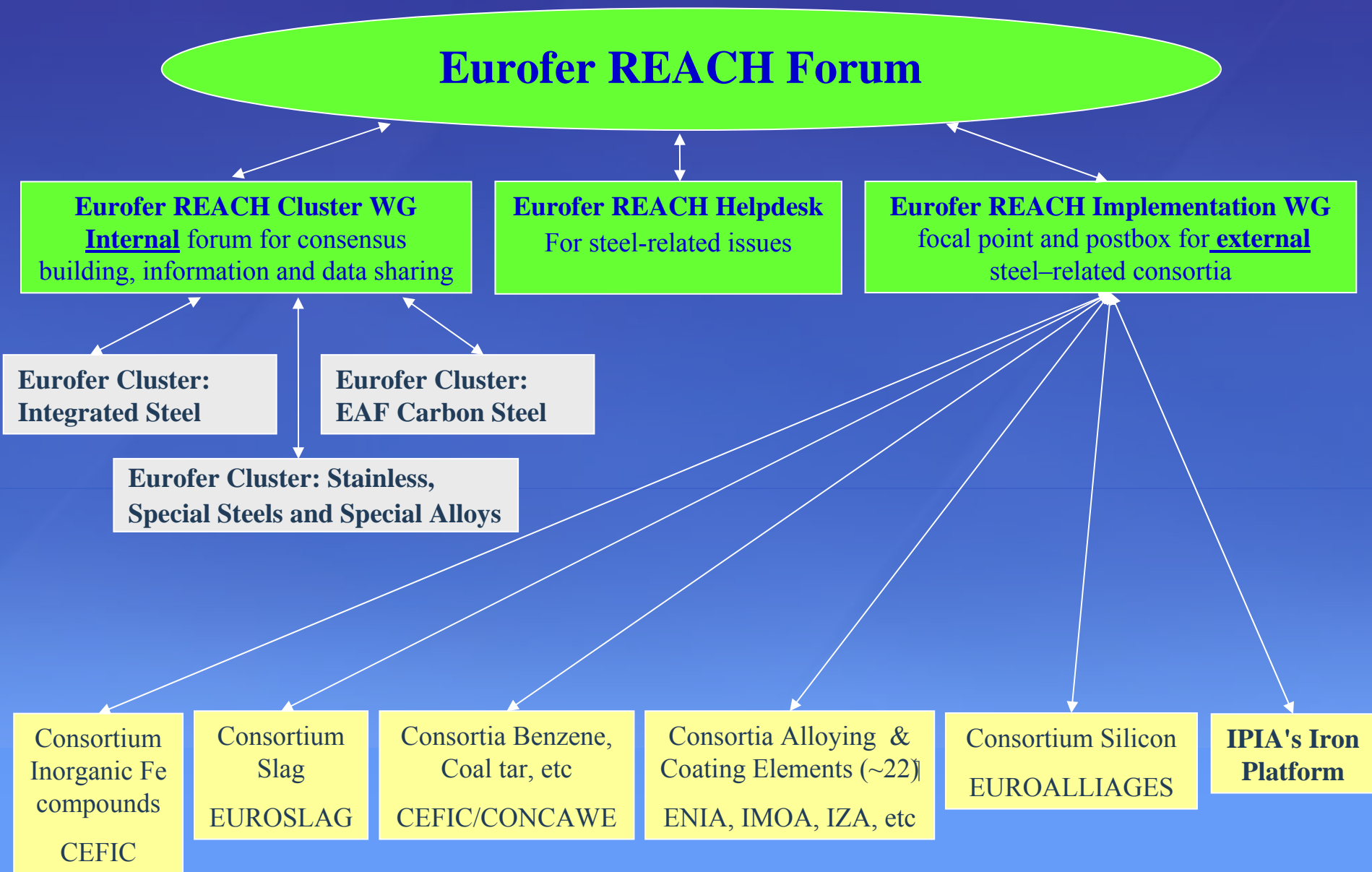
European Confederation of Iron and Steel Industries (EUROFER) www.eurofer.eu

- Founded in 1976 and located in Brussels
- Represents 100% of steel production in the EU
- Members are steel companies and national steel federations throughout the EU (for Switzerland and Turkey: associate members)[¶]
- Objectives of EUROFER:
 - Co-operation between its members in all matters that contribute to the development of EU steel industry;
 - Representation of common interests of its members vis-à-vis third parties (e.g. EU institutions and other international organisations)[¶]
- EU steel industry is the world leader in its sector:
 - Turnover: 140 billion EURO;
 - Direct employment: 370,000 people;
 - Producing over 200 million tons of steel per year.

EUROFER REACH Implementation

- EUROFER REACH Forum consisting out of Clusters (internal), an Implementation WG (communication with outside world) and REACH Helpdesk (internal and external forum; no consultancy service)
- Clusters: groups of steel producers with similar interests working together to implement REACH
- Pure technically spoken, clusters are consortia as they are groups with similar interests, working together on a temporary basis
- *The co-ordination in the steel sector and the focal point for external steel-related consortia are secured via:*
 - EUROFER REACH Cluster WG (internal)
 - EUROFER REACH Implementation WG (external)
 - acts as a postbox for information and data exchange
 - forum for discussion of common issues with external interests in iron

EUROFER REACH Implementation



EUROFER REACH Implementation

Eurofer REACH Cluster WG

Internal forum for common issues, consensus building,
information and data sharing

Chair: Ursula Gerigk, ThyssenKrupp

Co-chair: Rob Versfeld, Corus

Membership: Cluster Chairs, Co-chairs

Observers: National Steel Federations

Cluster: Integrated Steel & Iron (incl. Electrical/Silicon Steels)

Chair: Eric Pezenec,
ArcelorMittal
Co-chair: Christoph
Angermeyer, Voest Alpine

Cluster: EAF Carbon Steel (inc low alloy steels)

Chair: Mats Carlsson, Ovako
Co-chair: Magdalena Popescu,
TMK CRS
Co-chair: Jean-Pierre Jacobs,
Duferco

Cluster: Stainless, Special Steels & Special Alloys

Chair: Lionel Aboussouan,
ArcelorMittal Stainless
Co-chair: Pierre Chemelle,
Ugitech
Co-chair: Marie-José Schaff,
Erasteel

EUROFER REACH Implementation

- **Every Cluster:**
 - **Has a mission statement;**
 - **Made a list of the substances for (pre)registration; Out of these lists an EU master list was developed;**
 - **Is mapping the uses of its products (identified uses) via combining NACE-codes with use and exposure categories; Out of this, generic exposure scenario's will be developed (containing RMM's and PPE) assessing their human health /environment impacts for inclusion in the REACH technical dossiers for iron, iron oxide and inorganic iron compounds**
- **This information will be prepared in a format suitable for IUCLID 5 software ready for use by the relevant SIEFs**

Mission statement of the REACH Cluster (umbrella)

- (i) Gather existing human health and environmental data for iron (Fe , Fe^{2+} , Fe^{3+})
- (ii) Identify data gaps
- (iii) Determine which data gaps need to be filled and initiate studies
- (iv) Hold and maintain data
- (v) Prepare technical dossier for iron for steel producer applications (Fe , Fe^{2+} , Fe^{3+})
- (vi) Address common issues and agree common positions
- (vii) Identify substances for pre-registration by all clusters
- (viii) Develop common pre-registration dossiers
- (ix) Avoid duplication of work
- (x) Address common substance-related issues (e.g. alloys, articles, Stainless steel slag, etc)
- (xi) Develop common interpretations where uncertainties exist in the REACH text to support the iron dossier for steel producer applications
- (xii) Prepare for the SIEFs.
- (xiii) Prepare SDS and, where necessary, ES's

EUROFER REACH Implementation

- . The External REACH related consortia (*e.g. IPIA's Iron Platform, EuroAlliages, Eurometaux, Nickel Institute*)
- . The International Pig Iron Association's (IPIA) Iron Platform/Iron consortium
 - Launched to enable non-Eurofer interests in Iron and Iron oxide to implement REACH.
- . Co-operation between Eurofer and the Iron Platform
 - Working together via joint contracts on equal terms to obtain the scientific data needed for REACH registration;
 - Close contact/communication for preparing (pre-)SIEF's for iron and iron oxides; agree on lead registrants for the appropriate SIEF's;
- . Eurofer/IPIA Iron Platform joined project "study on data gap analysis for the substances of common interest"

Study on data gap analysis

- . Hazard data gathering for Iron and Iron compounds
- . Consultant: ENVIRON
- . Phases: data collection; literature searches; production of report, including an evaluation (quality and relevance screening) of the available data and a data gap analysis
- . There is a joint contract, a joint steering group and joint ownership of the study. Costs for this study are shared on a 50:50 basis between Eurofer/IPIA (Iron Platform)
- . The Joint Steering Group (management of the data gap analysis) consists out of:

For Eurofer: Eric Pezenec, Environmental Expert; Werner Theobald/Verena Schulz, Toxicologist/Medical Expert; and Danny Croon, Eurofer secretariat

For IPIA: Bill Adams, Environmental Expert; Sue Hubbard, Toxicologist; and Chris Barrington, IPIA secretariat

Study on data gap analysis

- . Substances of common interest: Iron, Iron furnace, Iron oxides (II, III), Iron (III) oxide hydroxide, Iron (II) (hydroxide, sulphate, chloride, nitrate)¹
- . Data in iron powder and iron alloys should also be retained along with data/studies on other iron compounds. *These additional studies will be vetted by the Joint Steering Group for relevance to the project.*
- . The IPIA is interested in pig iron, DRI, HBI, iron pellets, iron powder, ferroalloys and iron oxide.
- . IPIA and Eurofer are determining which iron oxides are important to the EU steel industry as well as in progress of agreeing the sameness of substances of common interest between IPIA and Eurofer.
- . Final draft report available by mid January 2009

(Pre)registration and (pre)SIEF

- . Pre-registration period: 1st June – 1st December 2008
- . Eurofer and its members are communicating/working with IPIA (Iron Platform) on an agreed (pre-)SIEF (strategy) for iron and iron oxides to avoid difficulties in the SIEF's
- . Eurofer and its members are communicating/working with the German slag federation/EUROSLAG on an agreed (pre-)SIEF (strategy) for slags
- . In each SIEF, a Lead Registrant will be responsible for the technical dossier and its joint submission prior to the registration deadline.

REACH and Steel-related Issues

- Eurofer position papers (amongst others) on:
 - Sameness iron & pig iron (under development)
 - Principle: *pre-register both and to declare that the two forms of iron will be registered in the iron dossier*
 - Iron oxides, pellets and sinter (draft version)
 - *Fe₂O₃ (e.g. iron ore pellets), iron sinter, iron ore agglomerates (e.g. briquetted iron ore pellets), scale (coating) steelfabrication, mill scale (ferrous metal; e.g. FeO).*
 - *Pre-register EINECS numbers*
 - *Read across: sameness check should decide how many SIEF's*
 - *Type of substances: monoconstituent / UVCB*
 - Carbon in steel (draft version)
 - *Exempted via Annex V 4(b): the carbon is not manufactured or placed on the market as pure carbon itself. Carbon in steel originates from the carburizing agents (natural products) and is a result of a chemical reaction in the converter. The purpose of carbon in steel is to provide an intended specific physiochemical characteristic function as an alloying element.*

REACH and Steel-related Issues⁴

- Eurofer position papers (cont.)⁴
- Steel scrap (draft version)⁴
 - *Article 2(7)d exempted from registration if the substances in the scrap will have already been registered; ECHA recommends (strict legally spoken) the pre-registration of the substances to be used as secondary product materials and this to benefit from the extended period for registration (as the requirement has yet to be fulfilled).*
- Borderline preparations / articles for steel products (final version forwarded to ECHA)⁴

REACH and Steel-related Issues

- Content of updated EUROFER REACH guidance

- Introduction to REACH
- The REACH process
 - (Pre)registration, SIEF, DU, Evaluation, Authorisation, Restriction, Classification and labelling
- Application of REACH to the steel industry
 - Registration, authorisation, DU
- Annexes
 - Definitions, abbreviations, useful web links, ECHA & REACH navigator guidance, EUROFER position papers
- *Will be available on the EUROFER REACH website the latest by mid October 2008*

REACH and Steel-related Issues

- Developing a legal frame for making Eurofer data available for legal entities not falling under Eurofer membership
 - *Legal entities need to have legitimate iron business or market in Europe;*
 - *The data can only be used for REACH purposes;*
 - *Transmit data via:*
 - *License to use the data, letter of access;*
 - *Swapping of data between consortia;*
 - *Contribution based on production (tonnage/year)*
- EIMAG (EU Industry Metallic Alloys Group) guidance on (pre)registration
- EUROFER REACH website:
 - <http://www.eurofer.eu/index.php/eng/REACH>
 - <https://extranet.eurofer.eu/index.php/eng/REACH>
 - Eurofer Q&A document

Thank you for your attention

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