



Precious Metals & Rhenium Consortium Management Committee

24 FEBRUARY 2015



Welcome and introduction

Competition law and confidentiality



DO	DON'T
<p>Application of competition law</p> <p>Art. 101 and 102 TFEU may be applicable to the conclusion of any preliminary agreement and activities of any preliminary phase.</p>	<p>Don't assume that conflicts with competition law are excluded simply by the fact that the Agreement complies with the provisions of the REACH Regulation.</p>
<p>Consultation in Matters of Competition Law</p> <p>Consult an in-house legal expert or the compliance officer of your company or an external lawyer whenever there are uncertainties respecting compliance with competition law. Stop all meetings/discussions which are not in compliance with these Compliance Guidelines until a legal expert has been involved.</p>	<p>Don't assume that these Compliance Guidelines deal with all competition law issues exhaustively. Basically, compliance with Art. 101 and 102 TFEU can be determined only on the basis of market impact in each individual case. These Compliance Guidelines may therefore be regarded only as a means of providing general conduct recommendations.</p>
<p>Activities in any preliminary phase and at any other stage of operation of the Consortium</p> <p>Restrict cooperation within the scope of the preliminary phase to the initially defined goals and purposes of the cooperation.</p>	<p>Pursuant to Art. 101 and 102 TFEU, activities which have the object of the effect of preventing, restricting and/or distorting competition are prohibited within the scope of this Agreement, including:</p> <ul style="list-style-type: none">- Coming to agreement, including arrangements or collusions, about prices, markets and customers (see Art. 101 paragraph 1 a)-e) TFEU);- Joint boycotting of other companies;- The unjustified unequal treatment of trade partners;- The abusive exploitation of a dominating market position.
<p>Exchange of Confidential Information</p> <p>Involve a Trustee for the exchange of Confidential Information.</p>	<p>The exchange of Information concerning market behaviour and having the object of the effect of preventing, restricting and/or distorting competition is inadmissible; in particular, this relates to:</p> <ul style="list-style-type: none">- Production capacities;- Productions or sales volumes;- Import volumes;- Market shares;- Price policy;- Distribution and marketing terms;- Marketing strategies;- Information regarding the relationship with suppliers.
<p>Documentation on Cooperation</p> <p>Keep minutes of all meetings which detail the subject of the meeting. In case of uncertainty, have the contents of the minutes reviewed by an external legal expert prior to sending them to all parties of the Agreement. Stop all meetings which are not in compliance with these Guidelines until a legal expert has been involved.</p>	

Tour de table and apologies



List of Participants

- Francisco Boo (Metalor, Switzerland)
- Roland Brasch (Heraeus, Germany)
- Guy Ethier (Umicore, Belgium)
- Rob Garrett (Ames, United Kingdom)
- Jörn Mühlenfeld (Aurubis, Germany)
- Juha Parkkinen (Noriisk Nickel, Finland)
- Mark Raffray (Johnson Matthey, United Kingdom)
- Heinz-Günter Schenzel, C. Hafner (Germany)

Secretariat

- Katrien Arijs (EPMF, Belgium): for agenda points 6, 7 & 8
- France Capon (EPMF, Belgium)
- Renaud Nicolay (EPMF, Belgium): for agenda points 6, 7 & 8
- Audrey Rondepierre (EPMF, Belgium)
- Klaus Rothenbacher (EPMF, Belgium): for agenda points 6, 7 & 8

Apologies

Michael Herman (Ames, United States)



Approval of the agenda

- Welcome and introduction
- PMC team
- Finance :
 - Review of accounts 2014 to be audited
 - Budget2015
 - LoA: costs sharing formula
- Scope of PMC
- PGMs: Downstream Users exposure assessment: pilot case
- Ag
- Authorisation
- A.O.B., next conf call and closing remarks



Minutes and actions (14/11/06)

	What?	Who?	When?
1.	Draft refined worst case cost estimates for Evaluation of Silver related costs, for presentation at the General Assembly meeting	K. Rothenbacher	
2.	Foresee sufficient time to debate this point on the agenda of the General Assembly	A Rondepierre	
3.	Literature search: - Discuss with Ag WG how to make literature review process more efficient - Review situation and make recommendation on how to apportion costs for literature search	K. Rothenbacher	
4.	EBRC and ARCHE will be questioned how their costs were built for completing Phase 4 of the Au and PM CN - projects before any contract is signed	R. Nicolay	
5.	Au WG to approve the 2015 budget	R. Nicolay	
6.	WCA to review and confirm the read-across strategy for the PM CN - project following the 8 October 2014 WG meeting decision to refute the read-across for mammalian testing on Annex VII.	R. Nicolay	
7.	WCA to confirm if Annex VIII testing should be conducted on potassium dicyanoargentate.	R. Nicolay	
8.	WCA to complete arguments to support any non-testing approach for the PM CN - project.	R. Nicolay	
9.	Review Refinables 2015 costs, reduce to the essential tasks and get approval from the WG	K. Arijs	
10.	Draft slides for the General Assembly and other background documents finalised on 19th Nov will be sent for approval to the Mgt Cttee shortly after the preparatory meeting. The Mgt Cttee is requested to give its approval within one or two days before it is sent to the whole General Assembly	Mgt Cttee	



PMC Team



R. Nicolay replacement

Four options:

1. No replacement: RN dossiers will be split amongst the existing staff

2. Appointment of a consultant to fill in the gap

3. Recruitment of a new staff member

4. Appointment of a consultant in 2015 to fill in the gaps and recruit in 2016 a new staff member

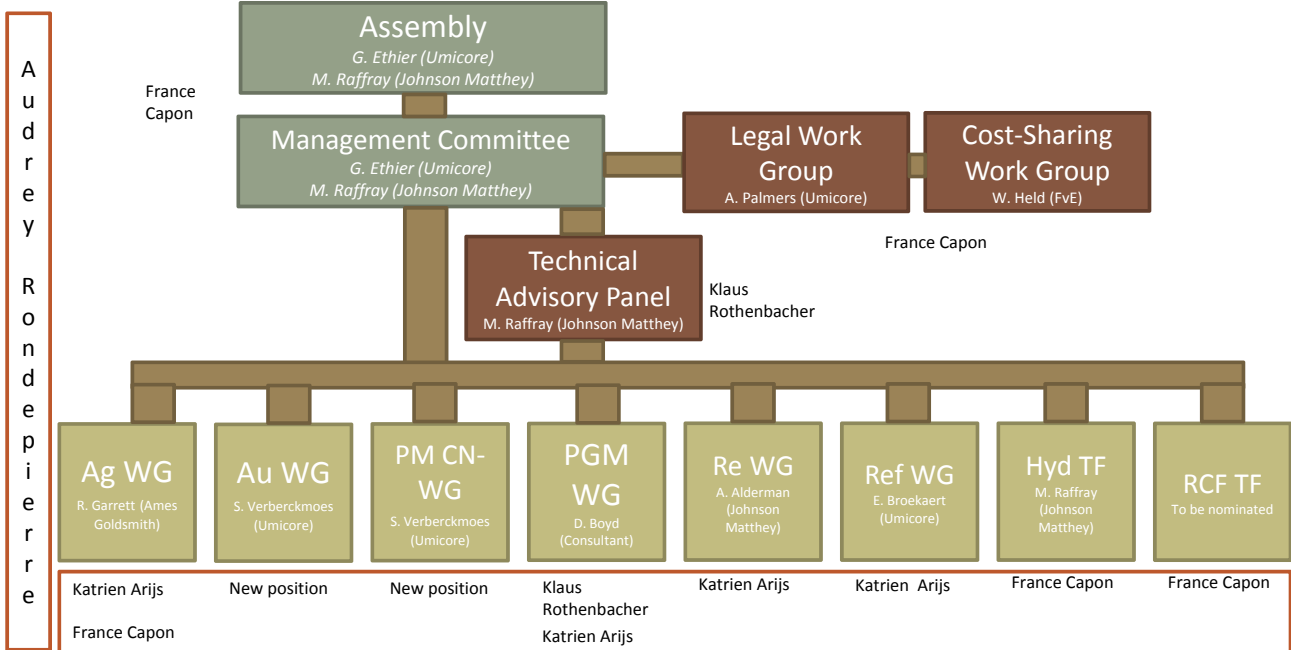


R. Nicolay replacement

FOR APPROVAL: Secretariat recommendation to have a consultant available to take over from RN in 2015 and start a recruitment procedure as soon as possible in 2015 to appoint a new staff member in 2016.



Staff reorganisation





- Management and Representation of PMC and EPMF
- PMC's Authorisation & Evaluation expert (including Hydrazine, and RCF projects)
- Participation/Representation in REACH & CLP fora

Secretary-General
(France Capon)

Office Manager
(A. Rondepierre)

- Office permanence PMC and EPMF, management and support
- Administration and accountancy
- SIEF communication, and LoA management expert

New position: Scientific Project Manager

Scientific Manager
(K. Rothenbacher)

Project Facilitator
(K. Arijs)

- Project Manager / Secretariat to Au and PM CN WG
- Overall cross-project progress tracking
- Coordination of exposure programmes across WG to ensure consistency
- In charge of Literature review programmes
- Participation / Representation in scientific and technical fora

- Project Manager / Secretariat to PGM WG
- PMC's Scientific expert (including hazard and exposure assessment)
- Participation / Representation in scientific and technical fora

- Project Manager/Secretariat to Refinables WG, Re WG, and Ag WG
- Shadow secretariat PGM WG (e.g: data collection)
- Facilitation of *ad hoc* tasks (e.g: ID card) across PMC projects
- Participation / Representation in scientific and technical fora

Review of PMC team 2015 objectives



Evaluation of performance for France Capon - Version 30 JAN 2015					
PERIOD: 01/01/2015 - 31/12/2015					
Objective Description	Target	End-period: Reviewer's comment	Completion	Share	
1. HR: reorganisation of PMC/EPMF team	> Propose the best solution for Project Manager replacement Q1 2015; > Ensure acceptable workload for staff and consultants by monitoring closely progresses in 2015 workplan and reporting status on a quarterly basis to PMC Mngt Cttee. > Develop and enhance capacities of team members			20% EPMF 80% PMC	
2. PMC workplan 2016-2019	> Review and update 2016-2019 PMC W/P including timeline, HR and budget by June 2015 > Develop a consolidated version of PMC W/P for 2016-2019 by June 2015 including a specific analysis covering a sustainable resource prediction, with a proposed approach to be validated in December 2015 > Ensure that timeline and budget are respected in 2015			100% PMC	
3. Supervise and actively contribute to organisation and holding of EPMF and PMC Board, Mgmt Cttee, and Assembly meetings and social events and appointments.	> Review and approve the invitations and provisional programmes two months before the meeting; > Finalise agendas at least one week before a Board or Mgmt Cttee meeting, and at least 6 weeks before an Assembly meeting; > Finalise support documents (especially budget proposals) at least one week before a Board or Mgmt Cttee meeting, and at least one month before an Assembly meeting, respectively; > Finalise power point slides at least two days before a Board or Mgmt Cttee meeting, and at least one week before an Assembly meeting, respectively.		SELECT: Below expectations Reached expectations Exceeded expectations	20% EPMF 80% PMC	
4. Become REACH Evaluation and Authorisation expert and first contact for Evaluation projects with Member States, EU institutions, Eurométaux and other associations.	> Participate in all relevant Evaluation/Authorisation-related events; > Keep a record of the best practice re Evaluation/Authorisation for PMC; > Chair the Eurométaux Authorisation platform to gain and share experience of benefit to the PM and metals sector and participate actively to the Eurométaux Evaluation platform > Lead Evaluation of Ag project as an interface between RIVM and PMC as well as project coordinator for all administrative/management steps > Lead Authorisation preparatory efforts: shadow RMO, coordination with key players...		SELECT: Below expectations Reached expectations Exceeded expectations	100% PMC	
Increase the visibility of the EPMF towards EU regulators	Occupational exposure work on hydrazine to be completed before Summer 2015 > Respond to EU's public consultations on topics of relevance to the immediate agenda of EPMF, e.g.: Responsible sourcing, TTIP, Safe use of Precious Metals; > Participate in all relevant EUROMETAUX meetings, if need be, f.e. General Assembly, Trade Committee, EHS, work-shops; prepare statements in collaboration with President, Vice-President or EPMF-Board. > Organise at least one EPMF political breakfast per year, as part of the general Secretariat for Platform		SELECT: Below expectations Reached expectations Exceeded expectations	100% EPMF	
Implement Secretariat Work Procedures	Respect and follow/implement the PMC/EPMF Secretariat Règlement de Travail		SELECT: Below expectations Reached expectations Exceeded expectations	80% PMC/20% EPMF	



Review of PMC team 2015 objectives

Evaluation of performance for AUDREY BONDEPIERRE - Version 26 Jan 2015					
PERIOD: 01/01/2015 - 31/12/2015					
#	Column	Objective Description	Target	End-period: Reviewer's comment	Completion
1	EPMF PMC	Organise Assembly meetings and social events and appointments, which includes: > Preparing and circulating invitations and provisional programmes two months before the meeting; > Setting-up the participants' lists and ensuring the minimum quorum will be reached at the latest one week before the meeting; > Preparing template agendas at least one month and a half before the meeting; > Preparing power point slides templates and support documents as per instructions of the meeting's secretariat at least two weeks before the meeting; > Organising the appropriate logistics (meeting rooms, lunches, sound system, polyspan, beamer, travel and accommodation of staff) in a cost-efficient manner.	> Meet all deadlines by planning ahead and reminding relevant secretariat/participants of upcoming deadlines. > Work with (Vice-)President of EPMF and (Co-)Chairman of PMC not to exceed a total cost 200 K/participant (excluding social events).		SELECT: Below expectations Reached expectations Exceeded expectations
2	PMC	Organise Work Group, Task Force, and Committee meetings and conference calls, which includes: > Assisting the meeting secretariat with the setting of the most convenient date, at the latest one month before the event for meetings, and one week before the event for conference calls; > Setting-up the participants' lists and organising the relevant logistics (meeting room, lunches, polyspan, beamer, etc.) in a cost-efficient manner; > Preparing template agendas at least one month before the meeting, and two weeks before the conference call; > Preparing power point slides templates and support documents as per instructions of the meeting's secretariat at least two weeks before the meeting, or one week before the conference call.	> Meet all deadlines by planning ahead and reminding relevant secretariat/participants of upcoming deadlines. > Work with (Co-)Chairman of the relevant WG, TF or Cttee not to exceed a total cost 50 K/participant for meetings organised in the Metals Conference Centre and not to exceed a total of 150 K/participant for meetings taking place in order locations than the MCC (when the MCC is full, and excepting the gold room).		SELECT: Below expectations Reached expectations Exceeded expectations
3	EPMF PMC	Keep accountancy up to date and complete by ensuring all EPMF/PMC invoices, expense notes, credit cards statements, bank statements, are correctly encoded in Winbooks on a monthly basis.	> Achieve payment in time > Review of correct encoding done by accountant and circulation of monthly extracts for a given month at the latest by the 20th of the following month. > Send P&L tracker quarterly > Prepare draft EPMF/PMC 2016 budget for generic costs		Below expectations Reached expectations Exceeded expectations
4	PMC	All Lead Registrant declarations of commitment are completed and signed	> Ensure that all confirmed substances have a Lead Registrant > Ensure that all Lead Registrant declarations are sent back to the secretariat by end of Q4		SELECT: Below expectations Reached expectations Exceeded expectations
5	PMC	Filing, archiving of test reports	> Ensure PMC test reports are filed at the latest three weeks after receipt, both on H drive and Sharepoint, and the associated table/index is updated in parallel.		SELECT: Below expectations Reached expectations Exceeded expectations
6	EPMF	Updating the "Règlement de Travail" (work regulations)	> Ensure that the Règlement de travail is up to date following the recent changes > Once it has been updated and validated by the social secretariat, follow the formal procedure of communication of this updated Règlement de travail with the staff (règlement de travail should be displayed in the office for 15 days before entry into force) > Ensure that each employee has received a copy of the updated Règlement de travail and has signed a receipt > Ensure that a copy of the règlement de travail is sent to the regional bureau of the "Contrôle des lois sociales" within 8 days of its entry into force		SELECT: Below expectations Reached expectations Exceeded expectations
7	EPMF	Implement Secretariat Work Procedures	Respect and follow/implement the EPMF Secretariat Règlement de Travail		SELECT: Below expectations Reached expectations Exceeded expectations



Review of PMC team 2015 objectives

Klaus Rothenbacher				
PERIOD: 01/01/2015 - 31/12/2015				
#	Objective Description	Target	End-period: Reviewer's comment	Completion
1	Complete all remaining PGM testing	> Finalise scheduled p/c tests by May 2015 > Finalise scheduled ecotox tests by Sept. 2015 > Finalise scheduled mamm. tox. tests by June 2015 (exc. Ru: to extend into 2016) > Manage study schedules to deliver results on time > Discuss progress and any pertinent issues with PGM tox expert group > Send monthly progress updates to PGM WG and TAP		SELECT: Below expectations Reached expectations Exceeded expectations
2	Become point of contact for scientific questions within the consortium	> Participate in SETAC, ETAP, and relevant Eurometaux meetings > Actively contribute in EM WGs, become champion for specific issue > Participate in PMC internal meetings and provide advice as appropriate > Continue professional development: follow at least 2 tox. courses in 2015		SELECT: Below expectations Reached expectations Exceeded expectations
3	Project management	> Project mgt of ongoing PGM studies > Communicate high level Gantt charts to MC/ WG quarterly > Track budget, invoicing, for respective projects		SELECT: Below expectations Reached expectations Exceeded expectations
4	Silver dossier transition	> Ensure smooth transition of Evaluation, biocides, lit updates, to KA, FC by May 2015 > Remain resource for consultation for the rest of 2015		SELECT: Below expectations Reached expectations Exceeded expectations
5	Work-life balance	> Participate in cardiac rehab. programme Q1/2 2015 > Organise tasks so that sufficient time is available for objectives 1-4 and related targets		SELECT: Below expectations Reached expectations Exceeded expectations

Review of PMC team 2015 objectives



Performance Evaluation - RENAUD NICOLAY - Period: 01/01/2015 - 30/06/2015

OBJECTIVES			
#	Objective Description	Target	End-period: Reviewer's comment
1	Knowledge transfer: Ensure the efficient knowledge transfer of the Au and PM CN dossiers before leaving EPMF.	> By beginning of April 2015, Draft general overview of the Au and CN dossiers with key documents and their location, key contacts, and an updated work plan and open actions	SELECT: Below expectations Reached expectations Exceeded expectations
2	Early Registration of Au/CN - Analyse if phases IV and V of the Au and PM CN- projects can be squeezed and the registration dossiers submitted earlier than June 2016 in order to free workload for other projects. All substances of these dossiers are in scope except for Potassium Dicyanoargentate.	> By March 2015, draft a planning proposal to shorter Au-CN projects with the aim of submission of Au-CN dossiers before mid-2016, > By June 2015, progress on Phase IV (derivation PNEC, DNELs) and exposure data gathering.	SELECT: Below expectations Reached expectations Exceeded expectations
3	Preparation of KAg(CN)2 2016 testing programme to ensure that testing program can be initiated on time.	> By March 2015, analyse offers from CROs > By April 2015, negotiate conditions for updating quotations by 2016 > By June 2015, contract CRO(s) including review and approval of testing protocols and confirmation of ITS and time schedule.	SELECT: Below expectations Reached expectations Exceeded expectations
4	Knowledge transfer: Ensure the efficient knowledge transfer of the Hydrazine (Authorisation) dossiers	> By end of February 2015, draft general overview of the Hydrazine dossier with key documents and their location, key contacts, and an updated work plan and open actions > By beginning of April 2015, draft general overview of the remaining Authorisation dossiers with key documents and their location, key contacts, and an updated work plan and open actions	SELECT: Below expectations Reached expectations Exceeded expectations

PMC - MANAGEMENT COMMITTEE MEETING 24/02/2015

15

Review of PMC team 2015 objectives



Performance Evaluation - KATRIEN ARIJS - Period: 01/01/2015 - 31/12/2015

OBJECTIVES			
#	Objective Description	Target	End-period: Reviewer's comment
1	Refinables projects-Refinables Coordinate discussions/meetings of the Refinables WG and Sameness Expert Group, coordinate drafting of a document explaining the PM Ref WG's approach to SID, follow-up splitting and update ID cards accordingly, collect updated LE specific compositions to update ID cards	> Internal document explaining the PM Ref WG's approach to SID by June 2015 > Updated ID cards for all Refinables, with updated identifiers, descriptions and compositions by end of 2015	SELECT: Below expectations Reached expectations Exceeded expectations
2	Refinables project - Revise Refinables classifications with MeClas following SID refinement / splitting and change the formulas in the classification-related compositions into elemental compositions where possible	> Updated classifications for all Refinables to be entered in IUCLID files by WCA for submission early 2016	SELECT: Below expectations Reached expectations Exceeded expectations
3	PGM project - Draft ID cards for all PGMs and circulate to PMC members for input/review/completion	> ID cards for all PGMs by end of 2015	SELECT: Below expectations Reached expectations Exceeded expectations
4	PGM project - Circulate questionnaires drafted by WCA / EBRC and collect use data and exposure data for Ir, Rh and Ru substances	> List of uses for Ir, Rh and Ru substances in cooperation with WCA/EBRC end of 2015 > Exposure data to be used by WCA/EBRC in ES end of 2015	SELECT: Below expectations Reached expectations Exceeded expectations
5	Silver WG - Coordinate discussions/meetings related to silver dossiers	> Taking over silver dossier by June 2015 > Coordinate technical input into silver Evaluation in 2015 > Coordinate input into CLH proposal silver zinc zeolite by mid-2015 > Update silver compounds dossiers (silver halides, carbonates and sulfates) by Q1 2015	SELECT: Below expectations Reached expectations Exceeded expectations

PMC - MANAGEMENT COMMITTEE MEETING 24/02/2015

16

Review of PMC team 2015 objectives



FOR INFORMATION: 2015 objectives of the team

FOR APPROVAL: investigate on a bonus system through ARCHE for KA to secure her collaboration until 2018



Finance



2014 accounts to be audited

2014 PMC Accounts				
<i>(indicative amounts, to be confirmed in March 2015 after audit)</i>				
		2014 PMC Budget	2014 PMC expenses by 31 Dec	%
2.1	Generic costs	€ 745.140	€ 654.426	88
2.2	Ag-specific costs	€ 210.285	€ 220.615	105
2.3	Au-specific costs	€ 117.300	€ 160.433	137
2.4	PM CN- -specific costs	€ 165.300	€ 152.686	92
2.5	PGM-specific costs	€ 817.650	€ 1.313.106	161
2.6	Re-specific costs	€ 9.450	€ 7.268	77
2.7	Refinables-specific costs	€ 612.064	€ 318.800	52
2.8	Hydrazine-specific costs	€ 60.000	€ 5.543	9
TOTAL		€ 2.737.189	€ 2.832.877	103



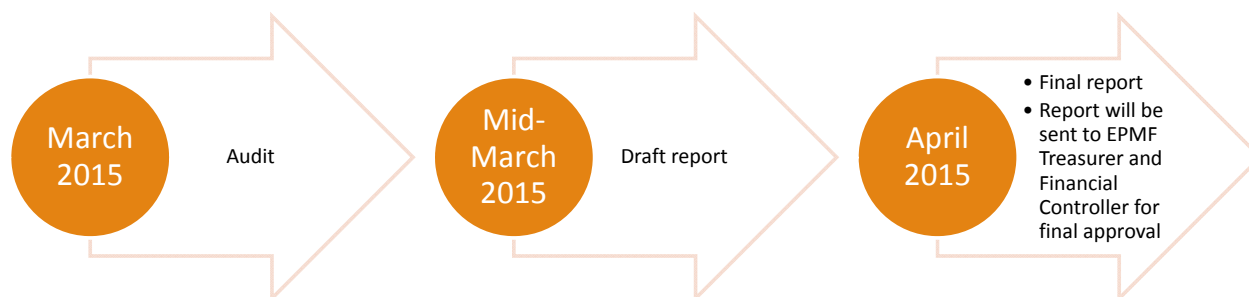
2014 accounts to be audited

- 2.1.: **underspent** in the generic costs - absence of PMC Trustee the last four months of 2014.
- 2.2.: **overspent** in Ag project - unexpected increase of the costs related to the literature review.
- 2.3.: **overspent** in Au project - additional testing costs.
- 2.4.: **underspent** in CN project - delay in some testing
- 2.5.: **overspent** in PGM project - study phasing cost calculation error in the original budget
- 2.6.: **underspent** in Re project - lower activity in the literature review
- 2.7.: **underspent** in the Refinables project – no 2014 budget - not all the reserves were needed
- 2.8.: **underspent** in hydrazine project - delay in the exposure assessment which will only start in 2015.



2014 accounts to be audited

Timeline



2015 budget

	Agreed at 3 Dec 2014 GA	Forecast on 17 Feb 2015	Difference	Comments
2.1 Generic costs:	€789.928	€842.105	€52.177	Increase mainly due to salaries & salaries related costs new S-G, bonus for all staff...
2.2 Ag-specific costs	€241.415	€255.415	€14.000	EBRC proposal on Biocides
2.3 Au-specific costs	€56.650	€56.650	€ 0	
2.4 PM CN- -specific costs	€193.900	€193.900	€ 0	
2.5 PGM-specific costs	€1.168.010	€1.168.010	€ 0	
2.6 Re-specific costs	€9.450	€9.450	€ 0	
2.7 Refinables-specific costs	€365.824	€365.824	€ 0	
2.8 Hydrazine-specific costs	€78.000	€78.000	€ 0	
TOTAL	€2.903.177	€2.969.354	€66.177	

An exceedance of 2,25% of the budget is expected.



2015 Invoicing

		2015 Budget	Reserves end 2014	Reserves to be used*	Additional amounts to be invoiced**	Amounts to be invoiced in March 2015
2.1	Generic costs	€ 789.929	€ 135.103	€ 0	€ 116.388	€ 891.317
2.2	Ag-specific costs	€ 241.415	€ -2.154	€ 0	€ 243.529	€ 484.944
2.3	Au-specific costs	€ 56.650	€ 38.694	€ 0	€ 41.570	€ 98.220
2.4	PM CN- -specific costs	€ 193.900	€ 133.028	€ 0	€ 64.543	€ 258.443
2.5	PGM-specific costs	€ 1.168.010	€ 1.086.204	€ 400.000	€ 0	€ 768.010
2.6	Re-specific costs	€ 9.450	€ 132.131	€ 9.450	€ 0	€ 0
2.7	Refinables-specific costs	€ 365.824	€ 293.264	€ 0	€ 0	€ 365.824
2.8	Hydrazine-specific costs	€ 78.000	€ 54.457	€ 0	€ 0	€ 78.000
	TOTAL	€ 2.903.178	€ 1.869.700	€ 409.450	€ 466.030	€ 2.944.757

* as agreed at GA 03/12/2014

** 2014 Budget retroactive payments + acquisition minimum reserves, as agreed at GA 03/12/2015

Total amount to be invoiced in March 2015: 2.944.757€



2015 Invoicing

		2015 Budget	Reserves end 2014	Reserves to be used	Additional amounts to be invoiced**	Amounts to be invoiced in March 2015
2.1	Generic costs	€ 789.929	€ 135.103	€ 52,177	€ 116.388	€ 891.317
2.2	Ag-specific costs	€ 241.415	€ -2.154	€ 14.000	€ 243.529	€ 484.944
2.3	Au-specific costs	€ 56.650	€ 38.694	€ 0	€ 41.570	€ 98.220
2.4	PM CN- -specific costs	€ 193.900	€ 133.028	€ 0	€ 64.543	€ 258.443
2.5	PGM-specific costs	€ 1.168.010	€ 1.086.204	€ 400.000	€ 0	€ 768.010
2.6	Re-specific costs	€ 9.450	€ 132.131	€ 9.450	€ 0	€ 0
2.7	Refinables-specific costs	€ 365.824	€ 293.264	€ 0	€ 0	€ 365.824
2.8	Hydrazine-specific costs	€ 78.000	€ 54.457	€ 0	€ 0	€ 78.000
	TOTAL	€ 2.903.178	€ 1.869.700	€ 409.450	€ 466.030	€ 2.944.757

** 2014 Budget retroactive payments + acquisition minimum reserves, as agreed at GA 03/12/2015

Total amount to be invoiced in March 2015: 2.944.757€



LoA: costs sharing formula



Background

Principles:

- **Fairness:** Same cost sharing formula to all potential registrants
 - Generic costs are shared equally among all potential registrants
 - Metal-specific costs are distributed per project or substance family as follows:
 - 50% is distributed by applying a weighted approach
 - 50% is distributed according to the total number of PMC substances (SCC intermediates are excluded) to be registered by each company in each project
- **Transparency:** predictions and calculations are based on clear, sound and objective hypotheses and assumptions
- **Non-discrimination**
- **Non profit**



Issues

Fairness: Same cost sharing formula to all potential registrants

- Generic costs are shared equally among all potential registrants:
 - Is it logic to not allocate HR to projects?
 - Is it logic that PMC members and SIEF members pay the same while the rights are different (e.g.: ownership of data, access to meetings, access to the data...)
- Intermediates: SCC versus non-SCC
 - Decision must be left to companies
 - Different prices must be offered for SCC and non-SCC for refinables
- Tonnage band: why for refinables do have have the same prices for all the tonnages?

Transparency:

- Predictions and assumptions: high risk to be far from reality! Why not invoicing on « real costs » and invoicing on annual basis since the agreement of LoA allows?
- => Could decrease the risk of being challenged by SIEF members



Proposal

- Reactivate the Cost sharing Work group
- Review the cost sharing principles within PMC and for LoA
- Present the outcome of the review and new proposal to the Assembly in June
- Communication to SIEFs

FOR APPROVAL: review of the Cost sharing principles and LoA



Issues

- Predictions and assumptions: an example for silver

2014 calculation based on assumption:

1-10	7.950 €
10-100	10.100 €
100-1000	21.700 €

2015 calculation based on real costs:

1-10	16.350 €
10-100	20.850 €
100-1000	44.750 €



Scope of PMC



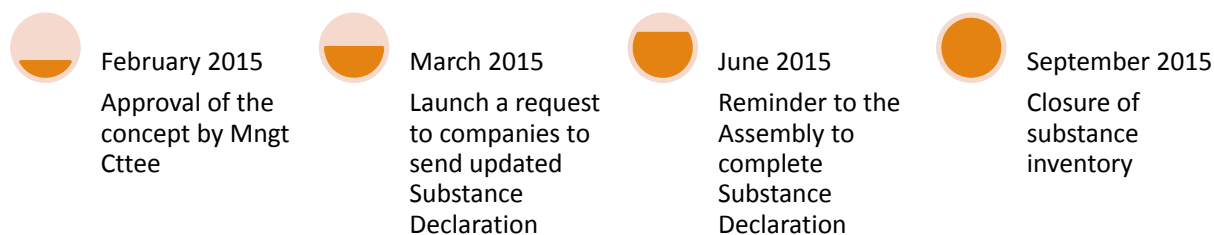
Closure of substances inventory

- Background:
 - Request for predictability in HR and financial resources
 - Next Registration deadline (2018) approaching
 - Remaining uncertainties in the scope of the PMC:
 - Substances
 - Tonnage bands
 - Nano forms
- Proposal: closure of the substances inventory in 2015



Closure of substances inventory

• Proposed timeline



• Benefits:

- Ensure better predictability in budget and resources for 2016-2019 workplan
- Secure on-time registration of good quality dossiers
- Help with balancing staff workload in the coming years

FOR APPROVAL: closure of the substances inventory by mid-2015

Uses from co-registrants outside PMC



- Background:
 - Only uses declared by Consortia members are covered
 - Only few SIEF members are getting active
 - Uncertainties regarding coverage of main uses for some substances (e.g.: PGM)
- Risks:
 - If refusing to include a use in joint CSR: DU will submit individual CSR – no control of quality nor of the data used
 - If not anticipated, predictability of budget and resources will be at risk

Uses from co-registrants outside PMC



- Proposal:
 - Conduct an uncertainty analysis regarding the coverage of the uses in the different projects to estimate where are the gaps
 - Launch a communication campaign outside PMC to reduce uncertainties and identify potential new uses upfront
 - Include a contingency in PMC workplan to cover uses which could be declared by non-PMC members
 - Develop a procedure to declare new uses

FOR APPROVAL: include uses from non-PMC members and implement Secretariat proposal in 2015



SDS template

Background:

- December 2011: proposal to draft SDS template for PMC substances BUT no formal agreement from Assembly
- 2012: SDS templates drafted for Ag
- December 2013: formal approval for draft SDS templates for Re

Issue:

- No clear rules
- No dedicated budget
- No formal approval of the inclusion of SDS into PMC workplan



SDS template

Pros and Cons: including SDS into PMC workplan

Pros	Cons
Guarantee consistency amongst SDS	SDS must be company specific
	Liability issue for the Secretariat (content, updates...)
	Additional workload and financial resources for PMC

FOR APPROVAL: the Secretariat recommends to not include SDS drafting into the PMC workplan



PGMs: pilot case DU exposure assessment



Background

PMC exposure programme:

- Focus on manufacturing process
- Only few DUs monitoring data are gathered to develop exposure scenarios
- Modelling is very often used at DUs level

Issue:

- For hazardous substances, monitoring data are critical for
 - Registration and the development of realistic GES
 - Evaluation: to avoid that substance is prioritized based on potential Regional Risk or on potential occupational risk
 - Authorisation: during the RMO process, the prioritization and in case if an Authorisation is required

Develop and implement an exposure programme at DUs level is time and resource consuming but critical



Proposal

Short term:

- Focus in 2015 on a pilot case for DU exposure assessment: to be selected on PGMs based on the following criteria:
 - Most hazardous substances
 - Mapping of uses finalized
 - DUs sectors where associations exist and are active
 - Other?
- **N.B.:** the pilot case must be conducted under the current budget!
- In 2015, develop in 2016-2018 PMC workplan an exposure programme based on priorities (classification, tonnage, critical uses...)
- In 2015, develop a strong DUs communication programme to implement the PMC exposure programme

Mid-term:

- 2016 – 2018: implement the exposure programme in a tiered approach
- Long-term: full integration of the exposure programme in the dossiers updates



Pilot case DU exposure assessment

FOR APPROVAL:

- *In 2015, launch a pilot case DU exposure assessment with PGM*
- *2016-2018: develop an exposure programme in PMC workplan*
- *Beyond 2018: fully integrate exposure programme in the dossiers updates*



Silver dossier



Silver Evaluation

Outcome of the RIVM conference call: content of the draft decision

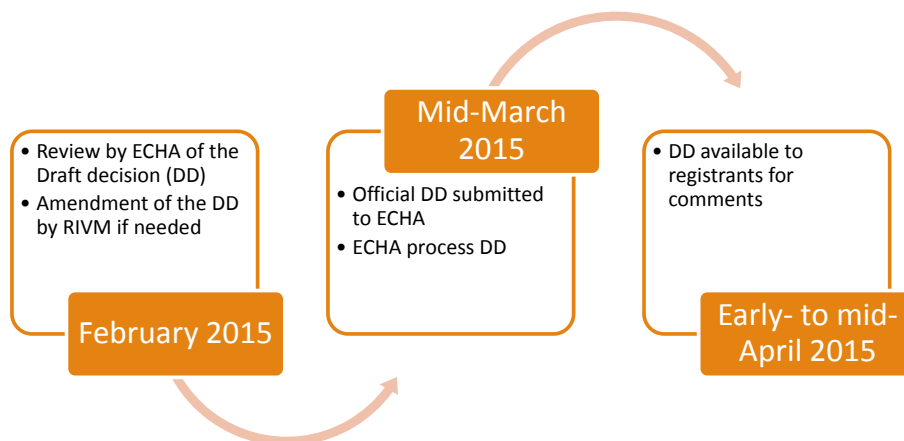
- **Wide dispersive use in Environment:** more clarity on the uses (including end uses) and the environmental exposure to nano silver.
- **The use of the Ag ion as a worst case for the environmental Risk Assessment:** additional (fate) testing will be required to demonstrate that the ion is more toxic than the particles in the environment compartment (aquatic and soil).
- **Characterisation of the nanoform registered: each company** (not only the LR!) will be invited to provide additional phys-chem data (PSD, surface areas...) to ensure a proper characterisation of the substances as placed on the market.

Overall, no changes in the position of the NL which remains consistent with previous discussions and need for clarifications



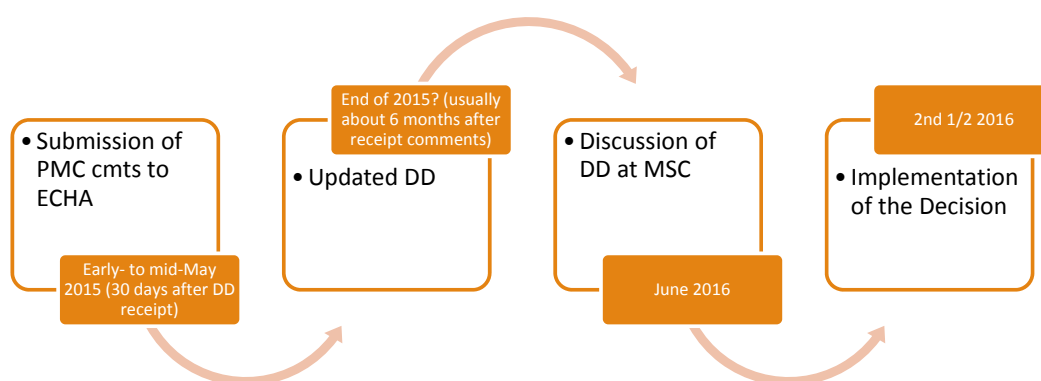
Silver Evaluation

Outcome of the RIVM conference call: timeline



Silver Evaluation

Outcome of the RIVM conference call: timeline





Silver Evaluation

Next steps:

- **By March 2015:** PMC will review the previous exchanges with RIVM to prepare the comments to the DD on the ion theory and potential additional related testing requirements
- **April 2015:** comments drafting (with the support of WCA)
- **April 2015:** based on the DD and agreed comments, development of an advocacy strategy with MSCAs.
- **May 2015:** submission of comments to ECHA
- **2nd ½ 2015:** start implementation of the decision which is not challenged (e.g.: additional data gathering on uses and characterisation work at company level)
- **2016:** finalisation of the Decision and participation to the MSC hearing (June 2016)
- **2016 and beyond:** implementation of the Final Decision



Nano-silver Literature review

Options

Options	Pros	Cons
Status quo	<ul style="list-style-type: none"> • Good quality service delivered so far by the consultants • Ensure compliance with REACH regulation for a dossier which is already under scrutiny 	High costs
Streamline current searches <ul style="list-style-type: none"> - Reduce frequency of lit. searches to 1/a - Reduced reporting (table format) - Combine searches and IUCLID input 	<ul style="list-style-type: none"> • Same quality as status quo, but at lower cost • Straightforward to implement • Could save ca. 2000 GBP = 2700 Euros by reducing searches • Combined searches/ input could reduce time per paper from 3,5h to 2,5h = ca 3000 Euros saved 	Rel. modest savings (ca. 6000 Euros = 15% of WCA costs)



Nano-silver Literature review

Options	Options	Pros	Cons
	Request new/revised offers	Could increase competition between consultants and decrease costs	Adding another layer of complexity in an already quite complicated system. Could be inefficient for the staff managing the project if another consultancy were involved.
	Mutualisation of efforts with Silver Institute	Could halve the costs	No legal obligations for the Silver Institute to conduct such a type of review on a regular basis – risk of non-compliance regarding REACH.
	Mutualisation of efforts with Silver Task Force (in charge of silver biocides registration)	<ul style="list-style-type: none"> • Could halve the costs. • The Silver Task Force replied positively to the offer. 	Legal obligations are different under biocides therefore timing and frequency could be different and inconsistent – risk of non-compliance regarding REACH.
	Internalization of a part of the tasks (conduct actual search, produce master list of studies)	Could save ca 6300 Euros (15% of WCA budget for the literature review)	Will increase the workload of existing staff without a significant financial additional value.



Nano-silver Literature review

Options	Options	Pros	Cons
	Internalization of the work (above scope + reviewing papers + IUCLID input)	<ul style="list-style-type: none"> • PMC team is under reorganisation due to recent changes in the staff – good opportunity to reshuffle the tasks • Only a part of the existing budget (78 536 Euros) needs to be kept for the outsourcing of the literature review on HH (25 000 Euros). • Gives some flexibility in the future regarding literature review work in general 	Not possible with the current staff (KR, KA)
	Collaboration with University	<ul style="list-style-type: none"> • Very efficient on a costs basis • Good quality expected 	<ul style="list-style-type: none"> • Timing issue – University timeline not always consistent with industry timeline – risk of non-compliance • Possibly different focus (research vs Reach)



Nano-silver Literature review

FOR APPROVAL: Secretariat recommendation to perform environmental literature review in-house (if RN replacement is approved) in 2016 and include Ag literature review in the work to be done by the consultant fulfilling the gaps left by RN and share the costs with the Silver Task Force.



Authorisation

(ACKNOWLEDGEMENT – SLIDES OF EUROMETAUX
AUTORISATION/RESTRICTION PLATFORM)



Latest news – 6th priority list

As a reminder:

- **Substances of relevance** for the sector:
 - *Borates, Pb compounds and CTP*
- MSC organised a **Public Consultation** “on full list” as proposed by ECHA
- Successful PC:
 - ECHA and MSC reviewing comments and developing draft opinion
- MSC will draft opinion by **April 9**
- **Issues at stake:**
 - Intermediates interpretation for several uses (**batteries**, **ceramics**, **glass**, **crystal**, **anodes**, ..)
 - Interpretation of art 58 § 2
 - Acceptance of volume / use data for priority scoring



Latest news – 6th priority list

Debating points - Requests from the metal sector:

Pb

- A more differentiating grouping approach, based on interchangeability
- Prioritization scoring factors and corrections needed
- Exemptions proposed

Borates:

- A review of the grouping categories given the present was seen as probably ineffective due to other substances not yet included as SVHC's
- A view on the proposed transitional arrangement
- Exemptions and in particular the use in catalyst and as micronutrients
- Use in nuclear applications

CTP:

- Very limited consumer use (volume) should not dominate prioritization
- Anode as an intermediate?
- Grouping with Anthracene not relevant due to lack of intersubstitutability



Latest news – 6th priority list

Debating points – ECHA reaction:

- Appreciated coordinated sectorial comments very much
- ECHA is still assessing the exemption requests
- **58 (2) exemptions: WILL NOT BE TAKEN INTO ACCOUNT FOR PRIORITISATION BUT FOR THE PROPOSED SELECTION FOR THE ANNEX XIV LIST BY COM**
- **Grouping**
 - direct proof of interchangeability is somewhat relevant
 - needs to be balanced with info from: PC, the substance properties and robustness of the evidence
- **Registration updates** will be checked for volumes reported (Borates, Pb comp.)
- **Non-existing uses:**
 - uses reported in the registration files have precedent over what some stated in PC
- **Intermediates:** ECHA's guidance will be used and all information of the PC



Latest news – 7th priority list

Indicative time plan for ECHA opinion on 7th priority list adopted

Process starts early 2015

- **Feb 2015** scoring of all new substances (incl. new Borates and Cd compounds)
- Allowing all to **update Registration file until March**
- In **MAY** the release of "*the first integrated scoring list*"
- MSC Discussion on **draft prioritisation results in June**
- Discussion on draft **7th recommendation in MSC-43, Sept 2015**
- **Public Consultation Oct-Dec 2015**
- SVHC's included in Dec.'14 and June '15 will be assessed in the 8th round
- **Adoption 7th list June 2016.**

Conclusion: process takes 1,5 y so overlapping 6 months with previous list. Aim is to maintain the one release/year.



Latest news – EM RMM strategy

Risk Management part of REACH requires:

IMPROVEMENT to be less impacting on the sector

More **EFFECTIVE/SELECTIVE** in case “risks need resolution”

REGULATORS’ RESPONSIBILITY

INDUSTRY’S RESPONSIBILITY

More **ATTENTION** and **RECOGNITION** by Industry

PREVENTION & ANTICIPATION by industry, instead of waiting for being selected/prioritised



Latest news – EM RMM strategy

Preventing is better than cure!





Latest news – EM RMM strategy

Main aim:

Contribute to maximizing the relevancy/selectiveness of REACH-RMMs and its efficiency through:

- Identification of potentials for improvement
- Prepare industry for the anticipation of RMM

Thought starter documents “assessment and proposals for measures “



Means and steps:

A mapping of experiences & learning lessons on metals RMMs under REACH

Objectives for improving the Risk Management selection system

Potential areas for improvement of the existing system

Next steps



Latest news – EM RMM strategy

Promote a Risk Management System along the following principles:

- **Transparency:** a **clear and transparent system** to identify Risk Management needs and identification of the most effective risk management options
- **Efficiency:** a **Risk based RMM** system whereby a cradle to grave approach (manufacturing, use, product life and recovery) is used to assess the risks
- **Efficacy:** RMMs to **focus on areas of potential for risks** thereby minimizing “collateral damage”
- **Balance:** **Balance RMMs under REACH with other EHS objectives** to prevent an REACH-RMM would cause a negative impact on other EU policy areas
- **Pragmatic:** A **realistic implementation** scheme recognizing time and resources needed to develop relevant RMMs (restrictions, OELs, Authorisation LAD, ...)
- **Equality:** A **non-discriminatory system** treating all similar hazards/risks equally



Latest news – EM RMM strategy

The **RMO phase:**

- Anticipate RMO data gathering and reporting (AAA)

Substitution planning:

- Anticipate substitution planning (AA)

Improving the **priority scoring:**

- Anticipate data gathering on factors influencing the PS (BB)

SEA and SIA data gathering:

- Gather SIA-SEA information for all steps (from “AA” to “BB”)

Communication and **engagement of the supply chain**

- Engage DU’s in the RMM strategy (from “A” to “B”)



Latest news – EM RMM strategy

Vision statement

On REACH and CLP

Implement a risk-based **Risk Management Policy**, along clear principles:

- Striving for *early identification and recognition of potential risks of metals’* manufacturing and
- Promote taking *anticipative Risk Management responsibility*
- Promote *better and more efficient regulatory action* where necessary



RMO on Chloroplatinates

Background:

- Chloroplatinates – respiratory sensitizer
- Respiratory sensitizer is considered as an « equivalent concern » under REACH to be identified as relevant SVHC and included into the Candidate List
- In 2014: RMO project on chloroplatinates has been approved

Proposal: conduct the RMO exercise on chloroplatinates in 2015

- Eurometaux RMO mock up is available
- Case studies are needed on other substances than CMR
- ECHA proposed to discuss and review the proposed methodology at the RiME – excellent opportunity to streamline and harmonize the RMO methodology used by authorities!

FOR APPROVAL: conduct the RMO on chloroplatinates in 2015 and use it (when anonymized) as a case study for the discussion with authorities on RMO methodology



Impact of Authorisation on recycling – EM project

Aim: Assess potential vulnerability of the metal recycling sector regarding Authorisation and determine mitigating measures

Steps:

1. Define and clarify **legal scope** of Authorisation vs. recycling
2. Identify types of **materials use** in recycling potentially vulnerable to Authorisation
3. Identify **areas of concern** for the metal recycling sector in general
4. Perform initial assessment of **potential vulnerabilities** of the major metal commodity recycling flows
5. Get a first **estimate of secondary streams** potentially affected as well as their scale
6. Develop **arguments pro limiting/preventing additional impact** of Authorisation on recycling of secondary streams
7. Identify possible **mitigation factors** to prevent/limit the impact of Authorisation on recycling of secondary streams
8. Suggest **way forward for industry** to further clarify impact and scale



Impact of Authorisation on recycling – EM project

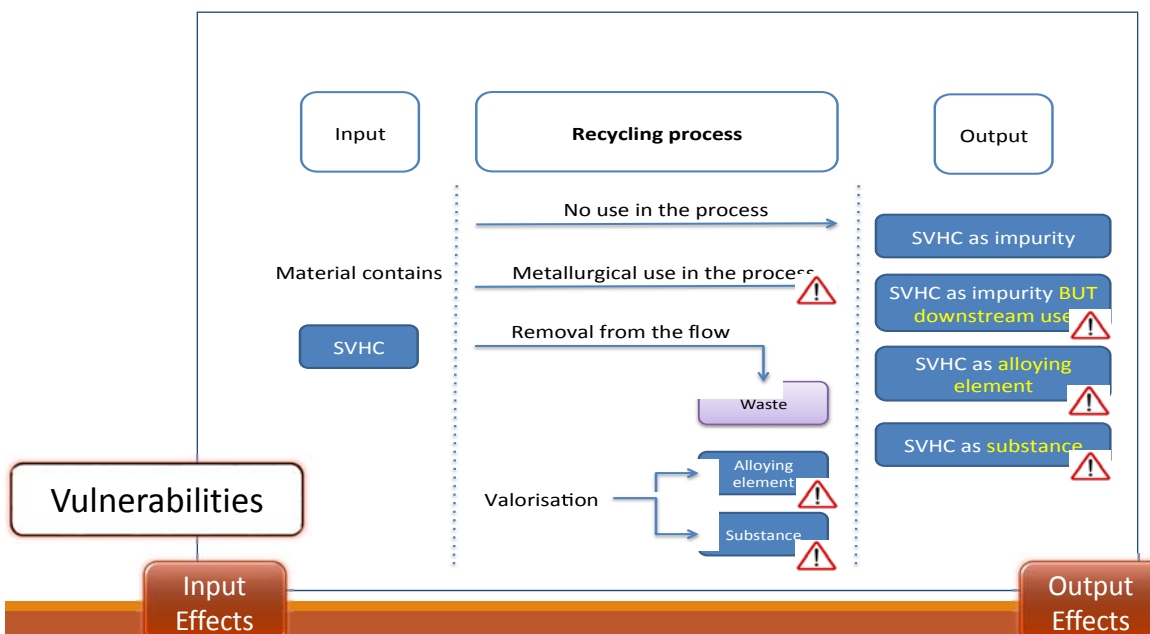
Legal scope and type of materials used

1. Define and clarify **legal scope** of Authorisation vs. recycling
 - = Clarify boundaries waste regime vs. REACH Authorisation
2. Identify “types of **materials use**” in recycling potentially vulnerable to Authorisation
 - a) Recycling of **metal compounds** (oxides, chloridic, sulphidic materials etc.) or **complex UVCB substances** (such as flue dusts, slags, etc.)
 - b) Recycling of **metallic scrap**
 - c) Waste recovery direct into an **article**



Impact of Authorisation on recycling – EM project

Areas of concerns and vulnerabilities





Impact of Authorisation on recycling – EM project

Secondary streams potentially affected

Recycling chain	Issue	Implications regarding Authorisation? (*)	EU tonnage
Lead alloy production, use and recycling value chain			
Lead scrap	Recycling of lead scrap (bearings etc.)	For arsenic, if arsenic is used as a functional alloying element For Lead metal	Thousands of tons >>Thousands of tons
...			
Copper alloys production, use and recycling value chain			
Copper alloys (brass, bronze, cupro-nickel, die castings)	Recycling of radiators e.g.	For lead, arsenic and beryllium if separated for use as metal or present in alloy as functional alloying element	Thousands of tons
...			
Tin production, use and recycling value chain			
Tin scrap	Recycling of lead-tin alloys	For lead and possibly cadmium if separated for use	Thousands of tons
...			
Nickel and cobalt-containing chemicals production, use and recycling value chain			
Rechargeable battery recycling	Recycling of Cd and Ni or Co-containing chemicals	For cadmium if separated for use For other CMR metal salts if recovered and manufactured	Thousands of tons
...			
Aluminium alloys production, use and recycling value chain			
Aluminium scrap	Recycling of Pb-containing scraps (Pb contained above 0,03%)	For lead if is used as alloying element.	5,9 Mt
...			
Precious metals production, use and recycling value chain (under review)			
...			
...			



Impact of Authorisation on recycling – EM project

Arguments to limit the impact

- Contribution to **Circular Economy**
- Reduced **energy** consumption and climate impact
- **International competition to access resources** including recyclables, is *exclusively* financially-driven
- **Composition of input materials** of primary and secondary materials can't be changed => SVHC impurities "must be eliminated" through:
 - disposal or
 - receiving valuable use
- Authorisation scheme on recycling could result in "**country shopping**" depending on "differences in implementation of Waste regulation"
- Reduction in number of recycling companies and loss of competitive **knowledge** in innovative recycling technology



Impact of Authorisation on recycling – EM project

Mitigation of the effects of Authorisation

- Identify possible **mitigation factors** to prevent/limit impact of Authorisation on recycling of secondary streams
 - Assess impact of Authorisation on recycling **from the start of the RMM process**:
 - *When*: during RMO phase in advance of screening for new potential SVHC's
 - *How*: a more holistic approach including qualitative assessment for specific concerns
 - *Aim*: define most appropriate RMM tool that considers all these aspects
- Consider **simplified Authorisation regime** for metal scraps recycling if use for recycling were to fall under Authorisation
- A scheme for “**Fast Track Authorisation**” in case of valuation of by-products in safe uses, to prevent their export and import of the articles/products



Impact of Authorisation on recycling – EM project

Next steps

1. Complete **inventory of generic and commodity stream impacts** (*March-April*)
2. Perform **Socio-Economic Impact Assessment** for **specific cases** estimating *quantitatively impact of CL and/or Annex XIV Listing* (*March-May*)
3. Further activity to identify relevant **mitigation measures** (*May-June*)
4. Communicate **Study outcome** and suggested mitigation measures:
 - to COM-ECHA (workshop) (September?)
 - to NeRSAP (concept) (June)
 - International study Groups (for pressure min of IND) (Nov?)



Impact of Authorisation on recycling – PMC contribution

Proposal

- Contribute to the inventory of generic and commodity stream impacts
 - Select a company
 - EM offers to allocate one day to review the main stream impacts on precious metals (as done for tin and other metals)
- Engage in the effort led by EM to advocate on the mitigation of impact of Authorisation on recycling
- Timing: March 2015
- Budget: no budget required BUT a volunteer amongst the companies!

FOR APPROVAL: PMC to be involved in the EM project on Authorisation and Recycling



Conclusions



Conclusions

- A.O.B.
- Actions summary
- Conclusions
- Next meeting/conf call:
 - End of April - Aim: review 2016-2019 draft workplan and prepare Assembly meeting in June 2015.