CALENDAR:

5-6 June 2018:
EPMF/PMC General Assemblies, Liège (Belgium)

9-11 October 2018:
PMC Autumn Back to Back meetings, Brussels

4-5 December 2018:
EPMF/PMC General Assembly, Brussels

Dear Members,

Registration is now over! Only one Rh compound still have to be submitted early April. This means that REACH is now officially moving from Registration to Dossier maintenance and Risk Management. PMC has already started the maintenance of registration dossiers and will engage into the Metals and Inorganic Sectorial Approach to ensure a smooth transition into the new REACH phase!

The restructuration of EPMF/PMC will be another instrumental and important step to address the next regulatory challenges for the precious metals industry. Already 31 companies and associations confirmed their intention to move to the new structure in June 2018.

To know more, please look at our PMC REACH News below!

Enjoy the reading!

France

…. We wish you a happy ….

Acronyms

http://www.epmf.be/members-area/#382-list-of-acronyms

PMC Administrative update

Overview of PMC already registered substances

Name of the substance	Identification numbers		LR	Registered by LR
	CAS	EC		
Silver	7440-22-4	231-131-3	Aurubis	Nov 2010
Silver nitrate	7761-88-8	231-853-9	Ames	Nov 2010
Disilver oxide	20667-12-3	243-957-1	Ames	Oct 2010
Silver carbonate	534-16-7	208-590-3	Johnson Matthey	Mar 2012
Disilver(1+) sulphate	10294-26-5	233-653-7	Johnson Matthey	Mar 2012
Silver chloride	7783-90-6	232-033-3	Agfa Gevaert	Mar 2013
Silver bromide	7785-23-1	232-076-8	Agfa Gevaert	Mar 2013
Silver iodide	7783-96-2	232-038-0	Agfa Gevaert	Mar 2013
Gold	7440-57-5	231-165-9	C. Hafner	Apr 2016
Tetrachloroauric acid	16903-35-8	240-948-4	Johnson Matthey	Feb 2018
Aurio(1+) 2,6,6-trimethylbicyclo[3.1.1]heptanethiolate	68365-87-7	269-858-3	Johnson Matthey	Jun 2016
Balsams, copaiba, sulfurized, mixed with turpentine, gold salts ***(UVCB!)***	68990-27-2	273-589-7	Heraeus	Apr 2016
Potassium dicyanoargentate	506-61-6	208-047-0	Saxonia Edelmetalle	Jan 2018
Silver cyanide	506-64-9	208-048-6	Saxonia Edelmetalle	Nov 2016
Potassium dicyanoaurate	13967-50-5	237-748-4	Umicore Galvanotechnik GmbH	Oct 2016
Palladium	7440-05-3	231-115-6	Umicore NV/SA	Jan 2017
Palladium dichloride	7647-10-1	231-596-2	BASF	Jan 2017
Dihydrogen tetrachloropalladate(2-) (in solution)	16970-55-1	241-047-9	Heraeus	May 2017
Diamminedichloropalladium	14323-43-4	238-269-3	Heraeus	Jan 2017
Dichlorobis(triphenylphosphine)palladium	13965-03-2	237-744-2	Heraeus	Jan 2017
Palladium (II) di(4-oxopent-2-en-2-oate)	14024-61-4	237-859-8	Heraeus	Jan 2017
Palladium(II) acetate	3375-31-3	222-164-4	Heraeus	Oct 2016
Palladium monoxide	1314-08-5	215-218-3	Heraeus	Jan 2017
Tetraamminepalladium (II) nitrate	13601-08-6	237-078-2	Johnson Matthey	Jan 2017
Tetraamminepalladium(2+) dichloride	13815-17-3	237-489-7	Umicore AG&Co.KG	Mar 2017
Tetraamminepalladium(2+) dihydroxide	68413-68-3	270-241-6	Heraeus	May 2017
Tetrakis(triphenylphosphine)palladium	14221-01-3	238-086-9	Umicore AG&Co.KG	Mar 2017
Palladium sulphate	13566-03-5	236-957-8	Heraeus	May 2017
Tetraamminepalladium(2+) diacetate	61495-96-3	262-819-1	Umicore AG&Co.KG	Apr 2017
Disodium tetrachloropalladate	13820-53-6	237-502-6	BASF	Jan 2017
Palladium dinitrate ***(UVCB!)***	10102-05-3	233-265-8	Heraeus	Apr 2017
Palladium dihydroxide	12135-22-7	235-219-2	Umicore AG&Co.KG	Apr 2017
Diammonium hexachloropalladate	19168-23-1	242-854-9	Johnson Matthey	Mar 2017
Dipotassium hexachloropalladate	16919-73-6	240-974-6	C. Hafner	Feb 2017
Platinum	7440-06-4	231-116-1	Heraeus	Jun 2017
Hexachloroplatinic acid	16941-12-1	241-010-7	Johnson Matthey	Jan 2018
Tetraammineplatinum dichloride	13933-32-9	237-706-5	Johnson Matthey	Feb 2017
Tetraammineplatinum dinitrate (in solution)	20634-12-2	243-929-9	Umicore AG&Co.KG	Aug 2017
Diammineplatinum (II) nitrite	14286-02-3	238-203-3	Heraeus	Feb 2018
Dipotassium tetrachloroplatinate	10025-99-7	233-050-9	Heraeus	Jan 2018
Platinum dioxide	1314-15-4	215-223-0	Umicore AG&Co.KG	Mar 2017
Dihydrogen hexahydroxyplatinate, compound with 2-aminoethanol (1:2) (in solution)	68133-90-4	268-717-3	BASF	Feb 2018
Dipotassium hexachloroplatinate	16921-30-5	240-979-3	Heraeus	Jan 2018
Platinum dinitrate ***(UVCB!)***	18496-40-7	242-383-9	Heraeus	Jun 2017
Platinum, 1,3-diethenyl-1,1,3,3-tetramethyldisiloxane complexes / Karstedt concentrate ***(UVCB!)***	68478-92-2	270-844-4	Heraeus	Feb 2017
Diammonium hexachloroplatinate	16919-58-7	240-973-0	Johnson Matthey	Jan 2018
Dihydrogen hexahydroxyplatinate	51850-20-5	257-471-2	Johnson Matthey	Jun 2017

Iridium	7439-88-5	231-095-9	Johnson Matthey	May 2016
Hexachloroiridic acid, Hydrogen hexachloroiridate (IV) ***(UVCB!)***	16941-92-7	241-012-8	Heraeus	Jun 2016
Diammonium hexachloroiridate	16940-92-4	241-007-0	Johnson Matthey	May 2016
Rhodium	7440-16-6	231-125-0	Johnson Matthey	Nov 2017
Carbonyl(pentane-2,4-dionato-O,O')(triphenylphosphine)rhodium	25470-96-6	247-015-0	Johnson Matthey	Oct 2016
Carbonylhydrotris(triphenylphosphine)rhodium	17185-29-4	241-230-3	Umicore AG&Co.KG	Mar 2017
Dicarbonyl(pentane-2,4-dionato-O,O')rhodium	14874-82-9	238-947-9	Umicore AG&Co.KG	Sep 2017
Rhodium trichloride, hydrate	20765-98-4	606-630-8	Heraeus	Sep 2017
Di-μ-chloro-bis(hapto-1,5-cyclooctadiene)dirhodium(I)	12092-47-6	235-157-6	Heraeus	Sept 2016
Tris(triphenylphosphine) rhodium (I) chloride	14694-95-2	238-744-5	Umicore AG&Co.KG	Mar 2017
Rhodium triiodide	15492-38-3	239-521-5	Umicore AG&Co.KG	Jul 2017
Dirhodium trisulphate	10489-46-0	234-014-5	Umicore AG&Co.KG	Mar 2018
Dirhodium trioxide	12036-35-0	234-846-9	Umicore AG&Co.KG	Jul 2017
Rhodium (III) acetate ***(UVCB!)***	42204-14-8	255-707-9	Umicore AG&Co.KG	Jul 2017
Rhodium trinitrate ***(UVCB!)***	10139-58-9	233-397-6	Johnson Matthey	Nov 2017
Rhodium trihydroxide	21656-02-0	244-508-2	Heraeus	Jul 2017
Diammonium sodium hexakis(nitrito-N)rhodate	64164-17-6	264-713-0	Umicore NV/SA	Jul 2017
Ruthenium	7440-18-8	231-127-1	Heraeus	Nov 2017
Ruthenium trichloride, hydrate	14898-67-0	604-667-4	Heraeus	Nov 2017
Ruthenium (IV) oxide	12036-10-1	234-840-6	Heraeus	Nov 2017
Tris(nitrato-O)nitrosylruthenium	34513-98-9	252-068-8	Umicore AG&Co.KG	Feb 2017
Hexakis[mu-(acetato-O:O')]-μ3-oxo-triangulo-triruthenium acetate / Ruthenium acetate	55466-76-7	259-653-7	Johnson Matthey	Feb 2018
Tetraammonium decachloro-mu-oxodiruthenate(4-)	85392-65-0	286-924-7	Heraeus	Nov 2017
Ruthenium trihydroxide	12135-42-1	235-221-3	Umicore NV/SA	Jan 2018
Rhenium	7440-15-5	231-124-5	KGHM Metraco	Sept 2013
Perrhenic acid (in solution)	13768-11-1	237-380-4	Heraeus	Nov 2013
Ammonium perrhenate	13598-65-7	237-075-6	Heraeus	Jul 2013
Sodium rhenate (in aq. solution)	13472-33-8	236-742-9	Climax Molybdenum	Mar 2014
Potassium perrhenate	10466-65-6	233-953-8	Heraeus	Aug 2013
Refinables (ALL)				Nov 2010

Metals and Inorganic Sectorial Approach (MISA)

The Metals and Inorganic Sectorial Approach is under discussion since August 2016. A first meeting was organized at ECHA to present the project at that time and a kick-off “trust building” workshop took place on 24th January 2018.

The agreed actions after the workshop were:

- refine format/template of baseline reports and identify the information that can be handed over to ECHA
- formalise the priorities
- revise the draft charter and
- set up communication (other inorganic sectors, MSCAs, Commission)

These actions are ongoing at Eurometaux Steering Committee level. The priorities set so far are matching with the priorities identified by PMC (when relevant) and are already integrated in the current PMC workplan, which will allow a smooth contribution to the initiative. It is worth to highlight that this approach cannot fully guarantee that MS will not continue to initiate regulatory actions on some dossiers but a communication is foreseen to MS and they are invited to contribute to the exercise. The final package including the PMC Baseline reports, the Rolling plan, the Charter and the benefits of joining the effort will be circulated in April to the Assembly for final approval since MISA will kick-off before summer.

PMC Technical update

Ag and compounds

Substance Evaluation of Ag metal (nano): No feedback from the eMSCA has been received yet following the 2017 silver REACH dossier update, in which PMC concluded that the nanoform of silver is less toxic than ionic silver and therefore further fate testing is currently not needed. The eMSCA has until July 2018 to evaluate the new information and they will conclude either that no further data is needed or they will draft a new decision indicating that further information is still needed to address the concern.

For more info: katrien.arijs@arche-consulting.be

CLH of silver containing active substances (SCAS) under BPR: The 60-day public commenting period for the 3 CLH proposals submitted by Kemi (Sweden) for silver zeolite (SZ), silver copper zeolite (SCZ) and silver sodium zirconium hydrogen phosphate (SSZHP) has not started yet. PMC is already preparing comments specifically on the Repr classifications of SZ and SCZ, and in this respect, will refer to their submitted testing proposal for the EOGRTS (see also below).

For more info: katrien.arijs@arche-consulting.be

Extended one-generation reproductive toxicity study (EOGRTS) testing proposal (TP) on silver acetate: During an informal discussion with ECHA staff, it was agreed to update the TP since the version submitted in 2015 is now outdated. PMC is currently updating the TP with the new data on reprotoxicity of silver that emerged since 2015, and aims to submit the update early April. The update will increase the chance of acceptance of the TP. ECHA will send the draft decision (to the LR) once they have considered the updated TP. After receiving the draft decision, a commenting period of 30 days will start during which we should also have the opportunity to have an informal call with ECHA.

In addition to updating the TP, PMC is currently preparing enabling work, with the input of a number of experts to ensure a robust proposal. Since the overall balance of evidence on silver reprotoxicity shifted adversely over the last two years, PMC is also developing a strategy in case of a negative outcome for the industry (i.e. Repr Cat. 1B classification for silver).

A first draft strategy to defend the TPs but also to assess the risks related to a potential classification and how to mitigate them has been developed Q1 2018 and will be updated on a regular basis.

For more info: katrien.arijs@arche-consulting.be

Potential prioritisation of silver under the Water Framework Directive (WFD): Silver is currently not proposed for the Watch List. Additional silver monitoring data have been received and JRC calculated a new STE score which is now < 1.8 (cut-off value for Priority Substances (PS) shortlist). A final decision on the relevance of silver for the PS shortlist will be made based on a confirmed PNEC/EQS. Silver EQSs are currently being discussed in a substance-specific sub-group led by Sweden. Both PMC and Eurométaux are participating to this sub-group, and MS participation is limited to Germany, France, Latvia and Denmark. The aim is to agree on EQSs for all matrices that could be of relevance, including sediment. There will be no revision of the PS list in the short term, but MSs will be encouraged to take into account shortlisted substances and their harmonised EQS for the third River Basin Management Plan (RBMP).

For the chronic freshwater PNEC, the PMC Secretariat and the silver sub-group were largely in agreement on the dataset and came to the conclusion that there are currently insufficient data to derive the PNEC using a Species Sensitivity Distribution (SSD). The Ag WG has therefore agreed to perform further ecotoxicity tests to generate the additional data. The chronic sediment PNEC has not been discussed yet with the silver sub-group, but the Ag WG recognised that the current available studies are not suitabel for PNEC derivation and agreed to perform well-designed sediment tests if the REACH sediment PNEC is challenged by the sub-group.

For more info: katrien.arijs@arche-consulting.be

Au and compounds

The REACH registration dossier of tetrachloroauric acid had been succesfully registered by the LR and co-registrants are kindly invited to register as soon as possible. All other gold and gold compound dossiers have been succesfully registered previously.

For more info: vincent.dunon@arche-consulting.be

Ir and compounds

The REACH registration dossiers for Iridium metal and two Iridium compounds have been successfully registered by the Lead Registrants (LR), and co-registrants are kindly invided to register as soon as possible.

For more info: jelle.mertens@epmf.be

Pd and compounds

The REACH registration dossiers for Palladium metal and all Palladium compounds have been successfully registered by the LRs, and co-registrants are kindly invided to register as soon as possible.

The agreed additional testing (cfr. minutes PMC autumn BtB meetings) has been started. The first range-finding tests are running or scheduled shortly. During the PMC Spring BtB meetings, one remaining decision has been taken: test PdO for oxidising properties (unless other evidence is delivered in the next week by a member company).

For more info: maxime.eliat@arche-consulting.be

PM CN

The REACH registration dossier of potassium dicyanoargentate has been succesfully registered by the LR and co-registrants are kindly invited to register as soon as possible. All other precious metal cyanide dossiers have been succesfully registered previously.

For more info: vincent.dunon@arche-consulting.be

Pt and compounds

The REACH registration dossiers for Platinum metal and all Platinum compounds have been successfully registered by the LRs, and co-registrants are kindly invided to register as soon as possible.

The agreed additional testing (cfr. minutes PMC autumn BtB meetings) has been started. The first range-finding tests are running or scheduled shortly.

The testing proposals (TP) for in vivo genotoxicity testing have been included in all relevant Pt dossiers, and are submitted to ECHA. During the PMC Spring BtB meetings:

- the participants agreed to also include a TP in the platinum dinitrate dossier. In total, there are now TP included in 9 PMC platinum dossiers covering 5 groups via read-across. ECHA confirmed that their will prepare all the DD in parallel to ensure a comprehensive review of the TPs by the MSC. They will try also to issue all the final decisions at once. PMC aims to test the substances in a tiered testing approach (i.e. sequential testing to optimise the testing protocols based on the learning lessons of the previous assays) to eventually avoid the need to test all 5 groups (in most optimistic case!).
- it was agreed with IPA that PMC takes the lead in the in vivo genetox testing under REACH. The PMC was considered the most appropriate association to communicate with ECHA and perform testing under REACH.

Further discussions with the PGM WG and Tox Experts are required to finetune and agree on a testing apporach, as well as with ECHA staff to defend our approach and formally agree on it. Our best guess for intiating the testing is Q2 2019.

For more info: maxime.eliat@arche-consulting.be

Re and compounds

The 2017 literature review for Re and Re compounds did not find any papers considered potentially relevant for inclusion in the REACH dossiers.

For more info: katrien.arijs@arche-consulting.be

Refinables

During the Spring BtB meetings the proposed split of refinable dossiers was discussed and approved, with the possibility for the addition of liquid solutions from leaching processes in an additional dossier(-s). During this meeting it became apparent that there is an interest in such a type of substance, currently registered under the Ag and Au electrolytes, and further interest has to be notified to the PMC secretariat. New tonnage band declaration will have to be completed to define registration requirements and to assign lead registrant. Meanwhile, preparation are being made for the dossier update of a first batch of six refinable dossiers.

For more info: vincent.dunon@arche-consulting.be

Rh and compounds

The dossiers of Rhodium metal and 13 Rhodium compounds have been successfully registered by the LR. Co-registrants are kindly invided to register as soon as possible. The dossier for dirhodium trisulphate was rejected by ECHA during registration early January 2018 because of SID concerns. The dossier has been updated (composition has been adjusted to meet the 80:20 rules for mono-constituent substances and phys-chem data have been added where required), and succesfully resubmitted by the LR earlier in March.

The dossier of triammonium hexachlororhodate has been removed from PMC scope. ECHA will be informed that PMC is the data-holder for this substance.

One dossier is still under development: rhodium tris(2-ethylhexanoate). The required phys-chem testing has been finalised, and the reporting is expected soon. Once available, the dossier will be finalised and send out for review and approval. The dossier is expected to be available for registration by the LR early April 2018.

During the PMC Spring BtB meetings, the participants agreed to include a testing proposal for in vivo genotoxicity testing with dirhodium trisulphate as test substance. The TP will be drafted and submitted shortly.

The agreed additional testing (cfr. minutes PMC autumn BtB meetings) has been started. The first range-finding tests are running or scheduled shortly. The additional AMES testing with the poorly water soluble Rh2O3 and Rh tris(2-ethylhexanoate) is also running and expected to be finalised in April. The running test with Rh tris(2-ethylhexanoate) does not influence the registration timing of this compound.

For more info: jelle.mertens@epmf.be

Ru and compounds

The dossiers for Ruthenium metal and all Ruthenium compounds have been successfully registered by the LR. Co-registrants are kindly invided to register as soon as possible.

The agreed additional testing (cfr. minutes PMC autumn BtB meetings) has been started. The contracts with the labs have been signed, and the first range-finding tests running or scheduled shortly.

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SVHC Roadmap

Pb has been proposed by Sweden to be included into the Candidate List. The public consultation started mid-March and will close on 23rd April 2018. PMC will prepare some comments in line with ILA strategy underlining the disproportionality of the measure and providing already relevant information for the next prioritisation step.

The **Article 58 (2)** legal review by Mayer Brown has been finalized and circulated to the SVHC Roadmap WG. The advocacy strategy has been discussed at Eurometaux level and will focus on a communication to the legal departments of ECHA, Commission and some key Member States.

A position on **"substance in susbtance" and Authorisation** has been discussed in November 2017 in a closed session of the CARACAL. The document has been made available to Eurometaux in March and confirm the intend to ensure grouping approach in authorisation (e.g: prioritising an SVHC on its own and in other substances under Annex XIV). Eurometaux agreed to launch a legal review of the proposal but also to investigate mitigation measures to avoid adverse impacts on UVCBs (and on our refinables).

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