



28 February 2009

Dear Pre-registrant,

By this letter, we wish to inform you about the Precious Metals and Rhenium Consortium that has been set-up for REACH compliance since September 2007, under the auspices of the European Precious Metals Federation (a member of Eurométaux). If you have pre-registered for more than one precious metal or rhenium substance that is in scope of the Consortium, you will probably receive this letter for each one of these.

The aim of the Consortium is to provide the precious metal and the rhenium industries with a common platform to comply with REACH. As you know, compliance towards the REACH Regulation is to be done jointly, in accordance with the OSOR principle (One Substance, One Registration). Moreover, SIEF requires a legal and cost-sharing framework to operate in a solid manner.

The scope of activity of the Precious Metals Consortium is built on a broad and inclusive basis in order to maximise the read-across potential when preparing the Registration Dossiers. The Consortium's work therefore covers several "simple" and "complex" (e.g.: refining feeds) substances in five substance families: silver, gold, precious metal cyanides, Platinum Group Metals (PGM) and rhenium. Close to 120 substances are currently in scope.

A total of 42 EU and non-EU major precious metal and/or rhenium manufacturing or importing companies have to date joined the Consortium. Their experts participate actively to the working structure of the Consortium, and are also mandated to supervise and ensure time- and cost-efficiency in all Consortium matters. The structure is supported by the EPMF's personnel, i.e. a Secretariat & Trustee (i.e. prime contact and responsible for safeguarding confidential (business) information for the Consortium), and a Scientific Manager (i.e. interface between the members and the expert consultants who have been appointed to prepare the Registration Dossiers as per REACH requirements).

Less than two years remain between now and the first REACH registration deadline. Since 2006, we have undertaken to offer efficient leadership and expertise, and to use all reasonable efforts to ensure the appropriate and timely achievement of REACH requirements, by concentrating on the following tasks:

- Performing data gap analysis and filling the identified gaps by applying read-across, grouping, test-waiving and test-derogation principles in order to avoid unnecessary testing, performing tests as required in Annexes VII and VIII, and preparing testing proposals as required for Annexes IX and X;
- Identifying and evaluating downstream uses, preparing Chemical Safety Reports and developing uniform Classification and Labelling proposals;
- Coordinating the submission, by the Lead Registrant, of the Registration Dossiers of the substances and isolated intermediates covered by the Consortium's projects, before the deadline for registration applicable to the substance; and
- Answering to possible requests from the Agency during the Dossier Evaluation period.

The efforts described above have been addressed in a phased manner, under the umbrella of metal-specific projects, and with the support of expert consultancy research



organisations which have gained experience in metals and risk assessments over the past years.

In light of REACH data-sharing and joint submission principles (Recitals 33 & 54, Articles 11, 19, 25, 29 & 30 of the REACH regulation), we may contact you again in summer 2009, through our designated Members, in order to see how your organisation wishes to engage in the activities of the Precious Metals and Rhenium Consortium. Because of the large numbers of pre-registrants for many precious metal and rhenium substances, we will probably employ structured and targeted forms of communication, such as electronic survey applications, to inform you on our progress, to invite you to participate to the substance sameness discussion, or to the appointment of the Lead Registrant, for example.

We understand that some entities having sometimes ticked the SIEF Formation Facilitator (SFF) box and voluntarily endorsing, as such, the role of SFF, state to be providing a broad range of services for subscribers, and requesting pre-SIEF participants to complete and return surveys. Please note that in many cases, these entities have no relationship to the Consortium, and it is not clear what the role of the entity in the industry sector or in the pre-SIEF really is. We therefore invite you to read any survey very carefully before you complete it (and engage or commit to anything with these SFF).

We strongly believe that the Consortium has the required sector expertise to effectively organise or lead the industry's REACH compliance. However, joining the Consortium is not the only way of successfully participating to the joint submission. Indeed, an alternative to membership is to obtain a right to refer to the Registration Dossier that the Consortium has prepared, by purchasing a Letter of Access or a Licence to Use. We are currently working on developing the conditions under which these rights can be granted by the Consortium and can hence not provide you with details at the moment, but we aim for these conditions to be fair, transparent and non-discriminatory. More information on this alternative should become available later this year.

Should you have any relevant data to be used in the preparation of the Registration Dossier, or would you have any question on the Consortium, please contact us (contact details in footer). Should you have any question on REACH, we strongly recommend you to use the ECHA portal and guidance documents, or to contact your national helpdesk to resolve these.

Thank you in advance for your interest!

Kind regards,

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