Chairperson: A. Alderman (Johnson Matthey)
Secretariat: K. Arijs (ARCHE)

1 July 2014, 10:30 – 11:10 CET

MINUTES

1. **Welcome and Introduction**
   a. Confidentiality and Competition law reminder
   b. The agenda was approved

2. **SID questions from ECHA**
   a. **Background of ECHA's request** (cf. slides 5-7 in Annex 2)
      - Earlier this year, ECHA did an IT-based screening of the SID part of registration dossiers to identify shortcomings. The results of the initial screening were communicated to registrants through informal letters, together with advice on how to fix potential inconsistencies, which should be done within 3 months.
      - The Lead Registrant (LR) of perrhenic acid received such a letter, identifying the following shortcomings in the SID part of the dossier:
        1) Missing concentration ranges: both the typical concentration and concentration ranges (min-max) should be provided.
        2) Additives without stabilising function: water was listed as a stabiliser with function 'solvent', however, the technical function of an additive should be compatible with stabiliser (definition of additives under REACH: 'substances that have been intentionally added to chemically stabilise the substance, and are therefore considered as intrinsic part of the substance.')

   b. **Update of the ID cards/dossiers** (cf. slides 8-12 in Annex 2)
      - Missing concentration ranges: the ID cards of all Re substances were updated to include the concentration ranges, and the registration dossiers for APR, potassium perrhenate and sodium rhenate were updated accordingly and were sent to the LRs for submission, together with guidance (and will be sent to co-registrants once the LR has confirmed submission). The perrhenic acid dossier was updated to include the concentration ranges but the stabilising function of the additive is to be further discussed (see next bullet point). In the rhenium dossier, the concentration ranges were updated but the Article service life is to be further discussed/added (see next agenda point)
      - Additives without stabilising function: a statement on the stabilising function of water in perrhenic acid was provided by the LR (cf. slide 9 in Annex 2), agreed upon by the WG and added to the dossier. However, after running the TCC on the dossier, a quality warning appeared (cf. slide 10 in Annex 2). ECHA indicated during the webinar on SID screening (30 April 2014) that solvents that cannot be completely removed without affecting the stability of the substance, should be reported as an impurity and not as an additive. Therefore, it is suggested to report water as an impurity in the composition of perrhenic acid, including the first remark on slide 12 in Annex 2.

Decision: All participants agreed to report water as an impurity in the composition of perrhenic acid.

Actions:
- **PMC Sec to send updated dossiers to co-registrants once LRs have confirmed submission.**
- **PMC Sec / WCA to update perrhenic acid ID card / dossier to include water as an impurity (Done – ID card available in Annex 4).**

Contact Info of the Consortium
Avenue de Broqueville, 12 – BE-1150 Brussels
Tel.: +32 2 775 63 23 **Fax:** +32 2 779 05 23 **Mobile:** +32 473 52 52 73
E-mail: braibant@epmf.be **Website:** www.epmf.be

3. **Article service life of rhenium** (cf. slides 13-22 in Annex 2)
    - For rhenium, some of the uses have ERC 5 selected ('Industrial use resulting in inclusion into or onto a matrix'), which normally suggests that the substance ends up in articles. In this case, the corresponding subsequent service life should be described. This information is now missing in the rhenium dossier.
    - The uses that are currently included in the dossier are listed on slides 15 and 16 in Annex 2. All participants agreed that these uses are still correct and that an article service life thus needs be added. It was suggested earlier that the use 'Manufacture of computer, electronic and optical products, electronic equipment' should be removed but it is now confirmed that it is relevant to some members. It is also suggested to add use in catalysts.
    - Only a service life name is required to pass the TCC in IUCLID but other fields can also be completed:
        - Article category related to subsequent service life: all participants agree that AC2 ('Machinery, mechanical appliances, electrical/electronic articles') and AC7 ('Metal articles') are the most relevant ones for rhenium.
        - Exposure related description of article: WG members are requested to indicate which picklist options (cf. slide 20 in Annex 2) are relevant for rhenium.
        - Environmental release category: WG members are requested to indicate which picklist options (cf. slide 21 in Annex 2) are relevant for rhenium.
        - Process category for articles used by workers: WG members are requested to indicate which picklist options (cf. slide 22 in Annex 2) are relevant for rhenium.

    Decision: All participants agreed that the uses currently included in the rhenium dossier are still correct, and that use in catalysts should be added.

    Actions:
    - **WCA to include use in catalysts in the rhenium dossier.**
    - **WG members to indicate which picklist options (cf. slide 20-22 in Annex 2) are relevant to complete the article service life fields in IUCLID for rhenium.**

4. **SDS comments and further input** (cf. slides 23-25 in Annex 2 and Annex 5)
    - WCA generated a standard SDS for all Re substances, this in order to ensure consistency between companies, particularly for hazard data and classification (cf. Annex 5).
    - The generic SDS was completed based on the REACH dataset and the Guidance on Safe Use (GoSU) provided by the LR, but data is not available to complete all SDS sections for all substances (not required under REACH). Some sections are to be completed / edited by each company.
    - SDS comments:
        - SDS for rhenium and APR: it was suggested earlier that the use 'Manufacture of computer, electronic and optical products, electronic equipment' should be removed but it is now confirmed that it is relevant to some members.
        - Section 10 – stability and reactivity: data should be provided so all members have this section in line with each other.

    Actions:
    - **PMC Sec to contact LRs for completion of Section 10 – stability and reactivity.**
    - **PMC Sec to circulate standard SDS for Re substances to WG once per year to check if update is needed.**

5. **AOB, next meetings/calls and closing remarks**
    - It is noted that when updating the IUCLID files by copying in the updated composition record, the LR needs to check that the composition is linked to the relevant classification in IUCLID Section 2.1 and 2.2.
    - Next meetings/calls will be scheduled on an *ad hoc* basis.

    Action: WCA to include guidance on how to link the composition to the relevant classification in the guidance for dossier updates (Done – updated guidance available in Annex 6).

Annexes

1. Agenda & list of participants
2. Slides presented at the call
3. SID questions from ECHA:
    3.1. SID information letter ECHA on perrhenic acid (ECHA, 8 April 2014)
    3.2. Annex SID information letter ECHA (ECHA, 8 April 2014)
4. Updated ID cards Re substances (PMC Sec, 4 Jul 2014)
5. SDS Re substances (WCA, 30 May 2014)
6. Guidance on updating rhenium IUCLID files (WCA, 1 Jul 2014)

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Avenue de Broqueville, 12 – BE-1150 Brussels
Tel.: +32 2 775 63 23 **Fax:** +32 2 779 05 23 **Mobile:** +32 473 52 52 73
E-mail: braibant@epmf.be **Website:** www.epmf.be