Precious Metals Consortium

MINUTES

PMCN Work Group Meeting

Chair: Steven Verberckmoes

19 April 2016, 9:30 – 11:00

Metals Conference Centre
Rue du Duc 100, Brussels (Belgium)

1. Welcome and Introduction

1.1. Reminder on Confidentiality and Competition Law

Participants are reminded on their obligation to comply with confidentiality and competition laws. All participants to the meeting are acting as moderators in this respect.

1.2. Tour de table and apologies

The list of participants is available in Annex 1.

1.3. Objectives, previous WG meeting minutes' approval, agenda approval

The objectives of the meeting are to update Members of the Precious Metal Cyanides ("PMCN") Work Group ("the WG") on the current status of the different phases of the project, to exchange critical information on the elements necessary to timely progress in the making of the registration dossier, and to agree on the next steps for its finalisation. The slides presented during the meeting are available in Annex 2.

The draft agenda is approved as distributed and is available in Annex 1.

The minutes of the WG meeting on the October 13, 2015 are approved.

1.4. Status of actions

The status of actions that were agreed at the last Au meeting(s) are presented on slides 7 of the meeting's slide deck (Annex 2). All actions were completed.

2. Phase I

2.1. Inventory and latest classifications

Classifications of all 3 PMCN has remained unchanged. It was first thought that a STOT-RE classification was needed for AgCN and $KAu(CN)_2$ based on the results of the OECD 422 study, but closer review by O. Green (WCA) concluded that no further classification was needed. The data gap document will be adapted and is available in Annex 3. **[A31]**

3. Phase III: Testing programme

3.1. Progress testing programme $KAg(CN)_2$

Second phase of the tox testing programme with KAg(CN)2 is ongoing and currently the doses for the OECD 422 are being decided on. The proposed doses are 1, 3 and 10 mg/kg bw/day. Although 10

mg/kg bw/day is rather close to the LD50 of 21 mg/kg bw, no effects in the 14 days dose range finding was observed.

Both the Ames test and in vitro cytogenicity test are negative (draft result) and therefor the in vitro mammalian cell mutation test (OECD 476) is the next step in determining the genotoxicity and will be authorised. **[A32]**

4. Phase IV: Exposure scenario data collection

4.1. Occupational Exposure Scenarios: progress update

Currently the Occ. ES are under development by EBRC and will be finalised end of April. Safe use could be demonstrated when applying safety measure that are rather easy to be implemented and often already common practise. Only for some of the professional uses higher RCRs are predicted (factor 1-10). First will be cleared out that the identified professional uses are also uses that are actually taking place. In a worst case scenario, a reduced exposure duration has to be implemented. This type of measure is difficult to implement and should be avoided. Therefor critical PROCs with a high risk will be highlighted and directly communicated to the members. In a first phase the members are asked to give there input if this PROC is relevant for their business.

When reviewing the draft Occ. ES it is asked to check that your PROCs are covered in the document and which are of relevance to you. It is also welcomed to give your consent on PROCs when meeting your requirements. **[A33-34]**

There was a discussion regarding the dustiness of the PMCN and if this was consistently used between the waiving of the inhalative acute toxicity and the ES. PMCN have a high dustiness and therefore exposure through the inhalative route is high. Though the waiving of the acute toxicity inhalation is based on the low respiratory fraction of the PMCNs.

5. Phase V: Dossier finalisation

AgCN and $KAu(CN)_2$ are still on schedule for registration in Q3 2016. Dossier review will normally start in the 2nd half of May, after commenting on the draft Occ ES. Because of the change of IUCLID version end of June, these dossiers will have to be submitted with IUCLID 6.

Currently there are no delays in the testing programme of $KAg(CN)_2$ and submission of the dossier is foreseen for Q3 2017.

6. List of actions

Table 1. Actions agreed on at the PMCN WG meeting of 19 April '16

[A]	WHAT	WHO	WHEN
31	Updated data gap matrix will be distributed as annex of the minutes	EPMF	May '16
32	Authorize the in vitro mammalian cell mutation test (OECD 476)	EPMF	Apr '16
33	The Occ ES draft will be sent around, highlighting the most critical PROCs.	EBRC/EPMF	May '16
34	It is suggested that each member checks that all their PROCs are covered in the draft Occ ES document and which of relevance to you. Also give your consent on PROCs that meets your requirements.	WG	May '16

7. List of Annexes

1. Approved Agenda and List of participants
2. Slides presented during the meeting
3. PMCN Data gap matrix