

Rhenium Work Group meeting
PM & Re Consortium

23rd September 2008
Metals Conference Centre
Brussels, Belgium



1. Welcome and introduction

1.2. Attendance list

1. Angela Alderman, Johnson Matthey (United Kingdom)
2. Peter Grohnert, Heraeus (Germany)
3. Michael Husakiewicz, Lipmann Walton (United Kingdom)
4. Anthony Lipmann, Lipmann Walton (United Kingdom)
5. András Szép, SEKOM (Austria)
6. Aad Van Meerkerk, Climax Molybdenum (The Netherlands)
7. Gary Van Riper, Climax Molybdenum (United States)
8. Ewa Zygnerska, KGHM Ecoren (Poland)

Secretariat:
Caroline Braibant
Zuzana Hugonin

Special guest:
Claire Mattelet, Nickel consortia (Belgium)

Excused:
Jean-François Lartigue, Eurotungstene (France)

1.4. Action points of last meeting (7 July 2008)

Who?	What?	When?
Re WG	Election of co-Chair	Today
Re WG and Trustee	Contact PPR registrants	Before end of Phase I of Re project
Secretariat	Make a cost-calculation to compare registering: - Substance in 1-10 tonnes/year band, vs - Intermediate in < 1000 tonnes/year bands	Today (see next slide)
Re WG and Ni consortia	Resolve Ni alloy (scrap) issue	Today
All Re members	Send available information on rhenium to Trustee	Before end of September 2008

No comments received on minutes → Vote

1.4. Cost-calculation: intermediate < 1000 tonnes/year vs. substance 1-10 tonnes year

	Substance 1-10 tonnes/year	Intermediate < 1000 tonnes/year
Registration fee*	1200 €	1200 €
Maximum testing costs**	Annex VII: ~ 45000€	None
Maximum information costs**	None (unless testing can be replaced by purchasing existing data, which then decreases above ~ 45000 €).	The cost of gathering, evaluating and organising "any existing available information" in the Registration Dossier will depend on amount of existing information, the need to purchase existing information.
Registration Dossier preparation costs	Depending on consultancy and amount of information to be integrated to Dossier, cost can vary from 5000 to 10000 €.	Depending on consultancy and amount of information to be integrated to Dossier, cost can vary from 5000 to 10000 €.
Strict control requirements	None	Pre-requisite: Should be ensured up and down the supply chain • Need for engagement, commitment, contract or agreement.
Evaluation costs	Unknown	Unknown
Authorisation costs	50 000 € for first substance and first use + 10 000 € per additional substance and + 10000 € per additional use. But unlikely that Re substance can be subject to Authorisation!	Exempted from authorisation.

* Assuming joint submission, non-SME company
** To be divided amongst all registrants

Company strategy must first of all be REACH-compliant!

1.5. Agenda

1. Welcome and introduction:
   - Rules of the game
2. Rhenium inventory:
   - Recent updates
3. Update on rhenium project/work programme:
   - Contributions and clarifications
4. AOB:
   - Way forward
5. Conclusion and next meetings



2. Rhenium inventory



2.1. Adjustment of Re inventory

Name of the substance	Identification numbers		Number of registrations	Tonnage Band			
	CAS	EC		10 - 100		1 -10	
Rhenium	7440-15-5	231-124-5	4			4	4S
Perrhenic acid	13768-11-1	237-380-4	3			3	2S+1I
Ammonium perrhenate	13598-65-7	237-075-6	8	1	1S	7	7S
Calcium perrhenate*	13768-54-2	N/A	1			1	1I
Dirhenium heptaoxide	1314-68-7	215-241-9	1			1	1S
Sodium rhenate	13472-33-8	236-742-9	1			1	1I
Dirhenium heptasulphide	12038-67-4	234-882-5	1			1	1I
Rhenium-containing scrap*			0				
Ion-exchanger (polymer)*			0				

* To be confirmed/discussed today.

- Substances have been added but still no one has declared Potassium perrhenate (PPR).
- One company has been contacted by SEKOM in regard of PPR but still no official approach to the Consortium.
- Should PPR be included in the above inventory, it should be done before the end of Phase I of the Re project: need for supply chain and intra-SIEF communication.

2.2. REACH categories: Definitions (1)

- **Substance**: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition:
  - Mono-constituent substance: main constituent is present ≥ 80% w/w.
  - Multi-constituent substance: more than one main constituent is present ≥ 10% w/w and < 80% w/w.
  - UVCB: substances of **u**nknown or **v**ariable composition, **c**omplex reaction products or **b**iological materials (large number of constituents and variability of composition is large and/or poorly predictable).

2.2. REACH categories: Definitions (2)

- Preparation: a mixture or solution composed of two or more substances.
  - Difference between preparation and multi-constituent substance: the components of the preparation do not react, they just blend.
- Article: an object, which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.
- Intermediate: a substance that is manufactured for and consumed in or used for chemical processing in order to be transformed into another substance (synthesis).

NB: The same substance could be an intermediate for one legal entity and a "regular" substance for the other:
they are still bound to joint submission!

2.2. REACH categories: Definitions (3)

- Non Isolated Intermediate: an intermediate that during synthesis is not intentionally removed (except for sampling) from the equipment in which the synthesis takes place. Such equipment includes the reaction vessel, its ancillary equipment, and any equipment through which the substance passes during continuous flow or batch process as well as the pipe work for transfer from one vessel to another for the purpose of the next reaction step but it excludes the tanks or other vessels in which the substance is stored after the manufacture.
- On Site Isolated Intermediate: an intermediate not meeting the criteria for the non isolated intermediate and where the manufacture and the synthesis of another substance from that intermediate take place on the same site operated by one or more legal entities.
- Transported Isolated Intermediate: an intermediate not meeting the criteria for a non isolated intermediate and transported between, or supplied to, other sites.

2.2. Confirmation of proposed categories (1)

1) Are all four following materials **mono-constituent substances** under REACH?

- Rhenium
- Perrhenic acid
- Ammonium perrhenate (APR)
- Dirhenium heptaoxide

2) Are all three following materials **mono-constituent intermediates** under REACH?

- Calcium perrhenate
- Sodium rhenate
- Dirhenium heptasulphide

For 3) see next slides

2.2. Confirmation of proposed categories (2)

- Some parts of pre-registration can be "corrected" at the time of Registration, following agreement in SIEF.
- However, having selected a specific status or category might trigger specific pre-registration approach:
  1. Preparation: Pre-register each and all components in individual pre-registrations
  2. Multi-constituent: Pre-register one substance and list all constituents in one pre-registration
  3. Mono-constituent: Pre-register one substance, no need to list constituents
  4. UVCB: Pre-register one substance, no need to list constituents
- Changing from 1 to 2 after pre-registration will probably require specific request and justification to ECHA → probability of success unknown.
- Changing from 3 to 4 requires no adaptation since Mono-constituent and UVCB appear as Mono-constituent/UVCB box when pre-registering → more flexibility.
- Changing from 3 or 4 to 1 or 2 would mean that company has performed incomplete pre-registration → would also require specific request and justification to ECHA (probability of success unknown).
- Important to agree on pre-registration strategy at:
  - Company level
  - Consortium level
  - Inter-consortia level (to facilitate future data-sharing exercise)

2.3. Clarifications on complex materials

3) What are the two following materials under REACH?
Substances or intermediates? Preparations? Articles?
Mono-constituent? UVCB? Multi-constituent?

- Rhenium-containing scrap
- Ion-exchanger (polymer?)

To be discussed today:

Rhenium-containing scrap: e.g.: Ni alloy scrap:

- Waste?
- Preparation?
- Multi-constituent substance?
- UVCB?

Ion exchanger:

- Polymer?
- Article?



3. Update Re project/work programme



3.2. Update on Phase I

- Phase I has commenced in late July 2008, following meeting with WCA on 4th June.
  - Report due for November 2008
- Still finalising contractual terms and conditions but Re project is definitively in very good and capable hands!
- Available studies from Members following several oral and written requests:
  - Feed-back is good, taking account of the data-poor status of rhenium and rhenium compounds
  - Thank you to those having contributed with references and studies:
    - Climax Molybdenum, The Netherlands / United States
    - Johnson Matthey, United Kingdom
    - Lipmann Walton, United Kingdom
  - Sent to WCA on 4th September
- Any question on Re project?



4. Any Other Business



4.1. Pre-registration recommendations

- Available in handouts.
- To be discussed: comments, suggestions and corrections welcome!
- Objective today: include learned lessons in order to provide common guidance and ensure structured SIEF formation!

4.2. Pre-registration/SIEF experiences



- Please feel free to share your comments through “confidential form” circulated at the beginning of the meeting.
- We are definitively interested in learning from your experience so far to finalise the leaflet and make sure Pre-registration is as structured as it can be.

4.3. Known Re and Re compounds pre-registrants



- Proposed way forward:
  - Prepare template letter to be sent by Members of Consortium to pre-registrants?
  - Ongoing update of SIEF activities to Secretariat:
    - Who are in the SIEF: manufacturers, importers, OR and who else?
    - Is there a SIEF Formation Facilitator? Is there any event being organised by him/her?
  - Any other suggestion?



5. Conclusion and next meetings



Reminders (all these are available on request):

- Template Agreement for Only Representative appointment is available to PM & Re Consortium members on request to Secretariat.
- EM is seeking clarification on the role of Importer and the need or not to own the material you import/register.
- Legal entity definition according to UK REACH enforcing authorities is available on request to Secretariat (Courtesy of LBMA).



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Pd

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Thank you and have a safe journey back home!