

**From:** EHS Assistant <EHSAssistant@eurometaux.be>  
**Subject:** FW: news on intermediates letters and PROCs  
**Date:** 5 Oct 2012 17:20:51 GMT+02:00  
**To:** EHS Assistant <EHSAssistant@eurometaux.be>  
**Cc:** Violaine Verougstraete <verougstraete@eurometaux.be>, "Katia LACASSE (katia.lacasse@copperalliance.eu)" <katia.lacasse@copperalliance.eu>, "Daniel VETTER (dv@ebrc.de) (dv@ebrc.de)" <dv@ebrc.de>

**To the Members of the Task Force on Reach Intermediates**

Dear All,

I hope you are all doing fine!

Yesterday evening, I had the opportunity to discuss with Andreas Ahrens the *intermediates letters* several companies received over the last weeks as well as the (metal) PROCs.

Thanks to those who kindly transmitted the PROCs that had been targeted and the huge amount of work Federica and Daniel did to compile them and draw some 'lessons', I had a nice technical support document for the discussion.

The discussion was open and constructive and we agreed on the following next steps:

1. **Follow-up on the technical aspects related to the metal PROCs**, i.e. used a table Daniel prepared early this week, where he commented on the assessment by ECHA of the different PROCs as being SCC compatible or not + highlight the following issues with regard to the metal PROCs:
  - a. some of the PROCs have been used to describe pre-steps of the chemical transformation and do not refer to the chemical transformation of the intermediate itself (e.g. it may refer for example to a pre-step where the physical appearance of the intermediate is modified (like milling) in order to increase the efficiency of the chemical transformation)
  - b. we agree 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. However, there are other PROCs where the PROC taken on its own does not allow to draw a clear-cut conclusion on SCC/or not SCC. An example is PROC 22, where the level of containment in the definition of the PROC is not clearly defined. The terms "*potentially closed*" have been used when drafting the PROCs to consider as well some differences between metals/plants in those hot processes. 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. *ECHA asks us though to indicate/explain where they will find the justification: in other words whether we will send in those appendices 3 as they do not have a lot yet*
  - c. PROCs have been defined and used –and the metals PROCs in particular- also as entry to Tier 1 exposure modelling tools, mainly MEASE. The purpose was not to reduce them as SCC descriptor

**Timing: before Monday COB**  
**Who? Daniel, Fè, Vio**

**2. Write a letter to Christel Musset explaining that:**

- we understood the purpose of the letters and seriousness of the issue
- explain that we are currently updating/upgrading a number of dossiers (moving either to Article 10 registrations or to well justified SCC cases with appendices 3 and 2) and that we are in discussion with the Substance ID units and Evaluation Units on the methodology to use to apply to upgrade our dossiers and give a kind of timeline
- stress that we have some issues with the table of PROCs as included in the annotation letters, linked to specificities in the metals PROCs/justification and that we would utmost welcome the possibility to have a technical discussion with the ECHA experts on this
- we will bring back the outcomes of this discussion with ECHA to our dossiers and correct the PROCs where need so (with proposal of timing) in the context of updates & upgrades

- that as EM we commit to the fact that the sector will integrate the updating of use description into the other mentioned revision activities (with proposal of timing, see above) and ask whether ECHA's follow-up on this issue (after 3 months) could be put 'on hold' temporarily

**Timing: asap**

**Who? A draft will be discussed at the meeting of the taskforce next week**

*Note: To ensure maximum impact of such a letter, it was recommended to write this letter as EM, as sector representative and to refrain from sending consortia-specific letters*

3. Organise a meeting on PROCS-discussion back-to-back with Substance ID discussion

**Timing: before end 2012**

**Who? EM-ECHA**

4. To further discuss on Friday but clearly we need to send in appendices 3 for those who have concluded their assessment as SCC compatible...

Please do not hesitate to contact us if something is unclear and let's discuss this further on Friday

Have an excellent weekend

Vio