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Metals Conference Centre – Nickel/Zinc Rooms
Rue du Duc 100 – 1150 Brussels (BELGIUM)

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 rules.

1.2. Tour de table and apologies

The list of participants and apologies 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 (18 June 2013) – including status of action points

The minutes of the meeting were approved. The status of the actions is reported in slides 5-6 of Annex 2.

2. Update on activities Eurométaux (EM) REACH intermediate task force *(Cf. slides 8-11 in Annex 2)*

2.1. Classification - feedback from workshop ECHA *(Cf. also Annex 6)*

ECHA's overall reaction on the MeClas tool was positive, though they invited the owners of the tool to improve the transparency of the classification calculations, especially in the companies' MeClas output sheets. A number of actions were identified with ECHA and by the EM Intermediates TF meeting subsequently. AP1

A follow-up workshop with ECHA will take place in January 2014, during which the overall UVCB risk assessment method will be presented to ECHA. No formal approval of the methodology should be expected, but probably recommendations to make the method clearer and generally acceptable from ECHA's viewpoint.

2.2. Timing of submission dossier upgrades

At least twelve upgraded Refinable dossiers (number depending on outcome splitting exercise – cf. agenda point 4) will have to be submitted not later than by mid-April 2014 (pending progress of the splitting exercise addressed under item 4 below). It was made clear that the next EM workshop with ECHA (Jan 2014) will allow improving the preparation of these upgrades and not at determining the detailed content of these upgrades.

*(**Post-meeting note**: The EM/ECHA workshop on risk assessment will take place on 22 January 2014. Hence, the final deadline for submission of the dossier upgrades is 22 April.)*

3. Classification of PM Refinables

3.1. Impact of the 4th ATP to CLP *(Cf. slide 13 in Annex 2)*

None of the changes to CLP under its 4th ATP triggered any change in the classification of PM Refinables. Other changes applicable to the Refinables will be checked in Nov 2013, prior to the submission of the next versions of their Dossiers. AP2

Participants were reminded on the need to follow-up the Specific Concentration Limit (SCL) discussions on Pb (Sweden proposal to decrease the reproductive classification cut-off from 0,3 to 0,03 %), which may affect the classification of various Refinables, such as doré. If this takes place, possible classification refinement work (e.g. bio-elution) may need to be considered.

EM and the International Lead Association (ILA) are implementing a number of technical advocacy messages, with the input of Cu, PM, and other metal sectors who try to illustrate the impact this refined SCL could have on industry and society as a whole. If this proposal is approved (without any refinement for e.g. massive mixtures) PM alloys used in medical devices, jewellery, or bank ingots for instance,

would bear a reprotoxic classification…

4. Splitting of PM slags, slimes & sludges and flue dust *(Cf. slides 15-32 in Annex 2)*

4.1. Outcome TF meeting 27 September *(Cf. also Annex 3)*

A dedicated task force (TF) discussed the possible approach to repeat/refine the substance identification in order to determine if/demonstrate that no over-grouping of UVCB streams was made under the following three Refinables: Slags, Slimes & sludges, and Flue dust.
The TF progressed with the identification assessment on the basis of the feedback received from PMC Members since the last PM Refiners WG meeting in June 2013 and recommended the following:

- For Slags: cf. item 4.2 below.
- For Slimes & sludges: cf. item 4.3 below.
- For flue dust, the TF recommended one group, as originally registered, as they are all sourced from often a unique exhaust air ventilation system and can generally not be re-assigned per source or process.

4.2. Splitting of PM slags: status and way forward

- The TF recommended two sub-groups based on source and process, separating doré-related smelting processes from other (assumed to be more PGM relevant) smelting or pyro-metallurgical processes.
- The TF agreed that whether or not to split slags into the above two sub-groups would need to be determined on the basis of the respective composition of the resulting sub-groups, after PMC Members' input.
- 7/8 PMC Members provided input, most of them re-assigning composition data for their respective company-specific slag streams (Note: non-contributing company has previously declared Hg content but in the absence of an updated composition submission, this was not considered in this exercise).
  *(**Post-meeting note**: After checking the company-specific composition data, it was noted that a copy/transpose error was made and Hg content was not declared in any of the slags. As the data of this company were not used in the sub-grouping exercise, this has no effect on the data presented at the meeting and the conclusions made.)*
- One company declared slags in both sub-groups, whereas the others declared slags in only one of the two sub-groups.
- The output of the re-assignment exercise is summarized in slides 22-29 of Annex 2. Slide 23 summarises the composition of the two sub-groups, which appears to be different. As regards the classifications of the two sub-groups, they are summarized in slides 24-27 of Annex 2, and appear to be not significantly different (i.e. inter-company variability higher than inter-sub-group variability).
- Looking back at the criteria determining the substance identification of a UVCB, the classification is irrelevant and only the process and source (eventually leading towards a different composition) should be considered.
- Based on the above, **the PM Refiners WG decided to submit separate registration dossiers for each slags sub-group. AP3-7**
- In order to implement this separate registration, it was noted that either a) a separate EC number needs to be identified among the existing ones, or b) a new EC number with a specific name and description would need to be generated.
- The financial impact of the separate registration for the PMC is considered to be low (mainly related to additional phys-chem testing).

4.3. Splitting of PM slimes & sludges: way forward

- The TF recommended five sub-groups based on source and process, separating slimes resulting from specific processes (e.g. electrolytic refining, hydro-metallurgical processes, or precipitation processes) and/or sources (e.g. PM rich input materials, PM poor input materials, PM solutions, etc.).
- Whether or not to split the slimes & sludges into the above five sub-groups will need to be determined on the basis of the respective composition of the resulting sub-groups, after PMC Members' input (as it was done for the slags case). **AP8-11**

4.4. Pros and cons analysis of 1 versus multiple registrations

Slide 31 of Annex 2 reflects the possible pros and cons to be considered when proceeding to a splitting exercise. This was considered for item 4.2 above and will be considered in future splitting exercises. It was noted that the effects and exposure assessment may be simpler for splitted Refinables (as the variability of each sub-group could be less than for the group as a whole). **AP12**

It is noted that EBRC is basing the human health assessment on the overall composition of the materials being handled, so the sub-grouping would not have an impact on the assessment.

4.5. UVCB identification rules for other Refinables

The decision to split a UVCB registration dossier should be based essentially on process, source, and resulting composition. Classification should not influence the substance identification. **AP13**

5. CSR human health and occupational sections *(Cf. slides 33-42 in Annex 2)*

Exposure assessment – general principles

- Company-specific, covering each hazardous constituent in all Refinables. Hazardous constituents are constituents with long-term inhalation hazard; the dermal exposure assessment was waived on the basis of skin corrosion classification of most Refinables, which allows to assume that no dermal contact will occur.
- Based on composition and monitoring data. In order to be conservative and robust, the maximum concentration of all hazardous constituents in the company across materials is used, not only the concentration of these constituents in the PM Refinables.
- Done per activity class in each workplace. Each activity class groups similar exposure settings (operational conditions and risk management measures).
- One or more constituents may occur in each activity class and workplace; the generic exposure database allows determining an exposure estimate for each constituent across activity classes (cf. next item).
- Arrives at one exposure estimate per activity class (considering exposure settings), that can be read-across across the same activity classes (with the same exposure settings) across companies. This allows using the composition and monitoring data in a conservative manner across companies, no matter their data-richness.

Generic exposure assessment (GEA) per constituent

- In the GEA table, each hazardous constituent present across all Refinables and/or in the workplace is, based on a number of observations (or monitoring data points reported), assigned to:
  - An activity class
  - A maximum concentration (of the constituent across all materials handled in the same workplace)
  - Specific exposure settings in each activity class, which are given a numerical code
- An exposure estimate can be calculated for each constituent in each activity class, using a percentile (to be selected among 50th, 75th, 90th, or 95th). If there is a low geometric standard deviation (GSD) across observations and a sufficient number of observations, the 75th percentile can be used (e.g. Pb case); but this remains to be discussed and properly justified.
- The exposure estimate can be used for all companies having that constituent in a same or inferior concentration, and the same activity class. Companies having a given constituent in a higher concentration than the one reported would not be able to use the exposure estimate derived on the basis of a lower concentration. **Hence, the need for all companies to correctly provide their composition and monitoring exposure data is stressed.**
- This comprehensive database approach allows avoiding unrealistically conservative modeling approaches being applied to perform the exposure assessment, and using real monitoring data instead. The monitoring data can furthermore be used across all Members, whether monitoring data-poor or monitoring data-rich, as long as the exposure settings in each activity class are comparable.
- Work is in progress, with exposure estimates currently being calculated for PGM, Se and Te, etc.

Blood levels – reported data

- Relevant for Pb exposure assessment, to be used instead of inhalation monitoring data (as available for other constituents in the above database).
- Medianised blood levels are tabulated per workplace (medianisation; 50th percentile from blood level of a specific worker in a specific year).
- There is one workplace where only a few measurements are available and which is above current DNEL of 30 µg/dl (female) but below DNEL of 40 µg/dl (male) (**AP14**); all others are below the current lowest DNEL (and assumingly safe use will be demonstrated for Pb).
- Will be included in the exposure assessment per workplace (covering several activity classes).

Section 9 of CSR – Exposure assessment

- Draft text describing the methodology has been prepared in a raw format (cf. Annex 5.1). **AP15**

Section 9.1 of CSR – Exposure scenarios

- Draft template describing format and likely content has been prepared in a raw format (cf. example in Annex 5.2), to be completed with each company following bilateral exchanges with EBRC. **AP16-20**
- Comments include:
    - Under 9.1.2.1, third column next to AC3, the PROC code should be added for completeness.
    - Under 9.1.2.2, title of second column, 'Substance' should be replaced by 'Constituent'.
    - As regards how to complete the ES to cover the manufacture and use (as intermediate) of each Refinable, there are different situations and PMC Members may be:
        - Registrants who manufacture and use;
        - Registrants who do not manufacture (import) but use; or
        - Registrants who manufacture but do not use;

      The use phase of each Refinable needs to be mapped out and a link with the relevant substance or intermediate needs to be included in the CSR (either in the introduction, or in the ES). **AP21**

      From an exposure assessment viewpoint, the ES for manufacture should be representative/conservative/worst-case of the ES for use, so there is no need to produce two separate ES but either:

      a) One ES for the manufacture, and an ES for the use which refers to the ES for the manufacture; or
      b) One ES for both the manufacture and use. **AP22**
    - As regards the need to supply customers with the extended SDS for the Refinables, if the ES are company-specific, they will likely be confidential, and cannot be readily sent to customers (who may also be competitors). It was agreed to discuss this after the dossiers have been finalized and submitted, in collaboration with the other consortia. **AP23**
- Once the company-specific ES are prepared, each company will indicate whether the information can be coded and compiled into a unique appendix to the CSR or whether even when coding the name of the company third parties could guess the company it relates to and hence confirm their preference to submit their ES separately in their individual registration dossier. If at least one PMC Member prefers to retain a non-coded company-specific ES, all ES will need to be submitted separately by each registrant. **AP24**

Hazard assessment

- Refinable-specific, on the basis of the hazard of its constituents.
- Utilising a template provided by EM to be circulated soon.
- Based on IUCLID 5 extracts (containing endpoint summaries) of relevant constituents shared by consortia based on an *ad hoc* data-sharing agreement developed under umbrella of EM.
- Specific endpoint summaries will include MeClas information/results with separate endpoint summaries for separate classification clusters of each Refinable (resulting in different hazard assessment conclusion or classification for that specific endpoint).
- IUCLID 5 extracts are needed for a number of constituents as summarized below:
    - Definitively needed: None yet, but probably most of those listed below;
    - Form of relevance to be identified before requesting IUCLID 5 extracts: Al, Sb, As, Cd, Se, Te,

$B/B_4O_7^{2-}$, Co, Hydrogen chloride, CaO/Cl, Sn, S, Ce, Mo, W, Mn, Mg, Zr, Bi, Ba, Fe;
    - Presence of constituent in Refinable to be confirmed before requesting IUCLID 5 extracts: Cr(VI).
- Some constituents are not registered yet, and hence IUCLID 5 extracts do not exist for these. **AP25-29**

6. CSR environmental sections *(Cf. slides 44-74 in Annex 2)*

Exposure assessment

- Based on constituents with environmental classification, assessed separately without consideration of additivity.
- Data was collected in a number of phases, which triggered additional WCA time (cost for PMC); **hence the need to respond efficiently to information requests was stressed.**
- Available waste-water emissions and receiving environment data supports use of SpERCs.
- Available stack emissions data appears to support use of SpERCs (to be confirmed by further statistical analysis).
- Three scenarios are required for aquatic (freshwater with and without STP, and marine water).
- No longer worst-case assessment (as presented in previous Ref WG meetings), now up to tier 3 using SpERCs and 50th percentile information (but still assuming sewage sludge is applied onto soil; may need refinement for those sites in regions where sludge cannot be spread on soil).
- It is noted that in the Cu slimes approach, SpERCs are not used, but only measured data and qualitative assessment is used where needed.
- Currently finalising generic ES (covering all sites) for inclusion in CSR. **AP30**
- Msafe approach is used in generating the GES. This is done by calculating the maximum tonnage of each constituent that can be manufactured or used without reaching or exceeding the RCR of 1 (working backwards).
- Status so far is not realistic and should be refined for some constituents:
    - **Ag**: RCR < 1 for all sites.
    - **Ni**: RCR > 1 for stack emissions for four sites (some of them using SpERCs), of at least one will need a higher tier assessment (or even monitoring).
    - **Pb**: RCR > 1 for freshwater and marine sediment for all sites (probably due to partition coefficient and high background concentration in water). **AP31**
    - **Zn**: RCR > 1 for freshwater and marine sediment for all sites (probably due to partition coefficient) and RCR > 1 for soil (still assumes sludge applied onto soil, to be refined. **AP31**
    - **Cr**: RCR > 1 for freshwater sediment for all sites (probably due to background concentration > PNEC) and RCR > 1 for soil (still assumes sludge applied onto soil, to be refined) (**AP31**). As regards local air, the RCRs are well above 1 for three sites (some based on SpERCs), which will probably require higher tier modeling or providing/generating monitoring data to refine this assessment.
    - **As**: RCR > 1 for freshwater for all sites (due to background concentration > PNEC). **AP31**
    - **B**: All RCR < 1.
    - **Cd**: RCR > 1 for freshwater and marine sediment for all sites (levels at which RCR occur may not be resolved with partition coefficient refinement and may possibly require monitoring); WCA will review the CSR of Cd and confirm. **AP31**
    - **Cu**: RCR > 1 for freshwater sediment for all sites (probably due to background concentration and partition coefficient). **AP31**
- Outstanding issues include:
    - Background concentrations > PNEC for some metals (e.g. As in freshwater)
    - Problematic with background concentration in water and partition coefficient that assumes all goes to (freshwater or marine) sediment. **AP31-32**
- Based on the above the WG agreed that a generic ES (GES) would be difficult to produce but it would simplify joint submission (and would develop arguments for use of SpERCs) and coverage of LoA purchasers and hence should be refined as far as possible.
- In addition to the GES, site-specific exposure assessments will also be provided to companies. **AP30**
- Total RCR considering mixture effects (assuming additive effect and exposure) with the background

concentration would be extremely high (from 5,2 to 65) and impossible to refine down to RCR < 1, except if the background concentration is not added up, in which case RCR remain > 1 (up to 2,6) but could possibly be refined.
- It was agreed that waste ES is not relevant for Refinables (cf. also Annex 6).
- It was agreed that indirect exposure via food and water is probably not relevant for Refinables (as they do not appear in the environment as such). **AP33**
  (***Post-meeting note***: *EBRC's tentative view: "We would not recommend waiving the 'man via environment' (MvE) assessment, unless it can be properly justified. Please also check section 3 Recommendations to registrants of the Evaluation 2011 report section 3.12.3 Scope of Exposure Assessment:" … ECHA also noted the cases where exposure of humanity via the environment was not assessed (nor the omission properly justified). "*
  Some possible justifications for not conducting an own assessment and some thoughts have been itemized below.
  1. *No hazard identified for oral or inhalation long-term systemic -> unrealistic in view of the metals concerned*
  2. *No exposure to the environment from industrial use -> unlikely*
  3. *The assessment for humans exposed indirectly via the environment has already been covered by the relevant metals registration dossiers -> how can this be verified if no access and no permit to use.*

  We assume that most of the work on indirect exposure has already been conducted by the different metal registrations. However, access to those assessments need to be requested. Furthermore, it is very likely that an local assessment for humans exposed indirectly via the environment has to be performed.")

Hazard assessment
- Refinable-specific, on the basis of the hazard of its constituents.
- Utilising a template provided by EM to be circulated soon.
- Based on IUCLID 5 extracts (containing endpoint summaries) of relevant constituents shared by consortia based on ad hoc data-sharing agreement developed under umbrella of EM.
- Specific robust study summaries will include MeClas information/results with separate robust study summaries for separate classification clusters of each Refinable (resulting in different hazard assessment conclusion or classification for that specific endpoint).
- Sections 5.1.2 Hydrolysis and 5.2.1 Biodegradation in water will be waived (Refinables are not organic)
- Sections 5.3 Bioaccumulation and 5.4.1 Adsorption / desorption cannot be completed with a MeClas entry or waived, therefore for these endpoints data on the constituents will be obtained from the relevant consortia.
- Sections 5 and 6 will be completed with the following:
  - Upper endpoint summaries: UVCB-specifc and constituent-specific
  - Endpoint summaries: UVCB-specific
  - Robust study summaries: UVCB-specific and MeClas output or waiver

7. CSR generic and other sections

Input from PMC Members will be required to produce the introductory/generic sections of the CSR and IUCLID 5 file, to be inserted in the CSR of each Refinable by EBRC or WCA as the case may be. **AP34-35**

8. Timing of submission upgraded PM Refinables dossiers

8.1. Status data-sharing agreements

Data-sharing agreements have been signed with Pb, Cu, Ni, Zn and Cd.
Data-sharing agreement requests have been sent to As.
Data-sharing agreements for the other constituents will be sent after PMC Members have confirmed the species of relevance in the occupational exposure assessment survey EBRC will circulate soon.
The data-sharing agreement states data can be exclusively used for UVCB Article 10 registrations. Though the data-sharing agreement prepared under the umbrella of EM foresees a free exercise, it is anticipated that some consortia (e.g. Co) will charge at least an administrative fee. **AP36**

8.2. Testing strategy for PM Refinables with phys-chem data gaps and implications for dossier submission

(Cf. slides 94-97 in Annex 2 and Annex 4)

- Ag electrolyte: Freezing, boiling point, and vapour pressure will most probably be required; however water solubility should not be tested, instead a waiving statement will be required.
  (***Post-meeting note:*** *Testing for freezing point* et al. *is unlikely to provide useful information either, but these*

endpoints are requirements under REACH and hence must be filled, either through available data, a data waiver or by conducting new testing. Additional thoughts:

- *Freezing point: the only constituent that will freeze is water; other constituents (salts) are diluted in water and cause the effect of melting-point depression (water). In case that only one constituent (e.g. $CaCl_2$) is dissolved in water, the freezing point of water from this solution may be used to extrapolate to the concentration of $CaCl_2$ in this solution. In our special case, many constituents are dissolved and each of them has different influence on the melting-point depression of water. In the end there is no relevant information to retrieve from this test and we should think about a derogation statement instead.*
- *Boiling point: the main constituent water will evaporate in a temperature range depending on the amount of dissolved constituents (salts). Again, a derogation statement should be used instead.)*

- Flue dust: Oxidising properties can be waived based on the oxidized nature of the flue dust (**AP37**), and the other tests (e.g. water solubility) can be done in-house on a LR sample by the LR.
- Pb bullion: Auto-flammability, flammability, and oxidizing properties can be waived based on expert judgement (an expert statement will be required from the Lead Registrant) and granulometry data will be provided by the Lead Registrant. **AP38**
- Materials for reclaim, PM in bricks, crucibles, and trays: Vale will provide granulomety data. **AP39**
- It was agreed to contact each LR and check whether they can perform these tests in-house by mid-December; if they cannot, this will be done at Harlan ASAP. **AP40**

8.3. Selection of PM Refinables dossier to be submitted first

It was agreed to develop the upgraded dossiers (and in particular the hazard, exposure and risk assessment) for all Refinables in parallel, with some of them possibly being finalized earlier than others. **AP41**

9. Next steps, AOB, next meetings/calls and closing remarks

The proposed timing is summarised on slide 100 in Annex 2. The environmental assessment should be finalised by the end of 2013.

It is proposed to have the next Refinables meeting between 15 Jan and 10 Feb, tbc after workshop with ECHA. **AP42**

9.1. TTIP TF

Participants were updated on the status of the Transatlantic Trade and Investment Partnership (Bilateral Trade Agreement between US and EU) and the joint PM industry proposal that is being prepared by the IPMI and the EPMF. The proposal aims at requesting a simplification of trade of PM containing raw materials (including Refinables) when these are listed as amber/hazardous waste by the authorities in the receiving or originating country. In practice, the PM industry would like to have the materials shipped from and to the US and the EU without having to wait for the shipment notification to be approved by the relevant authorities. Participants are invited to join the TTIP Task Force if interested.

Annexes

1. Agenda & list of participants
2. Slides presented at the meeting
3. Minutes 27 Sep 2013 meeting PM Refiners WG Task Force to split PM Refinables
4. Physico-chemical testing recommendations for Refinables substances (WCA, 11 Oct 2013)
5. Occupational exposure scenarios:
   5.1. Draft methodology section for Section 9 of the CSR (EBRC, 4 Nov 2013)
   5.2. Example occupational exposure scenario (EBRC, 4 Nov 2013)
6. Minutes 24 Oct 2013 meeting EM REACH Intermediates Task Force

Actions

Table 1. Actions resulting from the 5 November 2013 PM Refiners WG meeting in Brussels

	Action	Who?	Timeline
Classification			
1.	Produce and distribute guidelines to ensure a consistent completion of IUCLID 5 files, including classification information, by all inorganic UVCB Registrants	EM	Dec 2013
2.	Review classifications of the PM Refinables and submit updated classifications if necessary	Review by ARCHE, submission by LRs	Nov each year
Substance identification			
3.	Check correlation previously identified classification clusters and newly identified sub-groups	PMC Sec with ARCHE	Dec 2013
4.	Produce two new ID Cards for slags and circulate for comment/finalization	PMC Sec	Dec 2013
5.	Once the scope of each registration is agreed upon, inform EBRC and WCA, identify and launch the phys-chem testing needs, and produce separate registration dossiers	PMC Sec with EBRC & WCA	Jan-Feb 2014
6.	Once the dossiers have been finalized, review the LoA price to reflect the additional work done since the first submission in 2010	PMC Sec	Q2 2014
7.	After the separate dossiers have been submitted, inform the SIEF, together with the LoA Agreement/price announcement	PMC Sec	Q2 2014
8.	Circulate the five sub-groups for slimes & sludges to PM Ref WG so they can re-assign their slimes & sludges as it was done for the slags	PMC Sec	ASAP
9.	Re-assign their slimes & sludges to proposed sub-groups	PM Ref WG	By 9 Dec 2013
10.	Determine the composition/classification boundaries of the slimes & sludges sub-groups	PMC Sec with ARCHE	Dec 2013
11.	Discuss outcome slimes & sludges splitting exercise and decide on registration strategy	PM Ref WG	Next PM Ref WG meeting
12.	Include possibly simpler effects and exposure assessment as additional 'pro' of multiple registrations in the slide circulated with the minutes of the meeting	PMC Sec	Done
13.	Check source and process information currently in ID cards for all Refinables	PMC Sec	Nov-Dec 2013
CSR human health and occupational sections			
14.	Confirm gender of workers for which blood levels have been reported	EBRC with relevant company	Nov-Dec 2013
15.	Review/comment draft methodology section for Section 9 of the CSR (cf. Annex 5.1)	PM Ref WG	ASAP
16.	Produce 1st draft company-specific ES (taking into account comments made at PM Ref WG meeting) and distribute to relevant companies for comment	EBRC	By 18 Dec 2013
17.	Review/comment 1st draft company-specific ES	PM Ref WG	By 8 Jan 2014
18.	Produce 2nd draft company-specific ES (taking into account company-specific comments and recommendations from EM/ECHA workshop) and distribute to relevant companies for finalization	EBRC	By 15 Feb 2014
19.	Review/comment 2nd draft company-specific ES	PM Ref WG	By 1 Mar 2014
20.	Produce final draft company-specific ES	EBRC	By Mid Mar 2014
21.	Finalise mapping exercise and check approach is consistent across consortia	PMC Sec	Nov-Dec 2013
22.	Decide on best approach for the ES (in general or per company, or Refinable)	PM Ref WG	Jan 2014
23.	Discuss need to supply customers with the extended SDS for the Refinables	PMC Sec with other consortia	Q2 2014
24.	Indicate whether the information in the company-specific ES can be coded and compiled into a unique appendix to the CSR or whether they prefer to submit their ES separately in their individual registration dossier	PM Ref WG	Jan 2014
25.	Check speciation assumptions used for MeClas classification and send to EBRC for their information	PMC Sec	Done
26.	Send survey on speciation of constituents in Refinables, including a request to specify the level at which exposure control is implemented by companies for	EBRC	ASAP

	constituents where there is no REACH DNEL available (+ indication of reference value they are working against + legislation)		
27.	Companies to confirm form of relevance in EBRC survey, distinguishing form present in the Refinable versus form present in occupational air to which workers may be exposed during the process	PM Ref WG	After AP25
28.	Check whether Hg is present in any Refinable and inform EBRC and WCA accordingly so it can be added to the scope of data needs if relevant	PMC Sec	Done (Hg not present)
29.	Agree on the best way forward regarding predicted data gaps (e.g. qualitative assessment using publicly available OELs, etc.)	PMC Sec with other consortia	Q1 2014
CSR environmental sections			
30.	Finalise generic and site-specific exposure assessment based on information available to date and revert with updated assessment and monitoring recommendations	WCA	By end 2013
31.	Check the CSR of Pb, Zn, Cr, As, Cd and Cu and find a way to refine the generic ES Msafe exercise on the basis of the exposure assessment approach/principles that were used for each metal (e.g. bio-availability correction), as reported in the relevant CSR	WCA	Nov-Dec 2013
32.	Obtain access to CSR for As, Pb, Cr, and possibly others (tbc by WCA)	PMC Sec with input WCA	Nov-Dec 2013
33.	Check whether a local indirect exposure via stack emissions ES would be relevant for Refinables	EBRC & WCA	Nov-Dec 2013
CSR generic and other sections			
34.	Generate CSR template and coordinate LR input into generic segments	PMC Sec	Nov-Dec 2013
35.	Liaise and agree on how to start completing tox and ecotox general and specific portions of the CSR	EBRC & WCA with PMC Sec	Dec 2013
Data-sharing			
36.	If consortia request unreasonable payments for data-sharing agreements, invite the Ref WG to discuss, negotiate and/or approve the proposed amount	PMC Sec	As needed
Phys-chem testing			
37.	Send expert statement on waiving of oxidising properties for flue dust	A. Alderman	By 15 Dec 2013
38.	Send expert statement on waiving of auto-flammability, flammability, and oxidizing properties and provide granulometry data for Pb bullion	Pb bullion LR	By 15 Dec 2013
39.	Provide granulometry data for Materials for reclaim, PM in bricks, crucibles, and trays	Vale	By 15 Dec 2013
40.	Contact each LR and check whether they can perform the phys-chem tests in-house / have test data available / have justifications for waivers	PMC Sec	By 15 Dec 2013
Timing			
41.	Identify best case to act as first example to illustrate whole Article 10 registration dossier for a Refinable	EBRC & WCA	ASAP
42.	Set date for next PM Ref WG meeting once date of EM/ECHA workshop is confirmed	PMC Sec	ASAP