



MINUTES

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

1. Welcome and introduction.

1.1. Reminder on Confidentiality and Competition Law. Participants were reminded on their obligation to comply with Confidentiality and Competition Law.

1.2. Tour de table and apologies. The list of participants is available in Annex 1.

1.3. Approval of the agenda. The agenda is available in Annex 1. The aim of this meeting is to summarize where we stand and to review the next steps and associated timeline. No remarks / additions; agenda approved. Slides for this meeting are distributed in 2 sets:

- Annex 2.1 includes slides on the legal background and how companies should prepare for inspections.
- Annex 2.2 contains an overview of the current status of the Refinables project (workplace exposure, environmental emissions and classification).

1.4. Approval of the minutes of the last meeting (22 February 2012) - including status of action points.

A table with the status of the action points from the last meeting is available in Annex 2.1 - slide 4-7. In short:

- The classifications of the Refinables have been updated following a cluster analysis and are on the agenda for discussion today.
- ECHA does not consider the Eurométaux metal specific SCC examples to properly reflect SCC in the sense of the latest ECHA guidance on intermediates (*cf. Annex 5*). (**AP11-12**)
- Eurométaux and ECHA met on 21 May to discuss inorganic UVCB substance identification and assessment (*cf. Annex 6*) (**AP31**). This is on the agenda for discussion today.
- RiCoG will be publicly available soon. Once available, a survey will be launched to check for which Refinables / process steps RiCo can be demonstrated (by RiCoG or other means) and those where further exposure assessment is needed (**AP13-15**). The overall SCC status will be checked in a later survey (**AP26-27**).
- For the exposure assessment, WCA and EBRC have collected the info they need from PMC members, but the actual assessment will not be conclusive before the latest ERVs and TRVs become available (**AP18-25**). Eurométaux is developing a multi-metallic database containing metal ERVs and TRVs (**AP16-17**). The current status of the assessment and the status of the ERV/TRV collection are on the agenda for discussion today.
- Sites using borates as a flux agent or treating boron-containing intermediates are reminded to measure total versus soluble boron emissions in their aquatic effluents (**AP23**). Boron was discussed at the last meeting because of its environmental classification under the DSD.
- The cost-sharing will be reviewed once it is clear for which Refinables/companies an update will be done and for which an upgrade will be needed.

No remarks on the minutes; minutes approved.

2. Reminder on background and current state of play.

2.1. Legal background. (*Cf. slides 9-19 in Annex 2.1*)

- Participants were reminded on the definition of an intermediate, the specific registration requirements for intermediates and the definition of SCC. A “light” registration can be done for isolated intermediates if they are being manufactured and used under SCC. Absence of SCC confirmation over the complete supply chain triggers a full intermediate Dossier.
- SCC is a combination of RiCo and procedural and control techniques. It is stressed that an RCR (based on measured or modelled emission/exposure data) can be used as supportive evidence to supplement the demonstration of RiCo, but cannot be used to justify the lack or absence of RiCo.
- SCC has to be demonstrated for the entire lifecycle of the intermediate. If one step of the



lifecycle is not RiCo (e.g. loading / unloading furnace), then SCC cannot be demonstrated.

- Compliance with SCC is not a clear-cut decision and requires process knowledge and expert judgment at company level. Physico-chemical properties can be used to design RiCo. E.g. if a company switches from powder to crystals to protect its workers from exposure, this can be used in demonstrating RiCo can be achieved without implementing full enclosure (because prevention of release from a non-dusty material does not require the same level of enclosure than the prevention of release from a dusty one). However, PPE cannot be used to demonstrate RiCo.
- Companies who are confident about the SCC status of their intermediate(s) - and are thus going for an update of their Registration Dossier(s) - should document SCC status in Appendix 2 & 3 (using Eurométaux examples) as soon as possible, and attach their Appendix 3 to section 13 of their individual Registration Dossier to prepare for inspections (AP29). Otherwise they might be considered non-compliant and risk a penalty, as Member States now consider 'undue delay' passed and have started checking on SCC status.
- Companies who are unsure about the SCC status of their intermediate(s) need to be able to demonstrate ongoing work in preparation of possible upgrades ('due diligence') (AP34). The Eurométaux Roadmap on intermediates in Annex 7 can be used for this purpose.
- It is stressed again that it is a company's individual responsibility to demonstrate SCC to local authorities.
- REACH Article 36 allows ECHA and Member States to request from any registrant "all the information he requires to carry out his duties under this Regulation". Registrants of an intermediate are required to hold information confirming that the chemical is used as an intermediate (AP3), that SCCs are met and that downstream users are implementing those SCCs. In the Article 36 letters, ECHA asks registrants for detailed information on these three issues. Registrants are requested to provide details on the chemical reaction process for manufacturing another substance, a description of the technical role of the intermediate in this process and the chemical identity of the substance manufactured from the intermediate (AP28).

2.2. Outcome 21 May Eurométaux meeting with ECHA. (Cf. slides 20-32 in Annex 2.1 & Annex 6)

On May 21, Eurométaux met with ECHA representatives to discuss methodological aspects related to substance identification (SID) and assessment of UVCBs. The exploratory discussion allowed to highlight the issues the metals sector is facing when assessing UVCBs and to have a first exchange on the possible ways to address them. ECHA confirmed the need for a more in-depth technical workshop in Autumn, where science-based approaches could be presented at length and in presence of the consortia experts. This workshop shall cover human health and environmental risk assessment, SID, how to meet data needs, explanations and justification / format of reporting, weight of evidence and data access. Participants to this workshop are to be identified.

The discussion was open and targeted at finding pragmatic and scientific solutions. It highlighted the importance of SID for UVCBs:

- The motivation for grouping of substances is important and should be explained in a transparent and clear format. ECHA fears that a too wide SID could be used to include several (too) different UVCBs under one substance entry. On the other hand, SID should not be too legal entity specific to avoid unnecessary administrative burden (possible new streams should ideally be covered).
- The hazard identification should drive the risk assessment and characterisation rather than



the classification (cf. Recital 45 of the REACH regulation¹). Grouping can be done around compounds that are important for the risk characterisation.

- For the PM Refinables, sometimes streams from different sources are grouped under one Refinable for reasons of workability. PMC may need to reconsider or further document / justify this approach pending the results of the risk assessment.

For the risk assessment of UVCBs, an integrated approach will be needed. ECHA considered the decisive DNEL approach a novelty to be further worked out.

In preparation of the Autumn ECHA workshop, the Eurométaux taskforce on REACH intermediates (the former SCC taskforce, including representatives from several metal consortia) agreed to prepare guidance on how to perform substance identification (AP6) and how to assess metallic UVCBs, using practical examples (AP32-33) (cf. Annex 7).

(Post-meeting note: At the 6 July meeting of the Eurométaux taskforce on REACH intermediates, Flue Dust was identified as a common intermediate that may serve as one of the practical examples - to be further discussed.)

2.3. Multi-metallic database. (Cf. slides 33-40 in Annex 2.1)

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 (AP16). The database will allow access to and appropriate use of reliable and relevant data generated by several consortia.

The database is foreseen to be ready by end of August. There are a few issues to be sorted out:

- Data are still missing for several metals. It is important to communicate that data are not only needed for the assessment of intermediates but also for the assessment of alloys and mixtures.
- From the missing data to be followed up, Cd and As should be prioritised. These consortia will be contacted ASAP to check the status. If data for Cd and As are still lacking by the end of August, it is suggested to temporarily use the values from the ECHA dissemination website.
- A common (Letter of Access/License to Use-type) data-sharing agreement will be needed as not all consortia can give their data for free (AP17).
- Not all consortia may have the resources to fill out the questionnaire asking for their data; help might be needed.

2.4. Approach for the update/upgrade of the Refinables Dossiers. (Post meeting note for clarification)

The ongoing exposure assessment for the Refinables has two goals:

1. Support the RiCo assessment done by every company. For this goal the assessment should be as company-specific as possible; those companies having provided their exposure data should hence receive a company-specific report. Other companies will need to use the generic report which will be produced as part of the second goal.
2. Prepare upgrades (including an exposure assessment). For this goal the assessment will be generic, resulting in generic exposure scenarios (GES) which will be based on the operational conditions (OCs), risk management measures (RMMs) and exposure data provided by the companies who completed the questionnaires. Companies who have not provided questionnaires will need to make sure they "fit" with the GES themselves.

To finalise both assessments (company-specific and generic), the multi-metallic database is needed for access to the latest ERVs and TRVs, to which the exposure and emission data can be compared. Once the full assessment (several company-specific and one generic exposure scenario) is done, each company will

¹ The European Inventory of Existing Commercial Chemical Substances (EINECS) included certain complex substances in a single entry. UVCB substances (substances of unknown or variable composition, complex reaction products or biological materials) may be registered as a single substance under this Regulation, despite their variable composition, provided that the hazardous properties do not differ significantly and warrant the same classification.



be able to complete its SCC assessment and let the PMC secretariat know for which Refinables they need an update only and for which they need an upgrade. Each company should include several parameters in the SCC assessment, including the views of the local inspectors.

3. Workplace exposure assessment update. (Cf. slides 4-19 in Annex 2.2)

Approach for the workplace exposure assessment:

- Since quite heterogeneous feedback was received on the occupational exposure questionnaire, it was already proposed at the last Refinables meeting to group processes based on titles, descriptions, PROCs, OCs and RMMs.
- 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".
- The aim of the analysis of the measured inhalation monitoring data is three-fold:
 - 1) To determine similar exposure groups and to assign exposure estimates to them (classical approach - fall back strategy);
 - 2) To estimate the contribution of individual parameters to variation in exposure (advanced approach);
 - 3) To identify data-gaps (for conducting exposure monitoring).

50 questionnaires were received (1 further announced) and 710 monitoring data are included in the relational database (54 not yet included). At this stage, EBRC is focussing on the information submitted together with the monitoring data, to provide a basis for pooling/read-across:

- Process steps (company-specific) are grouped to process types ("pooled workplaces");
- For each process step, information on physical forms (e.g. "low emission potential" for damp solids, pastes, wet filter cakes) is aggregated where appropriate;
- RMMs and OCs are coded to enable categorical analyses;
- Composition information is reformatted. Currently the best descriptor for composition is being explored (min, max, median concentration).

For the analysis of measured data, personal measurements were used of the inhalable fraction and only measurements assigned to single process steps were used.

Several issues were observed during the analysis of the data (cf. Annex 2.2 - slides 13-14). EBRC is currently requesting further clarifications by data submitters (AP18). Similar discussions with non-data-submitters will follow since further information is required to enable the read-across approach.

Those who did not submit measured data yet, can still do so. If companies have measured data but not the resources to enter them in the EBRC form, they should send them to EBRC as such for inclusion in the assessment.

The advanced approach may involve a high workload for companies; costs and benefits are currently being analysed in a case study.

EBRC presented the explorative data analysis (cf. figures Annex 2.2 - slides 17-19). For Au and In, most measurement results were reported under the detection limit. For the time being the detection limit is used in these cases.

Once all data are received and TRV are compiled in the Eurométaux multi-metallic (E-)TRV database, EBRC will prepare generic exposure assessment reports and/or site-specific exposure assessments where needed (AP19-20).

**4. Environmental emissions assessment update. (Cf. slides 20-26 in Annex 2.2)**

The questionnaire gathered information on Refinable composition, tonnage, potential emissions, RMMs, monitoring data, local receiving environment characteristics and confounding factors. 12 questionnaires were received in total, of which 9 contained a good amount of useful information. These data will be the basis of the GES. A good level of information on wastewater output (and receiving environment) was available, slightly less information was available on stack emissions but just enough to work with.

A provisional GES was developed, primarily based on the 9 sites providing the most complete datasets. Recognising reasonable worst case and reasonable representative, it is recommended to use 90th percentile tonnage values and emission factors instead of maximum values.

The modelling is on hold until WCA receives the input parameters for each component (e.g. partition coefficients, PNEC etc.), which are currently being collated by Eurométaux. Once received, the environmental modelling will progress quickly. A tiered approach will be used. Company specific assessments will most likely be needed. [AP24-25](#)

5. Classification update. (Cf. slides 27-36 in Annex 2.2 & Annex 3)

The updated classifications of the Refinables are available in Annex 3. For each Refinable for which a cluster analysis was performed, a quick composition ID and a detailed composition ID with cut-off limits is available. The quick ID is based on the main drivers of the classification.

Classification of each Refinable can be done in 4 steps:

- 1) Check the concentrations of the main drivers in the Refinable based on the quick ID and identify the right cluster;
- 2) Use the full detailed ID to confirm the identified cluster;
- 3) If needed, use MECLAS or the full manual classification for refinement of the classification;
- 4) In step 4, further refinement potential can be evaluated.

The summation rule applies to classical mixtures (e.g. mixture of powders or alloys). For multi-constituent substances (MCS) with known ingredients (including known classification) the additivity rule can still be used. Normally, UVCB intermediates like the PM Refinables are considered substances under REACH meaning that the additivity rule can be used. The only exception would be if the UVCB is formed from a deliberate mixture of components.

Upcoming additional classification updates include:

- Multi-metallic platform to include “removal from water column” in next months. If Cu, Pb, Zn,... are driving the environmental classification, this can have a significant impact.
- Updates following the multi-metallic ERV data collection (low impact expected).
- Updates considering the PBT assessment. The new version of IUCLID includes the outcome of the PBT assessment in the extended Classification & Labelling IUCLID section (section 2.3). It is suggested to use the Unit World Model (UWM) calculation for this. [AP7-8](#)

It is suggested to include a classification assessment document in IUCLID for each Refinable ([AP9](#)). The concept of the cluster analysis will need to be explained. It is proposed to take this up with the ECHA classification unit through Eurométaux.

6. Preparing for inspections. (Cf. slides 44-74 in Annex 2.1)**6.1. Targeted “evaluations” and UVCB intermediates.**

Targeted compliance checks have been launched by ECHA, targeted on “virtually empty” dossiers with empty or limited CSR and on substances of the 2013 and 2014 CoRAP lists (or containing those) (e.g. Ag). Targeted compliance check themes for 2012 include ecotoxicity, genotoxicity and substance ID concerns. This may raise attention for inorganic UVCBs.

Earlier, ECHA screened all 414 (on-site and transported) intermediate Dossiers registered to



check whether they met the conditions specified for intermediates in REACH Articles 17 and 18. Of the 414 Dossiers (metals and inorganic substances), more than 80% had missing, insufficient or doubtful information on RMM/SCC and/or on intermediate status and were thus non-compliant. ECHA concluded that “most intermediate files require significant improvements” (updates or upgrades). The Management Board requested ECHA “to develop a compliance strategy (incl. intermediates)”, to promote the role of ECHA in improving compliance.

6.2. Caracal debriefing on ECHA’s activities on intermediates. (Cf. Annex 5.3)

Annex 5.3 gives an overview of ECHA’s activities on intermediates, mainly, but not only, focussing on SCCs. At this moment in time there are not sufficient grounds to initiate an update of the Guidance on intermediates. Furthermore, it is stated that a risk based approach to justify SCC is not in line with REACH and is not allowed.

In the Article 36 letters, ECHA asks registrants for clarification that the chemical is used as an intermediate, that SCCs are met and that downstream users (DU) are implementing those SCCs. Manufacturers have 2 options to confirm SCC at the DU level:

- 1) Confirmation from DU that they use the substance under SCC or;
- 2) Letter from Manufacturer imposing DUs to use the substance under SCC.

Registrants have 2 months to respond to the Article 36 letters. The requested info can be submitted via e-mail or in IUCLID. The outcome of the first round of Article 36 letters from ECHA is presently under review for recommending national site inspections, dossier CC priorities and for fine-tuning the Forum program on intermediates.

6.3. Preparing for ECHA and local inspectors’ questions.

Following steps can be identified in preparing for inspections:

- Step 0: Demonstrate substance status:
 - Document non-waste status of substance ([AP1](#))
 - Document UVCB status of substance ([AP2](#))

It should not be difficult to demonstrate the UVCB status of the Refinables but it will be difficult to prove that we did not “overgroup” streams under one unique UVCB. ARCHE will attempt to refine the Refinable ID cards based on the information used for the cluster analysis ([AP4](#)).

- Step 1: Demonstrate intermediate status ([AP3](#))
- Step 2: Demonstrate SCC:
 - Demonstrate RiCo (by RiCoG or other means) ([AP14-15](#))
 - Use exposure assessment to supplement the demonstration of RiCo if needed ([AP20](#) & [AP25](#))
 - Demonstrate SCC ([AP26-27](#))
- Step 2 bis: Demonstrate Due Diligence (if not SCC) ([AP34](#))
- Step 3: Decide and document decision
 - Update route: update individual Registration Dossier by adding Appendix 3 to section 13 ([AP29-30](#))
 - Upgrade route: contribute to develop approach to risk assess UVCB under REACH

It is stressed that Step 3 is a business decision. PMC and Eurométaux can provide tools and guidance to help registrants make the decision but they cannot provide yes/no answers.

If two or more registrants choose different registration routes for the same intermediate, joint registration still applies: a full Dossier can be submitted by the lead registrant and individual registrants fulfilling SCC can include Appendix 3 to their individual files. Companies can/must decide for their individual registration, not for the joint registration (consortia’s responsibility).



A survey will be launched to check Step 0 & 1, and 2 surveys will be launched to check Step 2 (first to check RiCo, then to check SCC).

6.4. Authorisation.

ECHA is presently preparing its proposal for the 4th Authorisation prioritisation list, which will be reviewed at the MSC meeting in June before being posted for Public Consultation over the summer. Borates and Refractory Ceramic Fibers, chemicals used in PM refining/extraction, are postponed for prioritisation in 2013. Hydrazine is not prioritised.

All PMC members are asked to speak up if they see a substance on the priority list that they use. The PMC secretariat (via Eurométaux, with other consortia, or as a standalone task force) can help.

7. AOB, next calls, meetings, and closing remarks.

It is proposed to have the next Refinables meeting early October.

Annexes

1. Agenda & list of participants
2. Slides presented at the meeting:
 - 2.1. Legal background and how companies should prepare for inspections
 - 2.2. Overview of the current status of the Refinables project (exposure assessment and classification)
3. Overview updated classifications PM Refinables (22 June 2012)
4. Eurométaux one-pager summarizing actions & status on SCC (V3, July 2012)
5. Eurométaux advocacy programme on SCC:
 - 5.1. SCC examples submitted to ECHA by Eurométaux (29 January 2012)
 - 5.2. ECHA's reply to the SCC examples (16 March 2012)
 - 5.3. ECHA paper from MSCA 28 June 2012 session reflecting ECHA's activities on intermediates
6. Outcome & presentation of 21 May meeting Eurométaux - ECHA
7. Eurométaux one-pager summarizing the activities undertaken by the REACH Intermediate Task Force (19 July 2012)

Actions

Table 2. Actions resulting from the 28 June 2012 PM Refiners WG meeting in Brussels

Action		Who?	Timeline*
PMC Surveys			
SURVEY 1: Non-waste, UVCB, intermediate status assessment		Circulate and collate: KA Complete: Registrants	Sep 2012
SURVEY 2: Rigorous containment assessment			Sep 2012
SURVEY 3: Strictly controlled conditions assessment			Dec 2012
A. Substance identification			
1.	Document non-waste status of each relevant Refinable based on: ➤ National/local legislation ➤ Definition of waste in Waste Framework Directive (cf. page 9 and Annexes I and II of http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:EN:PDF) ➤ Communication from COM to EC and EP on waste and by-products (cf. Annex II of http://eur-lex.europa.eu/LexUriServ/site/en/com/2007/com2007_0059en01.pdf) ➤ ECHA Guidance on waste and recovered substances (cf. pages 1, 5, and 22 of http://echa.europa.eu/documents/10162/13632/waste_recovered_en.pdf) ➤ EU end-of-waste regulations and technical reports (cf. http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:094:0002:0011:EN:PDF ; http://ftp.jrc.es/EURdoc/JRC53238.pdf ; and http://ftp.jrc.es/EURdoc/JRC64207.pdf) ➤ Eurométaux' document on waste and REACH (dd April 2006) ➤ Etc.	Registrants	Jul-Sep 2012
2.	Document UVCB status demonstrating that Refinables' s streams in Survey 1:	Registrants	Jul-Sep 2012



	✓ Have a sufficiently variable and poorly predictable composition at registrant level and across registrants to be considered as true UVCB under REACH (cf. pages 14, 26, and 32 of ECHA Guidance on identification and naming of substances: http://echa.europa.eu/documents/10162/13643/substance_id_en.pdf); and ✓ Have been grouped based on similar origin or source and/or similar processes or process steps (cf. page 27 of above ECHA Guidance on identification and naming of substances); and/or ✓ Have been grouped based on similar hazardous properties and classification (cf. Recital 45 of REACH regulation)		
3.	Document intermediate status demonstrating that each Refinable in Survey 1: ✓ Aims at being chemically transformed into another substance; and ✓ Chemical transformation occurs by one or more process steps recognised to trigger chemical modifications (cf. Eurométaux factsheet on chemical modification dd 2008); and ✓ If used as a reactant or catalyst, it is additionally fully consumed in the process, and becomes (part of) the resulting product of the reaction and not only an impurity (cf. pages 34 and 37 of ECHA Guidance on intermediates: http://echa.europa.eu/documents/10162/13632/intermediates_en.pdf)	Registrants	Jul-Sep 2012
4.	Adjust composition and concentration ranges of each ID Card based on composition information provided for classification assessment exercise + 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>	ARCHE	Jul-Aug 2012
5.	Update ID Card of each Refinable to reflect main outcomes of UVCB and intermediate assessment (responses to Survey 1) and update registration strategy accordingly	KA	Sep-Nov 2012
6.	Prepare input on substance identification of UVCB for Autumn ECHA workshop	Eurométaux (with PMC support)	Jul-Aug 2012
B. Classification & labelling			
7.	Find out about progress of multi-metal UWM report	CB	Done, report expected mid-Jul 2012
8.	Update MeClas and re-circulate updated classifications considering PBT assessment/removal from water column of each metal	ARCHE	Jul-Aug 2012 (pending Ag results)
9.	Prepare "Classification assessment" document for each Refinable (including description of the assessment, cluster analysis approach, specific classification outcome, and ECHA Helpdesk's e-mail to KGHM that stated registrants could use alternative classification on their substances to that in the dossier)	ARCHE (with Eurométaux)	Jul-Aug 2012
10.	Upload all updated classifications and "Classification assessment" document in each IUCLID 5 file	WCA	Aug-Sep 2012
C. SCC advocacy			
11.	Circulate SCC examples and outcome of Eurométaux' advocacy on SCC with ECHA to PMC Members	KA	Done, cf. Annex 4 & 5
12.	Circulate Jun 2012 "Update on ECHA's activities on intermediates" paper to PMC Members	KA	Done, cf. Annex 5.3
D. First tier Rigorous Containment assessment			
13.	Inform PMC Members when RiCoG becomes available	EBRC	As soon as available
14.	Perform first tier RiCo determination with RiCoG and/or other tools and complete Survey 2	Registrants	Jul-Sep 2012
15.	Compile answers to Survey 2 in order to list Refinables: • for which RiCo is demonstrated; • for which RiCo has not been shown yet (and exposure assessment is needed) • for which an upgrade will definitely be required (if PMC Members have already provided such indication)	KA	Sep-Oct 2012
E. Eurométaux Multi-metallic (E-)TRV database			
16.	Gather DNELs/OELs/PNECs and other relevant information for the effects, exposure and risk assessment of UVCB under REACH: • From existing Risk Assessment reports (e.g. Cd); • From the ECHA dissemination website; • From other consortia (especially As); • From PMC members / companies (national / regional OEL)	Eurométaux	Aug 2012



17.	Prepare simple 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-Sep 2012
F. Second tier Rigorous Containment assessment (HH Exposure assessment)			
18.	Following 1-to-1 sessions and PM Refiners WG meeting held on 27 and 28 June 2012, send remaining exposure data to EBRC	Registrants	Jul-Aug 2012
19.	Once all data are received and TRV are compiled in the Eurométaux multi-metallic (E-)TRV database, prepare generic exposure assessment reports for discussion with Members before Autumn ECHA workshop	EBRC	Sep-Oct 2012
20.	Consider need for site-specific exposure assessment	All	Oct 2012
G. Second tier Rigorous Containment assessment (ENV Exposure assessment)			
21.	Following 28 Jun 2012 PM Refiners WG meeting send remaining emission data to WCA	Registrants	Jul-Aug 2012
22.	Check the relationship between the Kd and the EF in more detail. Progress environmental modelling as far as possible bearing in mind that additional modelling parameters are required from sources outside the PM Ref WG before this can be finalised.	WCA	Aug-Sep 2012
23.	Measure total versus soluble boron emissions in aquatic effluents and provide dataset to WCA	Registrants	ASAP
24.	Once all data are received and ERV are compiled in the Eurométaux multi-metallic (E-)TRV database, prepare generic exposure assessment reports for discussion with Members before Autumn ECHA workshop	WCA	Sep-Oct 2012
25.	Consider need for site-specific exposure assessment	All	Oct 2012
H. Final tier SCC compliance assessment			
26.	Perform final tier SCC compliance assessment and complete Survey 3 based on: - REACH text - REACH Guidance - Any precedents or previous experiences - First tier RiCo assessment - Second tier RiCo assessment - Expert judgement - View of local inspectors and national competent authorities - Table of pros and cons of updates and upgrades - Legal entity, business unit, company or group' decision	Registrants	Nov-Dec 2012
27.	Compile answers to Survey 3 in order to list Refinables for which either an: • update will be needed, or • upgrade will be needed Report update/upgrade scope to Members and consultants	KA	Dec 2012 Jan 2013
I. Updates			
28.	Circulate example of Article 36 Letters from ECHA	D. Cholakova	ASAP
29.	Prepare SCC supporting evidence in the form Appendix 2 & 3 (using Eurométaux examples) and submit Appendix 3 (attached as a .pdf file to section 13) as an update of individual Registration Dossier	Registrants	ASAP and at latest by Sep 2012 and Jan 2013
30.	Check IUCLID 5 files for each Refinable to make sure they contain the updated information listed below and send to each LR for inclusion of Appendix 3 and submission to ECHA: ✓ Updated ID Card: clarification of UVCB status, narrower composition ranges + disclaimer on substance sameness flexibility, and updated Registration strategy ✓ Updated classification ✓ Classification assessment document: approach to derive classifications per stream, worst case classification grouping based on cluster analysis, resulting classification and ECHA Helpdesk's e-mail to KGHM ✓ Appendix 3: for those Lead Registrants wishing to demonstrate compliance with SCC as per Dec 2012 ECHA Guidance on intermediates Attach Appendix 3 to section 13 of IUCLID 5 and submit updated joint Registration Dossier to ECHA	KA Lead Registrants	Sep-Oct 2012
J. Upgrades / Risk Assessment of UVCB under REACH / ECHA Autumn workshop			
31.	Circulate minutes of 21 May 2012 ECHA + EM meeting to PMC	KA	Done, cf. Annex 6
32.	Develop test cases: - Cu slags example (UVCB Substance) - Cu slime example (UVCB Intermediate) - Pb dross example (UVCB Intermediate) - PM example (UVCB Intermediate)	Eurométaux	Jul-Oct 2012



	... to demonstrate applicability of tools and models and ideally arrive at common approach to risk assess (inorganic) UVCB (and mixtures) under REACH: ➤ Identification of constituents driving effects assessment ➤ Environmental effects assessment of a UVCB ➤ Human health effects assessment of a UVCB ➤ Identification of constituents driving exposure assessment ➤ Environmental emissions assessment of a UVCB ➤ Human health exposure assessment of a UVCB		
33.	Prepare input on risk assessment of UVCB for Autumn ECHA workshop	Eurométaux (with PMC support)	Sep-Oct 2012
K.	Due diligence / Compliance without undue delay		
34.	Document steps taken under items A to J above and use Eurométaux Roadmap on intermediates to demonstrate due diligence and compliance of Registration requirements without undue delay	Registrants	ASAP

* Key dates:

- **Sep 2011 - Jun 2012:** first round of Article 36 letters from ECHA requesting information confirming the chemical is used as an intermediate, that SCC are met, and that DU are implementing SCC
- **May 2012 - ?:** second round of Article 36 letters from ECHA requesting information on SVHC used as intermediates
- **Early Oct 2012:** PM Refiners WG meeting to review progress and prepare Autumn 2012 ECHA workshop
- **Autumn 2012:** Eurométaux + ECHA workshop on substance identification and risk assessment of UVCB under REACH