**ECHA's committees in focus: Tim Bowmer reflects on 11 years as Chair, PFAS restrictions, and future outlook**

## Transcript

00:00:10:23 - 00:00:37:09

Adam Elwan - Host, ECHA

Welcome back to another episode of the Safer Chemicals Podcast. I'm Adam Elwan and today we have Tim Bowmer, Chair of our Risk Assessment Committee, and Maria Ottati, Chair of our Socio-Economic Analysis Committee with us. Now, the two committees give scientific opinions that guide the European Commission and EU countries in managing chemical risks effectively. Tim and Maria have just wrapped up their June meetings and I'm looking forward to diving into the key topics they covered.

00:00:37:12 - 00:00:57:15

Adam Elwan - Host, ECHA

We have some interesting things to discuss, including Maria's update on where we are with the universal PFAS restriction proposal. Now, we touched on this in our last episode, but let me briefly recap it for you. So this proposal is one of the broadest restrictions ever proposed in the EU and it covers a wide range of PFAS and their uses.

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Adam Elwan - Host, ECHA

Its primary goal is to minimise PFAS releases and the exposure of people, plants and animals to these persistent chemicals. National authorities estimate that if no action is taken, around four and a half million tonnes of PFAS could enter the environment over the next three decades. This episode also marks Tim's last committee meeting and podcast episode as he prepares for a well-deserved retirement after chairing for an impressive 11 years.

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Adam Elwan - Host, ECHA

It's a perfect opportunity to hear his reflections on his time as chair and to discuss the future of our committees, considering the evolving regulatory landscape and the new challenges that lie ahead. Without further ado, let's kick things off with Maria and delve into the latest updates on the PFAS restriction proposal. So, Maria, what did the committee discuss?

00:01:47:11 - 00:02:10:03

Maria Ottati - Chair, Socio-Economic Analysis Committee

Well, the topic in this meeting was the recommendations of RAC and SEAC to what we call the dossier submitter. So basically the member states who submitted the proposal. In this case, we are talking about Germany, the Netherlands, Sweden, Denmark and Norway. So these are the committee suggestions as to how the proposal could be improved in order to facilitate the assessment and the rapporteurs come up with these recommendations.

00:02:10:04 - 00:02:28:07

Maria Ottati - Chair, Socio-Economic Analysis Committee

There's a consultation with the members. There were a few that were suggested by some of the members in their comments and now the committee has discussed it and they will be sent to the member states. They will then consider whether they would like to implement any of them and they can update the proposal based on these recommendations.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

What we also had in the meeting was participation of stakeholders. So we had stakeholders being able to give their views. Some were able to do so in the meeting and some in writing, and all will be included in the minutes. So this will be published very soon as well. In March, if you remember, we agreed that the dossier was in conformity and that allowed the consultation on the proposal to start, and that's been running for about three months now with quite a lot of comments coming in.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

We're up to 700 already in about three months. And we always know that the most come right at the end. So we're expecting a big flurry there in the end and the end will be on the 25th of September. That's until when the consultation is running. So we really would like to thank those who have taken the time to submit their comments and their information, and we remind them that there is still time to submit more information if they've got something that is relevant to the proposal and a reminder that these comments should be based on evidence.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

It's not about making claims, but also about supporting those claims and providing the evidence that the committee can assess. So in the upcoming meetings, we will continue discussing the proposal and in the next meeting we will be having the first opinion. We're taking a bit of a sectoral approach. So the first sector is going to come in the next one and that is food contact materials.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

And I note that the registration will open very soon for the September plenary. So that's the point where interested stakeholders can register and say that they would like to attend and we will consider it.

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Adam Elwan - Host, ECHA

All right. Thanks a lot for the updates. We'll be following this topic with a lot of interest in our future episodes. And as Maria mentioned, you can still send your comments on the proposal. So do take that opportunity if you have relevant information that you can share. Now, let's continue our discussion on PFAS, focussing this time on a separate proposal regarding their restriction in firefighting foams.

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Adam Elwan - Host, ECHA

Now this proposal put forth by ECHA as the dossier submitter in January last year, aims to prohibit the placing on the market use and formulation of PFAS in firefighting foams. However, it does consider specific transition periods for different sectors to ensure fire safety. In our previous episode, we summarised the Risk Assessment Committee's opinion on this proposal. Today, Maria will give us a brief overview of the final opinion from the Socio-Economic Analysis Committee.

00:04:48:18 - 00:05:09:19

Maria Ottati - Chair, Socio-Economic Analysis Committee

Yes, as you mentioned, the opinion was agreed in March and after that the consultation opened on the draft opinion of SEAC and people who wanted to send comments in were able to submit it. These were analysed then by the rapporteurs and the committee and the opinion was amended to reflect any changes that were made as a result of those.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So on the whole, the committee agreed in March that the restriction is proportionate and the option that was proposed by the dossier submitted was the most appropriate one. And this didn't change at all based on the comments. But there were some specific areas where SEAC was asking for more information and information was received from some of them.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

And also on other areas that we were not specifically asking about. All that was analysed and we can highlight some of the changes that were made. There were several bigger and smaller changes and we wont go into every single one of them. But for starters, there are some uses where the committee considered that if there are no alternatives that perform well enough by the end of the transition period, the consequences of reduced fire safety could be quite disastrous.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Basically, SEAC agrees with the dossier submitted that it's very likely that there will be alternatives by that time, but it's important that we reduce the chance that they are not there to a minimum. So that is why SEAC has considered that there should be a review of the availability of alternatives before the end of the transition period. Just to check that that is actually the case.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So in the opinion that was agreed in March, this was a recommendation for SEVESO establishments. Based on the information received, this is now extended also to cover risks in neighbouring establishments and service establishments and also for offshore installations in the oil and gas industry for offshore as well. There was information received on the challenges that are there to achieve adequate performance in very hostile environments.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Basically SEAC considers that more time will be required to develop alternatives. The dossier submitter had proposed that there should be a five year transition period and based on the information received, SEAC considers that ten is more appropriate, aligning more with the SEVESO because there are some some similarities there.

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Adam Elwan - Host, ECHA

So still evolving and taking into account a lot of different uses and ensuring that there is definitely them enough fire safety.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Exactly that’s the idea. That's what we want to to avoid that we get into a situation where there isn’t alternatives that are performing as well as they should.

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Adam Elwan - Host, ECHA

Next, ECHA will then send the combined opinion of the two committees to the European Commission who will then take the decision on the restriction together with EU Member States. Let's now shift focus to the Drinking Water Directive. So this directive plays a crucial role in safeguarding the well-being of citizens and the environment, and it does this by addressing the potential risks associated with contaminated drinking water and ensuring better access to clean drinking water.

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Adam Elwan - Host, ECHA

Now, a couple of years ago, the European Commission gave ECHA specific tasks under this directive, and one of the most interesting ones is setting up lists of chemicals that can be safely used in materials that come into contact with drinking water. And these are so-called positive lists. Tim, could you shed some light on what the committee will be doing and when does the work actually start?

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Tim Bowmer - Chair, Risk Assessment Committee

The revised Drinking Water Directive entered into force, in fact, in January 2021 already. So it's already a reality and it's a sort of an authorisation or licensing system for materials, as you said, that come into contact with drinking water. And that could be at any part of the process through collection, maybe purification, transport and storage. So it's quite quite an across the board type of regulation.

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Tim Bowmer - Chair, Risk Assessment Committee

Now, a number of member states have already informed ECHA of their national positive lists, so we're compiling a master list, as it were, out of these and these will form the basis of what's called a European positive list. Now there isn't just one list, there's in fact four, and they cover different types of materials. The first one covers organic materials, things like polymers, the second covers metallics, for example, stainless steel or copper, which you would find in water pipes.

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Tim Bowmer - Chair, Risk Assessment Committee

The third is cementitious, and the fourth is a group of substances called enamels, which are glass like ceramics and other inorganics. And these all have different information, requirements and needs. The plan is that the first European positive list will be adopted next year and then a 15 year review programme would start, which continues to 2039. So ECHA will start regular maintenance of the European positive list and they do that by adding new entries.

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Tim Bowmer - Chair, Risk Assessment Committee

Or we could amend existing entries or we could even remove entries. So for a substance to remain on the European positive list, it can be added or removed. Companies or authorities will submit applications to ECHA and they will have to do this about 18 months before, give an expiry date for that substance. So there's a series of expiry dates for all of the substances on the lists which will be planned in and then applications have to come in a set time before those expiry dates.

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Tim Bowmer - Chair, Risk Assessment Committee

And the notification of each submission has to be done beforehand so that we can anticipate the incoming work and try and plan it properly. Now RAC’s task is to evaluate how these substances are used and their potential to enter the drinking water, and that's their ability to migrate out of the contact material and into the drinking water. And we do that by looking at migration data.

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Tim Bowmer - Chair, Risk Assessment Committee

That's where a substance emerges out of its matrix or material. And we look at the toxicological properties of that substance and we basically do a risk assessment to assess the risks. Additionally to the process, any comments by third parties on the application will be considered and we will prepare an opinion as always. So at our second last meeting in March of this year, RAC adopted a mandate on the drinking water to set up a working group to look specifically at this process.

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Tim Bowmer - Chair, Risk Assessment Committee

And in the first two years of the existence of this working group. So the remaining half of this year and next year, they will look at pilot projects to do with model substances, which we will try and evaluate. We will look at some emerging guidance to govern the process and we will generally set up committee procedures so we're able to evaluate these in an efficient manner when we start.

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Tim Bowmer - Chair, Risk Assessment Committee

Now, the first meeting of the working group took place the week before last, so in Helsinki on the first and second of June, and the member states nominated 16 experts. These experts have new expertise which RAC doesn't have at present. So there are real additions to the expertise of the committee and they have been linked as advisors to current RAC members.

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Tim Bowmer - Chair, Risk Assessment Committee

So there's a strong connection with the committee.

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Adam Elwan - Host, ECHA

Sorry to interrupt you there. How do you select these experts? Who are they and who do they represent?

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Tim Bowmer - Chair, Risk Assessment Committee

We approach the permanent representatives in Brussels and we ask them to nominate experts to these working groups. And they send us a range of CV's, which we looked at, talk to the experts, and eventually 16 experts arrive for the working group in Helsinki to start the discussions. So as part of the first discussions in the Drinking Water Working Group, we had a look at the high level work plan for the next year and a half to try and look at the critical aspects of this and things we really need to get done as early as possible.

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Tim Bowmer - Chair, Risk Assessment Committee

And we looked at the difference between what might be simple cases of applications and more complicated ones. The thought here is that the simple cases could be strongly data based and could be managed in a sort of pro forma manner before they get to committee. So they would be pre-assessed in a very rigorous way. The more complex cases would need a more full evaluation by the committee.

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Tim Bowmer - Chair, Risk Assessment Committee

And just to conclude, I'd like to say that the second meeting of the working group is foreseen for October of this year. I think at that stage the focus will be on the emerging guidance and commenting on that.

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Adam Elwan - Host, ECHA

Right. So there will be guidance produced to support.

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Tim Bowmer - Chair, Risk Assessment Committee

There are two volumes of guidance being produced on the main aspects of the Drinking Water Directive.

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Adam Elwan - Host, ECHA

So very important work to be done by the Committee to ensure safe drinking water in the EU, starting of course with the big task of evaluating the existing positive lists. I'm sure we'll hear more about this in our upcoming episodes once the risk assessment work gets going at full speed. Next on my list is the committee's approach to assessing PBT and VPVB substances.

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Adam Elwan - Host, ECHA

So these are persistent, bio-accumulative and toxic as well as very persistent and very bio-accumulative substances. Can you, Maria, tell our listeners why this approach is needed?

00:14:07:15 - 00:14:29:28

Maria Ottati - Chair, Socio-Economic Analysis Committee

Yes. So for many cases what we do is the kind of more straightforward socio-economic analysis, which is what we call cost benefit analysis. So the idea there is that we quantify and monetise the cost and the benefits, and then it's pretty straightforward to compare them. However, the issue with these substances, PBT and VPVB substances, is that it's quite difficult to estimate what their effects are.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So doing the quantification for the benefits, that's really challenging. It makes it pretty difficult to come to a conclusion on things like proportionality. You know, is the proposal actually proportionate? But SEAC still needs to form an opinion on the substances and the decision makers need to decide as well. And the decision is also based on proportionality. So this is some of the work that the committee does in addition to looking at particular dossiers of particular cases, which is develop more horizontal methodological approaches.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Some years ago we put a paper together on how we can deal with assessing these substances and the idea is that we would be consistent in how we consider them so that not every single case is treated in a different way. And then also this paper is quite helpful for the dossier submitters, preparing cases to be able to know what the committee expects to see.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Now as we've applied it over the years and we've applied it quite a lot, we have noticed that some areas could actually be improved. There is some lack of clarity in some places and we have also found it quite useful with substances that are not considered strictly PBT or VPVB. So what we did is put together a working group of SEAC members in the plenary last December to do an update of the approach.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

It's not a full change, but it's been updated quite a bit. So improvements basically.

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Adam Elwan - Host, ECHA

So a good example of taking lessons learnt from the past and using those to improve the situation. So that's very good to hear. And what are the main elements of this approach then that you're preparing?

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So as in the previous version, the starting point to evaluating costs and benefits is going to be looking at the emission reduction. So basically here we're talking about the difference between not using and continuing to use the substance and then at the compliance costs. And these two aspects we think should always be included. And what we can do there is derive what we call the cost per unit.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So how much it costs to reduce one kilo of the substance emitted. So this is what we call basically looking at the cost effectiveness of the proposed measure. But yeah, then the decision makers, what they would do is to consider if this cost is acceptable to society, this is for for them to do. There are no set benchmarks, but there are some comparisons that can be done that are quite useful.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So for instance, looking at previous cases that were decided already. And this is kept, but what we do in the new approach is to increase the emphasis on the fact that, where available, qualitative information should be included as well alongside that. So for instance, information about some factors that could affect the damage potential of the substance. And there's quite a few examples given of these in the approach or things like information about avoided clean up costs, for instance. That’s also something.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

And we added a couple of other elements in the approach as well. So as I mentioned earlier, we have found the approach useful for other kinds of substances. So now the focus is more on persistence. So it covers other persistent substances that are not. PBT, VPVB, so an example of that would be what we call PMT, so persistent, mobile and toxic and also very persistent and very mobile.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So VPVM. So if RAC considers that emissions are a good proxy for risk, then this approach actually can be useful. So it applies to those already. We also provide more details on a complementary measure to just providing the releases, which is calculating the avoided stock and how that could be done. So there's some some details there. And then finally there are some more details on how to choose the appropriate assessment period.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

So over how many years they should consider costs and benefits and also about discounting the emissions. So basically bringing emissions that happened in the future to the point of today because different proposals may have emissions that happened with different time profiles. So that's the basics of it. And we invite people to have a look at the approach.

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Maria Ottati - Chair, Socio-Economic Analysis Committee

It’s only a few pages long.

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Adam Elwan - Host, ECHA

And when will this be published?

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Maria Ottati - Chair, Socio-Economic Analysis Committee

Well, it was just agreed now in June in the plenary, and we will still do some final editing just to make sure there's no typos and things like that and then publish it very soon on the ECHA website.

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Adam Elwan - Host, ECHA

All right, good. Thank you, Maria. Then the acceptability of cancer risks for determining occupational exposure limits. So this is all about identifying a level below which no cancer risk exists, which is actually currently not possible for most carcinogenic substances. Now, at the end of last year, the Commission's Advisory Committee for Safety and Health at Work adopted an opinion on limit value setting for non threshold carcinogens. And back to the Risk Assessment Committee.

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Adam Elwan - Host, ECHA

So the committee evaluates occupational exposure limits and applications for authorisation for which, considering these levels might be necessary. Can you share your thoughts about the opinion of the Commission's committee.

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Tim Bowmer - Chair, Risk Assessment Committee

Thanks Adam, I can indeed. This opinion of the ACSH is, I think, quite an important one, and it comes, I think, at the right time. And as you say, it could have an impact on our work on authorisations, but also on our work on occupational exposure limits. So currently for most genotoxic carcinogenic substances, it really isn't possible to determine a safe threshold.

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Tim Bowmer - Chair, Risk Assessment Committee

And the safe threshold would be a level of exposure at which there is no cancer risk. So setting occupational exposure limit values still involves some level of residual risk, and that's what we call acceptable cancer risk. Policymakers until now have had to decide on what level of risk is acceptable on a case by case basis. And that's not always the easiest or most efficient way to do things.

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Tim Bowmer - Chair, Risk Assessment Committee

So the Working Party on Chemicals of the European Commission's Advisory Committee on Safety and Health was tasked with developing a risk based approach for setting limit values for such carcinogens. Now the ACSH is a tripartite body advising the Commission, which includes both member states, employers and worker organisations, as representatives. So due to that representative structure, an opinion from them is actually quite influential and important.

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Tim Bowmer - Chair, Risk Assessment Committee

Their approach aims to establish OELs that are as protective as possible, while also being feasible in practice to implement at workplaces. So in their opinion, the upper risk level is set at four predicted cancer cases out of every 1 000 employees, while the lower risk level is set at four cases out of every 100 000. Now, this assumes that the worker is exposed for 8 hours every day, five days a week, and 40 years of working life.

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Tim Bowmer - Chair, Risk Assessment Committee

In itself, that's a fairly conservative assumption. The OEL should not go above the level of four in 1 000, but if it does, for the moment, the ACSH thinks that more time might be needed before entry into force to allow industry to adapt. So this is their line of thinking. When the initial OEL exceeds four in 10 000, then efforts should be made to replace it with a more protective value after a transition period.

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Tim Bowmer - Chair, Risk Assessment Committee

And they also think that the use of values below four in 100 000 is probably questionable. That's their safe level, if you like.

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Adam Elwan - Host, ECHA

You already mentioned a little bit about potential impacts on the Risk Assessment Committee. Can you say anything more about that? How do you expect this to have an impact on your work?

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Tim Bowmer - Chair, Risk Assessment Committee

Well, this really helps to consolidate the approach to genotoxic carcinogens, and I know it's intended for the workplace, but we have two processes in ECHA which are intimately related to workplace exposure, and I think it has potential benefits in both of these. And some of the consequences would be, for example, for Chrome six applications for chrome plating or other chrome processes where at the moment we also use a non-threshold approach.

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Tim Bowmer - Chair, Risk Assessment Committee

And I think these guide values of four in 1 000 to 4 in 100 000 put that very nicely in context as to the applications we are looking at as to how safe or risky they are. And whereas under REACH we're still obliged to look at non-threshold carcinogens in the usual way, I think this will give us some indication as to what we are really looking at in the right context.

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Adam Elwan - Host, ECHA

Thank you. Interesting to see how this develops. Now, let's take a short trip down memory lane with you, Tim, as you've just chaired your last committee meeting and prepare for a well-deserved retirement, I was hoping that you could share some of your reflections from your time chairing the committee. But before that, are you able to tell us anything more about who will be replacing you?

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Tim Bowmer - Chair, Risk Assessment Committee

I can. My successor will be Roberto Scazzolo. Roberto has longstanding experience in implementing chemicals and waste legislation in the EU. He's been involved in public administration but also in the private sector for some time, and his expertise is strongly related to the evaluation and management of chemical hazards. So right in the field, which involves RAC.

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Tim Bowmer - Chair, Risk Assessment Committee

So he joined the committee at RAC 65 the week before last as an invited expert to meet the members and get a feel for the current work of the committee. And I've been getting him up to speed with ongoing dossiers and the future work of the committee. So he will chair the RAC 66 meeting in September and we have the summer and quite a few weeks of handover to ensure a smooth transition and efficient continuation of the work of RAC.

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Adam Elwan - Host, ECHA

Sounds like Roberto will be hitting the ground running then.

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Tim Bowmer - Chair, Risk Assessment Committee

We hope so.

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Adam Elwan - Host, ECHA

So I'm wishing him a warm welcome and best of luck in his new role. Now back to you and your time as chair. You've been chairing the risk Assessment Committee since 2013. Right?

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Tim Bowmer - Chair, Risk Assessment Committee

2012, actually. So 11 years.

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Adam Elwan - Host, ECHA

I'm sure that in those 11 years you've been through quite a few interesting cases. Could you tell our listeners what the most memorable ones were and why?

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Tim Bowmer - Chair, Risk Assessment Committee

Well, there's so many. I mean, RAC has hit the 1 000 opinion mark earlier this year. I think that's quite an achievement for the committee in its own right. But I think the ones that come to mind for me personally, the microplastics, the intentionally added microplastics, was an important one. I thought it was a very cleverly designed restriction proposal because it built on EU definitions of plastic and solid materials to create this new particle definition and I think that's very strong.

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Tim Bowmer - Chair, Risk Assessment Committee

I also don't see why 40 000 tonnes a year of plastics should be discharged down the drain to landfill or elsewhere. So I found it quite compelling. It contained a number of internal challenges which we had to get over, and one of them was to how you could allow biodegradable microplastics to be derogated. We spent quite a long time on that.

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Tim Bowmer - Chair, Risk Assessment Committee

We had to refresh ourselves on the whole handbook of biodegradation testing. Having done that and come up with a solution, I think it stands for other future restrictions as well. So I would remind the ECHA colleagues that it's there and they might need to look back at it some time in the future. I was appointed somewhat unexpectedly as the ECHA contact person for worker protection.

00:26:14:21 - 00:26:46:07

Tim Bowmer - Chair, Risk Assessment Committee

I think it was back in 2013, and I sort of said yes, without really, I think, understanding what it would mean. And it started with a difference of opinions between RAC and another Commission body, the Scientific Committee on Occupational Exposure Limits. So it had to do with the difference between a DNEL and an OEL and under Article 95 of REACH your instructions as to how you resolve these differences.

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Tim Bowmer - Chair, Risk Assessment Committee

And that took us on a path down a rather long road of three years of discussions as to a how do you resolve such differences and b, how can you prevent them in the future? And that's when I learned an awful lot from the colleagues of the Scientific Committee on Occupational Exposure Limits and from my RAC colleagues, because together we formed a joint task force and we met, I think on ten occasions over those three years in Brussels, eight or nine members from each committee to try and thrash these issues out and come to consensus.

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Tim Bowmer - Chair, Risk Assessment Committee

And the upshot of this was that RAC was asked to do some OELs on a trial basis and we got into that business. We also had to look at some guidance and methodology to help us along the way. And eventually ECHA took over doing the occupational exposure limit. So it's now a small but fully fledged process within ECHA.

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Tim Bowmer - Chair, Risk Assessment Committee

The Commission asks us every year to do a number of occupational exposure limits. ECHA drafts the proposals and then RAC evaluates and produces an opinion.

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Adam Elwan - Host, ECHA

All right, so quite an uphill road, I would say, then to get there.

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Tim Bowmer - Chair, Risk Assessment Committee

It was a very interesting time. I learned a huge amount, both personally and about people, I have to say as well.

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Adam Elwan - Host, ECHA

Anything else that comes to mind you'd like to highlight?

00:28:10:05 - 00:28:48:12

Tim Bowmber - Chair, Risk Assessment Committee

I suppose the unmissable one is glyphosate. RAC had glyphosate twice for evaluation as a classification and labelling dossier, the first time in 2016-2017, and the second time in 2021-2022. And that was not only a massive dossier with, for example, to cover carcinogenicity, there's more than 18 studies. To cover reproduction, there's even more. And each hazard class just has a massive, full, but messy number of studies in it.

00:28:48:15 - 00:29:12:14

Tim Bowmber - Chair, Risk Assessment Committee

So very difficult to find the weight of evidence and to assess that fairly. I have to say I was really proud of the Committee for Risk Assessment, the rapporteurs, but the members of the committee as well, that they came to what was actually quite a difficult conclusion that for carcinogenicity mutagenicity and reproduction toxicity, glyphosate should not be classified.

00:29:12:17 - 00:29:38:06

Tim Bowmber - Chair, Risk Assessment Committee

I think it would have been quite easy for them to take the line of least resistance and go for CARC or REPRO 2, for example, but they stuck to what they had assessed in the dossier and I think they produced an excellent opinion. The first one still stands as as a good piece of scientific writing. The second time, which was even more extensive, more literature studies had been added on.

00:29:38:08 - 00:29:58:18

Tim Bowmber - Chair, Risk Assessment Committee

There had been clearly a lot of controversy about our first opinion, and we had the opportunity to do it all again. And RAC chose to look at all the new studies to do as broad an assessment as possible, and they came to the same conclusion again. And I think we can all stand behind that conclusion.

00:29:58:20 - 00:30:03:14

Adam Elwan - Host, ECHA

Yeah, I remember that case as well. Very interesting and a lot of attention from everywhere on that one.

00:30:03:16 - 00:30:05:00

Tim Bowmber - Chair, Risk Assessment Committee

Yes.

00:30:05:03 - 00:30:12:16

Adam Elwan - Host, ECHA

Well, one more thing that comes to my mind is the authorisation process. Is there anything you'd like to talk about there?

00:30:12:18 - 00:30:44:15

Tim Bowmber - Chair, Risk Assessment Committee

I was lucky enough that I was, at ECHA, before the process really started. So I was there to see the committee procedures develop and to help with that. And I can recall a discussion on the length of the review period. And ECHA had proposed that it would be four, eight or 12 years and the eight would be the standard, the four would be short, and you would have to have extra motivation and justification to get the long one, 12 years.

00:30:44:18 - 00:31:14:19

Tim Bowmber - Chair, Risk Assessment Committee

And these are sort of inverse prison sentences. Getting 12 years is a good thing. Getting four years is a bad thing. So I recall the discussion quite vividly and basically the Commission didn't quite agree with the proposal. And after some discussion we came to four, seven and 12. So since then seven has been the standard review period. But going on from that, we evaluated the first applications that came in.

00:31:14:21 - 00:31:46:02

Tim Bowmber - Chair, Risk Assessment Committee

We saw all the good ones, we saw the bad ones, we saw consultants beginning to learn how to advise companies much better. And really the applications started to get much more predictable as we went forward. Unfortunately, along the way, we lost the upstream applications, which our hope initially was that these would very efficiently cover large groups of companies using the same substances.

00:31:46:05 - 00:32:15:27

Tim Bowmber - Chair, Risk Assessment Committee

Unfortunately, that didn't come out as we had hoped. So we're in a situation where we have occasional small groups of companies clubbing together, maybe as many as ten or maximum 20, but we don't have super applications of hundreds of companies anymore. So we're dealing primarily with single applications for unique workplaces or two or three workplaces. And as you could imagine, that takes a lot of resources.

00:32:15:29 - 00:32:33:27

Tim Bowmber - Chair, Risk Assessment Committee

So we are working our way through it at a steady pace. I think it's fair to say, and Maria can correct me if I'm wrong, but it has to be sustainable. If we overdo it, then it tends to affect other processes and that's not the intention. So we'll keep going steady as she goes.

00:32:33:29 - 00:32:54:15

Adam Elwan - Host, ECHA

Very interesting insight that we don't usually see in the meeting minutes. So thanks a lot for that, Tim. What about then, the future of the committee? Where do you see the work going now, thinking, of course, of all the new tasks that are coming our way, through for example the REACH and CLP review and Maria, please also do share your thoughts from the Socio-Economic Analysis Committee perspective as well.

00:32:54:17 - 00:33:24:06

Tim Bowmber - Chair, Risk Assessment Committee

What I am going to say might sound a bit strange, but really the priority for RAC is to keep the current processes running efficiently. That's the baseline to keep up with incoming classification proposals from member states, to keep up with the OEL requests from the Commission and to keep up with these mega restriction proposals that we're receiving from both member states and the Commission.

00:33:24:09 - 00:33:56:11

Tim Bowmber - Chair, Risk Assessment Committee

And that's the bottom line. I think we need to keep working away at massive numbers of applications for authorisation at a sustainable pace, as I said. And I think it's always very grounding to focus on the near field and what you need to do as the basics of moving forward, looking at the Drinking Water Directive, which is already with us and which we're actively taking steps to implement, it has a couple of years of, let's say, implementation time for us.

00:33:56:11 - 00:34:16:00

Tim Bowmber - Chair, Risk Assessment Committee

It might sound quite generous, but actually it's not, that will go by very quick. And then we have a fifth process in RAC which is actually quite a large one by comparison to the others. It's up there in scale. This is not something small or minor. So we have to learn how to deal with that.

00:34:16:03 - 00:34:40:27

Tim Bowmber - Chair, Risk Assessment Committee

I think a lot of the other processes which are being talked about in the background as yet, they have timelines, some of them the news tends to vary a little bit and they will get here when they get here is my view. So I think stay really grounded, concentrate on what we already do well and we fit the other things in bit by bit as they emerge.

00:34:40:27 - 00:34:49:09

Tim Bowmber - Chair, Risk Assessment Committee

But trying to predict the future or trying to seek for serendipity is not always the wisest thing to do.

00:34:49:11 - 00:34:51:18

Adam Elwan - Host, ECHA

All right, Maria, anything you want to add?

00:34:51:20 - 00:35:10:15

Maria Ottati - Chair, Socio-Economic Analysis Committee

Well, we have several tasks also coming for SEAC. At the beginning of this process, it looked like most of them would go for RAC. But lately there have been more and more where people are saying, well, it would be useful to have a SEAC opinion here as well. So quite a few potentially coming. The only one we know for certain is some tasks related to the Batteries Directive.

00:35:10:15 - 00:35:37:28

Maria Ottati - Chair, Socio-Economic Analysis Committee

So those are coming and things are being developed to implement that. But there are several others in discussion. So we think we need to learn from the experiences in RAC on how they have dealt with it and incorporated new tasks and learn from the excellent example that Tim has set there. And also think about things like making sure we've got the right expertise. I think probably expertise in waste and the end stage is probably going to be something that's quite important.

00:35:37:28 - 00:35:51:01

Maria Ottati - Chair, Socio-Economic Analysis Committee

That takes a while to to bring in. So that's something we can start thinking about already. But yeah, on a watching brief, basically for us, seeing what's coming and making sure we are ready when things hit.

00:35:51:03 - 00:36:04:12

Adam Elwan - Host, ECHA

Thank you to both of you for your explanations and insight into the work of the committees. And Tim, again, wishing you all the best for your retirement. I hope you get a chance to relax and do something completely different for a change. Hopefully.

00:36:04:15 - 00:36:05:16

Maria Ottati - Chair, Socio-Economic Analysis Committee

Lots of gardening.

00:36:05:19 - 00:36:10:05

Tim Bowmber - Chair, Risk Assessment Committee

Thank you so much. Who knows, we'll see.

00:36:10:07 - 00:36:31:09

Adam Elwan - Host, ECHA

All right. So the next meetings then take place in September, and we hope to have a new voice with us in the studio then. So this would be Roberto Scazzola, the Risk Assessment Committee's new Chair. And in the meantime, you can find all our podcasts at echa.europa.eu/podcasts. Thank you for listening.