



Refinables Work Group Meeting –minutes

AP refer to Action Points listed at the end of this document.

1 Welcome and Introduction

1.1 Reminder on Confidentiality and Competition Law

Participants were reminded on their obligation to comply with Confidentiality and Competition Law.

1.2 Tour de table and apologies

The list of participants is available in Annex 1.

1.3 Approval of the agenda

The agenda is available in Annex 1. No remarks / additions; agenda approved.

1.4 Approval of the minutes of the last meeting (25 Mar 2015) including status of action points

The minutes of the last meeting were approved. A table with the status of the action points from the last meeting is available on slide 6 in Annex 2. Due to urgent actions required for the Ag project, several actions on substance identity / structural representation of the Refinables are delayed (**AP1-7**).

2 Substance identity (SID) of PM Refinables

2.1 Further information from EC/ECHA

- On 27-28 April, the EC held a [workshop on SID of UVCBs and other complex substances under REACH](#) (attended by Katrien Arijs & Klaus Rothenbacher). Key messages and outcome are summarised on slides 8-9 in Annex 2.
- The main aim of the EC workshop is to develop sector-specific factsheets providing key information and best practices in identification of complex substances in selected industry sectors. Therefore, Eurométaux provided DG GROW and ECHA with the SID section of the Eurométaux inorganic UVCB Guidance (cf. Annex 3) to avoid that information not fitting metal specificities is delivered as outcome of the project and used further for REACH 2018 registrations/updates. ECHA provided some informal feedback on the Guidance (cf. slides 11-12 in Annex 2). Further comments:
 - **Manufacturing process:** While ECHA commented that changes in feedstock (e.g. from primary to secondary feeds) would require changes to the process infrastructure, it is common practice in the PM sector to process primary and secondary feeds together in the same process. (**AP8**)
 - **Composition:** ECHA requests to report speciation and not elemental content. Members agree that we need to stick to elemental measurements, which is consistent with other consortia and the Eurométaux guidance. It is suggested to take a pragmatic view and base the speciation on expert judgement where speciation analysis is missing, and challenge ECHA on XRD versus expert judgement. The main issue with speciation analysis is the selection of representative sample(s).
 - **80% rule:** the possibility to register some UVCBs (where a constituent is above 80%) as mono-constituent substances was discussed (e.g. Doré). What is the consequence? It means that the dossier can be part of the silver dossier with new composition and specific classification linked to impurities. (**AP9**)
 - **Structural representation:** no change in our approach.
 - Heraeus stated that they took a statistical approach to analyse different PM sludges. (**AP10**)



2.2 Structural representation of PM Refinables

In line with the newly proposed ECHA methodology, the PMC Secretariat has made an effort to identify structural parameters for the PM slags and the PM Refinables WG agreed previously that we continue the structural representation exercise with the other Refinables on elemental basis. (AP2-7)

3 Classification update

Once SID is finalised, updated compositions will be entered into MeClas and updated classifications will be derived. Samples will be grouped per classification and composition ranges will be derived per classification. (AP11)

4 Update on RA related issues

4.1 Status of environmental exposure assessment of PM Refinables

WCA is working on an update of the environmental exposure assessment for the Refinables, based on the additional 'driving constituents' added last year (Ag, As, Cd, Cu, Ni, Pb and Zn were considered in 2014 registration upgrades, but Se, Te, Co, Sn and the PGMs (Pd, Pt, Rh & Ru) were added based on criteria for selection of driving constituents).

Companies are reminded to send the information on emission data to WCA ASAP (AP12). Some companies stated that they will have additional data Q1-Q2 2016.

We should somehow justify why there are not more data, e.g. for PGMs, companies will prevent their presence in wastewater as much as possible because of their value.

4.2 Combined toxicity

PMC is following the discussions at Eurometaux level to ensure that a similar approach will be followed. Information on combined toxicity of metals: there are some modelling tools available.

5 Workplan and budget

- The 2015 financial status for the Refinables project is presented on slide 21 in Annex 2. Because the dossier updates will be done in 2016 instead of 2015, several amounts will be carried over to 2016. No comments.
- The draft 2016 PM Refinables workplan / budget is presented on slides 22-23 in Annex 2. It was noted that the costs for the additional phys-chem / T/D / validation testing (288.000 €) were invoiced in 2015 / already available in the reserves and will thus not be invoiced to members in 2016, but are budgeted again in 2016, hence the difference between the columns 'budget to be spent' and 'budget to be invoiced'. **The WG supported the proposed budget.** Upon questions from the WG, it was noted that the migration from IUCLID 5 to IUCLID 6 and the costs for MeClas are included in the budget.

6 AOB, next meetings/calls and closing remarks

The WG was informed about the ongoing dossier Compliance Check on "Slimes and sludges from the steel sector"; cf. slide 25 in Annex 2. The PMC Secretariat will follow up this issue.

The next PM Refinables WG meetings will be held 21 April 2016 and 6 October 2016 at the Metals Conference Centre in Brussels.

Annexes



1. Agenda & list of participants
2. Slides presented at the meeting
3. SID section of the Eurométaux inorganic UVCB Guidance

Actions

Table 1. Actions agreed at the 15 October PM Refinables Work Group meeting in Brussels

	What?	Who?	When?
Substance identity (SID)			
1.	Check if Doré slag number 7 is a Cu slag	PMC Sec with registrant	Q1-Q2 2016
2.	Send updated composition information PM Refinables to PMC Sec	Ref WG	Q1-Q2 2016
3.	Identify parameters allowing a structural representation PM Refinables	PMC Sec	Q2 2016
4.	Check which companies will need to register Fe bullion PGM rich and Cu bullion PGM rich	PMC Sec	Q2 2016
5.	Update the PM Refinables decision tree / process definitions document following the outcome of the structural representation exercise	PMC Sec	Q3 2016
6.	Draft internal document Refinables SID approach	PMC Sec	Q3 2016
7.	Organise PM Ref WG call to review/finalise the internal document on the Refinables SID approach	PMC Sec	Q3 2016
8.	Clarify during future dossier updates that it is common practice in the PM sector to process primary and secondary feeds together	PMC Sec	Q4 2016
9.	Check possibility to register Doré as mono-constituent substance	PMC Sec	Q1-Q2 2016
10.	Check statistical approach Heraeus to analyse PM sludges	PMC Sec	Q1-Q2 2016
Classification update			
11.	Derive updated classifications based on updated SID	PMC Sec	Q3-Q4 2016
Environmental exposure assessment			
12.	Return environmental exposure questionnaire with <u>all</u> available emissions data on the driving constituents present in the PM Refinables at their site	PM Ref WG	ASAP
13.	Compilation of emission data from questionnaires for all driving constituents to update the environmental risk assessment	WCA	Q2-Q3 2016
14.	Follow up access to exposure modelling parameter values and sign data-sharing agreements for all driving constituents	PMC Sec	Q2-Q3 2016