



MINUTES

(Actions in **Yellow**)

1. Introduction

- 1.1. Confidentiality and European Competition Law provisions.** Participants were reminded on their obligation to comply with confidentiality and Competition Law.
- 1.2. Tour de table and apologies.** The list of participants is available in Annex 1.
- 1.3. Follow-up on agreed actions and approval of the minutes of the last meeting (23 April 2010).** Slide 5 of Annex 2 summarises the actions that were not performed. Corrosivity to metals will be addressed today, the ID Cards and monitoring data will be considered later in the REACH project and the UV visible tests will be performed at JMTC now that samples have arrived. The minutes were approved.
- 1.4. Objective of the day and approval of the Agenda.** The Agenda was approved. This meeting aims at electing a new Co-Chairperson, agreeing on CLP classifications and the next steps of the REACH project (cf. slides 6 and 7 of Annex 2). An introduction to CLP is available in slides 8-10 of Annex 2.

2. Membership and chairmanship

2.1. Membership:

- 2.1.1. Feed-back from Molymet.** Molymet interested in joining the Consortium but probably not before 2012. Lipmann Walton & Co. and Climax Molybdenum invited to keep Molymet informed on the progress of the Re project.
- 2.1.2. Status of SEKOM.** 2009 and 2010(I) invoices from SEKOM remain unpaid to date. SEKOM is hence in breach of the Consortium Agreement and **will be excluded from the Consortium by the next Assembly meeting.** Andras Szép has been informed on this decision.
- 2.1.3. Representation of Heraeus.** Jochen Schlessmann will be replaced by Roland Brasch and Rüdiger Thiele. Chantre Viviers and Peter Grohnert will provide background support where and as needed. Welcome!

2.2. Chairmanship:

- 2.2.1. Representation of Climax Molybdenum.** Gary Van Riper will be replaced by Ken Kloska. Aad van Meerkerk will continue to represent Climax Molybdenum too. Welcome!
- 2.2.2. Election of the Re WG Co-Chairperson.** Ken Kloska was proposed as Co-Chairperson of the Re WG. The Re WG accepted this nomination. Congratulations Ken!

3. Preparation and submission of CLP notifications. The resulting classifications are summarised in the last page of Annex 3 (only Perrhenic acid is classified).

Self-heating: it was agreed that Re metal is never packed in big quantities or handled/transported at temperatures above 55°C and that therefore it should not be classified for self-heating. Suppliers of rhenium powder may however inform their customers that self-heating may occur at a temperature of 280°C.

Corrosivity to metals: WCA on the basis of redox potential and Members on the basis of handling experience have agreed that none of the Re substances or intermediates (with the exception of Perrhenic acid) are corrosive to metals.

Slides 14-20 of Annex 2 explain how CLP notifications will be submitted via REACH-IT, with the support of WCA and PMC. **Re CLP notifications may be submitted earlier than predicted, i.e. before 15 December.**



4. REACH programme. WCA and BIBRA have put together a testing programme proposal which takes account of REACH requirements (information requirements applicable per tonnage band, Annex III exemption, minimisation of animal testing, etc.).

It was noted that Table 5.2 in section 5 of the ITS report (Annex 5) does not fully reflect the competences of the consulted testing houses.

The participants found the report to be very easy to read and understand and agreed with the proposed way forward (testing of APR, read-across to perrhenic acid and others if relevant).

The following was agreed:

- Dec 2010-Jan 2011: WCA to obtain further information from the proposed testing houses
- 15 Jan 2011: WCA to revert with options (one/more testing houses, tests in parallel/sequence, etc.)
- By 31 Jan 2011: Re WG to select preferred option and inform WCA, WCA to inform testing house(s) and launch testing programme with support of PMC secretariat (signature of contract and study proposals, request and receipt of samples, etc.)
- Dec 2011: testing programme results to be discussed by WCA and Re WG to agree on next steps of the Re project

When drafting the several options for testing, the Working Group was invited to consider the possibility of performing the *in vitro* gene mutation test (OECD 476) before the *in vitro* cytogenicity test (OECD 487); if cytogenicity is observed during the OECD 476 test, the OECD 487 test may become less critical if an *in vivo* micronucleus test is then considered necessary. If no mutation or cytogenicity is observed during the OECD 476 test then the OECD 487 test would be required.

With regard to Rhenium metal, it was proposed by wca that relevant bioaccessibility testing be carried out (eg solubility in hydrochloric acid and dissolution in artificial skin surface liquid) if it was required to read across the results from the APR testing. This would be appropriate if Rhenium fulfils Annex III criteria and therefore would require Annex VII endpoints for registration.

In the event none of the test results indicate Ammonium perrhenate has hazardous properties this could be read-across to all other Re substances and intermediates and would mean all Registration Dossiers could be completed within a short timeframe after Dec 2011 for submission in early 2012.

If to the contrary, hazardous properties are identified during the testing programme, a chemical safety assessment should be performed for Ammonium perrhenate and registrations could take place in a sequential manner (non-APR substances and intermediates first, APR later once the CSA is finalised and safe use is demonstrated in the report (CSR)). The CSR involves the generation of monitoring data and may therefore take several months and up to one year (based on the Ag experience), deferring the submission of the APR Registration Dossier to 2013.

Considering the change of interpretation in the concept of intermediates and strict control under REACH, and the possibility to use read-across to prepare full dossiers for intermediates for no additional cost, it was proposed to defer the finalisation of the Re intermediates Registration Dossiers to 2012 too, so they can be completed and submitted in tandem with the substance Dossiers which await the results of the testing programme on APR.

5. AOB and concluding remarks

5.1. Re WG 2011 conference calls and meetings. The following dates are proposed:

- 28 Jan 2011 (conference call - 2 pm) - agree on testing strategy options
- 28 March 2011 (conference call - 2 pm) - follow-up on progress of testing programme + prep of next meetings
- 15 June or 15 Sep 2011 (face-to-face - UK; starting at 12:00) - depending on test results
- 8 Dec 2011 (face-to-face - Brussels; starting at 12:00) - back-to-back with PMC Assembly meeting (hopefully all test results available)



3 December 2010

5.2. PMC Assembly meetings:

5.2.1. Brussels, 12 Jan 2010

5.2.2. Cambridge, 17 Jun 2010

5.3. PMC Human Resources. Due to the recent discontinuation of Tim Hird' contract and the maternity leave of Caroline Braibant from 1 Feb till 1 June, the resources of PMC during the first half of 2011 will be reduced to one full time science manager (Klaus Rothenbacher) and one 4/5 time office assistant (Audrey Rondepierre). Tim Hird will not be replaced immediately, unless a REACH/technical candidate becomes available.

Klaus Rothenbacher will be focussing on the update of the Ag dossiers and the PGM REACH project. Caroline Braibant will be in charge of monitoring the progress of the PM Refinables as well as to coordinate the smaller REACH projects of Re, Au and PM CN- (from home). In light of this re-organisation, meetings of the Re WG during the first half of 2011 should ideally take place by conference call.

Annexes:

1. Agenda and list of participants
2. Slides presented at the meeting
3. Resulting CLP classifications as agreed at the meeting (for all PM and Re materials)
4. CLP notification guidance
5. ITS report