



## Mn REACH Conference: In the Nutshell

The Mn REACH conference which took place on the 26th – 28th September 2023 was a resounding success. This hybrid (physical and virtual) conference saw some 70 delegates not only from the Mn industry but also from other metal associations, law firms, consultants, and regulators.

The quality of speakers was outstanding with experience in their related fields ranging from 10 – 30 years. The speakers addressed issues related to the toxicological and ecotoxicological aspects of inorganic manganese as well as the present and possibly future regulatory threats to industry with foreseen effects on profitability.

### TAKE HOME MESSAGES

#### *Day 1, Session 1: REACH and Manganese Toxicology: Backward View*

Speakers	Presentation title	Main messages
Dr Doreen McGough, Secretary General - The Manganese Consortium	Registration of Mn- based substances - putting it in context	All 12 substances registered by the consortium have variable C&L. This plants uncertainty in our know-how. Industry must work together and should start by ensuring one substance, one registration, same classification.
Mr John Hislop, CEO - Relax Global Compliance, UK	Manganese SVHC Status	Manganese has been classified for some of the endpoints within the SVHC umbrella though at lower C&L categories. Industry must ensure a robust compliance for these endpoints to avoid a higher category of classification – Cat 1A or 1B could trigger the need for these substances being listed as SVHC which is a time consuming and expensive.
Mr Steven Renaut, Associate Director - DART- Labcorp	Reproductive Toxicity - Rats & Rabbits: diversity in effects	The rat tolerated Mn substances tested for Repro/PND very well, meanwhile the rabbit was more sensitive only when pregnant.
Dr David Dorman - Professor of Toxicology - North Carolina State University	Manganese Neurotoxicity - An overview	The essentiality aspect of Mn is reported across several organisms; however, deficiency is scarce. Mn will concentrate on certain parts of the brain if exposure is in excess resulting in overt effects. However, lower environmental exposure has been reported to cause subtle neurological changes in humans, the specific Mn substances causing these changes are not reported.

#### *Day 1, Session 2: REACH Changes, Groupings and More*

Speakers	Presentation title	Main messages
Hugo Waeterschoot, Chemicals Management Advisor - Eurometaux	Mn in the restriction roadmap - where is the road heading and what to learn from previous experience?	Tapping on the experience from other metals, the Mn industry was encouraged to prepare to face consequences of being included in the restriction roadmap by carrying out exposure, material flow and risk mapping as first steps
Claudio Mereu, Partner - Fieldfisher LLP	PFAS Restriction and the grouping approach – a dangerous precedent for manganese compounds	Using PFAS as an example and to avoid a similar pathway, the legality of the grouping approach and process was questioned with an advice use good science, good data and work together – be proactive to ensure good science is used for the different endpoint analysis



Dr Violaine Verougstraete - Eurometaux	REACH maintenance challenges and possible changes in REACH 2.0	Regulatory management of metals require a holistic approach and resource should target what matters. The CLP and REACH updates carry several grey areas for the metal industry
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## Day 2, Session 1: REACH post Registration Affairs – A complex Future

Speakers	Presentation title	Main messages
Dr Emily Richmond, Senior Managing Toxicologist - Exponent	Mn Endocrine Disruption - Facts or Fiction	Several publications exist but of non-regulatory compliance quality. Several OECD studies also exist. The overall data pool reaches variable conclusions, hence does not pinpoint with any certainty that some Mn substances are ED's. Industry is encouraged to carry out Invitro assay studies. Classification will be mandatory in 2026
Chrystele Tissier - European Chemical Agency	ECHA Assessment of Regulatory needs - what you need to Know?	ARN report is an informal screening document. It is simply a preparatory work to support other REACH & CLP processes. The deadline for its finalisation remains unknown. Industry is encouraged to update its dossiers as information on the updated dossiers are crucial.
Chrystele Tissier and Maarten Roggeman - European Chemical Agency	Q&A on Restriction Road map & Assessment of Regulatory needs reports	<ul style="list-style-type: none"> <li>- The grouping is based on structural similarity.</li> <li>- Most compliance checks will come from the ARN report.</li> <li>- First steps when the report is formalised will be the CLH</li> </ul>

## Day 2, Session 21: Mn Environmental Aspects & other Restrictions

Speakers	Presentation title	Main messages
Katie Hill, Head of Industrial Chemical Notification Services, Senior Managing Scientist - Exponent	Mn Aquatic toxicity - an overview	The Mn Industry is not data rich nor poor from an Env'tal perspective. However, more chronic data is needed. MnSO4 and Mn (dust) are the only substances classified as hazardous for Env, with the justification for the harmonised classification for MnSO4 unknown
David Lever, Principal Consultant - Risk & Policy Analysts Ltd.	Mn Slags as waste or By-products	SiMn slags and FeMn slags are considered as By-products for most countries in the EU but for Spain that considers them as waste. Categorizing them as waste has huge socio-economic impacts. Industry must address this discrepancy to ensure a level playing field
Nadia Vinck, Director EHS, Energy & Climate - Euroalliages	EU Carbon Boarder Adjustment Mechanism (CBAM): impact on ferro-alloys imports and production in Europe	The regulation came into force on October 1 <sup>st</sup> . FeMn alloy is the only Mn based alloy inclusive in the regulation. The carbon footprint of this material should be reported – this will trigger a fee. Importers need the CBAM authorization as of 1st January 2026 to remain compliant.
Marie Escorneboueu - Keller and Heckman LLP	Mn alloys and the upcoming European Critical Raw Materials Act	The Manganese industry should assess the potential for recognition of certain projects as 'strategic projects' against the criteria set out under the Regulation and monitor the issuance of delegated/implementing acts that will amend the content of the Regulation. If there is an interest for an extension of the listing of Mn as "strategic" for other grades, industry should prepare for outreach to the European Commission before 4-year revision milestone

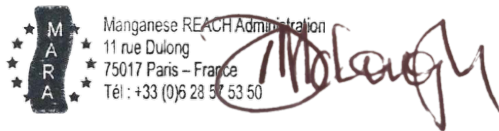


# Manganese REACH Administration

Association

Natalie Konings, Senior Associate - Fieldfisher LLP	Interaction between REACH and EU sanctions on Russia: how registrants should comply?	Failing to comply with the EU Russian sanctions can lead to huge fines and even imprisonment. Do not conduct any business activities that add value to the Russian economy. Industry was advised to design a compliance program as first steps.
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The conference ended with a panel of discussion with panellist emphasizing the different aspects of toxicology and ecotoxicology of manganese as well as the ever-growing complexities within regulations that can affect the metal industry as a whole. To mitigate the effects of regulations to bottom-line, Industry MUST work together.



13th October 2023