



Preparation of CLP notifications

Date: 30 July 2010

Objective: To assist PMC Members in the timely (before 3 January 2011) preparation of CLP notifications for all precious metals and rhenium and their compounds (whether or not they are subject to a REACH Registration by 1 December 2010) by:

- gathering, sharing and using available information and knowledge
- developing acceptable trends and tendencies by applying read-across where fully established, and
- identifying exceptions within the proposed read-across categories which will require further assessment under REACH once more data (e.g. on water solubility) becomes available

Timing: From August 2010 to December 2010

Scope: Broader than the one already scheduled for REACH Registration. All Ag, Au, PM CN⁻ and PGM substances and intermediates of interest to PMC Members (REACH inventory + any other which is not covered by REACH inventory) and where harmonisation of classification is possible/desirable, and the substance identity/characteristics are not considered to be Member confidential. Testing and compilation of IUCLID 5 files is excluded from the scope and remains the responsibility of each individual legal entity.

Participants: Participation is open to all technical experts of PMC Members having the proficiency and authority to discuss general toxicology and eco-toxicology behaviours of the materials subject to a CLP notification as defined in the above scope.

External support: From EBRC, WCA and BIBRA supported/coordinated by Hugo Waeterschoot.

Internal support: From Klaus Rothenbacher and Caroline Braibant. Members are expected to show leadership in assessing those substances that have been added to the scope on their request.

Approach:

- 1) Secretariat circulates pro-forma inviting all PMC Members to list substances and intermediates subject to a CLP notification which they wish to be considered for inclusion in this effort. An associated pro-forma is proposed to provide a start point for classification harmonisation (cf. Appendix 1);
- 2) PMC Members interested in participating in such a joint exercise shall revert back with a completed pro-forma by 15 August 2010, plus the name of technical expert to be contacted in the event of a question, and their availability for *face-to-face meeting in Brussels on a date to be confirmed between the 8 and 17 September 2010*;
- 3) Secretariat will populate a CLP Master inventory assembling all materials per family (and preliminary category) where feasible and reasonable, and any existing toxicology or eco-toxicology indicators or self-classification, i.e. either reported by PMC Members or evident from the Consultants via PM Phase I and Phase II reports. This Master inventory will be split into individual more user-friendly CLP matrices (e.g.: one per family or category);
- 4) CB, KR and HW will prepare face-to-face meetings with Members experts to:
 - a. Review available information provided by Consultants (CLP matrices) and Members - N.B.: PMC Members are required to provide evidence to substantiate classification/non-classification proposals
 - b. Discuss proposed trends, confirm (non-)applicability of read-across (and robustness of proposed categories) and identify uncertain areas and exceptions
 - c. Derive classification proposals where applicable
- 5) Consultants to integrate toxicology and eco-toxicology classifications proposals with results from CLP physico-chemical testing programme (as these become available) and prepare complete CLP notification proposals in IUCLID 5;
- 6) CB to circulate resulting CLP notification proposals to PMC Members for information/support (and then to SIEF for information) and request volunteers for submission to ECHA before 3 Jan 2011;
- 7) Lead companies to submit CLP notifications on behalf of concerned Members and with support of PMC and Consultants to ECHA before 3 Jan 2011.

Cost: Assuming this exercise will not encompass additional tests and that the classifications will be derived as typical trends rather than as individual assessments, the external support required for this exercise will be subject to *ad hoc* quotes and charged to all Members as per the PMC cost-sharing formula in place. N.B.: If any test (e.g.: T/D testing to avoid default environmental classification) is needed, this shall be paid by each concerned company(ies) on the basis of the PMC cost-sharing formula developed for the PM Refinables project (same weight no matter substance or intermediate).