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 (10 October 2012) – including status of action points.**
     A table with the status of the action points from the last meeting is available in Annex 2 – slide 5-7. Several action items are on the agenda for discussion today. In short:
     - A survey to assess the (non-)waste, UVCB and intermediate status of the Refinables, and to assess which Refinables are handled under SCC was circulated together with a number of factsheets and an assessment paper documenting the identity of the Refinables. Survey results will be presented today and will be used to update the Refinable ID cards and to define the scope of the 2013 work programme (updates/upgrades). AP1-3
     - The proposed intermediate workshop is organised as part of this meeting and outcome will be used to update the Refinable ID cards, factsheets and the assessment paper documenting the identity of the Refinables. AP1-3
     - Updated classifications have been submitted together with updated composition and concentration ranges. It is noted that MeClas (the Metals Classification tool) will become freely available soon. (***Post-meeting note:*** *MeClas is freely available since January 2013)*
     - In preparing for Dossier upgrades, Eurométaux has developed a multi-metallic database containing metal ERVs and TRVs that will be available online soon. A data-sharing agreement to be approved by all data providers is currently under discussion. Also, the PMC secretariat is supporting Eurométaux in preparing input on UVCB substance identification and in developing guidance and test cases to risk assess inorganic UVCB substances under REACH. An ECHA/Eurométaux workshop on UVCB substance identification is planned on 8 January 2013. AP11-14
     - PMC Members participated to the collective response from Eurométaux on the intermediate annotation letters, with commitment to update/upgrade. The need for company-specific responses to the annotation letters will be discussed today.
     - The proposed way forward for Dossier updates will be discussed today.
     - The approach towards preparation of sector-wide and company-specific Exposure Scenarios will be presented by EBRC today. Once the Eurométaux multi-metallic (E-)TRV database is available, the Exposure Scenarios will be further developed.

     No remarks on the minutes; minutes approved.

2. **Regulatory background and case studies from the PM sector: waste, by-products, intermediates, SCC and UVCB.**
   - 2.1. **How is a waste defined?** *(Cf. Annex 3.1 and slides 10-19 in Annex 2)*
     An overview is given on waste definitions, 'end-of-waste' concept and waste regulations. Remarks/additions:
     - Waste remains waste until it is recovered. Materials from intermediary steps leading up to the recovery can be sold as waste (whether the substance is marketable or not is irrelevant).
     - Four parties are involved in the decision on the (non-)waste status: the producer, the authorities of the producer, the authorities of the receiver, and the receiver. These parties should all agree. Authorities appear to be taking a pragmatic approach: if the authorities of the producing/sending country agree it is a waste, the authorities of the receiving country will generally also agree it is a waste.
     - It is stressed that once the decision has been made regarding (non-)waste status, argumentation needs to be clearly documented (in writing) in case demonstration to authorities is needed. AP7

- Whatever the status of the material, it has to be properly regulated, i.e. you have to comply with either REACH or national waste legislation etc.
- It is noted that waste is outside the scope of CLP. The European Waste Catalogue (Commission Decision 2000/532/EC) establishes a list of wastes and the classification system for wastes, including a distinction between hazardous and non-hazardous wastes.
- In Germany, once you chemically transform a waste, it is not considered a waste anymore (cf. 'end-of-waste' condition *'the substance or object fulfils the technical requirements for the specific purposes'*).
- For each material and company the interpretation can be different.
- Transport does not necessarily mean 'placing on the market' but companies transporting their material need to comply with the applicable transport legislation.

Several examples of waste versus non-waste are presented and discussed. Remarks/additions:

- Landfill is not the same as road fill. A landfill is a site for the disposal of waste materials by burial. Road fill is a form of construction aggregate used as base material in road construction. Road fill could be considered a use as it fulfils a set of criteria for use, although not all PMC Members agree.
- It is noted that the non-waste/REACH route might be more expensive than the waste route but is considered to be more sustainable in the long term. The biggest advantage of REACH registered materials is free trade in Europe.

For the PM Refinables the following was discussed:

- **Doré**, **PM matte**, **slimes & sludges**, **matte leaching residues**, **speiss leaching residues**, **silver electrolyte**, **gold electrolyte** are not to be discarded and thus are considered non-wastes.
- **Slags** are never discarded if they are truly PM slags and thus should never be regarded as waste. If they are not truly PM slags, they should be registered by another consortium / treated as waste / by-products. **AP5**
- **PM flue dust** can be both waste and non-waste. PM Refiners need this flexibility as some companies cannot export waste and thus should be able to use the non-waste/REACH route. Otherwise the flue dusts would have to go to landfill, which is not good for the environment (argument of sustainable access to raw materials). It is noted that some other consortia consider flue dust to be waste. If PMC Members register flue dust under REACH, they need to be able to demonstrate why as ECHA may challenge this.
- **Materials for reclaim 9.1** (PM with or without supports) are not discarded since they generally have a valuable PM content. Spent PM catalysts are however considered to be waste by some authorities so it might be difficult to prove their non-waste status. **AP6**
- **Materials for reclaim 9.2** (refractory bricks) can be both waste and non-waste. PM Refiners need this flexibility (same argumentation as PM flue dusts). Refractory bricks are generally crushed to recover the PM content.
- **Lead bullion PM rich** is not discarded since it generally has a valuable PM content. The market or demand for lead bullion PM rich is a weak point to be addressed. **AP6**

2.2. How is a by-product defined? *(Cf. Annex 3.1 and slides 21-26 in Annex 2)*

An overview is given on by-product definition and regulation. Remarks/additions:

- As long as by-products are not placed on the market, they are exempt from REACH registration obligations. Once placed on the market, they are subject to REACH.
- By-products and intermediates are not incompatible concepts; if you put a by-product on the market, it can still be an intermediate and is not necessarily a full substance subject to authorisation. If the by-product is an intermediate, SCC do not have to be demonstrated as long as the by-product is kept on site and not placed on the market (because exempt from REACH registration).
- The use of the by-product exemption route is company-specific: if the substance stays on site, it is

important to consider the by-product route.
- The importance of documenting arguments when deciding your substance is a by-product is stressed again (weight of evidence). AP7

Several examples of by-products are presented and discussed. For the PM Refinables the following was discussed:
- **Doré** is usually deliberately produced in a production process and hence cannot be considered a by-product. Some PMC members however argue that in some cases you can be able to demonstrate it is a by-product.
- **Slimes & sludges** can be regarded as a by-product but can also be deliberately produced for PM Refining purposes in specific cases (and is hence not a by-product).

2.3. How is an intermediate defined? *(Cf. Annex 3.2 and slides 28-29 in Annex 2)*

An overview is given on intermediate definition and on processes that cause chemical modification (cf. table on slide 29 in Annex 2). Some modifications to the table are suggested (AP2):
- Add 'electro-refining' to 'ion-exchange, solvent extraction or electro-winning'.
- Add 'cementation and reduction' to 'precipitation and gas precipitation'.
- Add 'distillation'.
- Add a column to the table 'oxidation/reduction' for exposure purposes.

Several examples of intermediates versus substances are presented and discussed. For the PM Refinables the following was discussed:
- A **PM slag** is considered to be an intermediate, as it is a product of an intended manufacturing process and the aim is to be transformed into another substance when used in PM refining (transformation is chemical modification occurring via smelting). If a slag is produced by a PM refiner but completely depleted of PMs and the aim is to be discarded / to use it as road fill aggregate and not to transform it into another substance, it is no longer considered to be an intermediate, but a substance. In this case however, it is no longer considered a PM slag (because depleted of PMs). If discarded, it is a waste. If used as road fill aggregate, it could be seen as a by-product, which is exempt from REACH as long as it is not placed on the market.
- Spent catalysts (**Materials for reclaim 9.1**) cannot be intermediates, as they are not manufactured to be chemically transformed, so they should be substances.
- **Leaching residues**, **PM cements** and **Materials for reclaim 9.3** are all products of an intended manufacturing process and the aim is to be transformed into another substance. For **PM flue dust**, it is more difficult to prove that it is a product of an intended manufacturing process. AP3

2.4. PROCs and compliance with intermediate definition *(Cf. Annex 3.2, Annex 4 and slides 30-33 in Annex 2)*

The screening conducted by ECHA on REACH intermediate registration dossiers focused on a number of use descriptors (PROCs and ERCs) that ECHA deemed incompatible with the intermediate definition and/or SCC requirements. Following this screening, ECHA sent annotation letters to those companies that submitted intermediate registration dossiers containing the challenged use descriptors.

After clarification by Eurométaux with ECHA regarding the technical aspects related to metal PROCs and their compatibility with the intermediate definition:
- A number of PROCs were agreed to be incompatible with the intermediate definition, as they are not expected in the context of chemical processing (cf. PROC numbers highlighted in red in table on slides 30-33 in Annex 2), whereas;
- Other PROCs that were originally identified by ECHA as incompatible with the intermediate definition (cf. non-highlighted PROC numbers in table on slides 30-33 in Annex 2), were agreed to be acceptable if adequate justification was provided in Appendix 3, explaining these PROCs apply to pre-transformation / post-transformation steps of the intermediate and not to the chemical

transformation process itself. This because PROCs are used to describe the whole lifecycle of the intermediate, and not only the chemical modification itself.

Furthermore, there are some PROCs that ECHA considers not compatible with the requirements on SCC or that require particular explanation on the applied technical process in order to justify that SCC can be met (cf. 2.6.).

2.5. Intermediates under REACH: how are they regulated? *(Cf. Annex 3.2 and slides 38-39 in Annex 2)*

An overview is given on intermediate regulation. Isolated intermediates benefit from reduced registration requirements under REACH if SCC can be demonstrated.

2.6. Strictly Controlled Conditions (SCC) / Rigorous Containment (RiCo) *(Cf. Annex 3.3, Annex 7.1 and 7.2 and slides 40-45 in Annex 2)*

An overview is given on SCC and RiCo definitions. Remarks/additions:

- SCC have to be demonstrated for the 'whole lifecycle' of the intermediate but legally speaking this cannot be enforced when importing from outside the EU. Companies claiming SCC should however ask for confirmation from the importer that they handle the intermediate under SCC. Since this has proven to be difficult, some companies have decided it is easier to go for an upgrade of the dossier. The entire lifecycle of the intermediate should then be covered in the CSR, except the manufacture outside the EU.
- It is questioned whether companies can still claim SCC if intermediates are imported. Some authorities seem to think this is not possible.
- Companies claiming SCC should have confirmation letters from their downstream users that the substance is handled under SCC, since authorities may ask for proof (e.g. UK authorities have been known to ask for this). This can be administratively burdensome.
- RiCo has to be applied in each processing step and SCC must be achieved without taking into account the use of personal protective equipment (PPE) except when it aims at limiting exposure resulting from accidents, incidents, maintenance and cleaning. Handling and sampling are considered to be processing steps. In the PM sector, sampling is typically done for valuation purposes. This sampling is generally done manually and thus it is difficult to prove RiCo.
- Judging from the exposure scenarios for the PM sector, EBRC thinks that RiCo will be hard to demonstrate. E.g. for silver, the exposure without RPE is above the DNEL.

The screening conducted by ECHA on REACH intermediate registration dossiers focused not only on the intermediate definition but also on SCC. After clarification by Eurométaux with ECHA regarding the technical aspects related to metal PROCs and their compatibility with SCC:

- A number of PROCs were agreed to be incompatible with the requirements on SCC (cf. PROC numbers highlighted in red on slides 43-44 in Annex 2), whereas;
- Other PROCs that were originally identified by ECHA as incompatible with the requirements on SCC (cf. non-highlighted PROC numbers in table on slides 43-44 in Annex 2), were agreed to be acceptable if adequate justification was provided in Appendix 3, explaining how RiCo and other SCC conditions are ensured during the applied technical process.

For examples of SCC/RiCo, reference is made to the Eurométaux examples that were submitted to ECHA in January 2012 (cf. Annex 7.1 and 7.2). ECHA did not consider any of the examples to be clear self-evident examples of SCC, not even taking into account the physical form of the substance (e.g. massive form). It is noted that ECHA is not the enforcing authority and it is up to companies to prove SCC to Member State Competent Authorities.

The PMC secretariat will prepare a decision tree on how to comply with REACH regulation requirements (waste/by-product etc.). **AP8**

2.7. Intermediate and UVCB status of PM Refinables *(Cf. Annex 5 and slides 47-48 in Annex 2)*

- For **doré** and **matte**, PMC Members agree that these are truly UVCBs for which legitimate grouping was done (i.e. no need to split to distinguish metallic forms of Ag, Au and PGM). For doré, it is suggested to consider registration as impure Ag or Au if Ag or Au content is higher than 80% (as these are already covered in the Ag and Au dossiers).
- **Slags**, **slimes & sludges** and **flue dust** are probably over-grouped, as several sources/processes were grouped under the same Refinable here. It is noted that most other consortia only deal with one metal (and thus have e.g. slags of similar composition) whereas the PMC deals with several metals. It is suggested to split these Refinables (**AP9**):
  - A task force will be created to split the three Refinables slags, slimes & sludges and flue dust in several sub-groups according to source (Ag, Au, PGM) and process. Volunteers for this task force are Daniela Cholakova, Edwin Broeckaert, Mike Shepherd and Hege Stubberud.
  - Some Members remark that the PMC already attempted to split these Refinables some years ago and information from this exercise should be used when restarting the exercise.
  - For guidance on processes, the NFM industries BAT Reference document (BREF) will be used.
- **Leaching residues** are truly UVCBs as there is a big variability in their composition.
- **Electrolytes** are truly UVCBs and not multi-constituent substances as their identification is source-driven.
- For **cements** and **lead bullion PM rich**, PMC Members agree that these are truly UVCBs for which legitimate grouping was done.
- **Materials for reclaim** are truly UVCBs and are already split over three sub-groups.

2.8. How to prepare for inspections on intermediate status?

Cf. Annex 3.2 and slide 50 in Annex 2.

2.9. Cease manufacture *(Cf. Annex 3.5 and slides 52-53 in Annex 2)*

An overview is given on what to do when manufacture/import of the registered intermediate is ceased or when the registered intermediate no longer falls under REACH. It is noted that to inform ECHA, using the REACH-IT 'cease manufacture' functionality is sufficient, and it is not needed to update the registration dossier as well. **AP2, AP28-29**

If a company is lead registrant (LR) and ceases manufacture, they can either stay the LR or change the LR. If a new LR needs to be found for PMC substances, this will be done by the PMC secretariat.

3. Update on activities Eurométaux REACH intermediate task force.

3.1. Data-sharing

No update. **AP11**

3.2. Status multi-metallic (E-)TRV database *(Cf. slide 56 in Annex 2)*

A disclaimer for the multi-metallic database has been approved by the Eurométaux REACH intermediate task force and is pending legal approval. All data have now been received and the database should be online shortly (**AP12**).

*(**Post-meeting note:** At he Eurométaux REACH Forum of 19 December 2012, the disclaimer was finalised, access rules were defined and IT issues were discussed. Currently Eurométaux is working on publication of the database on the Eurométaux REACH Metals Gateway providing access only to consortia/consultants.)*

3.3. Substance identification and characterisation *(Cf. slides 57-58 in Annex 2)*

On 21 May 2012, Eurométaux presented the NFM approach on substance identity (SID) to ECHA. Since then, the Eurométaux REACH intermediate task force developed examples laid down in internal Guidance. An Eurométaux/ECHA workshop with experts participation is planned for 8 January 2013 to present and discuss these examples, in order to create more transparency. **AP13**

*(**Post-meeting note:** First feedback from the Eurométaux/ECHA workshop:*

- *ECHA participants were mainly from the SID Unit (incl. Head of Unit), one expert from the Evaluation Unit,*

Mike Rasenberg (Head of Computational Unit); the chair was Derek Knight (Scientific Adviser);

- *The meeting was quite interactive and enabled a number of concepts and approaches to be clarified, such as the parameters of variability, the drivers (sources and processes), how we deal with this, the importance of the elemental composition, and the management of uncertainty. ECHA gave some clear recommendations with regard to how to report this in IUCLID;*
- *ECHA also gave some clarifications on EINECS names and descriptions and inquiries.*

Overall, the discussion highlighted again the importance of being really clear in the explanations and justifications that will be sent in; "industry has knowledge that ECHA does not have, but it should be communicated and made understandable to an ECHA expert opening the future dossiers".)

3.4. Human health risk assessment *(Cf. Annex 8 and slides 59-66 in Annex 2)*

EBRC presented the occupational exposure assessment approach for UVCB substances in PM refining. Remarks/additions:

- If the assessment results in an RCR above 1, RPE will be proposed.
- Assuming that we split some of the PM Refinables and the compositions become more specific, do we still need to go into the complexity of looking at different concentration ranges? It is noted that the suggested split might influence/simplify the proposed approach, which is currently based on broad concentration ranges.
- The speciation of the constituents should be taken into account in the risk assessment. It is noted however that, even if the species is available, we might have to use the worst-case speciation anyway because the DNEL of the correct species might not be available. A strategy will have to be developed on how to handle speciation. **AP20**
- The described approach focuses on inhalation exposure. For dermal exposure it is assumed that the same approach could principally be followed. However, since dermal exposure data are not sufficiently available, modelled data would be used.
- The CSR must cover manufacture and uses. It is to be checked if uses and manufacture involve the same exposure settings. It is suggested to develop a generic worst-case exposure scenario for downstream users, to cover all downstream uses.
- A question was received from the Cu consortium on whether the manufacture stage of the PM slimes would cover the use of the Cu slimes. It is stated that the Cu consortium should be covering the downstream use of Cu slimes.
- There will always be some overlap between the exposure scenario of the raw material and the substances produced out of it. EBRC to check how the site-specific exposure scenarios could be communicated down the supply chain. **AP24**
- At this point, it is not yet clear how and when the human health endpoints will be entered in IUCLID. This will be addressed when we have more clarity from ECHA and other consortia through the Eurométaux REACH intermediate task force.
- The anticipated timeline is available on slide 66 in Annex 2. It is suggested to test the approach. This would help for general understanding and would allow for an example to be presented to ECHA. We need to identify issues in time to allow for buffer time for upgrades but at the same time, we need DNELs from the multi-metallic (E-)TRV database to avoid working with too hypothetical examples. **AP21**
- A stand-alone tool to dynamically generate exposure scenarios (allowing to reflect changes in the composition profile) could be developed by EBRC if PMC Members think this is useful. **AP25**

3.5. Environmental risk assessment

No update. **AP14, AP26-27**

3.6. Timeline for updates and upgrades *(Cf. slides 68-71 in Annex 2)*

PMC Members participated to the collective response from Eurométaux on the intermediate annotation letters, sent on 6 November with commitment to update/upgrade. ECHA responded to the Eurométaux letter stating that in Q1 2013, they will further chase those registrants that received annotation letters

and that have not reacted. However, ECHA has no intention to penalize the people doing actual work and if they receive names from companies that will go for Article 10 dossiers (upgrades), they will de-prioritise those companies and consequently not 'further chase' those.

Therefore, Eurométaux suggested the following way forward:

- In case of upgrades: send the template letter (cf. Annex 9) to ECHA by end of 2012. **AP18**
- In case of updates: leave PROCs as they are and submit Appendix 3 with justified PROCs. **AP16-17**

In addition, PMC Members suggested to:

- Also send a letter to inform ECHA about those dossiers undergoing updates.
  (***Post-meeting note:*** *At he Eurométaux REACH Forum of 19 December 2012, companies going for updates were advised to inform ECHA in the same template letter as used for the upgrades, instead of sending a separate letter.)*
- Come up with a general statement on PROCs 22 and 26 to be added to Appendix 3 for the PM Refinables, in addition to company-specific justification as needed. **AP15**

4. 2013 scope and work programme.

4.1. Results survey and update/upgrade assessment *(Cf. slides 73-76 in Annex 2)*

Results of the survey are available on slides 73-74 in Annex 2.
Issues discussed:

- One company declared **doré** as a substance and not as an intermediate/UVCB. They are advised to register under impure Ag/Au.
- The waste/by-product status of the Refinables is not expected to have an impact on the EBRC exercise.

4.2. Slags used as aggregates (road fill) and potential SVHC concern: available evidence to demonstrate non-hazardous composition *(Cf. slides 75-76 in Annex 2)*

For those **PM slags** used as aggregate, historic data indicate that no leaching is possible. These should therefore be seen as inert waste/by-product and should not end up in the intermediate dossier. If they are identified as by-product and placed on the market, they need a substance dossier under REACH. Furthermore, these PM slags need to be identified when doing the subgrouping and excluded from the intermediate dossier. **AP9**
Since Johnson Matthey appears to be the only company using PM slags as aggregate, they are advised to repeat the inert waste test and to check with UK authorities on how to register and classify these slags.

4.3. Approval of the 2013 work programme and cost-sharing *(Cf. Annex 6 and slides 77-79 in Annex 2)*

The 2013 work programme and timeline is summarised on slides 77-78 in Annex 2.
For the cost-sharing, it is proposed to have equal sharing, meaning all PMC Members going for updates/upgrades contribute to the dossier upgrade preparation. Those ceasing manufacture will not contribute to the cost-sharing and should notify the PMC secretariat by end of January 2013 (**AP29**). It is noted that if you are lead registrant, you can go for an update but still stay lead registrant for the upgrade.

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

It is proposed to have the next Refinables meeting on 14 March 2013.

Annexes

1. Agenda & list of participants
2. Slides presented at the meeting
3. Factsheets

3.1. Waste (22 Nov 2012)
3.2. REACH & intermediates (25 Jan 2013)
3.3. Strictly Controlled Conditions (SCC) (10 Jan 2013)
3.4. REACH & UVCBs (22 Nov 2012)
3.5. REACH & ceasing manufacture (10 Jan 2013)

4. ECHA screening of intermediate dossiers
   4.1. Comments from the NFM industry to Annex I, Table 1 of ECHA letters dated 13 Sep 2012 (7 Oct 2012)
   4.2. List of PROCs (in)compatible with intermediate definition and/or SCC requirements after clarification by Eurométaux
5. Assessment document on (non-)waste, intermediate and UVCB status of PM Refinables
6. PM Refinables project priorities (8 Jan 2013)
7. SCC examples Eurométaux
   7.1. SCC examples submitted to ECHA by Eurométaux (29 Jan 2012)
   7.2. ECHA's reply to the SCC examples (16 Mar 2012)
8. EBRC approach towards preparation of sector-wide and company-specific Occupational Exposure Scenarios (14 Nov 2012)
9. Eurométaux template letter to inform ECHA about metals intermediate dossiers to be upgraded to Article 10 dossiers

Actions

Table 1. Actions resulting from the 13 December 2012 PM Refiners WG meeting in Brussels

	Action	Who?	Timeline
A.	***Substance identification & SCC determination***		
1.	Update ID Card of each Refinable to reflect main outcomes of survey and workshop assessing substance identity and SCC and update registration strategy accordingly	KA	Jan 2013
2.	Update factsheets with outcomes of survey and workshop: • Intermediate factsheet: adjust table chemical modification and table incompatible PROCs • SCC factsheet: adjust table incompatible PROCs • Cease manufacture factsheet: adjust procedure on how to inform ECHA	KA	Done; cf. Annex 3
3.	Update assessment document (non-)waste, intermediate and UVCB status of PM Refinables with outcomes of survey and workshop	KA	Jan 2013
4.	Check all constituents have been reported in ID Cards and inform PMC secretariat on missing ones	PMC Members	ASAP
5.	Ensure that all Refinables registered as PM Refinables are truly from PM Refining (not other NFM)	PMC Members	ASAP
6.	Prepare a list of generic arguments applicable to all companies to demonstrate the (non-)waste status of the Refinables, with reference to the Raw Materials Initiative	KA	Jan 2013
7.	Document company-specific analysis and arguments to demonstrate the (non-)waste, by-product, intermediate and UVCB status of the Refinables	PMC Members	Jan-Feb 2013
8.	Prepare decision tree on how to comply with REACH regulation requirements (waste/by-product etc.)	KA	Jan 2013
9.	Split PM slags, slimes & sludges and flue dust in several sub-groups according to source (Ag, Au, PGM) and process, using: • source information of slags, slimes & sludges and flue dust in scope (i.e. only including those from PM refining, not other NFM, and not including e.g. slags used as aggregate) • the NFM industries BAT Reference document (BREF) • available information from splitting exercise done previously	Designated task force (D. Cholakova, E. Broeckaert, M. Shepherd & H. Stubberud)	Jan-Feb 2013 (task force to meet in Jan 2013)
10.	After splitting these three Refinables into sub-groups, send survey to check which company's Refinables fit into which sub-group	PMC secretariat	Mar-Apr 2013
B.	***Eurométaux REACH Intermediate Task Force***		
11.	Prepare data-sharing agreement format outlining: background, purpose, access restriction and compensation mechanism to be formally approved by all data providers	Eurométaux (with PMC support)	Jan-Feb 2013
12.	Finalise and publish the multi-metallic (E-)TRV database for use in risk assessment of UVCB under REACH, including disclaimer	Eurométaux	Dec 2012 – Jan 2013
13.	Prepare input on substance identification of UVCB and metal-specific PROCs for 8 January 2013	Eurométaux	Done

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	Eurométaux/ECHA workshop	(with PMC support)	
14.	Continue development of guidance to risk assess inorganic UVCB under REACH, including test cases to demonstrate applicability of the developed approaches	Eurométaux (with PMC support)	Oct 2012 – summer 2013
C.	***Updates (only SCC compliant companies)***		
15.	Come up with a general statement on PROCs 22 and 26 to be added to Appendix 3 for the PM Refinables, in addition to company-specific justification as needed	EBRC to draft & check with Eurométaux	ASAP
16.	Justify PROCs for each step of the intermediate's production or life-cycle (on the basis of Annex 4.1 and 4.2) in the Appendix 3 of each and every SCC intermediate	PMC Members	ASAP
17.	Update individual IUCLID 5 file with Appendix 3 and justified PROCs	PMC Members	ASAP and at the latest by end Mar 2013
D.	***Upgrades***		
18.	Send signed and dated template letter (cf. Annex 9) to Mike Rasenberg at ECHA, providing ECHA with the names of the Legal Entit(y)ies and the dossier registration number(s) of the intermediates undergoing upgrades	PMC Members	By end 2012
E.	***Human health exposure assessment for upgrades***		
19.	Circulate EBRC approach towards preparation of sector-wide and site-specific Exposure Scenarios	KA	Done, cf. Annex 8
20.	Develop strategy to take into account speciation of the constituents during the risk assessment	EBRC	Jan-Apr 2013
21.	Test proposed approach	EBRC	Jan-Apr 2013
22.	Once TRV are compiled in the Eurométaux multi-metallic (E-)TRV database, continue preparation of sector-wide Exposure Scenarios for all PM Refinables, starting with those that will not be further split into sub-groups (see AP9)	EBRC	Jan-May 2013
23.	Develop site-specific Exposure Scenarios for all PM Refinables	EBRC	Jun-Aug 2013
24.	Check how site-specific Exposure Scenarios could be communicated down the supply chain.	EBRC	Jun-Aug 2013
25.	Consider need for optional stand-alone tool and provide feedback to EBRC	PMC Members	By Feb 2013
F.	***Environmental exposure assessment for upgrades***		
26.	Once ERV are compiled in the Eurométaux multi-metallic (E-)TRV database, prepare generic Exposure Scenario	WCA	Jan-May 2013
27.	Consider need for site-specific Exposure Scenarios	All	Jun-Aug 2013
G.	***Cease manufacture (only companies ceasing manufacture for commercial reasons or because of exemption from REACH registration obligations)***		
28.	Inform ECHA by using the 'cease manufacture' functionality in REACH-IT (cf. waste factsheet in Annex 3.1)	PMC Members	ASAP
29.	Inform PMC secretariat of intentions to cease manufacture	PMC Members	By end Jan 2013