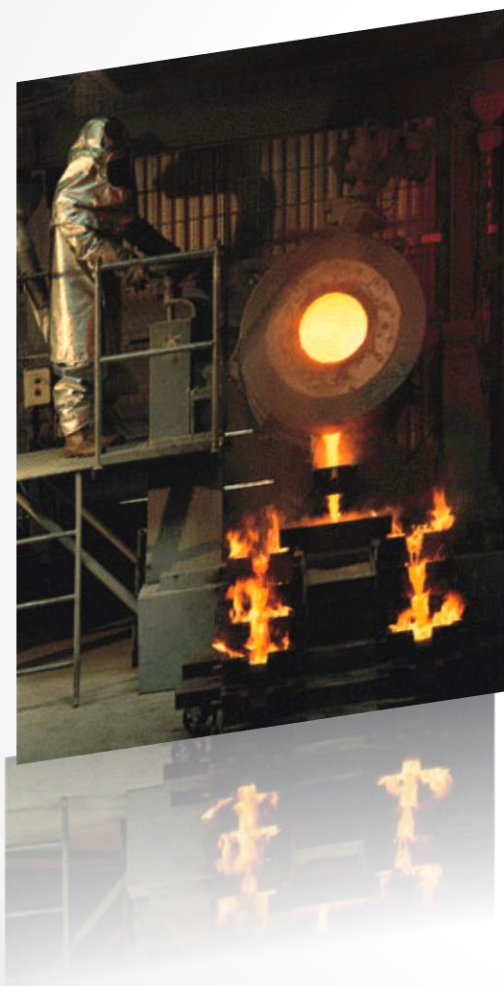




Precious Metals & Rhenium Consortium

Brussels, 13 December 2012

PM Refiners WG Meeting





1. Welcome & Introduction

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Edwin BROECKAERT



- Reminder on Confidentiality and Competition Law
- Tour de table and apologies
- Approval of the Agenda
- Approval of minutes of last meeting (10 Oct 2012)
 - including status of action points





Agenda

1. Welcome and introduction
2. Regulatory background and case studies from the PM sector: waste, by-products, intermediates, SCC and UVCB
3. Update on activities Eurométaux REACH intermediate task force
 - Approach for occupational exposure assessment
4. 2013 scope & work programme
5. Next steps, AOB, next meetings/calls and closing remarks



Actions (1)

Action	Who?	Status
PMC survey		
Survey to assess the (non-)waste, intermediate and UVCB status of the Refinables, and to assess which Refinables are rigorously contained / handled under SCC	KA to circulate & collate / Members to complete	Done
Compile answers to Survey in order to list update/upgrade scope and report to Members and consultants	KA	13 Dec 2012
Substance identification		
Provide comments on intermediates and SCC factsheet	PMC Members	No comments
Finalise factsheets on UVCB, waste and cease manufacture and circulate for comments and use for survey	KA	Done
Circulate draft assessment document (non-)waste, intermediate and UVCB status of PM Refinables for comments by PMC Members for comments	KA to circulate / Members to comment	Done
Prepare and circulate one-pager on proposed intermediate workshop to check interest from PMC Members	KA	Done
Adjust composition and concentration ranges of each ID Card based on composition information provided for classification assessment exercise without taking out outliers	KA	Done - updated ID cards to be circulated
Check all constituents have been reported in ID Cards and inform PMC secretariat on missing ones	PMC Members	ASAP
Update ID Card of each Refinable to reflect main outcomes of survey and update registration strategy accordingly	KA	Dec 2012 - Jan 2013
Classification & labelling		
Upload all updated classifications and "Classification assessment" document in each IUCLID 5 file	WCA	Done
Submit updated IUCLID 5 file	Lead Registrants	Ongoing ⁵



Actions (2)

Action	Who?	Status
<i>Eurométaux REACH Intermediate Task Force</i>		
Gather missing (E-)TRV and supporting information and further populate the multi-metallic (E-)TRV database for use in risk assessment of UVCB under REACH	Eurométaux	Done
Prepare data-sharing agreement format to be formally approved by all data providers	Eurométaux (with PMC support)	Jan - Feb 2013
Prepare input on substance identification of UVCB and metal-specific PROCs for January 2013 Eurométaux/ECHA workshop	Eurométaux (with PMC support)	Jul-Dec 2012
Continue development of guidance to risk assess inorganic UVCB under REACH, including test cases to demonstrate applicability of the developed approaches Take into account speciation of the constituents	Eurométaux (with PMC support)	Oct 2012 - summer 2013
Agree on a collective response to the annotation letters with commitment to update/upgrade and with timeline of the work programme and prepare Eurométaux letter to ECHA	Eurométaux (with PMC support)	Done
Circulate above letter to PMC Members for information	KA	Done
Follow-up response from ECHA on above letter and assess need for company-specific response to annotation letters	Eurométaux	Done
Request Eurométaux to make achievements more visible in their monthly REACH news	CB	Done
Eurométaux to present pros and cons of active involvement at ECHA at 5 Dec 2012 PMC Assembly meeting	CB to invite Vio	Done



Actions (3)

Action	Who?	Status
Updates		
Document SCC supporting evidence in Appendix 3	PMC Members	ASAP
Depending on the outcome of the PROCs discussion at the January 2013 Eurométaux/ECHA workshop, review and/or justify PROCs	PMC Members	Jan-Feb 2013
Update individual IUCLID 5 file with Appendix 3 and reviewed and/or justified PROCs	PMC Members	End Mar 2013
Human health exposure assessment for upgrades		
Describe approach towards preparation of sector-wide and company-specific Exposure Scenarios	EBRC	Done
Once TRV are compiled in the Eurométaux multi-metallic (E-)TRV database, continue preparation of sector-wide Exposure Scenarios	EBRC	Dec 2012 - Mar 2013
Develop site-specific Exposure Scenarios	EBRC	Mar-Aug 2013
Environmental exposure assessment for upgrades		
Once ERV are compiled in the Eurométaux multi-metallic (E-)TRV database, prepare generic Exposure Scenario	WCA	Dec 2012 - Mar 2013
Consider need for site-specific Exposure Scenarios	All	Mar-Aug 2013
Authorisation		
Screen individual SVHC lists and provide feedback to PMC secretariat on which substances they are interested in	PMC Members	ASAP



2. Regulatory background and case studies from the PM sector: waste, by-products, intermediates, SCC and UVCB

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Katrien ARIJS

Caroline BRAIBANT



PM Refinables & Waste

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2.1. How is a waste defined?

Waste Framework Directive (WFD):

‘any substance or object which the holder discards or intends or is required to discard.’



- **‘Discard’** applies to both recovery and disposal of waste.
 - But a substance which undergoes a recovery/disposal operation as listed in the WFD Annexes is not necessarily a waste *per se* (might be regarded as evidence for being waste);
- Discard can involve a **positive, neutral, or negative commercial value**.
 - Whether the substance/object is marketable or not is irrelevant;
- Discard can be:
 - intentional / deliberate on the part of the holder
 - unintentional / involuntary / accidental , or
 - even can occur with or without the knowledge of the holder;
- The storage location of a material is irrelevant.



‘End-of-waste’

‘Certain specified waste shall cease to be waste (...) when it has undergone a recovery, including recycling, operation and complies with specific criteria to be developed in accordance with the following conditions:

- a) *the substance or object is commonly used for specific purposes;* PM recovery?
- b) *a market or demand exists for such a substance or object;* PM market?
- c) *the substance or object fulfills the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products; and* REACH compliant?
- d) *the use of the substance or object will not lead to overall adverse environmental or human health impacts.* Safe use demonstrated? Minimisation of emissions?

These ‘end-of-waste’ criteria shall include limit values for pollutants where necessary and shall take into account any possible adverse environmental effects of the substance or object.’

-> criteria set by the Commission - Comitology procedure E.g.: iron, steel and aluminium scrap

-> if no criteria at Community level: MS may decide case-by-case PM sector willing to derive ‘own’ applicable criteria?



Which regulations apply to waste in the EU?

- **National regulations implementing the WFD** (each MS is obliged to enact a law which implements the Directive -> may be different from each other)
- **REACH Regulation**
 - Exempts waste (as defined in the WFD) from it BUT for substances subject to REACH registration, the waste life-cycle stage should be taken into account in the ES
 - As soon as a material ‘ceases to be waste’, REACH requirements apply, unless the material is covered by an exemption
 - REACH Article 2(7)(d): *‘The following shall be exempted from Titles II, V and VI: [...] (d) Substances, on their own, in mixtures or in articles, which have been registered in accordance with Title II and which are recovered in the Community if:*
 - *the substance that results from the recovery process is the same as the substance that has been registered in accordance with Title II; and*
 - *the info required by Articles 31 or 32 relating to the substance that has been registered in accordance with Title II is available to the establishment undertaking the recovery.’*

PM recovered from waste do not need to be registered/included in tonnage registered under REACH.

But only if waste source can be demonstrated (especially difficult for sites recovering PM from both waste and non-waste streams).



How to decide whether a material is a waste?

Depends on the specific factual circumstances and decision must be taken on a case-by-case basis, taking into account above definitions & regulations + following aspects:

- Full detailed **life cycle** of a material stream should be considered

When is the intermediate originated (possibly covered by another Consortium) and when does it become another substance?

- Similar material streams can be and have been named differently by different companies (by-products, intermediates, waste, etc.)
- Similar material streams can be and have been looked at differently by local, regional, MS and international competent authorities responsible for waste legislation or for waste transport legislation
 - Importance of considering **national/local legislation** when deciding on the status of a material
- EC list of wastes (the “**European Waste Catalogue**”): not an exhaustive list of wastes, but the inclusion of a substance or object in it is indicative that it may be waste
- When companies decide that their material is a waste, they should make sure they have **sufficient arguments** to clearly demonstrate this to authorities if needed



Example waste / non-waste Guidance

Slags and dusts from iron and steel production

- De-sulphurisation slag is produced due to the need to remove sulphur prior to the processing of iron into steel. The resulting slag is rich in sulphur, cannot be used or recycled in the metallurgical circuit and is therefore usually disposed of in a landfill.

Slags from iron and steel production cannot be used or recycled; PM slags can!

- Dust extracted from the steel production process when cleaning the air inside the plant:
 - captured in filters via an extraction process;
 - filters can be cleaned and the metallic content returned to the economic cycle via a recycling operation
- dust is waste at the point of production
- iron content extracted from the filters ceases to be waste once it has been recycled

Equivalent to flue dust? Flue dust always waste?



Example waste / non-waste Guidance

Spent catalyst

- If a spent catalyst is being sent for regeneration and the ownership of the catalyst does not change then some national authorities **do not consider the material as a waste** (regulations pertaining to the transport/transfer of wastes do not apply).
- If, however, the generator of the spent catalyst consigns a spent catalyst to a recovery or disposal facility then the spent catalyst will be classified as a **waste**.
 - Whereas some sites have operational permits for refining activities, some PM refiners are actually ‘registered’ with their permitting authorities as waste incinerators; it is much more difficult to claim non-waste status of feed material for waste incinerators than it is for PM refiners.
- Since the definition of “waste” and “hazardous waste” can give rise to considerable discussion and different interpretations or understandings between different authorities, it may be necessary for the owner of a spent catalyst to obtain a **clear understanding of the requirements of the various national or international authorities who may have jurisdiction over the spent catalyst while it is in transit through or being received in any particular country**. In this case, there should also be a general understanding of which documents and permits will be required, within which timeframe, when the spent catalyst is sent for processing.



Example waste / non-waste PM Refinables

Reason to claim non-waste status is mainly due to:

- ✓ Facilitated access to non-waste streams compared to waste ones maintaining same level of protection of human health and environment during transport, handling and processing
- ✓ Full life-cycle of the Refinable available from generation till transformation into another substance
- ✓ Generally PM content valuable
- ✓ Not discarded
- ✓ Commonly used for recovery of PM content
- ✓ A market or demand exists for Refinables
- ✓ Refinable fulfills the technical requirements for PM recovery operations (sometimes after pre-treatment)
- ✓ Refinables meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Using Refinable will not lead to overall adverse environmental or human health impacts as long as safe use can be demonstrated (in e.g. REACH dossier?)



Example waste / non-waste

PM Refinables

Doré

- ✓ Doré generated during smelting of PM containing material and transformed into another substance when it is fed into next refining steps (smelting, electrolysis, etc.)
- ✓ Generally high/valuable PM content
- ✓ Never discarded
- ✓ Commonly used as intermediate/concentration step for recovery of PM content
- ✓ A market or demand exists for Doré:
 - ✓ Smelters purchase doré and other metallic forms of PM from other sites
- ✓ Doré fulfils the technical requirements for PM recovery operations (intrinsic step, fit-for-purpose)
- ✓ Doré meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of doré demonstrated either by rigorous containment/SCC conditions or via a dedicated risk assessment reported in REACH dossier.

Flue dust

- ✓ Flue dust generated during smelting of PM containing material and transformed into another substance when it is fed into next refining steps (smelting, electrolysis, etc.)
- ✓ Generally high/valuable PM content
- ✓ Never discarded?
- ✓ Commonly fed back into PM smelting operations for recovery of PM content
- ✓ A market or demand exists for Flue dust:
 - ✓ Smelters purchase flue dust from other sites?
- ✓ Flue dust fulfils the technical requirements for PM recovery operations
- ✓ Flue dust meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of flue dust demonstrated by dedicated risk assessment reported in REACH dossier.



Example waste / non-waste PM Refinables

Slags

- ✓ Slags generated during smelting of PM containing material and transformed into another substance when it is fed back into smelting operations
- ✓ Generally high/valuable PM content (if truly a PM slag)
- ✓ Never discarded (if truly a PM slag)
- ✓ Commonly used as intermediate/concentration/collection step for recovery of PM content
- ✓ A market or demand exists for PM Slags:
 - ✓ Smelters purchase PM slags from other sites
- ✓ PM Slags fulfil the technical requirements for PM recovery operations (with pre-treatment if needed but really an intrinsic step, fit-for-purpose)
- ✓ PM Slags meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of PM slags demonstrated either by rigorous containment/SCC conditions or via a dedicated risk assessment reported in REACH dossier.

Materials for reclaim 9.1

- ✓ Spent PM catalyst generated after use/exhaust of a fresh catalyst and transformed into another substance when it is fed into smelting operation
- ✓ Generally high/valuable PM content
- ✓ Never discarded
- ✓ Commonly fed back into PM smelting operations for recovery of PM content
- ✓ A market or demand exists for Spent PM catalysts:
 - ✓ Smelters purchase spent PM catalysts from other sites?
- ✓ Spent PM catalysts fulfils the technical requirements for PM recovery operations (sometime require some pre-treatment)
- ✓ Spent PM catalysts meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of spent PM catalysts demonstrated by dedicated risk assessment reported in REACH dossier.



Example waste / non-waste

PM Refinables

Pb Bullion, PGM rich

- ✓ Pb Bullion, PGM rich generated during smelting of PM containing material and transformed into another substance when it is fed back into smelting operations
- ✓ Generally high/valuable PM content (difference from other Pb bullion)
- ✓ Never discarded
- ✓ Commonly used as intermediate/concentration/collection step for recovery of PM content
- ✓ A market or demand exists for Pb Bullion, PGM rich:
 - ✓ Smelters purchase Pb Bullion, PGM rich from other sites
- ✓ Pb Bullion, PGM rich fulfils the technical requirements for PM recovery operations (really an intrinsic step, fit-for-purpose)
- ✓ Pb Bullion, PGM rich meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of Pb Bullion, PGM rich demonstrated via a dedicated risk assessment reported in REACH dossier.

Materials for reclaim 9.2

- ✓ Refractory bricks generated after use/exhaust of a fresh bricks in smelting furnaces and transformed into another substance when it is fed into smelting operation
- ✓ Generally valuable PM content
- ✓ Never discarded?
- ✓ Commonly fed back into PM smelting operations for recovery of PM content
- ✓ A market or demand exists for refractory bricks:
 - ✓ Smelters purchase refractory bricks from other sites?
- ✓ Refractory bricks fulfils the technical requirements for PM recovery operations (sometime require some pre-treatment like crushing)
- ✓ Refractory bricks meet the existing legislation and standards applicable to products, e.g. REACH
- ✓ Safe use of bricks demonstrated by dedicated risk assessment reported in REACH dossier.



PM Refinables & By-products

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2.2. How is a by-product defined?

- A **production residue** is a material that is not deliberately produced in a production process but may or may not be a waste
- Article 5(1) of the WFD sets out the following four conditions that a production residue must meet in order to be considered a **by-product**:
 - *Further use of the substance or object is certain;*
 - *The substance or object can be used directly without any further processing other than normal industrial practice;*
 - *The substance or object is produced as an integral part of a production process; and*
 - *Further use is lawful, i.e. the substance or object fulfills all relevant product, environmental and health-protection requirements for the specific use and will not lead to overall adverse environmental or human health impacts. (i.e. or e.g. REACH)*

These tests are cumulative, meaning that all four conditions must be met



How is a by-product regulated?

- By-products are regarded by definition as **non-waste** -> subject to legislation which excludes waste from its scope, such as REACH
- Annex V of REACH Regulation: exemption from the registration obligation concerning 'by-products' (as defined in the WFD) only on the condition that by-products are **not imported or placed on the market themselves** (i.e. by-products which are transported do not benefit from the exemption).



Example by-product Guidance

Slags from iron and steel production

Blast furnace slag is produced in parallel with hot iron in a blast furnace. The production process of the iron is adapted to ensure that the slag has the requisite technical qualities. A technical choice is made at the start of the production process that determines the type of slag that is produced. Moreover, use of the slag is certain in a number of clearly defined end uses, and evidence of a demand can be provided. Blast furnace slag can be used directly at the end of the production process, without further processing that is not an integral part of this production process (such as crushing to get the appropriate particle size). This material can therefore be considered a by-product and fall outside the definition of waste.



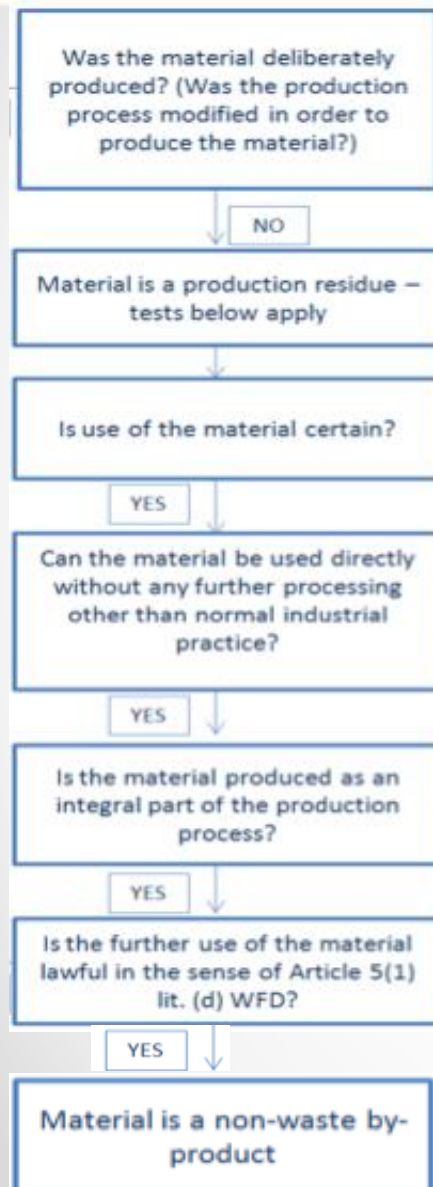
Example by-product PM Refinables

Zinc desilvering skim

- Silver is removed in the Parkes Process by adding zinc metal to molten lead with a silver impurity in exact proportion to the silver content. On cooling, the zinc combines with the silver and a crust of zinc, silver and lead forms on the surface of the melt. The AgZnPb crust is removed and passed to the Liquation process.
- The lead is pumped into another kettle, where another zinc addition is made to remove the last traces of silver and a further crust is produced. This crust is passed back to the first Parkes kettle.



Example by-product PM Refinables



No (the Parkes Process was developed specifically to remove a silver impurity from lead - pure lead is the product and lead with a sufficiently low level of silver may result in a low monetary value for the Skim, so it is not a product).

Yes - even with a low silver content, the Skim would always be processed further to recover the zinc reagent and the lead metal.

Yes - the subsequent processes are “normal industrial practice”.

Yes - pure lead cannot by definition be produced without removing the impurities, which includes silver.

Yes - lead and silver are placed on the market, recovered zinc is reused, and all downstream wastes are recovered or discarded lawfully.



Example by-product PM Refinables

PM Slimes and sludges

- ✓ PM Slimes and sludges not deliberately produced in a production process, not intended product;
- ✓ Further use of the PM slime and sludge in PM refining operations is certain;
- ✓ PM Slime or sludge can be used directly without any further processing other than normal industrial practice;
- ✓ PM Slime or sludge is produced as an integral part of a production process; and
- ✓ Further use of PM Slimes and sludges is lawful, i.e. PM Slime or sludge fulfil all relevant product, environmental and health-protection requirements for the specific use in recovery of PM and will not lead to overall adverse environmental or human health impacts (e.g. IPPC, REACH, etc.)
- ✓ If placed on the market/transported requires REACH registration as any other transported intermediate

Doré

- ✓ Doré deliberately produced in a production process, intended intermediate step;
- ✓ Further use of Doré in PM refining operations is certain;
- ✓ Doré can be used directly without any further processing other than normal industrial practice;
- ✓ Doré is produced as an integral part of a production process; and
- ✓ Further use of Doré is lawful, i.e. Doré fulfils all relevant product, environmental and health-protection requirements for the specific use in recovery of PM and will not lead to overall adverse environmental or human health impacts (e.g. IPPC, REACH, etc.)



PM Refinables & Intermediates

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2.3. How is an intermediate defined?

- Substance that is manufactured for and consumed in or used for chemical processing **in order to be transformed into another substance** (intended process)
- The status is not specific to its chemical nature but to how it is used.
- Identification as intermediate strongly linked to the definition of an **intermediate use of a substance**:
 - for each substance considered as intermediate, only the quantity of that substance that is consumed in or used for chemical processing in order to be transformed into another substance is regarded as intermediate.
 - any other quantity of the same substance is not regarded as an intermediate.



Chemical modification

Processes applied to minerals, ores and ore concentrates:

Mineral, Ore, Ore Concentrate Processing Step	Chemical modification?	
Optical/Mechanised Sorting		No
Magnetic/Electrostatic Separation		No
Gravity or Dense Medium Separation		No
Preferential Crushing, Grinding or Milling		No
Screening, hydrocycloning or Classification		No
Agglomeration or Froth Flotation		No
Thickening & Filtration		No
Drying (or calcination that results in removal of water & impurities only)		No
Pelletising by granulation only		No
Leaching/washing Processes to remove impurities		No
Leaching processes to extract the value-mineral	Yes	
Pelletising with sintering	Yes	
Ion-exchange, solvent extraction or electro-winning	Yes	
Pressure Digestion in aqueous NaOH	Yes	
Sintering, Roasting & Smelting	Yes	
Calcination involving changes in the chemical structure (e.g., CO ₂ release)	Yes	
Precipitation and gas precipitation	Yes	



2.4. List of use descriptors (**in-**)compatible with chemical modification (ECHA)

PROC	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
6	Calendering operations	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3
7	Industrial spraying	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3
10	Roller application or brushing	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition
11	Non industrial spraying	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition
12	Use of blowing agents in manufacture of foam	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition



List of use descriptors (**in-**)compatible with chemical modification (ECHA)

PROC	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
13	Treatment of articles by dipping and pouring	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition
14	Production of preparations or articles by tableting, compression, extrusion, pelletisation	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3
16	Using material as fuel sources , limited exposure to unburned product to be expected	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC
17	Lubrication at high energy conditions and in partly open process	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC



List of use descriptors (**in-**)compatible with chemical modification (ECHA)

PRO C	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
18	Greasing at high energy conditions	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition
19	Hand-mixing with intimate contact and only PPE available	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3
20	Heat and pressure transfer fluids in dispersive, professional use but closed systems	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition
21	Low energy manipulation of substances bound in materials and/or articles	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3



List of use descriptors (**in-**)compatible with chemical modification (ECHA)

PRO C	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
23	Open processing and transfer operations with minerals/metals at elevated temperature	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC
24	High (mechanical) energy work-up of substances bound in materials and/or articles	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	OK if registrant explains this applies to pre-transformation/ post-transformation steps of the intermediate in Appendix 3
25	Other hot work operations with metals	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition



Example intermediate PM Refinables

PM Slag as (transported) intermediate

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be transformed into another substance (e.g. pure PM in compound or metallic form) when used in PM refining
- ✓ Transformation is a chemical modification occurring via smelting

PM Slag as substance

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be used as roadfill aggregate, and not to be transformed into another substance
- ✓ Not chemically transformed

Truly a PM slag?



Example intermediate PM Refinables

Leaching residues

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be transformed into another substance (e.g. pure PM in compound or metallic form) when used in PM refining
- ✓ Transformation is a chemical modification occurring via dedicated refining steps such as leaching, precipitation, etc.

Material for reclaim 9.3

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be used as feedstock into PM recovery operations and be transformed into another substance
- ✓ Transformation is a chemical modification occurring via smelting and other refining processes



Example intermediate PM Refinables

PM Cements

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be transformed into another substance (e.g. pure PM in compound or metallic form) when used in PM refining
- ✓ Transformation is a chemical modification occurring via dedicated refining steps such as precipitation, etc.

PM Flue dust

- ✓ Product of an intended manufacturing process
- ✓ Aim is to be used as feedstock into PM recovery operations and be transformed into another substance
- ✓ Transformation is a chemical modification occurring via smelting and other refining processes



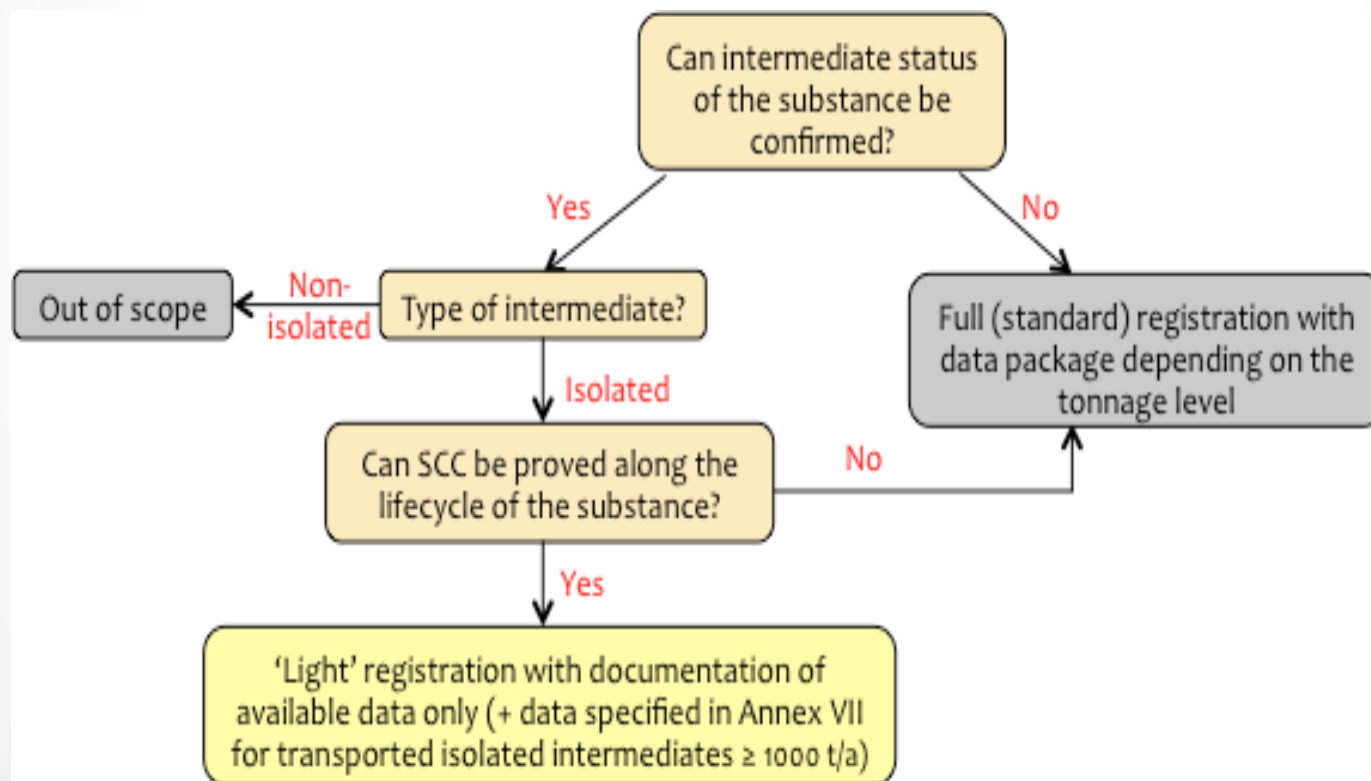
PM Refinables & RiCo/SCC

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2.5. How is an intermediate regulated?

- REACH does not apply to non-isolated intermediates.
- Isolated intermediates are ruled under REACH but benefit from **reduced registration requirements** if SCC.





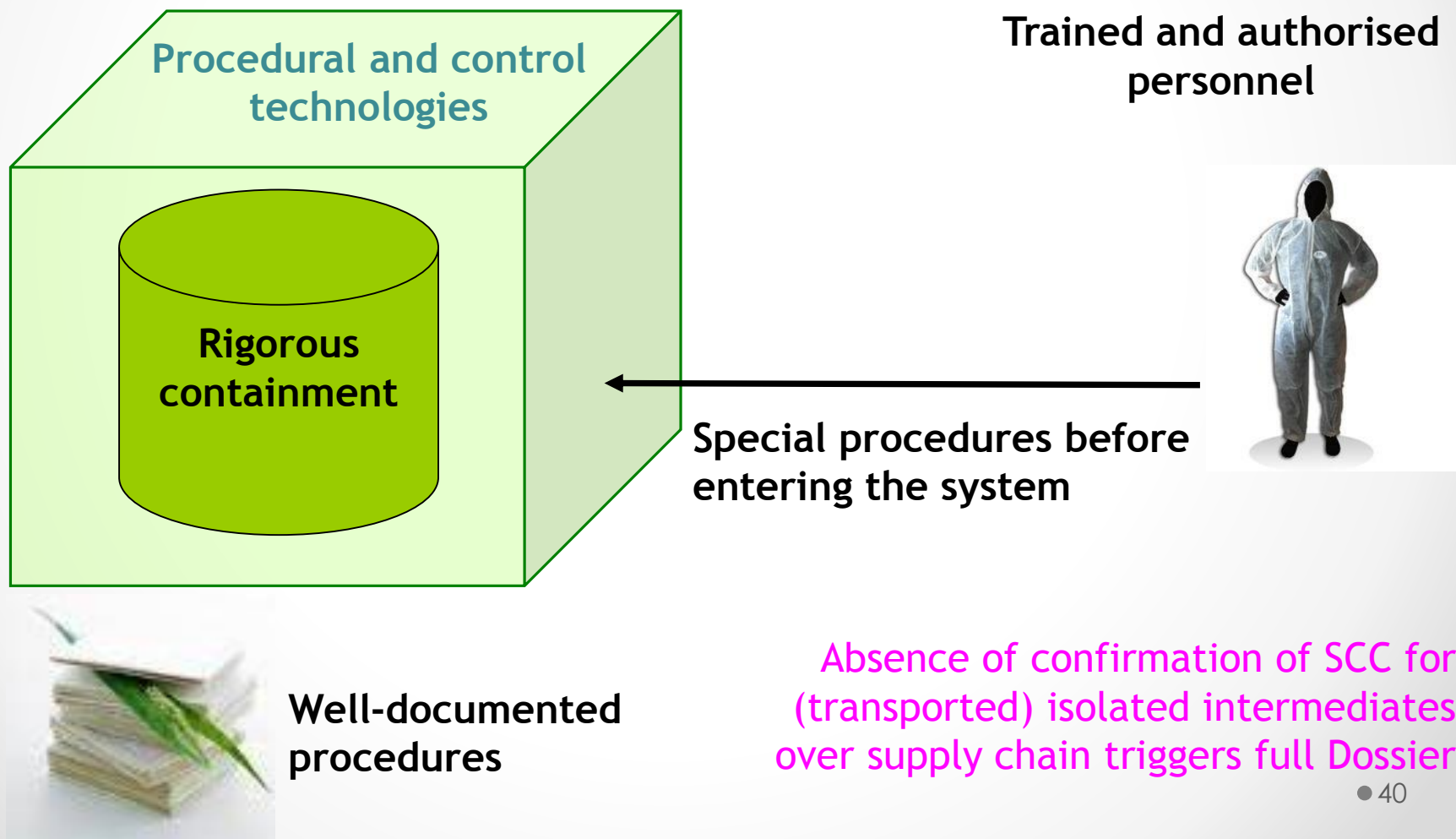
How is an intermediate regulated?

- For *on-site* isolated intermediates used under SCC, neither dossier nor **substance evaluation** apply (Article 49).
- **Dossier evaluation** and **substance evaluation** do apply to *transported* isolated intermediates used under SCC.
- In any case, where MSCA considers that a risk to human health or the environment, equivalent to the one triggering listing under Authorisation, arises from the use of an on-site isolated intermediate and that risk is not properly controlled, it may require more information and risk management measures.
- (*On-site* and *transported*) isolated intermediates whether used under SCC or not are exempt from **Authorisation** (Article 2(8)).
- For *on-site* isolated intermediates, the provisions on introducing new and amending current **restrictions** (Article 68(1)) do not apply.



2.6. SCC / RiCo

SCC: All conditions shall apply and be met **at the same time** during the **whole lifecycle** of the intermediate





Rigorous containment (RiCo)

- **Definition:** technical hardware designed for preventing releases, taking into account the **physical-chemical properties** (not its HH or ENV hazards) of the substance and the process conditions if relevant
- **Implementation:** through containment systems, such as (combinations of) suitable mechanical barriers and air dynamic barriers (e.g. LEV) as applicable in each processing step

- RiCo $\neq$ SCC
- SCC = RiCo + procedural and control techniques



PROCs and compliance with SCC

- In Sep 2012, ECHA conducted an IT-based screening to check whether REACH intermediate registration dossiers contain information that put into question the **transformation** of the substance during chemical processing and/or the **SCC** until its transformation
- Challenged PROCs for the Refinables are **PROC 22** and **PROC 26**

PROC22	<u>Potentially closed</u> processing operations with <u>minerals/metals at elevated temperature</u> Industrial setting	This category is not compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.
PROC26	<u>Handling</u> of solid inorganic substances at ambient temperature	This category is, without adequate justification, unlikely to be compatible with the requirement on strictly controlled conditions. as set out in Article 17(3) and 18(4) of REACH.



List of use descriptors (**in-**)compatible with SCC (ECHA)

PROC	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
4	Use in batch and other process (synthesis) where opportunity for exposure arises	This category is not compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	Not compatible with SCC
5	Mixing or blending in batch processes for formulation of preparations* and articles (multistage and/or significant contact)	This category is not compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	Not compatible with SCC
8a	Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities.	This category is, without adequate justification, unlikely to be compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	OK if registrant explains how rigorous containment and other SCC conditions are ensured during transfer of intermediate in Appendix 3
16	Using material as fuel sources , limited exposure to unburned product to be expected	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC
17	Lubrication at high energy conditions and in partly open process	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC



List of use descriptors (**in-**)compatible with SCC (ECHA)

PROC	Description	Compatibility as per ECHA's screening tool	Compatibility after EM's clarification
22	Potentially closed processing operations with minerals/metals at elevated temperature Industrial setting	This category is not compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	OK if registrant explains how rigorous containment and other SCC conditions are ensured during processing of intermediate in Appendix 3
23	Open processing and transfer operations with minerals/metals at elevated temperature	This process category is not expected in the context of chemical processing (synthesis), and hence it is not compatible with the definition of an intermediate under REACH.	Not compatible with intermediate definition or SCC
26	Handling of solid inorganic substances at ambient temperature	This category is, without adequate justification, unlikely to be compatible with the requirement on strictly controlled conditions. as set out in Article 17(3) and 18(4) of REACH.	OK if registrant explains how rigorous containment and other SCC conditions are ensured during handling of intermediate in Appendix 3
27a	Production of metal powders (hot processes)	This category is, without adequate justification, unlikely to be compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	OK if registrant explains how rigorous containment and other SCC conditions are ensured during production of intermediate in Appendix 3
27b	Production of metal powders (wet processes)	This category is, without adequate justification, unlikely to be compatible with the requirement on strictly controlled conditions as set out in Article 17(3) and 18(4) of REACH.	OK if registrant explains how rigorous containment and other SCC conditions are ensured during production of intermediate in Appendix 3



Examples SCC / RiCo

Cf. Examples prepared by industry for ECHA

- Pre-discussed with ECHA at 28 Aug 2011 meeting
- Refined versions sent to ECHA in Jan 2012
- ECHA's response says:
 - *Our experts have examined the information & we conclude that unfortunately we still do not have clear self-evident examples of SCCs*
 - *industry are responsible for designing & implementing SCCs for manufacture & use of on-site and transported isolated chemical intermediates that are registered using the provisions of Article 17 & 18 of the REACH Regulation*

Also available in handouts

(and circulated by e-mail to Ref WG on 11 Jul 2012)



PM Refinables & Identification as UVCB

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2.7. Intermediate & UVCB status of PM Refinables

- Cf assessment paper in meeting documents
 - ✓ **Doré**
 - truly a UVCB or should it be split to distinguish metallic forms of Ag, Au and PGM?
 - consider registration as impure Ag or Au if Ag or Au content > 80%
 - ✓ **Matte**
 - truly a UVCB or should it be split to distinguish matte from Ag, Au and PGM?
 - make sure only includes matte from PM refining (not other NFM)
 - **Slags - too large**
 - make sure only includes slags from PM refining (not other NFM)
 - consider splitting based on source (Ag, Au, PGM) and process (smelting + flux used?)
 - **Slimes and sludges - too large**
 - make sure only includes slimes and sludges from PM refining (not other NFM)
 - consider splitting based on source (Ag, Au, PGM) and process (?)
 - ✓ **Leaching residues**
 - truly a UVCB



Intermediate & UVCB status of PM Refinables

- Cf assessment paper in meeting documents
 - ✓ **Electrolytes**
 - Truly a UVCB
 - ✓ **Cements**
 - truly a UVCB
 - make sure only includes products of cementation and precipitation processes
 - **Flue dust - too large**
 - make sure only includes flue dust from PM refining (not other NFM)
 - consider splitting based on source (Ag, Au, PGM) and process (smelting, calcination, etc.)?
 - ✓ **Materials for reclaim**
 - truly UVCBs
 - already split over three sub-groups
 - ✓ **Pb Bullion, PGM rich**
 - truly UVCB



PM Refinables & Inspections

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2.8. How to prepare for inspections?

- Prepare evidence and extensive documentation of intermediate (and SCC) status for ECHA and inspectors/MSCA (ideally Appendices 2 and 3 formats)
 - ✓ **Full description** of the synthesis route of **the manufacture of the intermediate** and of each substance manufactured from the intermediate (e.g. in the form of a chemical reaction scheme)
 - ✓ **Full description of RiCo/SCC** conditions implemented during entire life-cycle of intermediate supported by exposure and emission data where relevant
 - ✓ Proper reference to and justification of **applicable PROC codes**
- If the intermediate (or SCC) status of their substance cannot be demonstrated, entity shall make sure:
 - ✓ the substance is **covered by the waste legislation** and relevant requirements are implemented, AND/OR
 - ✓ the entity **updates its REACH registration dossier** without undue delay to include, depending on the applicable tonnage band all the information required by Articles 10 and 12 of the REACH regulation.



PM Refinables no longer under REACH

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2.9. What to do when manufacture/import of the registered intermediate is ceased?

- Inform ECHA through the REACH-IT 'cease manufacture' functionality
 - ❑ Registered volume in registration shall be put to zero (**Article 50(2)**)
- Registrant must keep the information of its registered substance for 10 years after last manufacture or import and make it available on request (**Article 36(1)**).
- In the case where he restarts the manufacture or import of the substance he has to notify ECHA accordingly and update its dossier accordingly.



2.9. What to do when manufacture/import of the registered intermediate is ceased?

- **‘Cease manufacture’ functionality** should be used in the following cases:
 1. A registrant ceases manufacture/import of a registered substance for commercial reasons (e.g. no longer profitable or competitive, alternatives available, etc.)
 - ☐ Registration status is changed to **‘inactive’**
 2. A registrant ceases manufacture/import of a registered substance upon receipt of a draft decision (e.g. requesting further information on the substance after a compliance check or decision on authorisation/restriction regime)
 - ☐ Registration status is changed to **‘revoked’**
 3. A registrant decides that the registered substance is exempted from REACH registration obligations
 - ☐ Registration status is changed to **‘inactive’**.
- In any case, and in case 3. in particular, registrants should be able to justify that their decisions are made in accordance with the REACH Regulation if contacted by ECHA or inspectors/MSCA.



3. Update on activities Eurométaux REACH intermediate task force

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Caroline BRAIBANT

Katrien ARIJS



3.1. Data-sharing

- No update



3.2. Status EM multi-metallic (E-)TRV database

- Complete database on effects assessment outcomes
- Disclaimer has been approved by EM REACH Intermediates TF and is pending legal approval
- All data have now been received
 - Database will be online (Reach Metals Gateway - members only section) within next few days
- ECHA is releasing additional information on PNEC/DNEL assessment (Dec 2012)
 - In January 2013 EM will update the database for the ECHA substances
- Regular updates will be made following regular reminders to data providers



3.3. Substance identification (SID) and characterisation

- Helsinki, 21 May 2012: NFM approach on Substance Identity presented to ECHA
- Since, EM REACH Intermediates TF developed examples laid down in internal Guidance:
 - Mainly Cu, Pb and PM; Zn invited to provide examples too
 - Distinguish identification from characterisation, distinguish sameness from risk assessment
 - Distinguish grouping/splitting across EC entries from sub-grouping for classification purposes
- Helsinki, 8 Jan 2013: Workshop with ECHA to
 - Discuss with ECHA staff - Only experts participation!
 - V. Verougstraete, H. Waeterschoot, F. Iaccino (Eurométaux)
 - K. Lacasse (European Copper Institute)
 - D. Vetter (EBRC, in replacement of C. Braibant)
 - F. Verdonck (Arche)
 - J. Liipo (Outotec) - optional



3.3. Substance identification (SID) and characterisation

- Helsinki, 8 Jan 2013: Workshop with ECHA to
 - Present examples of SID for inorganic UVCB - Transparency!
 - Agree on naming and descriptions (knowledge on production process, market considerations, NFM BREF terminologies)
 - Mention examples of merged EC#, new EC descriptions, new EC numbers
 - Illustrate significance of spatial and temporal heterogeneity and variability in compositions and physical forms
 - Outline how complex inorganic UVCBs are analysed: for sameness checks, and for classification purposes
 - Demonstrate how reference samples are selected
 - Explain processes and raw materials in NFM sector
 - Request ECHA to update (EC) inventory with new information - New numbers, new descriptions, etc.
 - Set the scene for next workshop - Demonstrate Classification and Risk assessment purposes are well addressed

3.4. Occ. exposure assessment and development of occ. exposure scenarios for UVCB substances in precious metal refining

PM Refinables

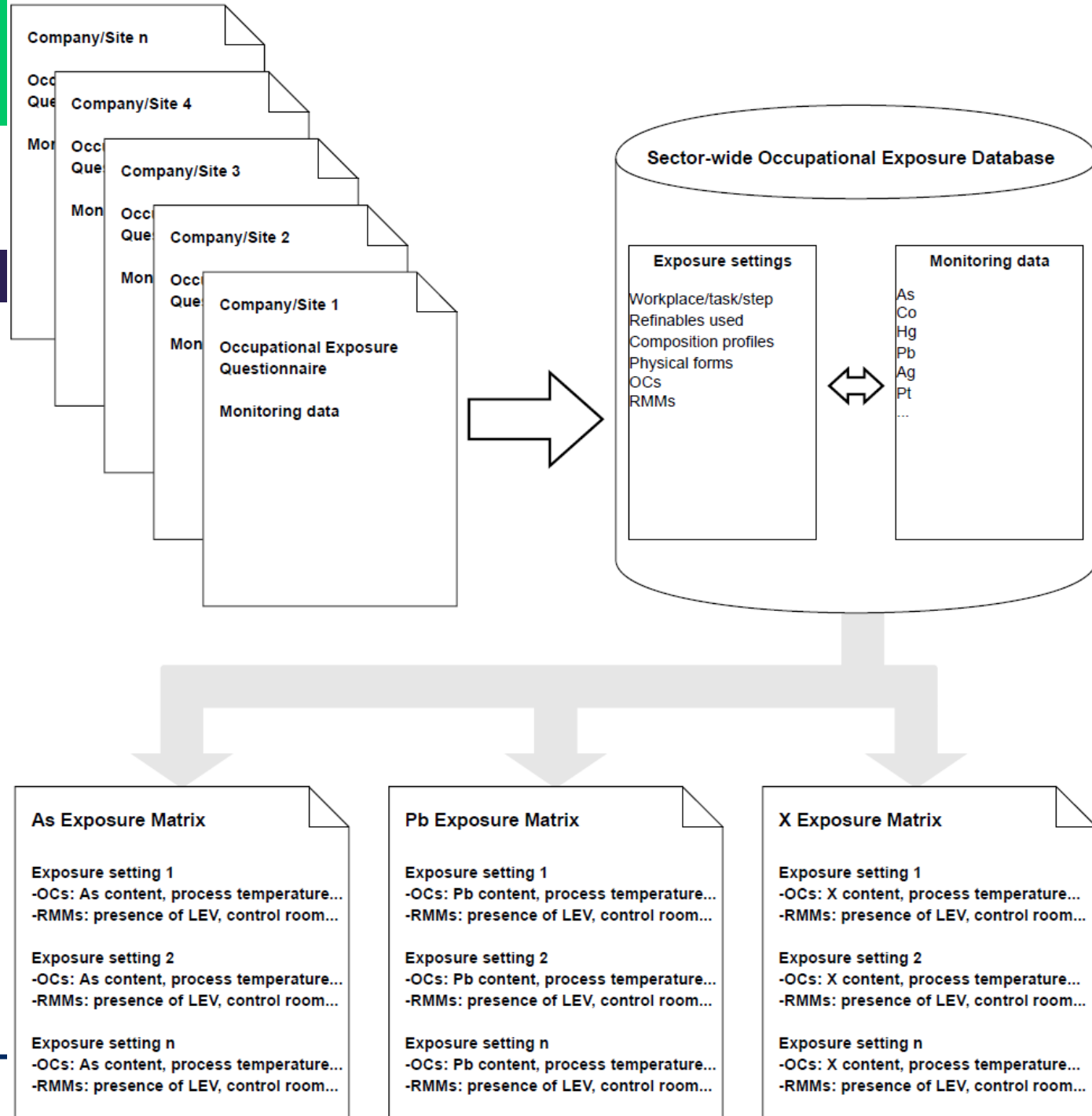
Brussels

13 December 2012

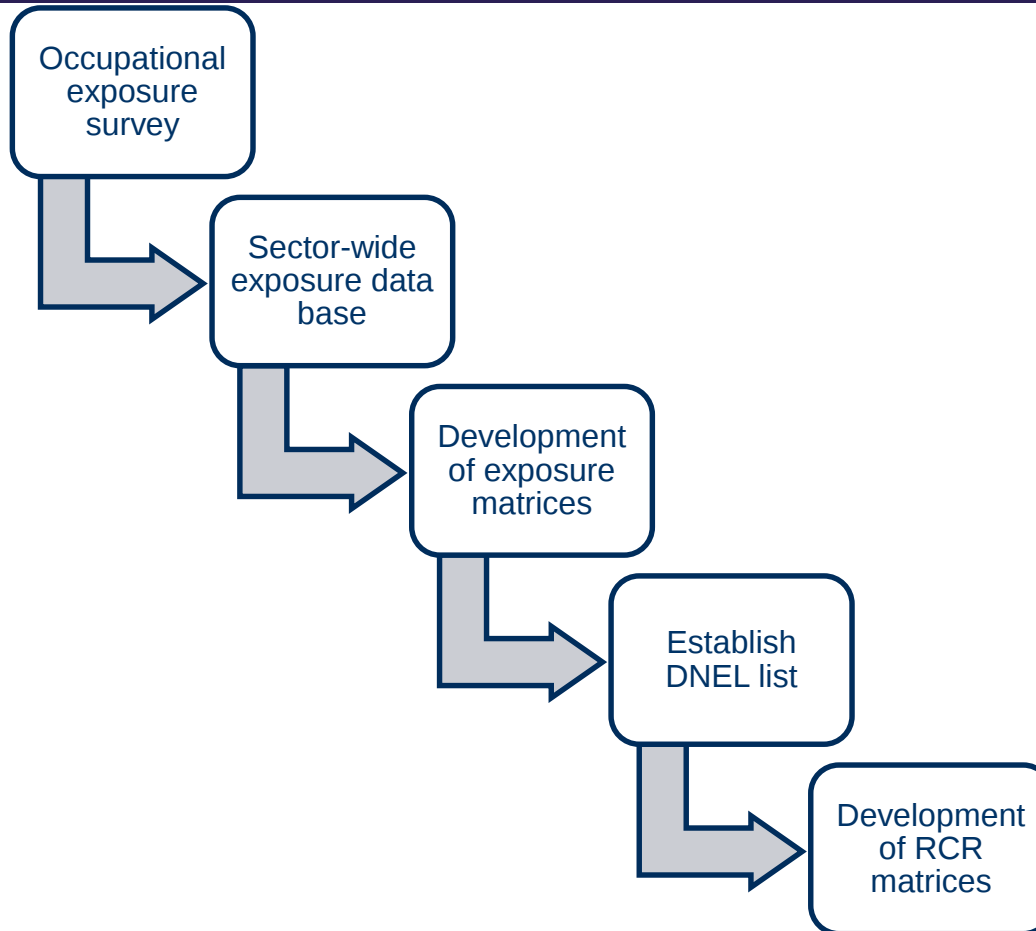


Daniel Vetter
EBRC Consulting
Hannover, Germany

Data collection



Development of RCR matrices



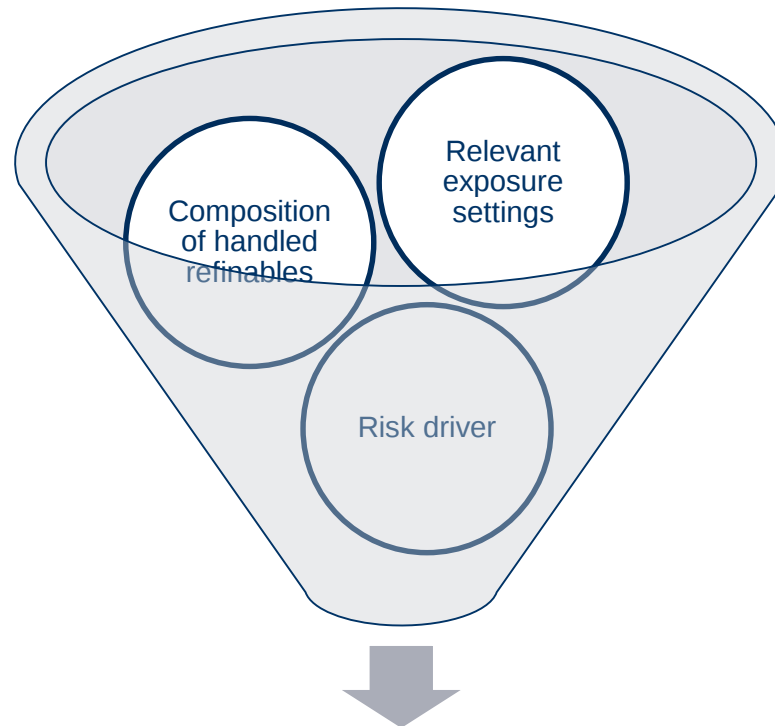
Use of site-specific information

Exposure matrices						List of DNELs		RCR matrices						Site specifics							
Arsenic						Constituent		DNELs		Arsenic						Exposure settings					
Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5	As	6	Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5	Set 1	WP1	WP2	WP3	WP4	WP5
	Set 2	2	2	6	12	9	Ni	80		Set 2	0.3	0.3	1.0	2.0	1.5	Set 2				X	
	Set 3	16	9	10	7	2	Pb	150		Set 3	2.7	1.5	1.7	1.2	0.3	Set 3					X
...	...	...	...	...	...	...	...	...	...	...	...	...	...	...	...	...					
Conc 2	Set 1	4	11		11	3			Conc 2	Set 1	0.7	1.8		1.8	0.5	Ref 1					X
	Set 2	1	3	12	2	17				Set 2	0.2	0.5	2.0	0.3	2.8	Ref 2		X		X	
	Set 3		3	17	5	8				Set 3		0.5	2.8	0.8	1.3	Ref 3	X				
...	...	...	...	...	...	...			...	...	...	...	...	...	...	Ref 4	X	X			
Conc 3	Set 1	16	10	11	8	15			Conc 3	Set 1	2.7	1.7	1.8	1.3	2.5	...					
...	...	...	...	...	...	...			...	...	...	...	...	...	...						
Nickel						Nickel		Nickel		Nickel						Refinables used					
Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5			Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5	Ref 1					X
	Set 2	146	130	120		65				Set 2	1.8	1.6	1.5		0.8	Ref 2		X		X	
	Set 3	81	34	71	28	114				Set 3	1.0	0.4	0.9	0.4	1.4	Ref 3	X				
...	...	72	28	69	138	30			...	...	0.9	0.4	0.9	1.7	0.4	Ref 4					
Conc 2	Set 1	50	141	28		65			Conc 2	Set 1	0.6	1.8	0.4		0.8	...					
	Set 2	51	38	84	59	113				Set 2	0.6	0.5	1.1	0.7	1.4	...					
	Set 3	25	19	66	10	141				Set 3	0.3	0.2	0.8	0.1	1.8	...					
...	...	...	...	...	...	...			...	...	...	...	...	...	...	...					
Conc 3	Set 1	47	17	37	132	14			Conc 3	Set 1	0.6	0.2	0.5	1.7	0.2	...					
...	...	...	...	...	...	...			...	...	...	...	...	...	...	...					
Lead						Lead		Lead		Lead						Max conc. ranges					
Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5			Conc 1	Set 1	WP1	WP2	WP3	WP4	WP5	Ref1	Ref2	Ref3	Ref4		
	Set 2	9	71							Set 2	0.1	0.5				1	1	-	-		
	Set 3	110	64							Set 3	0.7	0.4				1	-	-	1		
...	...	51	122						...	...	0.3	0.8				-	-	3	2		
Conc 2	Set 1	84	26						Conc 2	Set 1	0.6	0.2									
	Set 2	103	141							Set 2	0.7	0.9									
	Set 3	25	123							Set 3	0.2	0.8									
...	...	...	...	...	...	...			...	...	...	...	...	...	...						
Conc 3	Set 1	48	31						Conc 3	Set 1	0.3	0.2									
...	...	...	...	...	...	...			...	...	...	...	...	...	...						
														Summary list							
																	As	Ni	Pb		
														WP1	Set 1		1	3			
														WP2	Set 1	1	1	2			
														WP3	Set 2	-	-	-			
														WP4	Set 1	1	-	-			
														WP5	Set 3	1	1	-			

Simplified site-specific exposure scenario

Site-specific exposure scenario						
Contributing Exposure Scenario	Exposure Settings	Risk Driver	Initial Exposure Estimate	APF	Refined Exposure Estimate	RCR
WP1	Set 1	Ni	146	10	14.6	0.18
WP2	Set 1	As	15	10	1.5	0.25
WP3	Set 2					
WP4	Set 1	As	20	10	2.0	0.33
WP5	Set 3	Ni	30	1	30.0	0.40

Required site-specific information



Site-specific exposure scenario

Further aspects

- Development of DNEL list
- Speciation of constituents
- Monitoring data not specific to common workplaces
- Integration of bio-monitoring data
- Combined toxicity
- Dermal exposure
- Formal requirements and implications for reporting ES of UVCBs
- What to do if risk driver is not present in the refinable to be assessed?

Anticipated timeline

Anticipated timeline	Task/Module			
End of 2012	Exposure Settings	List of DNELs (dependent on Eurometaux database)		
February 2013	Exposure Matrices		Workplace- Speciation-Matrix (dependent on consortium/industry input)	Stand-Alone Tool (optional)
April 2013	RCR Matrices			
May 2013	Modified Exposure & RCR Matrices			
June 2013	Site-Specific ES			
Summer 2013	Modified Site-Specific ES			



3.5. Environmental risk assessment

- No update



3.6. Timeline for updates & upgrades

6 November: EM letter to ECHA (C. Musset) on intermediates work + timetable

28 November: EM met an ECHA experts delegation

Generic input from ECHA:

- Statement from ECHA: they will further chase “those doing nothing” on intermediates: 3000 annotation letters sent, 350 updates received & a bit less than 10 upgrades
- Q1 2013: further actions foreseen in case of no reaction, article 36/annotation letters or eventually other legal routes
- No intention to penalize people doing actual work



Meeting EM / ECHA 28 Nov

UPGRADE

- If ECHA receives list of companies that will go for Article 10 (& dossiers registration numbers), they will de-prioritise those companies when re-doing the check early 2013 & consequently not 'further chase' those.

This means: providing the list before end of 2012

UPDATE

- Leave PROCs as they are in IUCLID 5 & submit Appendix 3, appropriately linked & consistent with the selected and justified PROCs
- Metal PROCs are acceptable under these conditions

But: ECHA will chase registrants changing/removing PROCs!!!



Way forward: Article 10 dossiers (‘upgrades’)

- Each legal entity to send a letter to ECHA following the same template, **by end of the year**

By reference to (i) the Eurometaux letter to ECHA dated November 6, 2012 and (ii) the ECHA response dated November 22, 2012, the registrants mentioned below are expected to upgrade their intermediate dossier to an Article 10 dossier, using the methodologies and agreements currently under discussion at Eurometaux:

Legal Entity	Registration number

Add date and signature and send to Mike Rasenberg (cc Eurométaux)



Way forward: SCC intermediates('updates')

Submit Appendix 3 asap

“Registrants will update their dossiers with attachment in the IUCLID section 13 with the file name "RMM_details" explaining the risk management measures implemented to ensure strictly controlled conditions as advised in ECHA's Guidance on Intermediates. Any relevant use descriptors (PROCs, ERCs etc.) used to describe handling/processing of an intermediate, especially ones indicated in ECHA's communication as not compatible with intermediate definition and/or SCCs, have to be explained in the attached document, i.e. linked to the intermediate handling/processing steps.”



4. 2013 scope & work programme

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Katrien ARIJS
Caroline BRAIBANT



4.1. Results survey (1)

	Responses	Waste	By-product imported / placed on market (subject to REACH)	By-product not imported / placed on market (exempt from REACH)	Update	Upgrade	Highest tonnage band non-SCC
1. Doré	8	12,5 %	12,5 %	12,5 %	25 %	50 %	>1000 t/a
2. Matte, PM Refining	5	20 %	0 %	0 %	0 %	80 %	>1000 t/a
3. Slags, PM Refining	10	20 %	20 %	10 %	20 %	50 %	100-1000 t/a
4. Slimes & sludges, PM Refining	10	10 %	10 %	10 %	20 %	60 %	>1000 t/a
5.1. Matte leaching residues	3	0 %	0 %	0 %	0 %	100 %	>1000 t/a
5.2. Speiss leaching residues	2	0 %	0 %	50 %	0 %	50 %	?
6.1. Ag electrolyte	2	0 %	?	?	50 %	?	?
6.2. Au electrolyte	2	0 %	0 %	0 %	50 %	50 %	?



Results survey (2)

	Responses	Waste	By-product imported / placed on market (subject to REACH)	By-product not imported / placed on market (exempt from REACH)	Update	Upgrade	Highest tonnage band non-SCC
7. Flue dust	9	11 %	11 %	22 %	11 %	56 %	100-1000 t/a
8. Residues, cementation & reduction	10	20 %	20 %	10 %	10 %	60 %	100-1000 t/a
9.1. Mat. for reclaim - w/ or w/o support	6	17 %	17 %	17 %	0 %	83 %	100-1000 t/a
9.2. Mat. for reclaim - in bricks, crucibles, trays, etc.	6	33 %	33 %	17 %	0 %	83 %	100-1000 t/a
9.3. Mat. for reclaim - production by-products	4	50 %	25 %	25 %	0 %	50 %	100-1000 t/a
10. Pb bullion PM Rich	1	100 %	0 %	0 %	0 %	100 %	10-100 t/a



- To be discussed:
 - **Doré:**
 - One company declared this as a substance, not an intermediate
 - **Slags:**
 - Slags declared to be intentionally used as aggregate (i.e. substance) but can also be used as intermediate/by-products. Are these truly PM slags? Are there other PM Refinables having this multiple profile? Slags from PM refining usually contain valuable metals that are further recovered. If a process for PM refining is designed to produce a slag with lowest level of metals (valuable as well as hazardous) than this slag can be used as aggregate for road construction but cannot be used as intermediate at the same time - no possibility to recover metals. How can we justify that a slag with low metal content and a slag with high metal content are the same substance? Don't they originate from different sources and processes? Is the slag meeting the criteria for road aggregate really a PM slag (i.e. resulting from the refining of PM and not a step before?). Need for separate dossiers for each type of slag based on actual source and process?



- To be discussed:
 - If the slag used as roadfill aggregate is considered to be a separate slag, what manufacture/imported tonnage applies? Would it be potentially subject to Authorisation? Unless it has been depleted from hazardous constituents or composed of non-leachable constituents and is hence not classified? Can this be demonstrated?
 - **Slimes & sludges:** waste status and UVCB status (need for separate dossiers for each type of slime based on actual source and process?)
 - Same material may be designated as waste and as non-waste by different costumers/suppliers. How to reconcile this different approach to the regulators?



4.3. 2013 work programme

Project strategy:

1. Demonstrate and document the substance status of the PM Refinables:
 - Waste, by-product or non-waste;
 - Substance or intermediate;
 - UVCB.
2. Update preparation (if SCC): demonstrate SCC and update individual Registration Dossier by adding Appendix 3.
3. Upgrade preparation (if not SCC/business decision):
 - Demonstrate due diligence;
 - Risk assessment of UVCB: contribute to Eurométaux guidance under development;
 - Upgrade joint Registration Dossiers by addressing tonnage band related information requirements via an approach alternative to testing developed by Eurométaux members with ECHA.



Timeline 2013 work programme

	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Assess substance status & SCC of the Refinables - Survey refinement/clarification if needed - Define update/upgrade scope - Update ID cards to reflect outcomes survey + workshop									
Prepare input substance ID UVCB for 8 Jan EM/ECHA workshop Use assessment paper?									
Updates / SCC documentation - Document SCC supporting evidence in App. 2 & 3 - Review and/or justify PROCs - Update individual IUCLID 5 file									
Upgrades Contribute to development guidance to risk assess inorganic UVCB under REACH									
Preparation of sector-wide/generic Exposure Scenarios									
Development of site-specific Exposure Scenarios									

EM/ECHA workshop

EM MM database

Ref mtg?



Cost-sharing

PROPOSAL

Whether going for updates or upgrades, proposal is to go as other consortia:

- Everyone contributes to dossier upgrade preparation
 - What happens with those ceasing to manufacture?
- Each registrant to identify whether upgrade needed once ready/if challenged by authorities



5. AOB, Next Meetings/Calls & Closing Remarks

• • •

Edwin BROECKAERT



Thank you and happy holidays!

