



PRECIOUS METALS AND RHENIUM CONSORTIUM
RHENIUM WORK GROUP FACE-TO-FACE MEETING

Chairperson: *Angela Alderman (Johnson Matthey)*
Co-Chairperson: *Gary Van Riper (Climax Molybdenum)*

29 September 2009 (10:30 - 15:30 BST)

MINUTES

1. Introduction and Welcome

- 1.1. The participants (Annex 1) were reminded on their commitment to comply with Confidentiality and Competition Law provisions.
- 1.2. Presentations were made through a tour de table. Participants who were not able to attend are listed in Annex 1.
- 1.3. All actions have been progressed with or will be addressed at the meeting. On page 3, under item 6.1, a correction needs to be made: silver, PGM and refinables are bound to 2010 and 2013 registration deadlines. The minutes were approved.
- 1.4. The Agenda was approved. The objectives of the meeting are presented on slide 6 of Annex 2.

2. Re Project Development and Progress

- 2.1. A project plan has been prepared and provided to the Re WG for discussion (Annex 3). The plan will be adjusted according to WCA/BIBRA's presentation below and discussed again under item 2.6 below.
Phase I. Although it is unlikely that any new information on Rhenium materials has become available (BIBRA's latest search was done in July 2009), *WCA was requested to perform another search and report the outcome by the end of October, in the final Phase II report.* New data may become available from a potential Member of the Consortium, *PMC is in discussion with this Member in order to obtain this information.*
WCA awaits PMC's signal to work on the assignment of a financial value to proprietary data, so as to consider this value when preparing the letters of access.
- 2.2. Slide 9 of Annex 2 presents the three categories that have been proposed for Re. These categories may be adjusted following the test results.
- 2.3. WCA/BIBRA's presentation is available in Annex 4. It presents the entire testing strategy proposed by the consultants. The group agreed to proceed with a tiered testing programme (cf. Annex 5) performed by Aqura, unless TAP indicates preference for another test house. *Members should be ready to provide the samples to WCA upon request by the PMC.* Dirhenium heptasulphide is not tested due to its intermediate status. Although Sodium rhenate is an intermediate too, as it may become the Re project's reference substance for read-across, some tests may be performed on this intermediate. Sodium rhenate will be provided by Johnson Matthey.
Some tests may be waived based on pH test results (corrosive substances do not require to be tested for skin or eye irritation/sensitisation endpoints).
It was clarified that human exposure to ammonium perrhenate can not be excluded and reprotox tests may be needed. Although REACH only requires testing proposals to be submitted for Annex IX and X tests, there is a general preference for avoiding *in vivo* tests, even if belonging to lower annexes. ECHA recently confirmed that a dossier containing a testing proposal for reprotox as a waiver for a lower tier test would be considered as complete. The need for some data to support classification by 2010 should however be considered when deciding whether or not to proceed with the test.
- 2.4. Slide 13 of Annex 2 addressed Phase IV. A questionnaire to collect information on uses, emissions and exposure is being prepared by WCA. Once the template is finalised, it is up to the Re WG to launch the CSA/CSR phase, which can run in parallel with the testing



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phase.

Ammonium perrhenate is unlikely to be classified under GHS (LD50 > 2 g/kg body weight), which may indicate no classification for the other rhenium materials. Some tests results will be required before a full CSA/CSR can be performed.

A preliminary list of uses is available in Annex 6. *The Re WG is required to identify any missing use, and complete the second worksheet and return it to PMC by 31 October.*

- 2.5. *The Re WG should agree on whether the data owners can be mentioned when stating the bibliographical references in IUCLID 5. It was agreed for the PMC to organise IUCLID 5 training sessions for the Consortium Members.* WCA proposes a IUCLID 5 hosting service which would allow a centralised access to IUCLID 5 files by both PMC and its Members; different user profiles would limit the access to each file to respect ownership and confidentiality rights. *PMC will consider this service with TAP and the Management Committee.*
- 2.6. The project plan was discussed again. Following the discussion with WCA, registration readiness of the Rhenium materials by December 2010 is unlikely. The Re WG participants aim at registering by mid-2011. It was agreed to indicate the PMC invoicing periods in the plan.

3. Key outcomes of ECHA's Workshop for Lead Registrants (11 September 2009)

A. van Meerkerk's presentation is available in Annex 7. All recommendations made to the participants of the workshop have been acknowledged by the Re WG and the PMC Secretariat will apply these in future pre-SIEF communications.

4. Communication with pre-SIEFs

- 4.1. All in-scope rhenium materials have a Consortium Member SFF and volunteer Lead Registrants.
- 4.2. PMC will send all pre-SIEFs for in-scope substances a presentation letter. Following communication steps are provided in slide 21 of Annex 2.
- 4.3. The Re WG agreed to keep the ID card template as simple as possible and to avoid any information which is unlikely to assist in confirming sameness. This template will be the same for all PMC materials. It will be fully populated by PMC staff with the support of the WGs and *only a complete version will be circulated to each relevant pre-SIEF for sameness confirmation.*
- 4.4. The steps involved in performing a joint submission through REACH IT are detailed in slides 23 and 24 of Annex 2. *PMC will circulate a request to the Members to formally confirm the nomination of the volunteer Lead Registrants. Once these LR are officially nominated by the Consortium, the nomination will be shared with the pre-SIEF.*
- 4.5. It was agreed to keep the doors of the Consortium open and also work on the preparation of a letter of access. Determining the cost of such letter of access will depend on many factors, including the value of proprietary data as indicated in item 2.1 above. *PMC shall develop a letter of access template (based on existing templates).*

5. Budget progress (informative)

- 5.1. See slide 27 of Annex 2.
- 5.2. See slide 28 of Annex 2.



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6. AOB, next meeting, and closing remarks

- 6.1. Ni Alloy scrap must be registered by 2010 due to its classification (triggered by its Nickel content). PMC is in *pour-parlers* with the Ni consortia to make sure this intermediate dossier is prepared on-time and ready for submission by 1 December 2009. Concerned Members will be informed on developments in due course.
- 6.2. Next face-to-face meeting: Brussels, 4 December 2009. *PMC will propose future meeting dates for 2010* (ideally, back-to-back with other meetings in Brussels/Europe).

Recapitulation on agreed actions:

	Who	What	When
1.	WCA	To perform another search and report the outcome in final Phase II report	31 Oct
2.	PMC	To obtain information held by Powmet	23 Oct
3.	PMC	To prepare confirmation letter for testing programme and request samples from sample providers	7 Oct
4.	Sample providers	To provide the samples to WCA upon request by the PMC	15 Oct
5.	Re WG	To complete uses spreadsheet	31 Oct
6.	Re WG	To agree on whether the data owners can be mentioned when stating the bibliographical references in IUCLID 5	31 Oct
7.	PMC	To organise IUCLID 5 training sessions	Jan 2010
8.	PMC	To consider IUCLID 5 hosting service proposed by WCA	31 Oct
9.	Re WG	To validate ID cards before circulation to pre-SIEFs	31 Oct
10.	PMC	To circulate ID cards to relevant pre-SIEFs for substance sameness confirmation	1 Nov
11.	PMC	To circulate a request to the Members to formally confirm the nomination of the volunteer Lead Registrants	1 Nov
12.	PMC	To share LR nominations with relevant pre-SIEFs	1 Nov
13.	PMC	To develop a letter of access template for discussion	1 Nov
14.	PMC	To discuss data-sharing with NFM consortia of metals contained in Nickel Alloy Scrap for dossier preparation	1 Nov
15.	PMC	To propose 2010 meeting dates	4 Dec

Annexes:

1. Agenda and list of participants
2. Slide set
3. Re project time plan
4. WCA/BIBRA presentation
5. Agreed tier 1 testing programme
6. List of uses identified for Rhenium materials + questionnaire for Members
7. Presentation on Lead Registrant Workshop