



# ANNUAL REPORT SUMMARY 2023

## THE EPMF'S MISSION

### AMBITIONS

- risk-controlled environment through sourcing, production, use and recycling of the precious metals (PMs)
- improved social and environmental footprint of PMs
- increased awareness and understanding of environmental impact, importance and advantages of PMs use and recycling
- respect the EU values by developing a more industry-friendly EU

### POLICY ASKS

- a more integrated and harmonised EU legal framework
- growing expertise at EU and member state level
- a regulatory global level playing field with better enforcement of rules
- an increased role for the EU in the world
- a smart and risk-controlled environment
- a framework to increase waste collection and effective waste treatment
- more ambitious EU Conflict Minerals Regulation

### CONTRIBUTION

- an open dialogue with policy makers
- credible leader with realistic pathway proposals
- knowledge on risk management throughout life-cycle
- waste as a resource and contribution to circular economy
- part of the solution thanks to technology
- communication on impact and contributions of PMs on a high-quality modern lifestyle

# CHEMICALS MANAGEMENT



## I. The harmonised classification of silver metal

[link](#)

**ISSUE:** In July 2019, Kemi proposed classifying silver metal as hazardous (i) skin sensitiser cat. 1; ii) mutagenic cat. 2; iii) reprotoxic cat. 1B; iv) aquatic toxicant (acute and chronic) cat. 1. This proposal has potential consequences for all uses of silver, including jewellery, silverware, electronics, solar panels, aerospace, and others. The silver nitrate classification proposal was very similar. The discussions and conclusions around the classification will impact the REACH registration dossiers.



**IN 2023:** the European Chemicals Agency's Risk Assessment Committee (ECHA-RAC) published its opinion on silver metal classification. It did not consider the EPMF's position that silver metal (massive and powder) does not require a human health classification but agreed on a repro cat. 2 and STOT RE 2 (specific target organ toxicity after repeated exposure) classification. In parallel, the EPMF contributed to the silver nitrate (AgNO<sub>3</sub>) CLH public consultation.

**EPMF MESSAGES:** the EPMF acknowledges the RAC opinion regarding silver metal but disagrees with its scientific basis. The EPMF maintains that silver metal massive should not be classified for human health endpoints.



## II. The Water Framework Directive: silver as potential priority substance

[link](#)

**ISSUE:** Water Framework Directive (WFD) aims to protect inland surface waters and groundwater against pollution. The European Commission selects and regulates priority substances. It was proposed to revise the list of pollutants affecting surface water and groundwater and to include silver on the Priority Substances list.



**IN 2023:** the EPMF actively engaged in scientific discussions concerning the silver EQS (Environmental Quality Standards) from the early stages of the process, raising methodological concerns on the data assessment. Together with Eurometaux an advocacy strategy was developed, targeting the Commission, the Parliament and the Council. In autumn 2023, a number of meetings were conducted with the Permanent Representatives of various EU countries and more are planned for 2024. The EPMF also sponsored further scientific investigations on silver EQS.

**EPMF MESSAGES:** the EPMF disagrees with the prioritisation of silver as the agreed methodology does not suggest an EU-wide risk. The EPMF believes the EQS value proposed by the Commission is overly conservative and without environmental benefits.



## III. REACH & CLP Revisions

[link](#)

**ISSUE:** REACH and CLP revisions aim to boost innovation for safe and sustainable chemicals and improve the protection of human health and the environment against hazardous chemicals.



**IN 2023:** the EPMF continued to work on the CLP and REACH revisions in close collaboration with Eurometaux and Cefic. The primary focus of the EPMF's activities was engaging with the Commission regarding the revisions of the REACH regulations and holding discussions with key MEPs.

**EPMF MESSAGES:** (i) start the chemicals risk management phase with a transparent prioritisation system to facilitate data collection and predictability; (ii) ensure effectiveness and target only what matters, REACH risk management should remain risk-driven and consider exposure potential in addition to hazard; (iii) avoid regrettable substitution by considering safer and more sustainable alternatives within a lifecycle approach; (iv) ensure overall transparency and predictability in the various REACH processes; and (v) extend the low tonnage requirements proportionately while focusing on 'what matters'.



## IV. REACH Dossier Updates

[link](#)

**ISSUE:** between 2010 and 2018 the EPMF registered approx. 100 substances under EU REACH. The maintenance of the registration dossiers is a key aspect of a well-functioning chemicals management system.



**IN 2023:** the EPMF updated several dossiers (e.g.: silver, PGMs, precious metal cyanides and precious metals refinables dossiers) to reflect the most recent science and exposure data.

**EPMF MESSAGES:** market changes are continuous, and data generation under REACH is a moving target. The revision of REACH and CLP Regulations may be future drivers for additional substance data in the lower tonnage bands. In addition, the generation of test data under EU REACH has triggered further testing requirements beyond the original 2018 REACH registration deadline. The filling of these data gaps is an ongoing process at the EPMF with the intention of providing conclusive answers to open questions.

# CHEMICALS MANAGEMENT



## V. Metals Environmental Exposure Data (MEED)

**ISSUE:** MEED is a multi-metallic programme initiated under the auspices of Eurometaux in 2022 and running until 2025. The comprehensive program gathers and assesses environmental exposure and toxicity data to facilitate the metals industry's compliance with the Zero Pollution Action Plan (ZPAP) and biodiversity objectives.

[link](#)



**IN 2023:** MEED projects progressed well: (i) the Mixture Assessment Factor (MAF) and the identification of Inorganic Priority Contributing Substances (I-PCS) to mixture toxicity; (ii) regional exposure assessment; (iii) sewage treatment plant exposure assessment; (iv) mixture effects of metals, including organics; (v) ecological relevance.

**EPMF MESSAGES:** to communicate findings to the scientific and regulatory community via scientific conferences (e.g. The Society of Environmental Toxicology and Chemistry - SETAC). The MEED team is keeping close contact with non-EU countries to cross-feed and achieve the best outcome for metals. Ultimately, the output of the MEED project aims to ensure the continued safe manufacturing and use of metals.



## VI. Endocrine Disruption (ED) guidance

**ISSUE:** ED is included as an additional hazard endpoint in CLP since April 2023. This endpoint covers human health and the environment in two separate classification entries and consists of two categories: Cat. 1 for known or presumed endocrine disruptors and Cat. 2 for suspected endocrine disruptors. For existing chemicals, classification and labelling for ED is mandatory from November 2026 onwards.

**IN 2023:** the EPMF is part of the metals industry delegation that actively contributes to the ED guidance development. The primary aim is to ensure that the guidance applies to metals and adequately recognises their key features, like essentiality, natural occurrence and metal speciation and complexation.

**EPMF MESSAGES:** (i) metal speciation and complexation need to be correctly recognised in ED assessment; (ii) the experimental conditions on in vitro ED assays must be compatible with the tested complex to avoid re-complexation and consequent irrelevant ED conclusions; (iii) ensure that only relevant effects are considered for ED assessment; (iv) a separate Annex should be developed for the ED assessment of metals, and include metal-specific frameworks.

**2023 was a comprehensive journey through chemicals and sustainability dossiers.** The EPMF continued delivering on silver classification and REACH dossier updates and maintained active involvement in REACH and CLP revisions, CRMA, and waste management. Other EU initiatives, such as ESPR, Endocrine Disruption, and Environmental Footprint, also required our full attention. If you are eager to learn more about the EPMF work, just navigate this summary of the Annual Report further.

# SUSTAINABILITY



## I. The Critical Raw Materials Act (CRMA)

[link](#)



**ISSUE:** the CRMA aims to secure a sustainable supply of critical raw materials in the EU and identify strategic projects along the value chain. It will address the low diversification of EU supply sources and existing regulatory frameworks that support circularity. Together with the Net-Zero Industry Act, the CRMA aims to strengthen the competitiveness of European industries, as announced in the Green Deal Industrial Plan.

**IN 2023:** EPMF submitted precious metals feedback to the impact assessment and public consultation. The EPMF invited Hildegard Bentele (MEP), to contribute to our [external newsletter](#). Regular DG GROWTH contact on Critical Raw Materials and Strategic Raw Materials lists is an ongoing priority.

**EPMF MESSAGES:** (i) the tangible actions and speed for the implementation of the CRMA. The provisions set up in the CRMA should be easily achievable and not scattered in lengthy and burdensome application processes; (ii) consistency with other EU policies, especially with the REACH revision; (iii) effective implementation of the EU waste policy framework to boost the collection and sorting of products containing precious metals and to guarantee high-quality recycling.



## II. Environmental Footprint (EF)

**ISSUE:** in 2023, the EPMF expanded the Sustainability platform by including environmental footprint. Current work is based on: (i) regulatory mapping, (ii) methodology, (iii) definition of recycled gold (and by extension all precious metals), (iv) Circular Footprint Formula (CFF).

**IN 2023:** the EPMF launched work on regulatory mapping and clarifying concepts of recycled gold definition and methodologies and values for key parameters in the CFF (Circular Footprint Formula). The EPMF's position on the definition of recycled gold was made available and shared with the Responsible Jewellery Council and Eurometaux.

**EPMF MESSAGES:** the definition of 'recycled gold' should be universal and applicable to all (precious) metals and should be aligned with existing examples within the regulatory context. The definition should not be seen or used as a solution or prevention for the greenwashing of issues. Neither should it be a problem-solving principle in due diligence and responsible sourcing questions. Consider End-of-Life (EoL), and End-of-Use (EoU), and pre-and post-consumer concepts. Lastly, no thresholds should be used in the definition, as doing so severely limits and is overly strict in the qualification of recycled (precious) metal.



## III. Ecodesign for Sustainable Product Regulation (ESPR)

**ISSUE:** ESPR addresses the design of all products on the EU market to ensure recyclability and resource-efficiency. It aims at better tracking of Substances of Concern (SoC) along the supply chain. Non-Ferrous Metals (including precious metals) were identified as intermediary products, meaning that they could be suitable for first-priority products and horizontal measures under ESPR.

**IN 2023:** under the ESPR proposal the SoC definition employs a blanket approach (all substances are included). The EPMF disagrees with the generalisation and co-signed an industry letter with 24 other organisations, including Cefic, Eurometaux and the Cobalt Institute, addressed to the Parliament's ENVI Committee, which engaged in compromise discussions to determine their stance on the matter of SoC definition. We met with the JRC team working on the priority products list, data sources, and Digital Product Passport. The EPMF requested clarification on the definition of intermediate products and coherence with REACH.

**EPMF MESSAGES:** the ESPR should only apply to product groups with sustainability requirements not covered by other specific regulations. Hence, we need a definition of SoC that fits the purpose of sustainable products and clarity that substance restrictions driven by safety concerns will remain under REACH. In contrast, restrictions on SoCs under the ESPR should only address the recyclability and reusability of products.



## IV. Waste Shipments

[link](#)

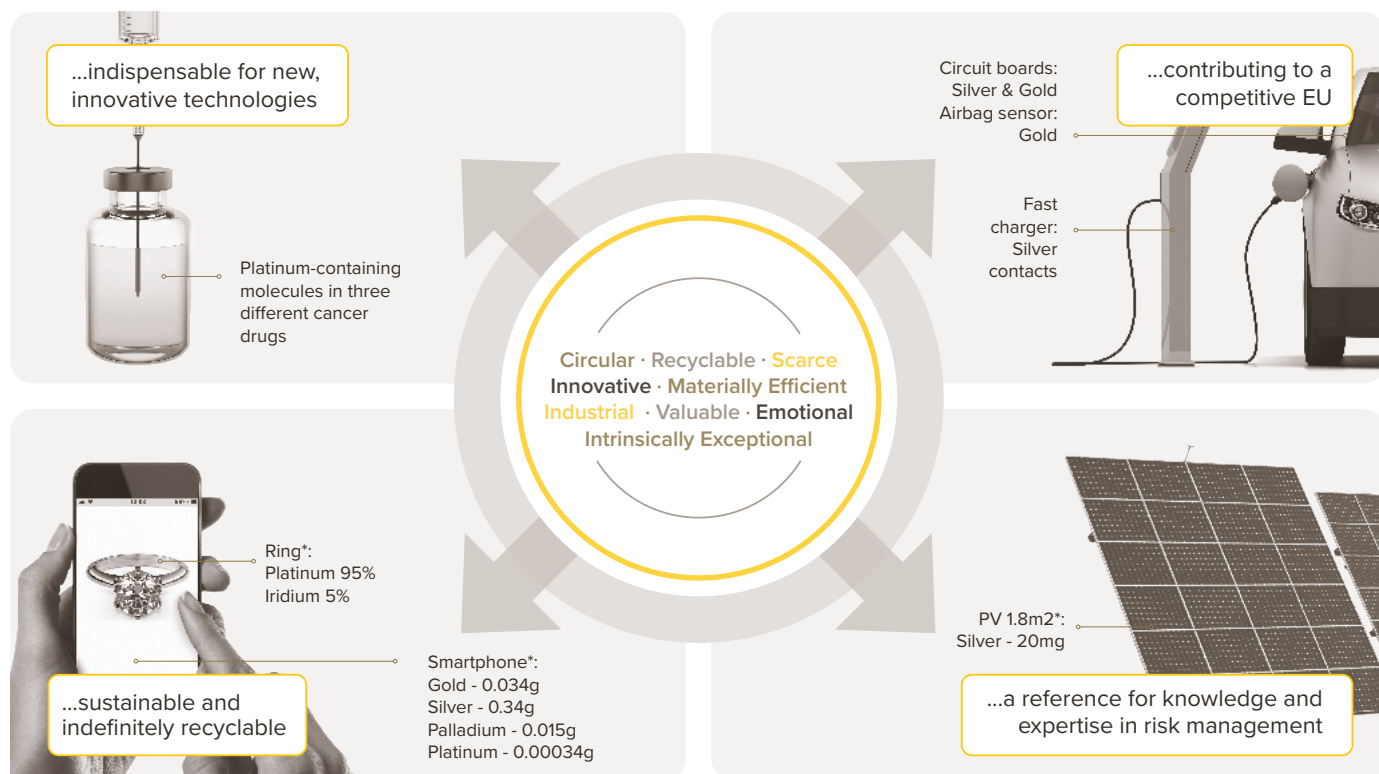


**ISSUE:** the Commission's proposal on the Waste Shipment Regulation (WSR) sets out new rules on waste shipment to ensure more harmonised regulations across the EU, a shift to digital solutions, further recoverability of waste, and restricting the export of all waste to non-OECD countries while effectively tackling illegal waste shipments.

**IN 2023:** while the WSR was in the trilogue phase, the EPMF and Eurometaux maintained contact with the key policymakers, providing input on the issues most relevant to the non-ferrous and precious metals industry, especially on pre-consented facilities and environmentally sound management.

**EPMF MESSAGES:** there are remaining issues for the EPMF, primarily related to the pre-consented facilities. We ask that the status of the pre-consented facilities should be accepted across the Member States and for the provision of automatic recognition of pre-consented status issued by a Competent Authority in one Member State by all EU Member States.

## PRECIOUS METALS ARE...



\* All figures/constituents are estimates and will differ according to type and manufacturer

## THE EPMF TEAM



**The EPMF Staff:** Secretary-General: Ms France Capon, Senior Scientific Manager: Dr Jelle Mertens, EU Policy Manager: Ms Zinaida Nazarenko, Office Manager and Advocacy Support: Ms Audrey Rondepierre, Back-Office Assistant: Ms Cathy Martin.

**The EPMF Consultants / Project Facilitators:** Ms Katrien Arijs, Mr Maxime Eliat, Ms Aurine Verkest.

## EPMF MEMBERS

**Companies:** Affinor BVBA, Agnico Eagle Finland Oy, Ames Goldsmith UK Ltd, Aurubis AG, BASF SE, Boliden AB, C. Hafner GmbH + Co. KG, Celanese Performance Solutions Germany GmbH, Chimet S.p.A, Climax Molybdenum Marketing Company, Fenzi AGT Netherlands B.V., Glencore International Import B.V, Heimerle + Meule GmbH, Heraeus Deutschland GmbH & Co. KG, Huta Cynku "Miasteczko Slaskie" S.A, Johnson Matthey Plc., KGHM Polska Miedz S.A., Krastsvetmet JSC, Lipmann Walton & Co Ltd., Lucas Milhaupt Riberac S.A.S, Metalor Technologies S.A, MKS Pamp S.A., Norilsk Nickel Harjavalta Oy, PX Group SA, Rustenburg Platinum Mines Ltd, Safimet SpA Società Benefit, Saft SAS, Saxonia Holding GmbH, Shell Catalysts & Technologies LP, Tanaka Kikinzoku Kogyo K.K, Traxys Europe S.A, Umicore NV/SA, Valcambi SA, Varinor SA, Vibrantz GmbH.

**National Associations:** Association Suisse des Fabricants et Commerçants de Métaux Précieux (ASFCMP), Associazione Nazionale Industrie Metalli non Ferrosi S.r.l (ASSOMET), Fachvereinigung Edelmetalle e.V.

**The European Precious Metals Federation** (aisbl)

Avenue de Tervueren 168, Box 6, 1150 Brussels

info@epmf.be | www.epmf.be

EU Transparency register No. 72702399216-46

