



Precious Metals & Rhenium Consortium
Conference call, 30 June 2014, 14:00-15:00



PM Refiners WG - Substance identification



1. Welcome & Introduction

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Edwin BROEKAERT



- Reminder on Confidentiality and Competition Law
- Approval of the Agenda



Agenda

1. Welcome and introduction
2. Substance identity (SID) of PM Refinables
 - 2.1. Information from ECHA
 - 2.2. UVCB identification rules: decision tree for SID
 - 2.3. Way forward
3. AOB, next meetings/calls and closing remarks



2. Substance identity (SID) of PM Refinables

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Katrien ARIJS



2.1. Information from ECHA (1)

- No feedback on dossier upgrades so far
- ECHA/EM call of 4 April to discuss SID:
 - 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 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
 - In the BRef these are described as hydro-metallurgical processes overall
 - Existing EINECS entry groups slimes and sludges (but: we have generated new, separated entries for other Refinables like the electrolytes...)
 - 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
 - Done by PMC secretariat + check by LRs
 - Now: further refine using SID decision tree to prepare for further questions from/discussion with ECHA



Information from ECHA (2): New service

- **New service ECHA:** registrants can change the EC number in their registration if the substance has been incorrectly identified
- New EC number can only refine the identity of the substance initially concerned (cannot correspond to totally different substance)
- During change process: registrant's rights to M/I are not affected
- 'Administrative' fee (scientific validity has to be checked)
 - Depending on anticipated workload
 - Minimum charge of 445 € per registrant requiring correction
 - Deadline for payment: 30 days
- ECHA encourages companies to use the service even before a compliance check is done



Information from ECHA (3): New service

- How: send request to ECHA helpdesk
- Joint registration: LR to submit **joint submission plan** including:
 - Chemical identifiers of substance to which existing registration of each co-registrant should refer;
 - Indication of which SID information in original dossier demonstrates that the substance with the chemical identifiers mentioned above is covered in that dossier (e.g. spectroscopic data, analytical information, reported composition or description of manufacturing process);
 - Chemical identifiers of any other substance that would require an additional registration as a result of the service request;
 - Identity of LR for the registration of the substance subject to this service request;
 - Documentary evidence that all co-registrants agree to the request specified in the joint submission plan (e.g. signed confirmations or copies of e-mails between the registrants).
- ECHA check -> if ok, service charge issued (this is not a compliance check!)
- Payment received -> ECHA updates identifier information in REACH-IT -> registrants receive confirmation through REACH-IT and are given a reasonable deadline by which to submit updates of their registration with the correct identifiers if necessary.



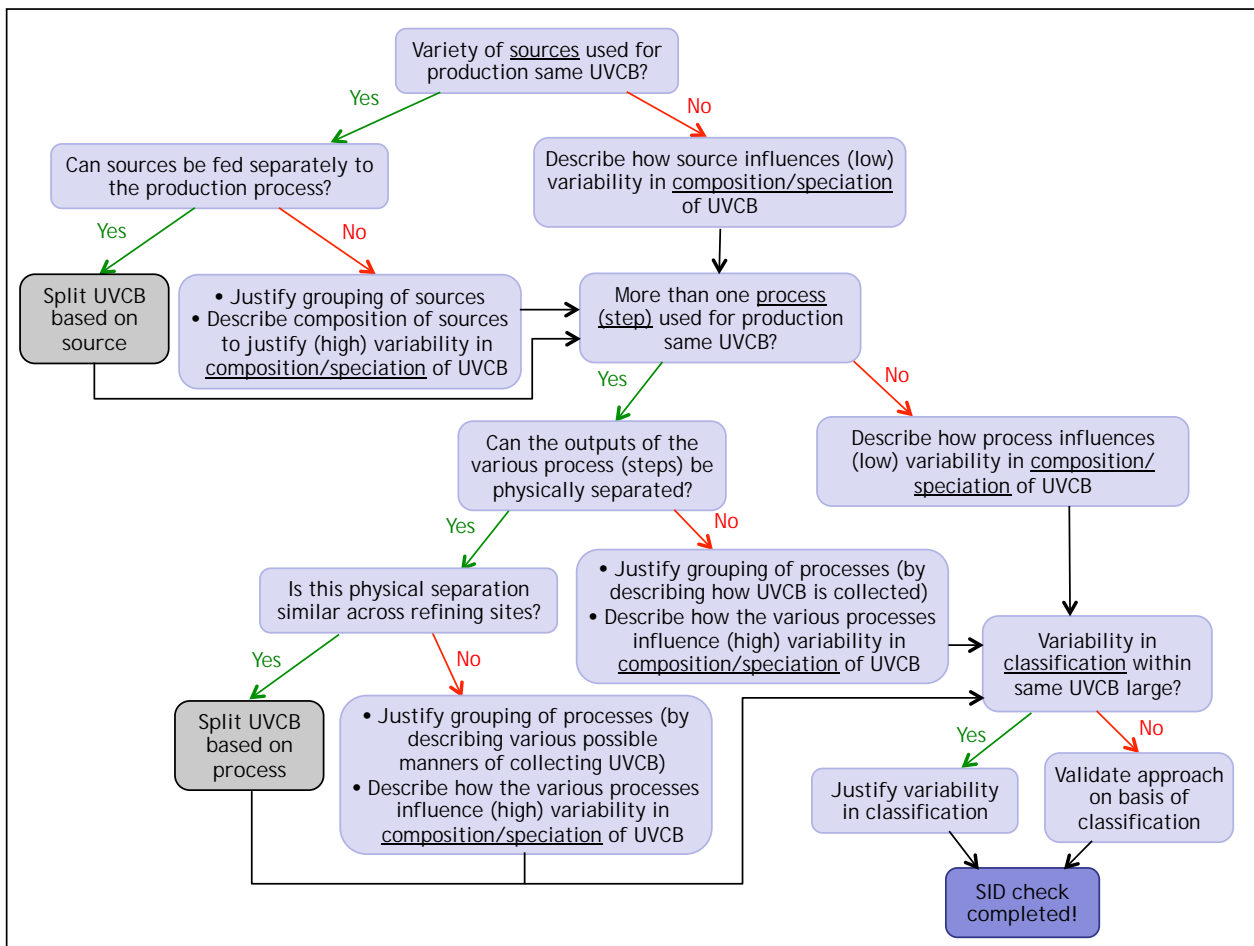
Information from ECHA (4): New service

- PM slags:
 - WG currently agreed on 2 sub-groups with 'new' EC-numbers
 - Registrants with only 1 sub-group: would have to pay only service charge
 - Registrants with 2 sub-groups: would have to pay service charge + new registration fee
- Way forward?
 - Once further SID check done for PM slags, prepare joint submission plan
 - Submit right away or wait until ECHA requests it?



2.2. UVCB identification rules: decision tree for SID

- Background doc
 - Information from ECHA guidance
 - Information from EM guidance (REACH intermediates TF)
 - For justification of SID
- Decision tree



2.3. Way forward

- Timeline:
 - 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** 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 & Closing Remarks

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Edwin BROEKAERT



Thank you!

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