MINUTES

1. Welcome & Introduction

1.1. **Reminder on Confidentiality and Competition Law.** Participants were reminded on their obligation to comply with confidentiality and Competition Law rules.

1.2. **Approval of the agenda.** The agenda is available in Annex 1. No remarks/additions; agenda approved.

2. Substance identity (SID) of PM Refinables

2.1. Information from ECHA

- ECHA has not provided feedback on the dossier upgrades so far.
- As already indicated by e-mail, **ECHA requested a call with Eurométaux (EM) on 4 April to discuss substance identity (SID)** in more detail:
  - Participants from EM side were Violaine Verougstraete (EM), Federica Iaccino (EM), Caroline Braibant (PMC), Katia Lacasse (ECI) and Aggie Kotze (ILA).
  - ECHA specifically requested to discuss 4 PM examples: matte, slimes & sludges, residues from cementation and reduction, and flue dust.
  - ECHA was satisfied with the explanations provided by Caroline on variability for matte, residues, and flue dust.
  - For slimes and sludges ECHA spontaneously asked why we had grouped slimes from electrolysis processes with sludges from hydro-metallurgical processes. ECHA stated electrolysis is a separate process justifying separate UVCB registrations. Caroline explained that in the BRef these are described as hydro-metallurgical processes overall and that the existing EINECS entry groups slimes and sludges.
  - ECHA insisted that the variability of each Refinable, and possible approaches to decreasing the variability by splitting would need to be described in detail in each CSR. This was done by the PMC secretariat and checked by the Lead Registrants.
  - The aim is to now **further refine SID using the SID decision tree** in order to prepare for further questions from/discussion with ECHA.
- ECHA has launched a **new service for registrants to change the EC number in their registration** if the substance has been incorrectly identified (cf. Annex 3 and slides 7-9 in Annex 2):
  - The PMC secretariat learned about this new service through the ECHA newsletter, it is thus not entirely clear if this service is related to / a result of the discussions EM had with ECHA on SID / possible splitting of inorganic UVCBs.
  - The request to change the EC number has to be made through the ECHA helpdesk. For a joint registration, a joint submission plan has to be submitted.
  - The service fee is currently not fixed: it will depend on the anticipated workload but a minimum of 445 € per registrant requiring correction will be charged. ECHA charges for the administrative work to change the identifier and to check the scientific validity. Some WG members consider it unfair that for a joint registration, one joint submission plan has to be submitted/checked by ECHA but the fee is charged per member of the joint registration. Furthermore, it is not entirely clear how a change in tonnage band resulting from splitting will affect the total fee to be paid.
  - The PM Ref WG agreed previously on 2 sub-groups for the PM slags. Since ECHA encourages companies to use the service even before a compliance check is done, the WG agrees to start preparing a joint submission plan for the PM slags but wait with its submission until we have further details on the service / ECHA requests it.

Actions:

- **PMC Sec to ask EM to contact ECHA to:**
  1) **Check if this new service is a result of the discussions EM had with ECHA on SID / possible splitting of inorganic UVCBs.**
  2) **Get clarification on service fee.**
- **PMC Sec to start preparing a joint submission plan for PM slags once further**

clarification is received from EM/ECHA.

2.2. **UVCB identification rules: decision tree for SID and way forward**
A draft decision tree for SID of inorganic UVCB has been circulated to the WG on 25 June, together with a background document with relevant information from ECHA/EM guidance (cf. Annex 4.1 and 4.2):

- The decision tree is a tool for internal use only and is meant to be a basis or 'checklist' for further justification of SID.
- Expert judgment will need to be applied to each question. It is noted that given the complexity of PM refining, considerable flexibility is needed and therefore process steps / sources should not strictly be defined.
- WG members are invited to comment on the decision tree within 2 weeks. Once the decision tree is updated, it is suggested to try it on a number of Refinables. We can then update the decision tree as needed.
- It is suggested to share the decision tree (once updated) with other consortia for a crosscheck.

Actions:

- **PMC Sec to check with EM when next Intermediates Task Force meeting is planned (and share SID decision tree if updated by then).**
- **Ref WG to comment on SID decision tree/background doc by Wednesday 16 July.**
- **PMC Sec to update SID decision tree/background doc by Thursday 24 July.**
- **PMC Sec to run SID check for each Ref by end of August/early September together with LR.**
- **Ref WG to comment on SID check by end of September.**
- **Start preparation joint submission plans where necessary (i.e. for Refinables where splitting/change in identifiers is needed) in October (but wait with submission until ECHA requests it).**
- **Submit updated SID justifications for next updates (end of 2014).**

3. **AOB, next meetings/calls and closing remarks**
Next meetings/calls will be scheduled on an *ad hoc* basis.

Annexes

1. Agenda & list of participants
2. Slides presented at the call
3. ECHA newsletter: 'Is the substance identifier in your registration correct?' (ECHA, 12 June 2014)
4. SID decision tree:
   4.1. Background document (PMC Sec, 24 June 2014)
   4.2. Draft decision tree (PMC Sec, 24 June 2014)