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Precious Metal Refiners Work Group

Face-to-face meeting

Brussels, 11-12 Oct 2010
Metals Conference Centre



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Agenda

- **Introduction**
 - Confidentiality and European Competition Law provisions
 - Tour de table and apologies
 - Pending actions and approval of the minutes of the 7 Sept 2010 (C. Braibant)
 - Strictly controlled conditions (H. Waeterschoot)
 - Availability of MeClas: timing and conditions (F. Verdonck)
 - Objective of the day and approval of the Agenda
- **Proposed environmental and human health classifications for all Refinables**
- **Status of tests performed at Harlan and resulting physico-chemical classification**
- **Progress achieved in preparation of IUCLID 5 files and proposed timeline for LR dossier submission & joint submissions**
- **Q&A, next meetings, AOB and concluding remarks**



1. Introduction



Introduction

Pending actions of 7 Sep mtg

	Action	Who?	Status
1	Inform WCA on approach followed by Cu Consortium to complete sections 4 to 7 of IUCLID 5	CB + DC	Done
2	Request updated Guidance on strict control and date of workshop to Eurométaux	CB	Done
3	Check what is the minimum number of fields in section 3.5 that must be completed for an intermediate file to pass the TCC	CB	In progress
4	Check what is the minimum number of fields in section 11 that must be completed for an intermediate file to pass the TCC	CB	In progress
5	Circulate guidance inviting LR to create joint submission object and generate token number for each Refinable on REACH-IT	CB	Done
6	Provide one-pager on method applied to calculate cutt-off limits	ARCHE	Done
7	Obtain minutes or "compte-rendu" of meeting between Eurométaux and ECHA in summer 2010	CB	Done
8	Clarify with Eurométaux whether the classifications derived with MECLAS should consider the available classification (e.g.: reported in Annex VI of CLP) or the classification resulting from the REACH work (self-classification until picked up for harmonisation and approved at EU level)	CB	Done



Introduction (cont.)



Strictly controlled conditions



Background:



- Intermediates can be registered with light dataset if they are handled under strictly controlled conditions during their entire life cycle



- Strict control as described in the REACH regulation not exactly fit-for-purpose to describe conditions of control in NFM processes



- Still, industry always understood:



- No exposure and emissions: non-isolated intermediate, no registration



- Minimised exposure and emissions to best possible: isolated intermediate, registration needed



Introduction (cont.)



Strictly controlled conditions (cont.)



Today:



- Registration of intermediates in 2010 according to current interpretation
- ECHA known to check intermediates' dossiers closely, though checking strict control is a MS responsibility



As from 2011:



- Interpretation of strict control becoming more stringent - updated ECHA guidance to be released in 2011 → **minimisation** of exposure and emission replaced by **no exposure and emissions**



- Hence, Consortium devising strategy in the event all intermediate dossiers must be updated into substance ones



- Key messages:



- PM Refinables project not over in 2010...
- All work done in 2010 will require update as from 2011...
- Discussions today should take above context into consideration



Introduction (cont.)



Availability of MeClas



- Reference samples now uploaded onto MeClas, tool ready to be used by PMC Members
- Licence agreement circulated with Agenda and support documents
 - PMC c/o EPMF's licence covers work done on reference samples
 - Individual company streams' classification work performed in the context of ad hoc project with ARCHE
 - Companies wishing to be granted an access to the online tool may contact ARCHE/Eurométaux - two licences proposed:
 - Full (all tiers covered)
 - Light (only tiers 0 and 1) - assumes users would not have T/D data
- **Questions for ARCHE?**



Introduction (cont.)



Objective of the day



- Agree on proposed classifications
 - HH and ENV - ARCHE
 - Physico-chemical - Harlan
- Identify remaining steps towards finalisation of Refinables' IUCLID 5 files



2. Proposed HH & ENV classifications for PM Refinables



Slides removed to avoid confusion between original situation and outcomes of PM Refiners WG discussion

Please refer to *ad hoc* Annex and below timeline instead



Remaining steps and envisaged timeline around classification agreement - proposal



	What?	Who?	By when?
1.	Circulate notes from the meeting	CB	15 Oct
2.	Complete classification triggers/compositions	ARCHE	15 Oct?
3.	Update ARCHE work onto IUCLID 5	WCA	20 Oct
4.	Circulate draft IUCLID 5 files including classification proposals to Members	CB	20 Oct
5.	Provide comments on circulated files	All	23 Oct
6.	Integrate comments and update IUCLID 5 files	ARCHE + WCA + CB	25 Oct
7.	Send final IUCLID 5 files for LR submission	CB	25-28 Oct

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3. Status of tests performed at Harlan and resulting physico-chemical classification



See separate file



4. Progress achieved in preparation of IUCLID
5 files and proposed timeline for LR dossier
submission & joint submissions



4.1 IUCLID 5 fields completed



Section	Completed with	Comments
1.1 Substance ID	ID Card info	
1.2 Substance composition	ID Card info	Generic composition of ID Card currently included Awaiting confirmation of classification(s) to add relevant composition(s)
1.4 Analytical information	Outotec reports	Can also add T/D reports (unless added in sections 4 or 5) This section is not mandatory for intermediates
3.1 Technological process	ID Card info	
3.5 Identified uses	Codes relevant for intermediates	
3.7 Waste from production and	Generic statement on waste minimisation and re-use	
11. Guidance on safe use	Statements from LR + default statements extracted from Article 18(4) of REACH on strict control	Precautionary statements will be added after classification(s) confirmed Registrants then free to include relevant statements in their SDS

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4.2 IUCLID 5 fields to be completed



Section	Comments
2. Classification	Awaiting agreement on classification(s)
4. Physico-chemical endpoints	Awaiting final reports from Harlan
5. - 7. HH and ENV endpoints	Awaiting agreement on classification(s) in order to adjust generic description of MeClas approach to each relevant endpoint



4.3 Proposed timeline towards submission



	What?	Who?	By when?
1.	Create joint submission object	LR	15 Oct
2.	Circulate joint submission object name and token number	CB	15 Oct
3.	Join joint submission	Co-registrants	5 Nov*
4.	Finalisation of IUCLID 5 files	PMC+WCA	25/26 Oct
5.	Submission of joint IUCLID 5 files	LR	25/26-31 Oct
6.	Circulation of pre-completed IUCLID 5 files and guidance to joint registrants	CB	Early Nov **
7.	Submission of co-registrations	Co-registrants	Before 1 Dec 2010 ***

* Token numbers expire within one month of creation

** Or as soon as they are finalised/submitted by the LR

*** Or as relevant to each registering legal entity

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5. Q&A, next meetings, AOB and concluding remarks



- Any other question?
- Any other business?
- Next meetings:
 - Conference call to address any pending issue before dossier finalisation?
 - Brussels, 8-10 November: PMC joint submission session for those who are interested
 - Brussels, 29 November: EM workshop on strict control of intermediates
 - Brussels, 11 January: PM Refiners WG meeting
 - Brussels, 12 January: PMC Assembly meeting



THANK YOU!