*4 September 2013, 10:30 – 16:30*
*Metals Conference Centre – Aluminium Room*
*Rue du Duc 100 – 1150 Brussels (BELGIUM)*

**MINUTES – ITEM 5.2 CORRECTED ON 17 SEP 2013**
AP REFER TO ACTION POINTS LISTED AT THE END OF THE DOCUMENT

## 1. Welcome & Introduction

### 1.1. Reminder on Confidentiality and Competition Law
Participants were reminded on their obligations to comply with confidentiality and Competition Law provisions.

### 1.2. Tour de table and apologies, including presentation of R. Nicolay, new Manager in PMC
The list of participants is available in Annex 1. Renaud Nicolay, new Manager in PMC, introduced himself to the participants and informed them that although he would not be actively involved in the Ag project, he would gladly review the Ag Dossier before submission and capture metal-specific REACH compliance aspects to get acquainted with the (precious) metals sector.

### 1.3. Approval of the agenda
The Agenda (Annex 1) was approved. The slides are available in Annex 2.

### 1.4. Status of actions agreed at and approval of the minutes of the last conference calls (17 & 18 July 2013)
Most actions are completed except those which were subject to discussion during the meeting, and those where input from companies was requested (sometimes 6 responses received out of 33 expected).
One action that was not formally listed in the actions table was discussed: final decision on the Klimisch ranking approach followed by PMC. DuPont had disagreed with PMCs approach. Feed-back received from Members and other consortia indicated that the ranking is adequate and it was hence decided to retain the current assessment approach.
Another action that was not picked-up in the Agenda relates to the regular literature searched commissioned by PMC. Literature searches are done twice per year by EBRC and WCA to identify recent publications. It was agreed to continue the searches at the same pace and to use the findings of the March 2013 (ENV) and August 2013 (HH) search for the preparation of the Dossier update (and properly indicate this in the scope of the dossier); future findings will be integrated in next updates.

## 2. To Do List: Last comments from Ag WG before finalization and use towards Dossier update submission
The version circulated prior to the meeting was approved and will be used by the Secretariat as a starting version to compile all agreed actions and steps (living document) (**AP1**).

## 3. Feed-back from RAS Materials on data-sharing request
Participants were updated on the latest feed-back received from RAS Materials, a member of NIA, who participates in the on-going OECD Sponsorship Programme on nanomaterials. It was agreed to request an access to their data (even if their registration needs/intentions remain unclear) under the relevant data-sharing agreement and ensure the data is received in-time for the Dossier update preparation and submission (**AP2**). Furthermore, it was agreed to request permission from RAS Materials to circulate the list of available studies to the Ag WG for information.

## 4. Freshwater

### 4.1. Status of PNECfreshwater
The current PNECfreshwater for Ag remains unchanged (40 ng/l); it does not (yet) reflect any bio-


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availability considerations. The recent literature updates did not indicate a need to revise the PNEC.

**4.2. BLM Proposal from WCA: discussion and recommendation to the Mgmt Cttee**

It was agreed that in a first step, we need to engage into additional research to determine the influence of environmental conditions on the speciation of Ag in freshwater and check whether the current WHAM software properly predicts Ag complexation in the presence of specific chemicals.
It was clarified that this research (two years, ~ 75.000 €) would need to be concluded before a full BLM could be developed (several years, higher budget).
Co-sponsoring opportunities (with Unliver, Government of Canada, photographic industry, etc.) exist and will be investigated by PMC (**AP3**).
The outcome of this work would possibly enable to review the freshwater PECs so that they reflect the actual bio-available concentration of Ag (and would make the demonstration of safe use easier).

## 5. Marine water

**5.1. Oyster embryo re-test with silver and nanosilver: Revised proposals and next steps**

An experts conference call was held on 21 Aug allowed to agree on the outline and technical details of the testing protocol of the Oyster Embryo testing. As regards the test house, PMC had to decide between the following two options:
1) EU laboratory which is GLP accredited but not equipped to properly characterize the supplied test material during testing, or
2) US laboratory which is not GLP accredited but willing to undergo a third party GLP/equivalent standards audit, and which is fully equipped to perform all characterization work *in situ*.
From a worst case viewpoint, both the non-GLP status and incorrect characterization could trigger a rejection of the study by the authorities; however it was agreed that reasonably speaking there is less risk of rejection of the study by authorities if the study is carried out according to GLP principles (but not GLP certified) with proper substance characterization than if the study is GLP compliant with unsufficient substance characterization. WCA have discussed this with ECHA and the UK authorities in general (without disclosing the substance) and was advised that if a study will not be used to replace another study a non-GLP study might be acceptable too.
It was decided to perform the study at the US laboratory on the condition that the Ag WG receives more information on the format and validity of the GLP audit (including a confirmation that the 3rd party auditor is EPA certified) (**AP4**), as well as on the elements of the GLP compliance that must be fulfilled by the laboratory to minimize the chances of the study to be rejected.

**5.2. Status of PNECmarine: RIVM Environmental Risk Limits (ERL) position paper**

The Ag PNECmarine derived by PMC (860 ng/L) is higher than the Environmental Risk Limit (ERL) derived by The Netherlands (Evaluating Member State); The NL could hence challenge PMC's PNECmarine for Ag on the basis of their own interpretation of the data. As done for the PNECfreshwater, it was agreed to produce a summary note on the review of proposed marine ERL in preparation of future exchanges with The NL during Evaluation (**AP5**).

**5.3. Proposal for additional testing to construct SSD: Discussion on recommended approach to the Mgmt Cttee**

As agreed at the previous Ag WG meeting, additional testing is recommended to develop a species sensitivity distribution for marine waters. The experience made with the Ringwood et al. study demonstrated how weak the dataset and overall derivation of PMC's PNECmarine is. One way of making this value more robust and stable is to generate additional data and derive the PNEC on the basis of a Species Sensitivity Distribution (SSD). The Ag WG agreed with the study outline proposed by PMC (cf. background documents) and the selection of testing houses and agreed to proceed with the work (~ 65.000 €) (**AP6**).


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## 6. Microorganisms

### 6.1. Status of PNECmicroorganisms

PMC's Ag PNECmicroorganisms (0,025 mg/l of dissolved Ag) is applicable to both (ionic) Ag and nanoAg. However, as regards the toxicity to microorganisms in sewage sludge the dataset for nano silver is equivocal and it was hence agreed to perform a comparative activated sludge test (OECD 209). The testing is currently ongoing.

### 6.2. Activated sludge testing: status of testing

Results from the range-finding study received recently suggest that ionic Ag remains the most toxic form of Ag to microorganisms. What remains to be decided once the final dataset is complete is whether PMC should use the lowest result or the result of the GLP study in its PNECmicroorganisms derivation (**AP7**).

## 7. Soil

### 7.1. Soil testing at CSIRO (Testing Proposal): status of testing

Participants were informed that ECHA has issued its final decision on PMC's Testing Proposals. The decision indicates that ECHA agrees with the proposed tests by PMC and requests PMC to supply the results of these by April 2014. Since PMC had launched feasibility phases and soil ageing work already, it will be possible to have the information ready in time for the Dossier update and hence before the deadline set by ECHA.
The study results should be provided by CSIRO to WCA as from mid-September, with a final report anticipated in November. Participants were informed that CSIRO is not a GLP accredited laboratory but that this should not pose a problem because of their known expertise in metals toxicity to soil, and the fact that the methodology of the study could not have been conducted in many other test houses, and certainly not under full GLP conditions.

### 7.2. Status of PNECsoil and 7.3 SSD proposal from WCA

Once the results from CSIRO become available, and the full data from NanoFate is received too, WCA will derive a PNECsoil for each soil profile (with a corresponding influence on the bio-availability of Ag) on the basis of an SSD. It is anticipated that this revised PNECsoil will be available towards the end of Sep/early Oct and will be less sensitive and more robust than the one currently used (0,794 mg Ag per kg of wet weight), which will make the demonstration of safe use more straightforward.

### 7.4. Data-sharing and further research with CSIRO: discussion and recommendation to the Mgmt Cttee

In addition to the results of PMC's study with CSIRO, CSIRO have also agreed to share results from soil studies on nanoAg that they have conducted separately. This dataset is however small and not yet fully compiled in (draft) reports that can be easily shared. CSIRO is nevertheless committed to sharing their nanoAg data assuming that PMC will engage into further research with CSIRO. A draft proposal for additional research has already been submitted by CSIRO and will be considered in due course, according to PMC's priorities (**AP8**).

## 8. Recap on status of PNEC

PMC's PNECs are available on slide 35 of Annex 2. Most of Ag's current PNECs are very sensitive and do not take account of bio-availability.
The SSD work recommended and approved in the above items will potentially strengthen the PNECs and make them less susceptible to newly published results.
On the other side the on-going CSIRO work and future speciation work will allow integrating bio-


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availability considerations in the PNECsoil and PECfreshwater. This post-registration research is hence critical to ensuring a realistic and proportionate risk assessment of Ag in the environment and move away from extreme/worst case regulation of the manufacture and use of Ag.

## 9. Read-across approach for environmental endpoints

The environmental sections of the Ag metal Dossier are populated on the basis of a large dataset on ionic Ag. Though this is not strictly speaking a read-across approach, it extrapolates information on a specific form of the substance (represented by silver nitrate) to other forms of the substance.
The 'read-across' approach used in the Ag project will be justified in each relevant endpoint in the IUCLID 5 file, as well as in a summary document, as recommended in the ECHA Guidance. Furthermore, in order to respond to ECHA's request to better understand how 'read-across' is applied between nano and non-nano forms of metals, it was agreed for WCA to explain this in a short slide set that will be presented by Christine Spirlet (International Zinc Association) to ECHA's NanoMaterials Working Group at their next meeting (Brussels, 1-2 Oct) (**AP9**).

## 10. Mammalian toxicity

### 10.1. Results of updated literature search (including update on feed-back from author of NTP 13 weeks gavage study with nanoscale Ag (M070067) and Ag acetate on rats (if any))

Though back in 2010 there were only a few publications available on (nano)Ag, the recent literature search conducted by EBRC in August revealed around 50 interesting references (almost exclusively addressing nanoAg) which add up to the patchy dataset available. The evaluation of new studies is still in progress and EBRC gave an update of the current status.

### 10.2. Overview of relevant new data published since 2010

A summary of the most relevant studies assessed so far is available in slides 45-54 of Annex 2. These studies have all been conducted on nanoAg of different sizes, with different doses, and only in some cases has the study been conducted comparing nanoAg and Ag acetate (as a representative of 'soluble' Ag). Studies demonstrate that nanoAg is less toxic than ionic Ag, but it is not possible to set a distinct cut-off. Available studies are often not directly comparable (e.g. because using different dose levels, nanoAg of different sizes and with different coatings). The most relevant (since guideline conform, subchronic) investigation which could allow a better direct comparison of the toxicity of nanoAg compared to soluble compounds has been conducted at the NCRT (part of US FDA) in collaboration with the NTP. Unfortunately, only preliminary results of the study have been made available to the public (BfR conference – Berlin, 7-8 Feb 2012) and the electronic microscopy, pathology, and analytical chemistry work has not yet been finalized so that more final results can be shared by the study director to EBRC.
For the dossier update it is foreseen to maintain two categories (soluble vs. poorly soluble). The data requirements for poorly soluble compounds will mostly be addressed with nanoAg studies.

### 10.3. Current dossier content and DNEL, and implications of new data

Current DNELs are mostly based on (I)OEL and an incomplete dataset. The new references found by Aug 2013 will be uploaded onto the IUCLID 5 files (cf. slide 58 of Annex 2 for timing) and are unlikely to trigger significant changes in the DNELs (except perhaps the Hadrup *et al.* study (silver acetate) to be used to set the oral DNEL for soluble compounds). EBRC will check in detail whether this 28-day study will need to be considered until the full results on the NCRT/NTP 90-day study become available. A further dossier update including a review of the DNELs will need to be envisaged.

## 11. Read-across approach for human health endpoints

The human health sections of the Ag metal Dossier are populated on the basis of a patchy dataset on a number of Ag compounds and metallic (nano)Ag. This is not strictly speaking a read-across approach, but


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rather a category or grouping approach which uses the information that is available to address data gaps of other (forms of the) compounds. The generic group assessment is based on Ag (ion) for sensitisation and genetic toxicity (both endpoints "negative") and is completed by two read-across categories for (i) soluble and (ii) poorly soluble Ag substances.
The 'grouping' approach used in the Ag project will be justified in each relevant endpoint in the IUCLID 5 file, as well as in a summary document, as recommended in the ECHA Guidance. Furthermore, in order to respond to ECHA's request to better understand how 'read-across' is applied between nano and non-nano forms of metals, it was agreed for EBRC to explain this in a short slide set that will be presented by Christine Spirlet (International Zinc Association) to ECHA's NanoMaterials Working Group at their next meeting (Brussels, 1-2 Oct) (**AP9**).

## 12. Feed-back from PMC Members on new uses to be registered (if any)

None of the few responses received indicated the need to report any new use of Ag or Ag compounds in the updates under preparation.

## 13. Environmental exposure assessment

### 13.1. Revised spERCs and nanoAg

It appears that using the version 2.1 of the spERCs will generally improve the situation and make it easier for individual sites to demonstrate safe use.
Including nanoAg in the relevant environmental ES will not be problematic.

### 13.2. Draft updated ENV ES: timing

A draft updated environmental ES is likely to be available for comments by mid-October.

## 14. Occupational exposure assessment

### 14.1. Feed-back on PMC mini-survey on nanoAg in Ag ES

PMC received 24 responses out of 33 companies contacted. The outcome of the survey identifies 6 companies involved in nanoAg. The sixth respondent (which arrived shortly before the meeting) provided responses which constitute outliers compared to the 5 respondents and needs further discussion with the company before it is added to the aggregated results presented in slide 68 of Annex 2 (**AP10**).
None of the responses reported any consumer use of nanoAg (though nanoAg can be used in the fabrication of certain consumer electronic products). This means that textiles containing nanoAg may be produced by a subset of the Ag sector in the EU, not represented in PMC, or be the result of imports from non-EU regions.
For certainty it was suggested to specifically ask registrants of non-nanoAg to check whether any of their downstream users transformed larger forms of Ag supplied to them in nanoforms and if so, to indicate which method was used (with or without chemical modification) (**AP12**).
Ink-jet type of spraying was confirmed to be a relevant use of nanoAg but is likely to take place with very small volumes of nanoAg, and in quite closed conditions. This will be checked by EBRC.

### 14.2. Occupational ES: requirements and timing

A number of fields aimed at collecting use and exposure data have been modified in recent versions of IUCLID 5. This requires EBRC to adjust the information provided in these fields in previous versions of the Dossiers as well as to work on the inclusion of nanoAg in the occupational ES update. For the latter, the 6 companies mentioned in item 14.1 above will be requested, via a dedicated questionnaire (**AP11**), to provide the following information:

- Sign a confidentiality agreement with EBRC (and WCA) to establish direct contact with


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the expert consultants.

- Provide more detailed information on the coatings used for their nanoAg powders.
- Confirm which ones of the pre-selected ES (9.1 – 9.5 + 9.8) do involve nanoAg related operations.
- Discriminate between normal powder handling workplaces and nanoAg powder handling workplaces from the list of workplaces provided in slide 73 of Annex 2
- Provide more information on the workplace conditions under which spraying of nanoAg occurs.
- Indicate which sorts of coatings are used in which workplaces where nanoAg is handled.

**14.3. Applicability of occupational ES to nanoAg and way forward (including dustiness testing, exposure monitoring, etc.)**

Once the information bulleted in item 14.2 above is gathered, EBRC will be able to devise a dustiness testing recommendation and on the basis of this dustiness information, propose a detailed exposure monitoring campaign.

Meanwhile the information is gathered (14.2 in Sep, dustiness in Oct, exposure monitoring not before 2014) the occupational ES relevant for nanoAg will include a separate nanoAg workplace recommending specific worst case risk management measures specifically applicable to those handling nanoAg.

It was suggested to contact RAS Materials to obtain feed-back on the questions listed in item 14.2 above and possibly also dustiness and/or exposure data for their nanoAg (**AP2**).

**15. Waste exposure scenario: final draft for discussion/approval by Ag WG**

The final draft Waste ES for Ag was presented to the participants. All assumptions and results of ARCHE's work on Ag (done along the lines of what was done for other metals) were supported by the Ag WG and the report was approved. For practicality reasons, only the conditions and measures related to external treatment of waste for disposal (slide 87 of Annex 2) will be added to the ES. The remaining of the report will be attached as an addendum to the CSR.

**16. Prioritisation of technical items according to Dossier update needs and available PMC Secretariat resources**

Participants acknowledged the importance of prioritizing the various items of the Ag project so that resources would be allocated to progressing those items which are essential for the Dossier update, followed by those which are 'nice to have' for review by The NL, and finally those items which are longer-term projects to fill science gaps and strengthen the overall risk assessment of Ag.

The prioritization listed in slide 91 of Annex 2 was approved.

**17. Status of characterization data generation**

To date only 4 of the 6 companies involved in nanoAg have provided characterization data that can be used by EBRC and WCA to define the scope of applicability of the joint risk assessment and complete the relevant IUCLID 5 sections. An aggregated summary of the provided information is available in slide 95 of Annex 2 (**AP11**).

Participants agreed for nanoAg companies to establish direct exchanges with EBRC and WCA in order to allow their technical experts to request more specification around the characteristics of the nanoAg covered by the joint Ag registration dossier.

Moreover, it was agreed to update PMC's one-pager on analytical information requirements on characterization with examples of descriptions of coatings normally found in the literature (**AP13**). This would guide companies as to how far their e.g. coating materials should be described.


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## 18. Preparation of meeting with RIVM (Bilthoven, 20 Sep 2013)

### 18.1. Feed-back from RIVM including proposed Agenda

The Agenda was received just before the meeting. It includes part of the items suggested by PMC and proposes an 'informal' meeting. It is not sure whether this indicates that other 'formal' meetings can be expected later in the process but it is assumed that The NL will clarify this under item 3. of their proposed agenda. The meeting will be opened by The NL and will give the floor to PMC to present the dossier (update) and its (on-going) research work on Ag.
As regards the proposed participation, on The NL's side, except B. Hakkert (coordinating), the other participants are relatively unknown. There is more human toxicology expertise than ecotox one, which can suggest a higher attention on human health aspects?
Regarding PMC's participation, it was seen as well balanced and fulfilling all legal, representation and technical needs of the meeting.

### 18.2. Outcome of preparatory meeting with PMC delegation and Eurométaux

The initial grounds for concern, Agenda and list of participants were discussed with representatives of the PMC delegation as well as Eurométaux representatives just before the Ag WG meeting. The core of the discussion addressed the content of the assessment and in particular its possible weaknesses/hot topics:

- Characterisation insufficiently precise (especially on coatings) and not matching characteristics provided in supporting literature – Should be addressed if actions agreed under item 14 above are properly actioned.
- Patchy dataset on Human Health - Should be strengthened with NTP study once published, but nothing prevents The NL from requesting additional information to be generated by PMC (meanwhile other results become publicly available).
- Effect of particle vs. ion - Precautionary approach for ENV and awaiting NTP study for HH; could also trigger specific information requirements from The NL.
- No reference to any consumer use of nanoAg (e.g. textiles) – PMC must have a strong and credible explanation to why consumer uses are not reported in the 2013 version of the joint Ag registration dossier.

### 18.3. Agreement on key messages and relevant documents to be circulated to RIVM

It was agreed to highlight the unfinished nature of the Ag risk assessment and present the status of the dossier with a focus on what will be delivered in 2013 instead of what was delivered in 2010.
A draft slide set will be prepared by PMC Secretariat, EBRC and WCA, and circulated to the Ag WG for comment before it is discussed and finalized by the PMC delegation participating in the 20 Sep meeting (conf call 18 Sep 2 pm CET) (**AP14**).
It was agreed to provide documentation to The NL upon request from them instead of before the meeting.

## 19. Discussion and agreement on recommended approach towards reviewing the Ag Dossier update

The participants agreed with the following process (**AP15**):

- EBRC and WCA finalise IUCLID 5 and CSR by end Oct
- The end Oct versions are reviewed by R. Nicolay and Eurométaux colleagues (H. Waeterschoot for the ENV, V. Verougstraete for the HH) by the 1st week of Oct
- Specific items picked up by Eurométaux will be reviewed further by specialized consultants (ARCHE for ENV, Dr. Gerd-Rüdiger Jänig for HH) by 3rd week of Nov
- Ag registrants will be invited to provide comments on the end Oct versions by 3rd week of Nov too


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**20. PMC response to EU public consultation relating to REACH annexes and nanomaterials: discussion and approval of version for submission by 13 Sep 2013**

A draft response to the EU public consultation was circulated prior to the meeting for comment. Deadline for comment is 9 Sep 2013 (**AP16**) so PMC's input can be provided to Eurométaux and used to respond to the consultation before 13 Sep.

**21. Typical profiles of Ag and Ag compounds**

Impure profiles of Ag, AgNO3 and AgCl have been reported by a few PMC Members and are provided in slide 106 of Annex 2. These will be included in the relevant dossiers as non-intermediate impure profiles typically found on the EEA market after ARCHE has derived the applicable classifications for these profiles (**AP17**). The risk management measures associated to the safe handling of these impure profiles is the responsibility of the individual relevant companies, not of all registrants.

**22. Transport classifications and translation of short ES for (relevant) Ag and Ag compounds in scope**

The proposal to derive transport classifications and translate the short ES for Ag and Ag compounds was supported by the Ag WG. It will be proposed to the Assembly as it will probably be done for all projects of PMC, and not only Ag.

Although the transport classifications will be derived as soon as the dossier update is finalized (early 2014) (**AP17**), the translation of the short ES will not be launched before PMC has discussed whether and when to start using Chesar (**AP18**) (probably not before the next significant update towards end of 2014). If PMC members need their translated short ES earlier than when PMC commences to use Chesar, the translations will be organized.

**23. AOB, next meetings and closing remarks**

- No other business was raised.
- The next meetings originally scheduled on 23 Oct and 3 Dec were cancelled and replaced by a unique face-to-face meeting on 19 Nov which will be followed by a meeting or conference call towards the mid of Dec aimed at closing the dossier update preparation and auctioning the submission of the dossier update before the winter holiday period.
- Sincere thanks were expressed to EBRC, WCA, and ARCHE for having allowed an efficient preparation of the meeting.

**Annexes:**

**1.** Agenda and list of participants
**2.** Slides presented at the meeting


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**Table 1.** Actions agreed at 4 Sep 2013 Ag WG meeting (and on-going from previous meetings/calls)

| | What? | Who? | When? |
|---|---|---|---|
| 1. | Update To Do List with decisions and actions agreed at 4 Sep 2013 Ag WG cc | CB | ASAP |
| 2. | Contact RAS Materials and request:<br>- Access by consultants to studies of relevance for assessment<br>- To check workplaces relevant to nanoAg manufacture, handling, and use<br>- Availability of dustiness, exposure monitoring data, and any other information which could support the exposure assessment | CB | ASAP |
| 3. | Investigate co-sponsoring opportunities for pre-BLM Ag speciation work with:<br>- Government of Canada<br>- Unilever<br>- Photographic industry<br>Prepare Ag WG recommendation for approval by Assembly | <br><br>WCA<br>WCA + KR<br>CB<br>CB | Oct 2013<br><br><br><br><br>Nov 2013 |
| 4. | Obtain further information on:<br>- Name and credentials (EPA certification) of the 3rd party auditing company inspecting Nautilus' GLP compliance<br>- Content and validity of audit/inspection procedure and outcome (compared to GLP and/or other equivalent standards) | WCA | Before launching oyster embryo test; assumed Sep 2013 |
| 5. | Finalise summary note on RIVM's ERL for Ag and circulate to Ag WG for information/comment | WCA | Sep 2013 |
| 6. | Submit additional work (e.g. marine water SSD) to approval by Mgmt Cttee and Assembly | CB | Oct and Dec 2013 |
| 7. | Keep Ag WG up to date as to which result was used to derive the PNECmicroorganisms (GLP or lowest value) | WCA | Oct 2013 |
| 8. | Present summary of CSIRO's recent research proposal to Ag WG for discussion and consideration | KR | Nov 2013 mtg |
| 9. | Circulate draft slide set on Ag project read-across/grouping approach to be presented to ECHA NMWG meeting (Brussels, 1-2 Oct) for comment by Ag WG | WCA + EBRC | W/c 9 Sep 2013 |
| 10. | Send responses of mini-survey of companies involved in nanoAg to EBRC and WCA for further assessment | CB | W/c 9 Sep 2013 |
| 11. | Prepare second mini-survey for companies involved in nanoAg in order to request feed-back on the following questions:<br>- Need for confidentiality agreement with EBRC (and WCA) to establish direct contact with the expert consultants.<br>- Check slide 95 of Annex 2 and indicate whether the generic description of nanoAg by PMC members is complete and correct<br>- Provide more detailed information on the coatings used for nanoAg powders.<br>- Confirm which ones of the pre-selected ES (9.1 – 9.5 + 9.8) do involve nanoAg related operations.<br>- Discriminate between normal powder handling workplaces and nanoAg powder handling workplaces from the list of workplaces provided in slide 73 of Annex 2. | CB | W/c 9 Sep 2013 |


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| | What? | Who? | When? |
|---|---|---|---|
| | - Provide more information on the workplace conditions under which spraying of nanoAg occurs.<br>- Indicate which sorts of coatings are used in which workplaces where nanoAg is handled.<br>On the basis of the responses received, recommend next steps including, as relevant:<br>- Dustiness<br>- Exposure monitoring<br>- Etc. | EBRC | Early Oct 2013 |
| **12.** | Invite all companies involved in Ag to check whether any of their DU transforms larger sizes of Ag supplied to them by PMC Members to smaller, nanoforms and if so, to indicate which method is used | CB | W/c 9 Sep 2013 |
| **13.** | Update PMC one-pager on characterisation techniques and include examples of coatings normally found in literature (as example of coating description that should be reported by registrants) | CB | W/c 9 Sep 2013 |
| **14.** | a. Prepare draft slide set to be presented to RIVM at 20 Sep meeting and circulate for comments<br>b. Hold conference call to finalise slides and exchange final recommendations on meeting<br>c. Update Ag WG on outcome of meeting with RIVM | EBRC+WCA+PMC Sec<br>EBRC+WCA+PMC Sec+LR+EM<br>CB | W/c 9 Sep 2013<br>18 Sep 2013, 2 pm<br>W/c 23 Sep 2013 |
| **15.** | Establish confidentiality agreements with Hugo Waeterschoot and Violaine Verougstraete to prepare general review of Ag Dossier and block timing of specific review with ARCHE and Dr. Gerd-Rüdiger Jänig | CB | W/c 9 Sep 2013 |
| **16.** | a. Provide comments on draft response to public consultation on REACH annexes<br>b. Integrate comments received and submit a response on behalf of PMC<br>c. Circulate PMC's response to Eurométaux and PMC Members inviting them to use PMC response to respond individually<br>d. Respond to public consultation individually | Ag WG<br>CB<br>CB<br>Ag WG | 10 Sep 2013<br>11 Sep 2013<br>12 Sep 2013<br>B4 13 Sep 2013 |
| **17.** | a. Derive classifications for impure profiles of Ag, AgCl and AgNO3<br>b. Include classifications in respective ID Cards<br>c. Upload classifications into respective IUCLID 5 files<br>d. Derive transport classifications for all Ag substances and intermediates' profiles<br>e. Post latest (transport) classifications onto PMC inventories | ARCHE<br>KA<br>EBRC<br>ARCHE<br>AR | Sep 2013<br>Oct 2013<br>Oct 2013<br>Dec 2013<br>Dec 2013 |
| **18.** | Include clear dossier scope in Ag and Ag compounds dossiers prior to dossier update submission | EBRC+WCA | Dec 2013 |
| **19.** | Decide upon use of Chesar in next Dossier update and subsequently on:<br>- Need to push for derivation of standard phrases for metals industry with Eurométaux<br>- Need to translate short ES of Ag and other PMC substances | Ag WG | Jan 2014 |


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