



SUMMARY OF PMC RECOMMENDED STRATEGY: REFINABLES AND INTERMEDIATES

1	Non-chemically modified ores/concentrates ▶	Utilise Annex V exemption from registration.
2	If intake is definitely categorised as waste* ▶	General REACH exemption placing waste out of scope.
3	Where non-waste refinable/recovered materials from <u>within EEA</u> are under consideration ▶	<ol style="list-style-type: none">1. Utilise Article 2(7)d derogation related to prior upstream registration where they are deemed as being the same substance(s) and where information necessary for adequate risk management (SDS etc.) is available.2. Precautionary pre-registration by reclaimer is advised (per EU-COM and ECHA current guidance).
4	Where non-waste refinables from <u>outside of EEA</u> are under consideration (importer/Only Representative situations) ▶	<ol style="list-style-type: none">1. Designate as Transported Isolated Intermediates (TII) with reliance on a strategy of applying the reduced registration requirements applicable to TII.2. Provisos that: (a) subsequent chemical transformation can be proven; (b) a situation of rigorous control of the TII can be demonstrated.3. Members recommended to declare such entities to PMC where ≥ 1tpa.4. Pre-registration will be aligned by use of PMC recommended categorisation of entities (where possible aligned to suitable EC nr).5. Subject to internal PMC assessment, members may agree that future registration dossier preparation will be progressed as part of the PM registration projects.

* Based on suppliers designation.



5	For in-process/"simple" intermediates ▶	<ol style="list-style-type: none">1. Reliance on a strategy of reduced registration requirements as applicable to On-site or Transported Isolated Intermediates. Provisos as previous item.2. Members recommended to declare such entities to PMC where ≥ 1 tpa.3. Simple cases (e.g. mono-constituent intermediates) can be progressed as standard pre-registration actions.4. For complex cases, see below.5. Subject to internal PMC assessment, members may agree that future registration dossier preparation will be progressed as part of the PM registration projects**.
6	Strategy applicable to "complex refinables" and process intermediates which may <u>require registration through PMC**</u> ▶	<ol style="list-style-type: none">1. Members declare such entities to PMC where ≥ 1 tpa.2. Adopt an aligned pre-registration approach based on generic grouping to the full extent that can be justified. Wherever feasible reference these entries to EC number. Where this is not possible, align via the alternative substance identifiers but still in a standardised and harmonised manner. Description by speciation is considered a last resort.3. Leverage inter-consortia division of labour, e.g. Cu consortium may fully address all anode slimes.4. The aim is a situation of the fewest On-site or Transported Isolated Intermediates dossiers as is justifiable. This reduces registration dossier support requirements, and minimises total registration fees to PMC members.5. Subject to internal PMC assessment, members may agree that future registration dossier preparation will be progressed as part of the PM registration projects.

** Members may also decide to register these entities outside of PMC activity.