Participants:

Caroline Braibant	EPMF	Belgium
Peter Charlesworth	AngloPlatinum	South Africa
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MINUTES 10TH APRIL 2008

1. **Introduction (*M. Raffray, Johnson Matthey*).**
   - 1.1. **Confidentiality and European Competition Law provisions.** The attendees were reminded on their commitment to comply with Confidentiality and Competition Law provisions.
   - 1.2. **Objective of the teleconference.** The objective of the teleconference is to explore the outcomes of the second Precious Metals Refiners meeting (12th of February 2008) and the second Eurométaux Intermediates Task Force meeting (1st of April 2008) and to agree on a way forward.
   - 1.3. **Tour de table and apologies of non-attendees.** The list of participants is given above.

2. **Complex intermediates inventory.**
   - 2.1. **Eurométaux Intermediates Task Force meeting (1st April 2008).** Representatives of eight consortia met a second time in order to address the following issues:
     - Speciation: speciation is a second step in the characterisation of complex materials. It usually follows an elemental analysis in order to support or prove a classification and subsequent need for safety measures.
     - Speciation labs: Joeri Leenaers (Eurométaux) has found a source of information on speciation tests (www.speciation.net). Among the links, one is fully dedicated to platinum species determination (analytical methods etc), toxicity and biological activity of different platinum species, distribution and fate of platinum species in the environment, mobility, bioavailability and bioaccumulation of platinum species, Research groups and their projects related to the chemical speciation of Pt, Standards, rules and legislation related to platinum. Other precious metals are not mentioned. The use of speciation in toxicology and legislation is described and a list of EU-based laboratories providing analytical services is made available to the reader. Non-EU based sources should be explored as well. P. Charlesworth will inform the Secretariat on the existing non-EU based laboratories.
     - Intermediates inventory: 10 companies out of 20 (6 of the 26 Members of the Consortium are non-EU and do as such, not place their intermediates on the EU market) have listed and sent their complex intermediates inventories to the Secretariat. A compiled and anonymised list has been sent to J. Leenaers. A global 118 pages inventory has been put together by J. Leenaers and was presented at the meeting. In order for this inventory to be workeable, it was proposed to align all possible entries below common EINECS/CAS entries, and use composition ranges.
     - Naming, grouping and categorisation of intermediates:
   - 2.2. **Populate a template based on existing EINECS/ELINCS entries and adapt it to our purpose.** An attempt to identify applicable generic substance descriptors among the existing EINECS/ELINCS entries had been made in order to assign each typical primary and secondary feed to an existing entry. This exercise has been retaken in

order

2.3. The case studies / examples have to cover primary and secondary feeds, and intermediates as feeds. In addition to the existing examples, Members are invited to list and describe their intermediates as per Annex 4.

2.4. The goal is to identify descriptors for material feeds based on three criteria:

- **sufficiently broad categories to be useful to most PMC members;** Tacitly agreed by all attendees. It was mentioned that the EChA favours substance grouping, based on physico-chemical properties but especially, based on the toxicological and/or eco-toxicological profiles of the substances.
- **a single 'substance' identifier analogous to existing EINECS/ELINCS entries;** Tacitly agreed by all attendees, this ensures a structured pre-registration process and subsequent SIEF organisation.
- **if possible, a build on an EINECS/ELINCS entry representing an established precedent, or devise a closely matching entry (regulatory acceptance is more likely).** Tacitly agreed by all attendees. Other conclusions of the exercise are given in the last column of the tables of Annex 3. Further advice should be obtained on the situation where no EINECS entry exists for a substance, although this substance fulfils the phase-in status: what reference number or name should be used?[1]

2.5. Is chemical characterisation and investigative work needed in context of RIP 3.10? There are two ways of characterising complex intermediates:

- Listing the elemental and compound forms which are present in the intermediate;
- Listing the compounds or species as well as the mineralogical form under which they are present in the intermediate (e.g.: trapped in a specific complex, linked to the presence of a specific constituent, etc…).

The difference between both routes lays in the methodology which is used and on the relevance of the outcomes of each method for classification. Also, intermediates which have been characterised through one *or* the other route can not be easily compared or grouped. The characterisation should be regarded as a stepwise approach: the first route can sometimes be sufficient to characterise the intermediate; when it is not, the second route can be followed. Moreover, if a default classification is likely to be assigned following the outcomes of the two first routes, bio-elution and transformation/dissolution tests can be used to corroborate the classification.

2.6. What are the consequences of applying transported intermediate definitions to such feeds? Non-wastes fall within the scope of REACH and, provided that they match the definition, can be described as intermediates. They have reduced registration requirements under Article 18(2)d if handled under strictly controlled conditions.

3. Next steps (All).

3.1. Practical consequences of preceding discussion keeping in mind pre-registration targets. The PM Consortium must act in parallel with the other consortia[2] in order

[1] **Post-meeting note:** Slides 13 and 14 of Annex 4 present the options to refer to a substance during pre-registration: EC number, CAS number or substance name. Therefore, it seems as the EC number is not essential; the Consortium should agree on the name to be used for Pre-registration in order to ensure a structured SIEF formation and subsequent SIEF activities.

[2] **Post-meeting note:** An exploratory meeting between representatives of the lead, copper, ferro-alloys, nickel, molybdenum, tungstene, zinc, cadmium, precious metals and rhenium was organised on the 20th of February in order to align the initiatives of all the consortia and to discuss the best approach towards the Registration of complex

to make sure: (i) eventual scope overlaps are resolved, (ii) all materials are assigned to consortia (no orphans), (iii) data-sharing is facilitated from consortium to consortium, and (iv) the access to the Registration Dossiers is guaranteed to all Members in a cost-efficient manner.

3.2. Define PM Refiners meeting schedule running up to pre-registration window. Next meeting: teleconference on 10th April, 10:30 a.m. CET.

4. AOB.

5. Conclusion.

intermediates. The PM Consortium must inventory the intermediates of its Members (Annex 5) in order to be able to compare and discuss the way forward with the other consortia.