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Precious Metals Consortium

Update on main activities, current status
and preparation of next Assembly meeting

MC face-to-face meeting
Brussels, 27 September 2007

1. Following 29 June: Suggestions and questions on the PM Consortium Agreement

- Cost-sharing formula:
 - Italian suggestion received on 04 Jul and replied on 06 Jul.
- Legal reviews of the Agreement:
 - detailed opinions received from New Boliden and from KGHM, clarification questions received from several members.
 - in line with opinion of Cyril Jacquet (Legal Counsel).

2. PM Consortium signatories to date

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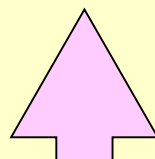
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Signed		Confirmed (awaiting signature)
1. Ames Goldsmith	04 Sep	Handy & Harman Canada
2. AMI DODUCO	05 Sep	Tanaka Kikinzoku Kogyo
3. Anglo Platinum	28 Aug	Varinor
4. Argor Heraeus	30 Aug	 Joining asap, otherwise: • Queue in substance list; • Responsible for any additional financial burden.
5. Britannia Refined Metals	12 Sep	
6. Cendres & Métaux	13 Sep	
7. C. Hafner	07 Sep	
8. Commerzbank	11 Sep	
9. CVRD Inco	10 Sep	
10. Falconbridge Europe	13 Sep	
11. Heimerle & Meule	06 Sep	
12. Johnson Matthey	12 Sep	
13. KGHM	13 Sep	
14. Lonmin	15 Sep	
15. Metalor	11 Sep	
16. New Boliden	15 Sep	
17. Norddeutsche Affinerie	31 Aug	
18. Norilsk Nickel	10 Sep	
19. PAMP	14 Sep	
20. PX Holding	14 Sep	
21. Safimet	15 Sep	
22. SEMPSA	11 Sep	
23. Umicore	11 Sep	
24. Wieland Dental + Technik	03 Sep	
25. W.C. Heraeus	03 Aug	



For discussion:

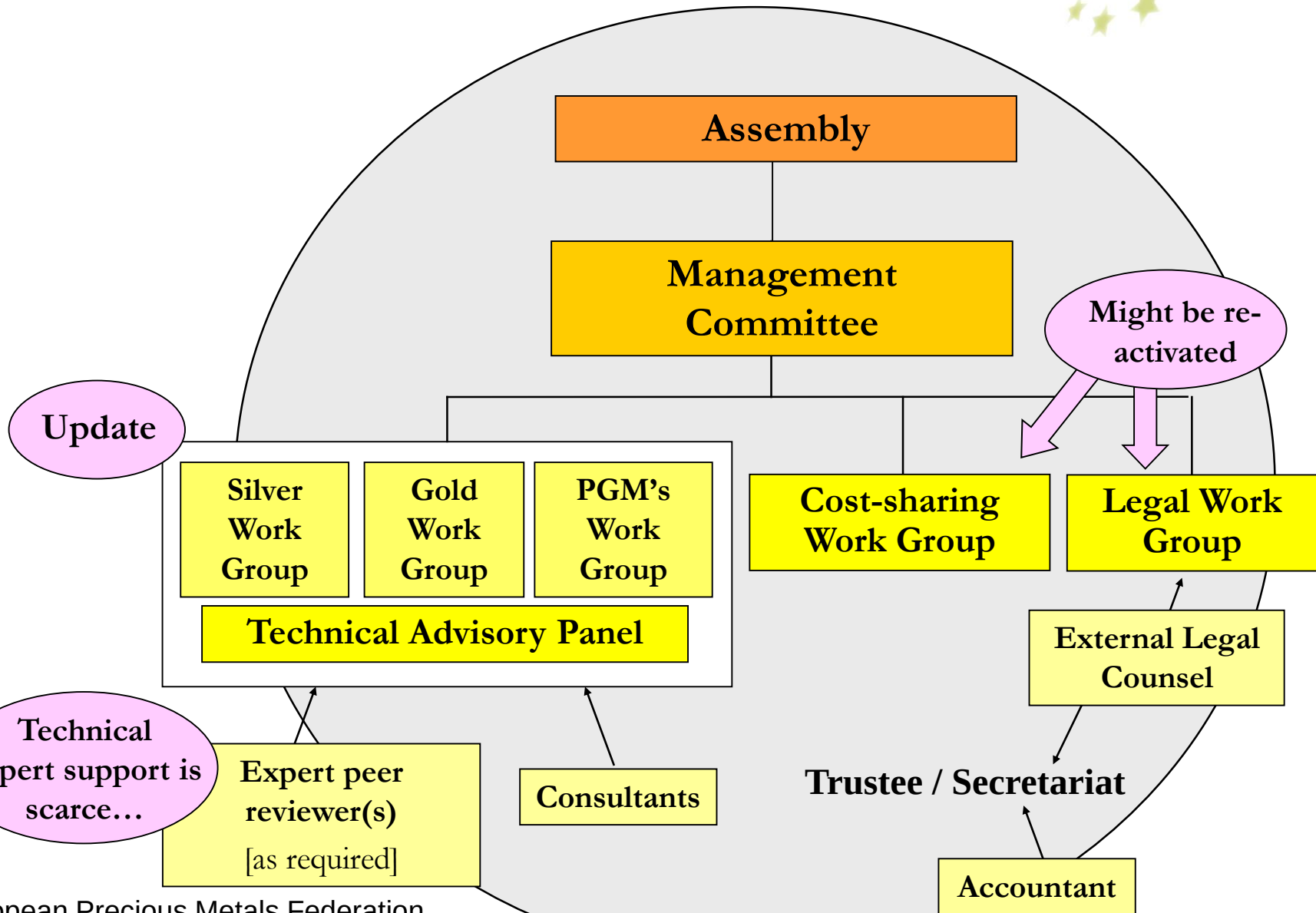
BASF Catalysts Germany

Impala

3. Trustee: ongoing actions

- Guidelines for safeguarding confidential information:
 - General protocol, can be used as checklist by data generator and data manager;
 - Part of document accessible to Trustee (and back-up) only;
 - Joint exercise with other consortia (ENiA, etc...).
- **Liability Insurance:**
 - First proposal (in French) received from Mr Chris Staes, Gerling-Konzern België N.V. and commented by Alain;
 - Need to focus on availability of guidelines + access to external legal counsel;
 - Need to envisage other Insurance companies: contacts wanted...

4. PM Consortium working structure



5. TAP + PM WG management plan



Timing	Action
September	1. WG's complete Indicative List for each PM family based on substance declarations (with TAP and Trustee support) 2. Related <i>above the line</i> and <i>below the line</i> assessments completed / agreed (may be revised based on later actions)
October	3. Technical specifications reviewed for each substance (main effort) a. data gaps / uncertainties identified (especially for Pre-registration data) and companies tasked with follow up 4. Initial substance sameness matching exercise 5. Substance profile assembly for each PM substance commenced (priority is the <i>above the line</i> items) a. Categorisations completed (M/I, intermediate, complex substance situation etc.)
November	6. Data gap filling ongoing and further refinement of substance profiles (main effort) 7. Further substance sameness assessment 8. Complex issues management (e.g. CBI follow up actions/consultant involvement)
Mid-November	9. Joint TAP and WG face-to-face meeting on the available dataset (Note: audio conferences at WG / TAP level running up to that timepoint as required; mainly coordinated by WG chairpersons) 10. Latest start point for linkage with Ag Project consultants via TAP
Mon 3 December	11. Each WG submits completed dataset for substance family for final review and in time for preparation of report back to EPMF Assembly

5.1. Technical specifications/data-sharing

- Quantity:
 - 15 companies out of 28 have contributed with data (not always technical data, sometimes safety data).
 - Info mainly for substances, not for intermediates.
- Quality:
 - Reasonable.
 - Major gap: Granulometry and spectral data.
- **AP:**
 - Second call for information needed, coupled with request for wider set of data, cf. 5.7 (**coming from Management Committee**);
 - Verify nature of confidentiality in received technical specifications.

5.2. Strict control of intermediates

- Generic spreadsheet with the following parameters:
 - Type of reaction vessel (blast furnace, rotary kiln, etc...).
 - Description of life-cycle (detail of steps).
 - Exposure (route of exposure (workplace) and exposed compartment (environment), risk reduction measures, data availability on exposure, emissions, etc...
 - Hazard.
 - Risk characterisation
- Spreadsheet was considered to be a good tool, enabling to consider all relevant parameters + those parameters which could eventually play a role in in-house discussions. Only obstacle:
 - Difficult to apply when no PNEC is available, up for discussion.
- **AP:** Follow the discussions (attend meetings) and test the spreadseets (input from companies).

5.3. Pre-registration and registration of intermediates

- Proposal for discussion: When an intermediate can be regarded as a group of intermediates X, Y, Z, ... n, it can be envisaged to (pre-)register each individual intermediate instead of the full intermediate.
- This proposal can be attractive when:
 - information is available on X, Y, Z, ... n (not necessarily the case for the full intermediate as such).
 - a full registration will be submitted anyway for X, Y and Z as individual substances, once they are recovered from the process.
 - the individual tonnage band of one or more of individual intermediates X, Y, Z, ... n does not reach the > 1000 tonnes/year limit (especially for transported isolated intermediates).
- **AP:**
 - List all complex PM refinables/recoverables in specific place holder in substance indicative list → Double interest: also necessary for grouping;
 - Follow discussions at Eurométaux to test applicability of this approach.

5.4. Exemption of specific massive PM

- Revision of Annex IV gives Industry a chance to submit proposals using specific criteria and an accepted format.
- Current criteria to include (a) substance(s) in Annex IV are:
 - “Sufficient information”: what is “sufficient”? As much as what is required in the Registration Dossier? At least specific endpoints? MS have different interpretations: still under discussion.
 - “Minimal risk” to human health and environment: even those substances for which a RA has been performed can not prove this to all stakeholders... Open interpretation allows for some flexibility.
- Some massive forms of PM are well known and pose none or a minimal risk to human health and to environment → Only PM will try this exemption.
- **AP:**
 - A rationale is being elaborated by chairpersons of TAP;
 - The intention is to submit the proposal
 - Annex IV: through German authorities.
 - Annex V: through BDI → German authorities.

Johan Arkenstijnn, REACH Alliance
Joeri Leenaers, Eurométaux

In Cc.

5.5. Global generic substance identification for ores and ore concentrates

- Euromines and IZA have launched some discussions to harmonise the identification of (hazardous) ores and ore concentrates to be used in the C&L Inventory.
- ENiA intends to prepare a pro-active approach to C&L.
- A wider support/contribution is required (First meeting: 4th October).
- **AP: Not a priority to PM:**
 - Attend meeting to seize the objective;
 - Eventually compile a list of PM ores and ore concentrates (combined with refinables / recoverables list).

5.6. Substance profiles

- In order to group all relevant information of each substance into one file, substance profiles will be prepared.
 - To be used as checklist to prepare for (Pre-)Registration.
- A template has been prepared and discussed:
 - Comments are welcome.
 - Need for intra-WG task distribution: still unclear.
- **AP:** Each WG (together with Trustee) will be responsible for completing its relevant substance profiles (specific contribution tbc) and present them at 13/12 Assembly meeting.

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5.7. Data-pooling per PM

- Creation of a data-pool per substance:
 - Agree on method for internal request (Letter from Trustee to all members referring to Article 3.2.2 (c) of PM Consortium Agreement) → Ames Goldsmith already active.
 - Launch data-sharing exercises (start with study-summaries) → already done with KODAK.
 - Contract consultants for relevant PM (data gap analysis, testing recommendation, monitoring and analysis, etc.).
 - Identify data-holders prior and during SIEF exchanges:
 - Develop an inter-consortia information exchange platform.

6. EBRC and EURAS quotations

- Received on 14/09 by Dr Maren Bode;
- Two separate quotations, possibility of only one after approval;
- Mark Raffray and Karl-Heinz analysed proposals, general conclusions:
 - Emphasising scope expansion (from original 3 Ag substances now to 12);
 - Indicating need for expansion of literature search (~12 k€) & more gap analysis (~12 k€) before defining test strategy;
 - Have provided REACH study 'menu' with costs (cost figures appear in line with expectations);
 - They also propose to compile IUCLID 5 files (predicted cost: 50000 €);
 - Basically ok, however:
 - Not much coverage of ITS / read-across at this stage;
 - Timeline quite padded -- should be possible to compress;
 - Useful confirmation of costs for dossier work;
 - If collaboration is confirmed, agree phase by phase.
 - Unlikely to be advantage to moving to another consultant (other consultants may be needed for Au and PGM's work).

6. EBRC and EURAS quotations: next steps

- ❑ Convene follow up discussion with consultants:
 - Push for reduced timeline for literature survey/gap assessment
 - Narrow the scope of the 2nd literature survey
 - Focus them on main M/I substances rather than on Intermediates
 - Re-emphasise ITS, read-across expectations
 - Technical specifications dataset, e.g. physico-chem parameters
 - Assess whether cost discount for “study package” is on offer
 - Can costs savings be realised using IUCLID4 to IUCLID5 path?
 - NB: Will cross-check validity of any costly testing proposals (using 2nd consultant)
- ❑ Then report back to PM Cs groups including MC with recommendation

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7. Pending (technical) issues

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- Special preparations:
 - Have all alloys containing PM been identified? → Need for close cooperation with other consortia.
 - Where is the borderline between alloys and articles? → Follow discussions at Eurométaux.
 - AP: Need to organise a working meeting for PM alloys and bank products.
- Non-waste refinables, by-products, etc:
 - Where is the borderline between waste and non-waste?
 - How to justify the categorisation?
 - Which consortium should cover them?
- Non-phase in substances (no EC or CAS # found): verification with company.
- Other?

8. 13/12 Assembly meeting

- **Venue:** Brussels, 13/12, Metals Conference Centre (MC might need to meet on 12/12 morning).
- **Agenda:** tbd.
- **Presentations/Deliverables/Up for discussion or approval:**
 - TAP: Silver quotation and eventual expansion of Consortium scope (Re);
 - WG's: Substance profiles;
 - LWG: Review of Consortium Agreement;
 - CWG: Review of Cost-sharing formula;
 - Legal Counsel: Training on identification of CBI;
 - MC:
 - Budget for 2007 and 2008;
 - Late members;
 - Election of new MC.
- **Invitations:**
 - Sent late October, the latest;
 - Addressed to: authorised representatives, signatories, participants of WG, Industry associations, and...?

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9. Rhenium

Compounds of interest:

- Rhenium (5)
- Perrhenic acid (1)
- Ammonium perrhenate (3)
- Ammonium tetraoxyrhenate (1)
- Hydroxotrioxorhenium IV (1)

To be included in an
additional Metal-
specific costs set

Interested parties:

- 4 members of Consortium
- ~5 non-members
(represented by a trader)

They can increase
number of members
sharing Generic costs

- Opinion of TAP and PM WG:
13 Supportive + 1 neutral.
- Opinion of MC: up for
discussion.
- Opinion of Assembly: proposal
for approval.

10. Election of new MC

According to Article 4.2.1.1. of PM Consortium Agreement:

- *“Upon decision of the Management Committee in place, the Secretariat shall invite all Members to nominate, on a voluntary basis, one candidate to sit in the Management Committee.”*

AP: Prepare letter and send it by 1 November

- *“Nominations shall be sent to the Secretariat within the 21 (twenty-one) calendar days following the invitation of the Secretariat.”*

AP: Set deadline for nominations: 1 November + 21 d = 22 November

- *“The list of candidates shall be collected by the Secretariat who shall present it to the Assembly.”*

AP: List of nominees sent by 5 December, the latest

- *“A formal election shall take place within the following 21 (twenty-one) calendar days of the closure of nominations.”*

22 November + 21 d = 13 December, hoping quorum is reached!

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Thank you!