

Comité REACH – BCR 2022/03 (Belgisch Comité REACH)

Closed Comité REACH 22/09/2022 (9.30-13h)

DRAFT AGENDA closed session

Salle : Gal 01.F.1 - Frieden - [01] (RIZIV-INAMI) www.reachinbelgium.be

FOD Volksgezondheid,
Veiligheid van de Voedselketen en Leefmilieu

Directoraat-generaal : Leefmilieu
Dienst Risicobeheersing van Chemische Stoffen
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SPF Santé publique,
Sécurité de la Chaîne alimentaire et Environnement

Direction générale : Environnement
Service Maîtrise des Risques pour les substances
chimiques (MRB-C)

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GESLOTEN SESSIE BCR - starts at 9.30 h			
AGENDA ITEM		DOCS/ SUBJECT	PROCEDURE
1. Approbation de l'agenda	1.1	Agenda 22/09/2022	FOR DECISION
2. Approbation du compte rendu	2.1	Draft PV du 14/06/2022 – closed + open BCR	FOR DECISION/
3. Informatie / Consultaties			

	3.1	Microplastic restriction : -BE preliminary notes and questions on the microplastic restriction proposal (3a + 3b+ 3C) - BE preliminary notes and questions on the microplastic restriction proposal (BCR note_BE notes questions on the MP restriction proposal_20220902). - BE preliminary notes and questions on the microplastic restriction proposal (BE preliminary notes and clarification questions on the microplastic restriction proposal_20220902)	For consultation/for info
	3.2	REACH restriction on Lead in Fishing Tackle and Ammunition: info point on the BE comment submitted to the SEAC draft Public Consultation and info on the discussion with BE Defense on lead in ammunition and their risk management and clean-up techniques on training sites. Contact was taken with MM (Marine litterplan) and Defense contact . on 2 topics = Lead contamination at the coast (> shooting activities) in sea and land . Lead concentration measured (uptake by birds)	
	3.4	AfA - Hubner - CT - again termination without results - vote - Salzgitter CT_ - vote - Blue Cube/Safechem - TCE - - vote - Lilly & Eli Lilly - OPE -	For consultation (& decision via written procedure)

		- vote - Swords - OPE - - vote - Wallac Oy1 - OPE - - vote - Zoetis & Delpharm - OPE - - vote - Instrumentation lab - OPE - - vote - Idexx - OPE & NPE -	
	3.5	overview BE votes - July 2022 AfA written procedure	For info
4. Beslissingen			
4.1. FOR DECISION			
	4.1.1	Microplastic restriction : First exchange on microplastic COM text – establishment of the BE position Presentation > The proposal was received in August 2022 and the 1st COM meeting will be tomorrow (September 23rd). ➤ We 'll refer also to the Ad-HOC BCR Meeting of April 2021 (info to the fed-reg colleagues on the technical dossier ECHA) All the documents > dossier and opinion are on the ECHA website. The COM proposal (act+ annex) ➤ We'll review the Annex doc. Goal of today : establisheent of a 1st position/commenting > BE . Comments BE to the COM on biodegradation and solubility criteria / tests needed (repeat the comments made during the PC on technical	

		dossier) Presentation of the COM proposal for the added microplastics: Left column (the substance)= the definition is difficult (synthetic polymer microparticules) ➤ Target the solid particles and intentional microplastics. Focus on the Persistence of the mircroplastics in the environment. Not too much deviation from RAC &SEAC opinions. Here the text seems to be clearer occure in nature/ All polymers with C in their structure are included (all the polymers with a C somewhere in the molecule / also inorganics with C in branches). Main provision : Properties socked with the microplastics > going back to the previous wording /more clear for INSP. Export ban > need to add the formulation wording as is being done with the PFAS in AFFF restriction dossier ! Particules: a definition of a particle has been added, single molecules are not considered particles// Para3=
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		Documentation could be used to decide on whether size limit is met > would be good to have a technical dossier (including identity and other info on the MP) Para4: Consider a definition or an appendix with a copy paste of the technical explanation of the 3 exeptions . Cosmetics - 3 categories out – out to municipal waste and not the drain. Lip , nails and make up products contains more ingredients so harder to reformulate. 12y is long but ok (COM justification) and the labelling requirements are too far. Synthetic sport surfaces- (but not the gardening and the playgrounds) Private use should not occure .> incontrolled private use . Discussion OVAM= on the fact that there is maybe a need for the refill life of the sport fields . VLAREM – containement measures are describes. No uses in playground or private use WL= no clear info > but not authorized for used in private-playground SEAC – ok after 6y problems only for 10%-15% of the fields . OVAM ok but no other solution for recycling of tyres for the moment . SPFECO- real issue but the reason for the transistion period. SOD H_E// we cannot agree to have secondary recycled materials with more dangerous materials than the premium placed on the market
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		Para7: Use and labelling instructions. Explanation why no labelling on medicinal product and fertilizers. Why no labelling for the temp derogated uses. ok for labelling too long .what the logic of the Commission. = are we speaking now of Labelling or instruction on use and disposal > clear in ECHA dossier not (contain microplastics’. Reporting = Ok for the reporting – but the report should be efficient / how to measure the release (guidance by ECHA ?) And the particule should be identified (trace production to the final product) Assessment on the lifecylcle. Tests should be added to the report and take this report under accesses and who’ll be able to see the report. OVAM – how to measure the release in the env. Manufacturers/ recyclers. Industrial DU’s and logistics actors. The doc will be send to the BCR. ➤ Ccls We support the restriction but nevertheless we need specific clarifications.
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	4.1.2	PFAS in AFFF restriction – BE comment on the Public Consultation – BCR agreement on the final version. goes through the comments prepared by the PFAS group CCIM. Please refer to the doc circulated for the meeting. The comment was agreed on by the BCR and could be submitted to the Public Consultation.
	4.1.3	AfA Chromium 4 AfA's - on hold . Introduction of a note by com . Several monitoring arrangements as conditions now And add ceiling for automotive and sanitary uses Auto- 6y Sanitary 8,5y. Initial with ceiling but = not agree for splitting both Auto and sanitary. will probably go for an end date to 2026 . So Belgium will send in some preliminary comments to push for a shorter review period. BE will upload the comments as presented by Q = RAC on uncertainties and data qualities ? no - not clear enough in the dossier opinion. Some other upcoming AfA's were presented, both Cr(VI) – decorative & non-decorative, & OPE/NPE incl. some BE applicants and sites COM introduced a new procedure to test the water for AfA dossiers in between REACH Committee meetings, in writing.

		The BCR supports the proposal of position and comments proposed by .	
	4.1.4		For info
4.2. FOR DECISION (BCR WRITTEN PROCEDURE) : FOR ENDORSEMENT			
	4.2.1	AfA - Huebner - CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
	4.2.2	AfA overview ongoing preliminary written preRC COM consultation	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
	4.2.3	AfA - Husqvarna CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
	4.2.4	AfA - Larschemie CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
	4.2.5	AfA - Oras CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
	4.2.6	AfA - steelcolor CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)

	4.2.7	AfA - Viega CT -	FOR DECISION (ENDORSEMENT OF WRITTEN PROCEDURE)
5. AOB	5.1		
	5.2		
6. Volgende vergadering closed session Virtual/office?	6.1	Volgende BCR Open session 9.30-15.30 (sandwiches will be foreseen after the open session)-	For INFO