



## MINUTES

AP refer to Action Points listed at the end of this document.

### Executive summary

- Updated **classifications** will be submitted together with updated **composition** and concentration ranges.
- A **survey** to assess **substance identity** (waste/non-waste, substance/intermediate, UVCB) and **SCC** will be circulated to PMC Members, together with a number of factsheets and an assessment paper documenting the identity of the Refinables. Survey results will be used to update the Refinable ID cards and to define the scope of the 2013 work programme (updates/upgrades).
- An **intermediate workshop** will be organised for PMC Members to get more clarity on the definition of intermediate/SCC/waste through presentation of theoretical background and practical examples.
- PMC Members agreed to participate to the collective response from Eurométaux on the **intermediate annotation letters**, with commitment to update/upgrade and with timeline of the work programme.
- Registrants going for a Dossier **update** should prepare SCC supporting evidence in the form of Appendix 2 & 3 and submit the respective Appendix 3 by March 2013. Depending on the outcome of the PROCs discussion at the January 2013 Eurométaux/ECHA workshop, PROCs will be reviewed and/or justified.
- In preparing for Dossier **upgrades**, Eurométaux is developing a multi-metallic database containing metal ERVs and TRVs and 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.
- The **exposure assessment** is conclusive as regards rigorous containment assessment (not feasible sector-wide, only company-specific) but will continue for preparation of upgrades (work in progress depending on multi-metallic database).

### 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 (28 June 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 4-7. 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 rigorously contained / handled under SCC will be combined and circulated later this year. Survey results will be used to update the Refinable ID cards and to define the scope of the 2013 work programme (updates/upgrades). **AP1-2**
- The composition and concentration ranges of each Refinable ID Card are currently being adjusted based on composition information provided in the 2011 occupational exposure questionnaire and for the classification assessment exercise. **AP7**
- The updated classifications of the Refinables have been re-circulated, approved and will be uploaded to IUCLID by the end of November, together with a classification assessment document explaining the approach used. **AP10-11**
- RiCoG can be downloaded from <http://www.ebrc.de/ricog.html> and PMC Members have been invited to use the tool to assess if their Refinables are rigorously contained.
- For the exposure assessment, WCA and EBRC have collected the info they need from PMC members, but the actual assessment for preparation of upgrades will not be conclusive before the latest ERVs and TRVs become available. Eurométaux is developing a multi-metallic database containing metal ERVs and TRVs and a data-sharing agreement to be approved by all data providers is currently under discussion. **AP12-13**
- The PMC secretariat is supporting the Eurométaux REACH intermediate Task Force in preparing input on UVCB substance identification for a workshop with ECHA planned to be held before end 2012. **(Post-meeting note:** *The ECHA/Eurométaux workshop will probably be held in January*



2013.) Furthermore, the PMC secretariat/consultants are supporting the Eurométaux REACH intermediate Task Force in developing guidance and test cases to risk assess inorganic UVCB substances under REACH. [AP14-15](#)

- Registrants who are confident about the SCC status of their intermediate(s) - and are thus going for an update of their Registration Dossier(s) - are reminded that they should prepare SCC supporting evidence in the form of Appendix 2 & 3 (using Eurométaux examples) and submit the respective Appendix 3 (cf. on-going discussion on PROCs addressed under 3.3 below) as soon as possible. [AP21](#)
- No remarks on the minutes; minutes approved.

## 2. Recap project strategy. (Cf. slides 8-10 in Annex 2)

The project strategy for the PM Refinables can be summarized as follows:

- 1) Demonstrate and document substance status:
  - Waste or non-waste
  - Substance or intermediate
  - UVCB
- 2) SCC determination and decision to update/upgrade using REACH text and guidance, RiCoG, exposure/emission assessment, expert judgment and view of authorities
- 3) Update preparation (if SCC): demonstrate SCC and update individual Registration Dossier by adding Appendix 3
- 4) Upgrade preparation (if not SCC/business decision):
  - Demonstrate due diligence
  - Risk assessment of UVCB: contribute to Eurométaux guidance under development
- 5) Classification: upload updated classifications

## 3. Demonstration of substance status of PM Refinables. (Cf. slides 12-23 in Annex 2)

### 3.1. Factsheets waste, UVCB, intermediates, SCC and survey 1 for non-waste, UVCB & intermediate status assessment.

- A survey to assess the (non-)waste, UVCB and intermediate status of the Refinables, and to review the scope of work will be circulated later this month. (**Post-meeting note:** Survey 1 will be combined with survey 2 and 3 to check RiCo and SCC and will be circulated in November.) [AP1-2](#)
- Factsheets have been developed to check the intermediate status of the Refinables and to check handling/use under SCC (Cf. Annex 3-4). Factsheets on waste and UVCB status are under development. [AP3-4](#)
- The PMC secretariat suggests organising an interactive 1-day workshop on REACH and intermediates, if there is enough interest from PMC members. The objective of the workshop is to get more clarity on the definition of intermediate/SCC/waste through presentation of theoretical background and practical examples. Specific (anonymised) case studies provided by PMC Members would be presented and potentially evaluated by experts/MSCA representatives (e.g. from Germany/UK) (caveat is that different MS may have different interpretation). It is stressed that examples at the workshop should not be viewed as final and applicable to all companies. The final decision on intermediate status is still company specific. (**Post-meeting note:** The intermediate workshop will be organised as part of the next PM Refinables meeting on 13 December 2012.) [AP6](#)
- Waste, as defined within the Waste Framework Directive, is explicitly excluded from REACH by not being classified as a substance, preparation, or article. However, if waste is being reprocessed and recovered, REACH applies from the point where waste ceases to be waste.
- If a company decides that his registered substance is actually a waste and thus exempted from REACH registration obligations, he shall inform ECHA by claiming he 'ceased manufacture'. Companies going for the waste route will need to provide very good arguments as to why they believe their substance is a waste, in case they are questioned by local authorities. In addition to the factsheet on waste, the PMC secretariat will prepare a factsheet on REACH and ceasing



manufacture. [AP4](#)

- Within the EU, the national regulations implementing the Waste Framework Directive will apply and must be observed for waste. PMC Members planning to categorise their Refinable(s) as waste are also reminded of the Basel Convention (Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal) on the limitation of movements of hazardous waste between nations.
- Spent catalysts are considered waste if they are discarded or intended to be discarded. 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. If, however, the generator of the spent catalyst sends a spent catalyst to a recovery or disposal facility then the spent catalyst will be classified as a waste and the regulations pertaining to the transport/transfer of wastes will apply. Once the spent catalyst is recovered or undergoes a chemical modification, it stops being a waste and the REACH regulation applies. It is noted that in Turkey, slimes and sludges are considered waste
- If PMC Members categorise a Refinable as intermediate, the Refinable of concern will have to be handled as an intermediate throughout its entire life-cycle and hence, its supply chain. The same applies to SCC, which need to be implemented throughout the entire supply chain and life-cycle for the registrant to be able to claim the SCC status and benefit from the lighter REACH requirements.
- In most cases, whether a Refinable is considered a waste or a substance/intermediate to be registered under REACH is ultimately a business decision. Each company should put the pros and cons of the different options next to each other for each material.
- If a substance is not considered to be a waste or an intermediate, a full substance dossier will be needed, meaning that the substance will not be exempt from Authorisation.
- The PMC secretariat will draft a paper documenting the (non-)waste, intermediate and UVCB status of the Refinables for PMC Members to provide comments/input on. [AP5](#)

### 3.2. Reviewed composition and concentration ranges.

The composition and concentration ranges of each Refinable ID Card are being adjusted based on composition information provided in the 2011 occupational exposure questionnaire and for the classification assessment exercise. The following disclaimer will be added:

*“In a UVCB substance, the number of constituents is relatively large and/or; the composition is, to a significant part, unknown and/or; the variability of composition is relatively large or poorly predictable. Hence, concentration ranges outside the ones given above do not exclude sameness.”*

The review results in narrower concentration ranges for some Refinable constituents, but can also result in broader concentration ranges for other Refinable constituents. The following options were proposed:

- Either removing outliers from the concentration range (based on classification outliers) to bring the concentration ranges to a more reasonable range (and assume these outliers are then covered by above disclaimer); or
- Submit the reviewed concentration ranges including the outliers (to make sure potential new registrants are also covered for example).

PMC Members agreed to leave the reviewed concentration ranges as they are (including outliers) ([AP7](#)). In case ECHA questions the composition or sameness of the Refinables because of the large concentration ranges, company-specific compositions as well as information on common origin and process, as well as common RMMs can be used to justify the concentration ranges.

PMC Members are asked to check if all constituents have been reported in the ID cards and to inform the PMC secretariat on missing ones ([AP8](#)). If PMC Members decide to produce/handle a new Refinable, the scope of the PM Refinables project can be enlarged if the new Refinable does



not fit the identity of any existing Refinable (depending on the tonnage of the new Refinable, it could be exempt from Registration under REACH).

The Refinable ID Cards will be further updated to reflect the main outcomes of the substance identification survey. [AP9](#)

### 3.3. ECHA screening of intermediate dossiers. (Cf. Annex 5-6)

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.

The tool screens the use descriptors (PROCs and ERCs) applied for the intermediate dossier submissions. Of the 5.500 screened intermediate dossiers, 2.388 included uses incompatible with intermediate definition/SCC conditions representing 760 intermediate substances. ECHA sent letters to 574 registrants. Several PMC members received annotation letters requesting them to review and update their dossiers within three months. Annotation letters were received for all Refinables but so far not for other PM intermediates (so-called simple or in-process intermediates). The challenged PROCs for the Refinables are PROC 22 and PROC 26. It is noted that ECHA has appointed dossier holders to follow-up those now opened registration dossiers. They will consequently not be closed by a simple removal of PROCs or by changing the PROC by free text.

Eurométaux (EM) sees this ECHA initiative as challenging the extensive work they perform on the updates of UVCB intermediate dossiers. ECHA indicated that the annotation letters should be considered as 'warnings' (the updated intermediate guidance dates from December 2010 and ECHA has not received any updated dossiers yet) and be seen as an opportunity to address these issues prior to potentially being imposed in a more formal and binding action e.g. via an Article 36 letter.

EM is undertaking the following actions regarding ECHA's screening of intermediate dossiers (Cf. Annex 5):

- Send an official letter to Christel Musset (Director of Registrations at ECHA) with a collective response from the metal sector to the annotation letters. The letter explains the action plan proposed by EM regarding updates/upgrades (with timeline - see below).

*(Post-meeting note: At the 16 October EM REACH Forum meeting, it was agreed that an Annex would be added to the letter with names of companies engaging with the EM action plan. As EM received heterogeneous information from different consortia, it was decided that it would be more appropriate to only provide names of consortia engaging with the action plan in the initial stage. Company names would be sent at a later stage.)*

The main reason for this 'sector commitment' is to reassure ECHA that the metals sector is taking action to bring intermediates dossiers in compliance. In the letter, EM also asks ECHA to keep the annotation letters on hold for those companies who committed to update/upgrade their dossiers. [AP16-18](#)

- Start an informal dialogue with Andreas Ahrens from ECHA's Computational Assessment Unit on the challenged use descriptors. EM agrees that some of the (metal) PROCs are indeed not compatible with SCC, in particular when the definition of the PROC mentions opportunity for contact/exposure/low or no degree of containment. For some of the challenged PROCs however, the PROC taken on its own does not allow to draw a clear-cut conclusion on SCC/not SCC. E.g. PROC 22, where the level of containment in the definition of the PROC is not clearly defined ("potentially closed"). In the context of PROC 22 (but also PROCs 26 and 27 a and b) the assessment of SCC should rely not only on the PROCs but also on the justification that will basically be provided in Appendix 3 (in this respect, it is important for companies that have concluded their SCC assessment to prepare and submit their Appendix 3 ASAP). [AP21-22](#)



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- Formal technical discussion/workshop between EM and ECHA on the PROCs issue to clarify specificities in the metal PROCs. Feedback from this discussion would be used to correct the metal dossiers where needed in the context of updates/upgrades. (**Post-meeting note:** The PROCs discussion will probably be held in January 2013, together with the UVCB substance identification workshop.) [AP14 & AP22](#)
- Formal technical discussion/workshop with the ECHA Substance Evaluation - and Evaluations Unit on the best methodology to use and apply for UVCB-intermediate dossier upgrades (cf. work done by the EM REACH intermediates Task Force). [AP15](#)

#### Comments/concerns from PMC Members:

- PMC Members agreed that in some cases, PROC 22 and PROC 26 can be SCC compliant, so there is added value in EM addressing this. It is noted by one of the PMC Members that if PROC 26 ('handling of solid inorganic substances at ambient temperature') as applied to massive blocks is run through RiCoG, rigorous containment can be demonstrated. However, since many of the PM Refinable dossiers will probably need an upgrade, we should avoid investing a lot of time on the PROCs discussion.
- If PMC Members decide to change their PROCs following the annotation letters, they should be aware that their Appendix 3 will be checked, so evidence will be needed in Appendix 3 why the PROCs were changed and why SCC can be demonstrated. [AP21-22](#)
- The annotation letters do not only challenge the SCC but also the intermediate status. Therefore, PMC Members should check the intermediate factsheet and make sure they can demonstrate transformation of the Refinables during processing. Especially for Refinables which are not intentionally manufactured (e.g. materials for reclaim, flue dusts and slags), it will be important to document the intermediate status well. Some examples of intermediates are included in Appendix 4 of the ECHA guidance on intermediates of December 2010. [AP5](#)
- If you un-tick the SCC box in your Registration dossier, you have to provide a full dossier right away.
- The cost of an upgrade will depend on the data-sharing agreement. We will not need access to the full dossier of the constituents; only RSS will be needed. (**Post-meeting note:** PMC anticipates a cost of 35.000 €/dossier upgrade (working hypothesis inspired from cost prediction of other consortia: Cu ~ 15.000 €/dossier upgrade and Pb ~ 50.000 €/dossier upgrade).)
- Some PMC Members questioned the benefit and outcome of EM's active involvement with ECHA. It was reminded that EM is gaining time and credibility for the metals sector when providing ECHA with the requested information; moreover, it gives the sector the opportunity and advantage to develop its own sector-specific approach to upgrade intermediate dossiers. Furthermore, the role of EM as a sector representative was emphasized: ECHA will not communicate bilaterally with companies but will communicate with sector associations; only few seats are available for permanent industry representatives in ECHA and EM together with CEFIC and a few other wide representatives of industry are the privileged ones. All member companies are welcome to provide input to EM activities / Task Forces. Although it may not always be clear from the EM monthly REACH News, EM is involved in several ECHA committees and has already made several achievements through their interactions with ECHA, e.g.:
  - EM was invited to train the ECHA evaluation unit on metal specificities (read-across, specific test guidelines for metals e.g. bio-elution, T/D);
  - EM advocated the use of measured data instead of modelled data for exposure assessment.(**Post-meeting note:** Other achievements will be presented by Violaine Verougstraete, EHS Director of EM, at the PMC Assembly Meeting of 5 December 2012 in Brussels.) [AP19-20](#)
- PMC Members agreed to refrain from sending individual/consortia-specific responses to the annotation letters but to participate to the collective response from EM and wait for ECHA's response ([AP16-18](#)). Meanwhile, those companies that are confident in their SCC compliance, should continue to prepare their in-house documentation and Appendix 3 for updates ([AP21](#)), and the PMC will continue to participate to EM's activities in developing the best methodology for upgrades ([AP15](#)).



**(Post-meeting note:** With regard to the action plan and timeframe, EM proposed the following to ECHA:

- In case of confirmed SCC/intermediates compliance:
  - Dossier update with a completed Appendix 3 and revised PROCs (according to the outcomes of the technical discussion). Proposal is to do this in one batch.
  - Fulfil the other conditions like in-house documentation, confirmation from users of intermediates, etc.
  - Timetable: if the discussion on PROCs can take place before end 2012, updates shall be carried out by end of March 2013
- In case the SCC or intermediate status cannot be confirmed:
  - Dossier upgrade to a full Article 10 registration, applying the methodology and agreements currently under discussion
  - Timetable: first dossiers shall be made available by summer 2013 and most will be complete by year-end.)

#### 4. Classification & labelling: status updated classifications. (Cf. slide 25 in Annex 2)

The updated classifications of the PM Refinables were presented at the last PM Refiners WG meeting (28 June). Since then, a minor modification was made to the classification of Doré (environmental and human health endpoints were integrated). Removal from water column results for Ag were not considered, as interpretation of these results are currently still under discussion (both within Eurométaux and within the Ag group). The PM Refinable classifications will be reviewed when we have more final decisions on the UWM results for Ag and other metals.

WCA will now enter the classifications into IUCLID and attach the document describing the approach. Updated IUCLID files will be supplied to the Lead Registrants for submission by end of November 2012.  
[AP10-11](#)

#### 5. First tier Rigorous Containment (RiCo) assessment. (Cf. slides 27-28 in Annex 2)

PMC Members were informed on the availability of RiCoG on the EBRC website (<http://www.ebrc.de/ricog.html>) some weeks ago and they agree the tool is useful. There were no technical questions related to the tool.

Survey 2 will be circulated later this month to check RiCo of the Refinables. This assessment can be done using RiCoG or other tools/expert judgment. **(Post-meeting note:** Survey 1 will be combined with survey 2 and 3 to check RiCo and SCC and will be circulated in November.) [AP1-2](#)

#### 6. Update on activities Eurométaux REACH intermediate Task Force and how these affect the Refinables project.

The PMC is participating to the Eurométaux Task Force on REACH intermediates (the former SCC Task Force, including representatives from several metal consortia), which is preparing guidance on how to perform substance identification ([AP14](#)) and how to assess metallic UVCBs, using practical examples ([AP15](#)). Within the Task Force, sub-groups have been identified on data-sharing, substance identification, human health risk assessment and environmental risk assessment.

##### 6.1. Data-sharing. (Cf. slides 30-31 in Annex 2)

It is a difficult process to get all consortia involved. There is now agreement to share data for development of the multi-metallic database, but the use of data for dossiers is still under discussion. John Schonenberger, chairman of the Eurométaux REACH Forum, sent a letter to the different consortia pleading for a documented but free exchange agreement between consortia. Since not all consortia agree with this approach, it currently looks like costs will be involved.

Information was collected on substances of interest for the different consortia and substances on which consortia hold data, company members of the consortia and information on existing LoA/LtU, as well as information on consultants involved in the risk assessment. In order to



objectively interpret the retrieved information, common Members and UVCB across consortia will be mapped in an objective and visual manner to support the need for having a simple/free data-sharing agreement. Data from commodities outside Eurométaux will probably not be needed, but this will need to be assessed. [AP13](#)

#### 6.2. Status multi-metallic (E-)TRV database. (Cf. slides 32-35 in Annex 2)

In order to perform intermediate and mixture effects assessments, access to data from several metal Dossiers is needed. To this purpose, Eurométaux is developing a multi-metallic database containing metal ERVs and TRVs and their justification. This is an important exercise to demonstrate to ECHA that industry shares relevant information. Data are being retrieved from the different metal consortia and additionally from the ECHA dissemination website.

Data are still missing for several metals ( $\pm 25\%$ ) ([AP12](#)). The collection of data is going slower than anticipated, since some consortia needed to reach agreement to participate to the exercise first. Also, some consortia may not have the resources to fill out the data questionnaire and help might be needed. For some metals, only effect data for the elemental form were received whereas for others, also species data were received. How to take into account the speciation (typical or worst case) of the constituents in the risk assessment of the PM Refinables will need to be clarified ([AP15](#)).

#### 6.3. Substance identification and characterisation. (Cf. slides 36 in Annex 2)

The substance identification sub-group is putting together guidance on substance identification and characterisation of UVCBs to be discussed at the planned workshop with ECHA. [AP14](#)

UVCBs are substances of Unknown or Variable composition, Complex reaction products or Biological material. For Refinables, the composition is quite well known but the variability of the composition both intra- and inter-registrants is large (more 'V' than 'U'). The chemical composition and the identity of the constituents of a UVCB should be given as far as known. If not all constituents are known, the risk assessment will have to be more conservative (several assessment factors will need to be taken into account).

#### 6.4. Human health risk assessment. (Cf. slides 37-41 in Annex 2)

The risk assessment of a UVCB is based on the available effects/exposure/risk information of the individual constituents. In order to develop a targeted risk assessment, a prioritisation tool is needed to identify the driving constituent(s) or 'risk driver(s)'. Selection of the risk drivers could be and has been performed in different ways. Currently, three approaches are being proposed:

- 1) Qualitative approach: expert judgment is used to select the driving constituent(s);
- 2) Constituents' hazard classification approach: hazard-based selection of driving constituents for each endpoint or effect and exposure route;
- 3) Decisive DNEL approach: risk-based selection of driving constituents for each relevant endpoint or effect, exposure route & exposure duration.

The approaches are still under discussion and their underlying principles should be validated by assessing one or several UVCB examples. [AP15](#)

Comments from PMC Members:

- Qualitative approach can be useful for a company-specific Exposure Scenario but difficult to use for a Generic Exposure Scenario (GES) or a CSR. In the decisive DNEL approach, you could start from a GES, and then go company-specific if needed.
- The decisive DNEL approach is useful for large consortia with a lot of companies and a lot of streams.
- It is noted that the decisive DNEL approach is also being taken up by other consortia (e.g. ILA).



➤ **Update on workplace exposure assessment of the Refinables.** (Cf. slides 43-53 in Annex 2)

EBRC presented the approach for the workplace exposure assessment:

- Low DNELs require exposure assessment based on monitoring data as modelled exposure levels are far too high.
- Exposure assessment to cover each site and Refinable.
- Pooling of monitoring data is required to enlarge the database for specific exposure situations (strict requirements in R.14). Pooling is justified for similar substances handled in similar processes. Similarities are identified based on composition (requiring information per stream) and based on RMMs and OCs as described in the questionnaire.
- Pooled workplaces in the exposure scenario result in “Pooled exposure assessments”.

EBRC received 50 questionnaires (17 additionally included/modified since last meeting) and 1.025 monitoring data, of which 778 are currently included in the relational database (clarification on others needed). This currently leads to 9.723 data points for individual constituents.

The main objectives of the analysis of the monitoring data are:

- To support a sector-wide demonstration of rigorous containment;
- To determine correlations between several exposure modifiers and exposure levels;
- To define similar exposure groups;
- To facilitate exposure assessments required for Exposure Scenarios.

EBRC presented the exposure analysis (cf. Annex 2 - slides 47-50). Current findings do not allow:

- To support rigorous containment on a sector-wide basis. Further support for rigorous containment assessment will only be possible at company level but not with the pooled database because of variability/reality;
- To find statistically significant exposure modifiers (operational conditions, risk management measures, composition);
- To attribute exposure to composition “exact” levels.

Current findings do allow to derive exposure levels on a sector-wide basis for specific

- i. Processes and classes of emission potential;
- ii. Constituents and;
- iii. Composition categories (to be defined per constituent).

The database will be used for the generation of a Generic Exposure Scenario (GES). This GES will provide exposure estimates for all constituents for different processes for different composition categories. From this GES, a ‘generic company-specific Exposure Scenario’ will be developed based on the composition of the Refinables handled at a given site under specific exposure settings. [AP24-26](#)

#### 6.5. Environmental risk assessment.

WCA will progress the environmental exposure assessment of the Refinables once the Eurométaux multi-metallic database (which will include partition coefficients) is available. [AP27-28](#)

#### 7. Authorisation - substances on SVHC list of relevance to the PM sector. (Cf. slides 57-58 in Annex 2)

The European Commission wants 136 substances included on the REACH Candidate List for Authorisation by the end of this year. All PMC Members are asked to screen SVHC lists and provide feedback to the PMC secretariat on the substances they use and would require Authorisation preparation support for (if the substance is added to the Candidate List and/or prioritised for Authorisation). The PMC secretariat can then set up a Task Force (via Eurométaux, with other consortia, or as a standalone Task Force). [AP29](#)

It is noted that during a public consultation round, interested parties only have 45 days to comment.



For authorisation, all users of a substance must be involved.

**8. Next steps, AOB, next meetings/calls and closing remarks. (Cf. slide 59 in Annex 2)**

It is suggested to combine the surveys into 1 survey and circulate it before the potential intermediate workshop (preliminary), and possibly repeat after the workshop (final). **AP1-2**

It is proposed to have the next Refinables meeting on 13 December 2012.

**Annexes**

1. Agenda & list of participants
2. Slides presented at the meeting
3. Factsheet intermediates
4. Factsheet SCC
5. Eurométaux actions on ECHA screening of intermediates
6. Eurométaux letter to ECHA with sector-wide response to the annotation letters

**Actions**

**Table 1. Actions resulting from the 10 October 2012 PM Refiners WG meeting in Brussels**

	Action	Who?	Timeline
<b>A.</b>	<b>PMC Survey substance identification &amp; SCC determination</b>		
1.	Survey to assess the (non-)waste, intermediate and UVCB status of the Refinables, and to assess which Refinables are rigorously contained / handled under SCC, to be circulated together with: <ul style="list-style-type: none"> <li>• Assessment document (non-)waste, intermediate and UVCB status of PM Refinables</li> <li>• Factsheets: <ul style="list-style-type: none"> <li>✓ Intermediates</li> <li>✓ SCC</li> <li>✓ UVCB (cf. AP4)</li> <li>✓ Waste (cf. AP4)</li> <li>✓ Cease manufacture (cf. AP4)</li> </ul> </li> </ul>	Circulate and collate: KA Complete: PMC Members	Preliminary: Nov 2012 (Final: Dec 2012 - Jan 2013)
2.	Compile answers to Survey in order to list Refinables for which either an: <ul style="list-style-type: none"> <li>• update will be needed, or</li> <li>• upgrade will be needed</li> </ul> Report update/upgrade scope to Members and consultants	KA	Dec 2012  13 Dec 2012
<b>B.</b>	<b>Substance identification</b>		
3.	Provide comments on intermediates and SCC factsheet	PMC Members	Oct-Nov 2012
4.	Finalise factsheets on UVCB, waste and cease manufacture and circulate for comments and use as in AP1	KA	Oct-Nov 2012
5.	Circulate draft assessment document (non-)waste, intermediate and UVCB status of PM Refinables for comments by PMC Members <ul style="list-style-type: none"> <li>• First commenting round for lead registrants</li> <li>• Second commenting round for co-registrants</li> </ul>	Circulate: KA Comment: PMC Members	Nov 2012
6.	Prepare and circulate one-pager on proposed intermediate workshop (addressing waste/non-waste, intermediate, UVCB status of PM Refinables) to check interest from PMC Members	KA	Nov 2012
7.	Adjust composition and concentration ranges of each ID Card based on composition information provided for classification assessment exercise without taking out outliers and add following disclaimer: <i>"In a UVCB substance, the number of constituents is relatively large and/or; the composition is, to a significant part, unknown and/or; the variability of composition is relatively large or poorly predictable. Hence, concentration ranges outside the ones given above do not exclude sameness"</i>	KA	Oct-Nov 2012
8.	Check all constituents have been reported in ID Cards and inform PMC secretariat on missing ones	PMC Members	ASAP
9.	Update ID Card of each Refinable to reflect main outcomes of survey and update registration strategy accordingly	KA	Dec 2012 - Jan 2013



<b>C. Classification &amp; labelling</b>			
10.	Upload all updated classifications and "Classification assessment" document in each IUCLID 5 file	WCA	Oct-Nov 2012
11.	Submit updated IUCLID 5 file	Lead Registrants	End Nov 2012
<b>D. Eurométaux REACH Intermediate Task Force</b>			
12.	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	Oct-Nov 2012
13.	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)	Aug-Dec 2012
14.	Prepare input on substance identification of UVCB and metal-specific PROCs for January 2013 Eurométaux/ECHA workshop	Eurométaux (with PMC support)	Jul-Dec 2012
15.	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
16.	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, cf. Annex 6
17.	Circulate above letter to PMC Members for information	KA	Done
18.	Follow-up response from ECHA on above letter and assess need for company-specific response (possibly a company letter or a disclaimer in individual IUCLID 5 file) to annotation letters keeping in mind the 12 December deadline companies received from ECHA	Eurométaux	Nov 2012
19.	Request Eurométaux to make achievements more visible in their monthly REACH news	CB	ASAP
20.	Eurométaux to present pros and cons of active involvement at ECHA at 5 Dec 2012 PMC Assembly meeting	CB to invite Vio	ASAP
<b>E. Updates (SCC compliant companies only)</b>			
21.	Document SCC supporting evidence in Appendix 3	PMC Members	ASAP
22.	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
23.	Update individual IUCLID 5 file with Appendix 3 and reviewed and/or justified PROCs	PMC Members	End Mar 2013
<b>F. Human health exposure assessment for upgrades</b>			
24.	Describe approach towards preparation of sector-wide and company-specific Exposure Scenarios	EBRC	Oct-Nov 2012
25.	Once TRV are compiled in the Eurométaux multi-metallic (E-)TRV database, continue preparation of sector-wide Exposure Scenarios	EBRC	Nov 2012 - May 2013
26.	Develop site-specific Exposure Scenarios	EBRC	Jun-Aug 2013
<b>G. Environmental exposure assessment for upgrades</b>			
27.	Once ERV are compiled in the Eurométaux multi-metallic (E-)TRV database, prepare generic Exposure Scenario	WCA	Nov 2012 - May 2013
28.	Consider need for site-specific Exposure Scenarios	All	Jun-Aug 2013
<b>H. Authorisation</b>			
29.	Screen individual SVHC lists and provide feedback to PMC secretariat on which substances they are interested in	PMC Members	ASAP