

This edition contains

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EUROFER REACH Forum

In order to anticipate to the needs of the EUROFER members whilst using human resources in an optimised way, the EUROFER REACH Forum has been restructured as follows:

- The Integrated Iron and Steel Cluster WG (IISC WG) has been absorbed into the REACH Cluster WG (decision making and strategy group)
- The EAF Carbon Steel Cluster WG became dormant. This WG can be reactivated on request of its members via the Chair of this Cluster
- The S4A Cluster WG remains unchanged and continues its work.
- The EUROFER REACH Expert WG (mainly dealing with exposure assessment of critical steel related substances) and the REACH Implementation WG (communication platform with representatives from steel related substances) remain unchanged. Both groups will have back-to-back meetings.
- The REACH Welding WG will cease to exist as it delivered its product (multi-metal welding matrix, including explanatory note for incorporation into substance Chemical Safety Assessments). It was also agreed that the EUROFER REACH secretariat will provide its members with a monthly REACH Newsletter to keep them posted on the core of the implementation activities.

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Iron Platform (IP)

The Iron Platform of which EUROFER is an associated member (with a seat on both its steering committee and technical working group) continues its work *for the registration of elemental iron/iron, furnace; iron ore pellets; iron sinter and mill scale*. Meanwhile, di-iron trioxide (Fe₂O₃) was handed over to the Iron Oxides REACH Consortium (see article on IORC further in this newsletter).

Currently, work is ongoing to have elemental iron/iron, furnace merged and as such to have one registration dossier (with lead registrant ArcelorMittal). It is believed that this exercise will be finalised during May 2010. And at that time, communicated to members. The substance identification

exchange fora for iron ore pellets and iron sinter were formed (with Corus as lead registrant for both substances). For mill scale, very recently, the final sameness survey was launched (ArcelorMittal to be nominated as lead registrant). The consultancies ENVIRON and ARCHE are preparing the dossiers for the completion of respectively the human health and environment parts of IUCLID V [which is the information management tool that is used by the European Chemicals Agency (ECHA)].

Meanwhile, the Lanxess Iron Oxide dossiers and robust summaries of studies have been acquired from the Iron Oxides REACH Consortium. This information is needed for read-across for the registration of the substances the Iron Platform is dealing with. The official timeline for the filing of the Iron Platform registration dossiers is September 30th 2010, but hopefully sooner. This gives legal entities another two months to deal with their individual registrations. IUCLID training for Iron Platform consortium members is under preparation.

The Iron Platform Letter of Access (LoA) document is in its final stages of drafting and will become available soon. The minimum fee for Iron LoA will be 2,500 Euro for an annual volume up to 100,000 tonnes Fe-contained. The minimum fee for other substances is likely to be 1,200 Euro/substance. The LoA's will be provided per substance, per legal entity via a web-based portal that will be part of the Iron Platform website. The LoA will include: the access «token» to the joint submission; the right to refer to the «core data» in the registration dossier (including any updates); any information necessary for substance identification (including copy of Chemical Safety Report, Safety Data Sheet and/or guidance on safe use as appropriate), classification and labelling; and the list of uses covered by the registration.

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Iron Oxides REACH Consortium (IORC)

Di-iron trioxide (Fe₂O₃), Tri-iron tetraoxide (Fe₃O₄) and Iron oxide hydroxide (FeOOH) are being handled by the IORC [of which Lanxess is the leading member]

Meanwhile, 14 Iron Platform members have joined the IORC [mainly integrated steel companies and catalyst producers] and they will be represented on the IORC Steering Committee by the IP Secretariat and, for technical issues, by Dr. Arno Buthe of SalzgitterFlachstahl. Total current membership of the IORC is now 27.

On 16th March, an IORC meeting took place at the premises of McKenna Long & Aldridge in Brussels. Amongst others, the following was agreed:

- There will be a IT solution to obtain the LoA. The costs are around 10,300 Euros per LoA. The LoA will be invoiced per company and it is valid for all affiliates of that company. A separate agreement for the Iron Platform has to be made.
- Lanxess may wish to purchase data and other information from the Iron Platform.
- The steering committee wants to use a broad way for describing the uses if possible [approach to be checked with

IUCLID 5.2 via the Technical Completeness Check (TCC) tool plug-in].

- A task force has been formed consisting of amongst others Dr. A. Buthe. The task force will draft a harmonised approach for the completion of the IUCLID V chapters 1.2 (on composition) and 3.5 (on identified uses and exposure scenarios) that will be made available for the registrants.

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Slags Consortium

Administrative tasks

The REACH Ferrous Slag Consortium (RFSC) is in charge of the preparation of 5 registration dossiers for the *slags, ferrous metals, blast furnace (ABS/GGBS); slags, steelmaking (SMS); slags, steelmaking, converter (BOS); electrical arc furnace slag (EAF) carbon* as well as *electrical arc furnace slag (EAF) stainless*. The consortium is managed by the German Slag Institute (FEhS).

The consortium has now 149 members, which present over 200 million tonnes (89%) of the crude steel production within the EU 27.

The SIEF for *electrical arc furnace slag (EAF)* is now divided into the SIEFs *EAF stainless* and *EAF carbon*, both SIEFs have already been confirmed by ECHA. Lead registrant of *EAF carbon* is Badische Stahlwerke Kehl and ThyssenKrupp Nirosta for *EAF stainless*. ThyssenKrupp Steel Europe AG is the nominated lead registrant for the slags ABS/GGBS; SMS and BOS.

Substance identity

Only those slags are registered which are considered as (by-) products and are already marketed today. All slags will be registered as Unknown, of Variable Composition, or of Biological Origin (UVCB) substances and substance identity is done with regard to production process. Analytical information, mineralogical description and leaching data are used as additional information.

Dossier preparation

In regard to studies and data gaps all registration dossiers are progressing well. For most of the endpoints, reliable data is available or studies are already in progress. Read across between the slags will be applied as far as possible.

The need for an inhalation study was discussed and favoured in February 2010. The study started in March 2010 under the direction of an expert for inhalation studies.

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REACH for Coal Chemicals (R4CC) Consortium

The "REACH for Coal Chemicals (R4CC)" consortium is amongst other substances in charge of the registration of coal tar and light oil.

The complex coal chemicals were grouped according to their composition and key physical parameters. Each group of CAS numbers is headed by a lead CAS number representing itself and the group of related CAS-numbers. For more details see www.r4cc.org

A joint submission dossier is produced for "Coal Tar" on CAS No. 65996-89-6 and RÜTGERS Germany is the appointed lead registrant. Pruna GmbH will take the lead for Light oil (coal), coke-oven (65996-78-3).

Both substances will be registered as (UVCB) substances and the substance identification will refer to the production process and a set of sameness criteria.

Coal tar and light oil are considered as transported intermediates and the dossier preparation will cover the use of *Coal Tar* and *Light Oil* as transported intermediate under strictly controlled conditions only. A model letter to ask partners in the supply chain confirming strictly controlled conditions will be available soon.

Registration is envisaged by the lead registrants during July 2010. A delay is possible and it depends on the timely delivery of the studies and data compensation negotiations.

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German BAUA considers slabs being preparations

BAUA has established a REACH Implementation guidance in German stating that "slabs are preparations". If the German authority sticks to its current position (slabs being preparations), German steel companies would not be able to import (from outside the EU) slabs as articles in Germany (and therefore would need to register all the constituents of the preparation).

BAUA wants to introduce their view in Europe via HELPEX (EU Group of national REACH Help desks), more in particular via the Q&A of the ECHA Helpdesk.

EUROFER REACH Cluster WG members have been asked to take contact with their representatives in HELPEX to inform/explain, asking for their support (slabs are articles, as acknowledged by ECHA and fully in line with the definition of an article from the REACH Regulation). EUROFER is also in contact with the industry observer in HELPEX on this.

Meanwhile, the German Steel Federation continues its work on this issue and may decide to establish a legal study by German companies, taking on board the ECHA position (slabs being articles).

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