



PGM Work Group Meeting – 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. No remarks / additions; agenda approved.

1.4 Approval of the minutes of the last meeting (9 Oct 2014) including status of action points

A table with the status of the action points from the last meeting is available on slides 5-7 in Annex 2. Several action items are on the agenda for discussion today. The IPA publication will be shared with EBRC on a confidential basis once available (**AP1**).

2 Substance identification and sameness of PGMs

2.1 Freezing of substance inventory

Following the request from the PMC Management Committee for predictability in human/financial resources given the approaching 2018 REACH deadline, it was decided to freeze the PMC substance inventory by September 2015 (cf. 18 March letter from PMC Secretariat to members and timeline on slide 10 in Annex 2). Over the past week, the PMC Secretariat already received new information that has a significant impact on the 2015 (and beyond) PMC budget and workload (cf. agenda point 2.6). The PGM WG specifically agreed with the new approach and had no objections.

2.2 ID cards

ID cards have been drafted for most PGMs in the testing programme. Given the timeline for freezing the substance inventory, ID cards for remaining PGMs will be circulated for input Q3/4 2015 and existing ones will be recirculated for finalisation. **AP2**

2.3 Sameness: Update on diammonium hexachlororuthenate vs TETRADORu

Following PGM Sameness Expert Group discussions, it was concluded that the compound we thought was 'Diammonium hexachlororuthenate' (CAS 18746-63-9, UVCB, 'AHCru') is in fact Tetraammonium decachloro-mu-oxodiruthenate (CAS 85392-65-0, mono-constituent substance, 'TETRADORu'). As a consequence AHCru is not on the PMC substance inventory any longer (TETRADORu was on the inventory before). Existing tests on AHCru are being revised to reflect the correct substance identity. The remaining tests had been on hold until the substance identity was clarified. These tests on TETRADORu have now been initiated and are currently ongoing. **AP3**

2.4 Karstedt concentrate: Update on discussions with Reconsile

Discussions are ongoing with the Reconsile consortium (LR for Karstedt concentrate is a member of Reconsile) on a technical level regarding substance identity of Karstedt concentrate. The process



definition and required analytical methods for substance characterisation have been agreed. The MoU is in preparation, pending agreement on sameness.

Reconsile has stated they will only prepare a 1-10 t/a dossier, whereas PMC needs the 10-100 t/a dossier (higher tonnage = more data requirements). Reconsile is prepared to transfer the LR role to PMC once they have finalised the 1-10 t/a dossier and submitted it, so PMC can update the dossier to their requirements then.

This approach has a couple of drawbacks:

- High administrative effort;
- Unpredictable timing;
- Reconsile has no metals experience and
- PMC members will have no vote in the process, so we have little control over the quality/content of the 1-10 t/a dossier.

The PMC Secretariat therefore recommends that a PMC company is taking over the LR role now, starting the testing programme asap and assessing the impact on the 2015 budget.

Discussion:

- It will require some discussions in order to take over the LR role from Reconsile. They plan to submit the dossier by end 2016 so will need reassurance that the dossier will be ready on time, should PMC take over the LR role. It is our understanding that Reconsile is currently still in the process of the data-gap analysis.
- PMC has made Reconsile aware of the PMC tonnage band several years ago already. Some PMC members question the legality of the LR's unwillingness to take into account the highest tonnage band of all registrants and associated data requirements.
- Heraeus would be prepared to take over the LR role, should Reconsile member relinquish their LR role
- It was proposed to go ahead with PMC registration dossier whatever decision of Reconsile member to relinquish or not their LR role. However, two registrations for the same substance could trigger a Dossier Evaluation. Moreover, due to the relationship between Reconsile members and PMC members, it is not recommended at this stage to take so extreme measures. This could be discussed again and considered at a later date.

The PGM WG agrees the PMC proposal to try to convince Reconsile to transfer their Karstedt concentrate LR role to PMC. [AP4](#)

2.5 Consideration of PGM nano forms

The responses received to the PMC questionnaires circulated in September 2014 and February 2015 did not provide sufficient data to decide whether or not the reported PGM blacks fall under the definition of a nanomaterial. Also, many companies that potentially produce PGM blacks did not respond. If we want to consider this information in the Registration dossiers, PMC will need to have this data as soon as possible. The PMC Secretariat therefore recommends conducting a coordinated effort to generate the required data, similar to the exercise on Corrositex tests done previously. The PMC Secretariat will coordinate the collection of data within the agreed timeline while the actual analyses will be paid by the individual registrants.

Discussion:

- When testing the material, it may be difficult to distinguish between aggregated particles and individual particles. It is noted that the EU recommendation refers to de-agglomerated and de-aggregated particles



- Some PMC members have reported intentional use/manufacture of nanomaterials, but this information alone is not sufficient. We will need actual measured data on substance properties to report in the dossier.
- Whether PMC members will have to consider PGM blacks or not depends on the total tonnage of the respective metal at their legal entity: if for example a legal entity manufactures > 1 t/a of Pd (e.g. 1100 kg), but only a very small amount of Pd black (e.g. 1 kg) then we need measured data on the Pd black since the overall tonnage is above 1 t/a.

The PGM WG agrees to undertake this coordinated effort to determine substance properties of potential PGM nano-forms ('PGM blacks') AP5-7

(Post meeting note: PMC sec. plans to complete this assessment before the Assembly meeting in June. So a quick turnaround will be essential for completing this in time)

The chair reminded PMC members to provide timely input to the PMC Secretariat's requests and comply with these requests, if they want to work to be carried out on time.

2.6 Inventory update

The PMC Secretariat received several changes to the PMC substance inventory: cf. slides 19-20 in Annex 2. Overall, there are 5 tonnage band increases:

- Rh(NO₃)₃: increase from 1-10t/y to 10-100t/y
- Dihydrogen hexahydroxyplatinate, compound with 2-aminoethanol (1:2): : increase from 1-10t/y to 10-100t/y
- Karstedt Concentrate: PMC may have to take over the dossier in order to cover the 10-100 tpa data requirements
- Dipotassium hexachloropalladate: increase from 10-100 tpa to 100-1000 tpa. This change was only confirmed the day before the meeting and is thus not considered in the ITS yet
- Ruthenium trichloride: increase from 1-10t/y to 10-100t/y. This change was only confirmed the day before the meeting and is thus not considered in the ITS yet
- Tetraammonium decachloro-mu-oxodiruthenate(4-) will replace AHCRu (same tonnage band = 10-100 tpa)

***Post meeting note:** another change in scope will be necessary: IrCl₄ will be replaced by 'reaction mass of iridiumtetrachloride and iridium trichloride' (1-10 tpa). No impact on budget/ workload is expected from this change.*

In addition, 5 substances were not supported by any registrants any longer and will be removed from the inventory:

- Dichlorotris(triphenylphosphine)ruthenium (CAS 15529-49-4)
- Diammoniumhexachloro ruthenate
- Iridium dioxide (CAS 12030-49-8Di-μ-chlorobis((1,2,5,6-eta)cycloocta-1,5-diene))diiridium (CAS 12112-67-3)
- Iridium dioxide (CAS 12030-49-8)
- Palladium dioxide (CAS 12036-04-3)

The PGM WG agrees to reflect the presented tonnage changes in Annex 2 of PMC's scope.

The tonnage band increases will have a significant impact on the 2015 (and beyond) PMC budget and HR. A first estimate indicated the following additional resource required:



- Financial resources: approx. 700 k€ for 2015 and approx. 300 k€ for 2016;
- Human resources: 0.5 FTE.

The additional financial resources needed in 2015 are not available in the PGM reserves. It is noted that affected members will have to pay according to the cost-sharing formula. However, additional invoicing cannot be done before agreement by the Assembly, i.e. not before Q3 2015. [AP9-12](#)

The Impact on budget and HR and options to be able to include these changes in PMC workplan will be discussed at the Management Committee on 29 April 2015 and presented at the Assembly meeting in June.

3 PGM testing programme/ Summary from PMG tox. experts mtg

3.1 Outstanding phys-chem testing

All phys-chem tests have now been completed or are the final testing stage; available results are summarised on slides 24-25 in Annex 2.

3.2 PGM ecotoxicity testing

The PGM Tox Experts Group has discussed potential new test requirements based on new available data and based on tonnage changes at their meeting on 24th March 2014 (cf. recommendations on slide 26 in Annex 2 as agreed by the PGM Tox Expert Group). The additional costs of additionally required ecotoxicity tests amount to approx. 80 k€ in 2015 whereas there is 117 k€ available in the 2015 budget for ecotoxicity testing.

For Dipotassium hexachloropalladate additional work according to Annex IX and X may be required. No data gap analysis has been conducted yet (PMC was informed about the tonnage change only 2 days before the meeting); however a testing proposal will be required for such tests and therefore no testing is anticipated in 2015/16.

The PGM WG agrees with the recommendations for additional ecotoxicity tests.

3.3 PGM genotoxicity testing

- The ECHA guidance on genotoxicity testing has been updated. Irrespective of the actual tonnage of the substance, Annex IX and X tests do need a TP. This change does not impact the testing strategy for the PGMs.
- All scheduled genotoxicity tests are now completed or in the reporting phase.
- The abovementioned tonnage band changes result in several additional genotoxicity testing requirements: cf. a first estimate is given on slide 28 in Annex 2. The additional costs of these tests amount to approx. 200 k€.

3.4 PGM acute/repeated dose testing

- All scheduled acute/RDT tests are now completed or in the reporting phase; results are summarised on slide 29 in Annex 2.
- At the PGM Tox Expert Group meeting on 24 March, the RDT study findings on Diammonium hexachloroplatinate (AHCpT) were reviewed and confirmed the need for a classification of STOT RE1 for this compound. As the observed effect is likely due to the hexachloroplatinate moiety, the same classification also applies for Hexachloroplatinic acid and Dipotassium hexachloroplatinate. [AP13](#)
- The above mentioned tonnage band changes result in several additional acute/RDT testing requirements: cf. overview on slide 30 in Annex 2. The additional costs of these tests amount to approx. 520 k€ (excl. testing for which a testing proposal is needed first).



4 Current status of PNEC and DNEL refinement

4.1 PNEC derivation

The Pd PNECs have been derived and finalised. For Pt, Rh and Ru, testing is still ongoing and some additional tests will be run in 2015. The PNECs will be therefore be derived once the testing data are available. [AP14-15](#)

4.2 DNEL derivation

The scheduled mamm. tox tests are on schedule, except for Ru-compound (no test material available). The schedule will need updating with the newly agreed tests. DNELs will be derived once the hazard assessment is completed. [AP16](#)

4.3 CLP update, CLP notifications

The ITS matrices / classifications have been updated in March 2015 following new test results. **The PGM WG agrees with the recommendation to update CLP notifications only once all data are ready via the REACH registration dossiers (unless the classification change requires action ‘without undue delay’).** [AP17](#)

5 Identified uses

5.1 Pd and Pt substances

The Pd use list is nearly finalised. There are some uses for which use descriptors have not been provided yet. For these, WCA and EBRC have suggested use descriptors where possible. [AP18-19](#)

5.2 Pt and Pt substances

- Some follow up questions for the Pt use list are still ongoing. [AP18-19](#)
- Some companies reported PROC4 (and other PROCs incompatible with SCC) for the chloroplatinates, so these PROCs are included in the list of collated uses. As some members are registering the chloroplatinates as SCC intermediates, they are advised to remove PROCs incompatible with SCC from their company-specific dossier.

5.3 Article service life

- The PGM WG agrees to update the minutes of the 19 June 2013 PGM WG meeting as suggested on slide 40 in Annex 2. [AP20](#)
- Until now, an article service life was only included for automotive catalysts, but may be needed for other types of catalysts. [AP21](#)

5.4 Downstream user (DU) pilot study exposure assessment

Cf. slides 47-49 in Annex 2. Given an anticipated lack of monitoring data at DU level (especially for PGMs), the PMC Secretariat proposes to develop and implement an exposure programme at DU level, in order to start educating DUs and encourage them to start monitoring on these substances where we know we will have an issue.

Discussion:

- It was proposed to perform the case study on a PGM used for surface treatment and in the automotive catalyst sector (one of the chloroplatinates?)
- It was noted that if this done thoroughly, it may become a major exercise. We may have to help DUs to employ the right monitoring techniques.



- It is noted that the most dangerous substances will not necessarily be the ones with the greatest risk, as DUs often already have the necessary RMMs in place for these.

The PGM WG agrees to launch the pilot case on DU exposure assessment with a PGM substance. [AP22](#)

6 Environmental emissions

6.1 Site-specific monitoring programme

- In order to demonstrate safe production/use, site-specific monitoring is recommended for those sites where aquatic and/or sediment RCRs > 0.5 and is essential where RCRs > 1.
- **Companies are still welcome to join the monitoring programme ([AP25](#))**. As discussed previously, it is also possible to extend the monitoring programme to additional metals (e.g. Au and CN). The analysis cost is only 6€ per additional metal.
- Status aquatic monitoring programme:
 - 4 companies have joined the aquatic monitoring programme managed by WCA, 2 companies are undertaking their own programme.
 - The sampling and analysis of effluent and receiving water samples is ongoing. Samples are being analysed for total and dissolved PGMs (as relevant) and phys-chem properties.
 - The monitoring programmes are anticipated to continue for 6-12 months based on review of the site-specific results.
- Status sediment monitoring programme:
 - Although the sediment monitoring programme was recommended for all sites (because we can reasonably expect that most PGMs will have low sediment PNECs), so far only 4 companies have indicated their willingness to take part (2 in UK, 2 in mainland Europe). There are still 7-8 companies not taking part in the programme.
 - Since it is not practical to organise a sampling trip using a UK-based consultant for a very small number of sites, the sampling practicalities for the sites in mainland Europe are to be sorted out depending on how many more companies join the programme. Companies should indicate if they can do their own sampling as there are some logistics involved. [AP24-26](#)
 - WCA was asked to check if retrospective analysis of previous samples for other PGMs is possible. [AP27](#)

6.2 STP monitoring programme

- In order to quantify the removal rate of the PGMs in sewage treatment plants (STPs), a monitoring programme has been established at STPs that are receiving discharges from plants processing effluent containing PGMs.
- A first round of monitoring took place in November-December 2014, and **initial results indicate a removal rate for Pd that confirms our predictions for partitioning** (82-84% versus 80% predicted) but lower removal rates for the other PGMs.
- A second round of monitoring is arranged for April 2015 (high flow conditions) and a third round of monitoring will take place in late August/early September (low flow conditions). Final results will be available in Q4 2015.

6.3 Emissions questionnaire Pt, Rh & Ru substances

- Since the last WG meeting, several more responses came in on the PGM environmental emissions questionnaire. Follow up questions have been sent to the individual sites, requesting clarification on overall tonnage, RMM type and removal efficiency, receiving water characteristics (even estimate of flow rate is already helpful!) and measured emissions to air.



- Questionnaire responses will be compiled and representative values will be taken for the Generic Exposure Scenario (GES). Risk characterisation will only be possible once PNECs are available.
- The majority of the respondents provided estimates of emissions to water but **there is still insufficient data on emissions to air**. In the absence of more stack emission data, SPERCs will need to be used but we cannot prove their reliability. Companies are advised to add PGMs to their routine monitoring if possible. A few companies have already indicated they will do additional monitoring. **AP28**

7 Occupational exposure

7.1 Scope of exposure assessment (workplace-specific vs. substance-based)

EBRC presented an alternative approach for the development of occupational exposure scenarios that may be more appropriate for the Pt substances. A comparison of the substance-specific ES approach (= standard REACH approach) and an 'advanced workplace-specific ES approach' was presented and pros and cons were discussed (cf. slides 73-76):

- In a substance-specific assessment, the same workplace is evaluated for each substance separately. This means that the associated RMMs can be different although they would be prescribed for the same physical workplace depending on the substance to be assessed.
- In a workplace-specific assessment, the actually required RMMs are determined by considering all handled/emitted substances for one workplace/activity instead of conducting assessments for each substance separately for the same workplace/activity. According to EBRC, this would result in more relevant exposure scenarios and realistic risk assessments done at each workplace, depending on the exposure potential specific to that workplace. Based on the currently available information and in view of the advantages in particular with respect to preparing for potential authorisation and restriction of Pt substances, EBRC recommended this approach as it better visualises the good occupational hygiene practice in the PGM sector.

Discussion:

- For now, PMC would be the only consortium following the workplace-specific approach, it will therefore be important to communicate it correctly to DUs. It would also be useful to present the approach at EM level.
- The workplace-specific approach may be particularly useful for the Pt substances, as their hazard potential varies significantly and is not solely based on the Pt ion. It is noted that only few other metal consortia have a similar situation.
- It was noted that the approach will be less useful for other PGMs and the normal REACH approach may be appropriate.
- Monitoring data are needed for both approaches. It was noted that monitoring data on Pt metal alone may not be sufficient. When monitoring, it is possible to distinguish between Pt metal and soluble Pt compounds. Then a precautionary approach may have to be used and all soluble Pt compounds are considered to be chloroplatinates as a worst case.
- The workplace-specific approach will require companies to complete another survey (on nature of exposure).
- It was noted that the SCC / non-SCC assessment is to be done by companies and not by EBRC based on the data received. EBRC will take into account the data submitted by companies.
- Some Pt substances are skin sensitizers – the participants were wondering how this will be handled. The hazard assessment is not completed yet, but it is assumed that this is a non-threshold effect and a qualitative assessment will be needed anyway (in this case it does not matter which approach is being used).



- EBRC anticipates an insignificant amount of extra time needed for the workplace-specific approach, so there are no major budget implications expected.

This approach will be presented and discussed at the RA and CI meeting organized by Eurometaux on 13 April 2015.

Overall, the **PGM WG suggested using the workplace-specific approach for Pt substances and the standard Reach approach for the other PGMs**. However, several participants requested some time to reflect on this and discuss internally before making a decision. [AP29](#)

7.2 Occupational questionnaires Pt substances

The occupational exposure questionnaires have been checked for completeness, and follow up questions will be sent by EBRC together with a submission form for monitoring data, after a decision has been made on the ES approach to be followed. [AP30](#)

8 Budget/ Project Planning

8.1 Financial update

- At an internal planning meeting, the PMC Secretariat has worked on a first draft 2016 budget for all PMC projects. This budget will be refined over the next months, but gives a first indication of the current expectations for 2016.
- The draft 2016 PGM budget is presented on slide 78 in Annex 2. It is noted that this budget does not include the additional costs of the recent tonnage band and substance changes (approx. 700 k€ in 2015 and approx. 300 k€ in 2016). [AP11](#)
- The PMC Secretariat also made an estimate of the human resources that will be required per project (not shown on slide 78), and 1,7 FTE is expected for 2016 for the PGMs (mainly Klaus with support from Katrien). It is noted that this will be increased to about 2 FTE because of the additional work related to the recent tonnage band changes.
- Given the experience with the silver dossier, it is noted that inclusion of nano-forms in the PGM dossiers may have a significant impact on the budget / human resources.
- At the 3 Dec Assembly meeting, it was decided to use 400 k€ of the PGM reserves. The PGM WG agrees the reserves will have to be built up again.

8.2 Project plan

- The programme is on schedule but the impact of the recent tonnage band changes and the Karstedt concentrate issue will need to be assessed carefully ([AP11](#)).
- PNECs and DNELs will be derived as soon as the hazard data are available and work on the ES will be progressed in 2015/2016.
- Registration strategy: the **PMC Secretariat proposes to prioritize the PGM dossiers in different 'registration waves'** so that dossiers can be submitted in a phased manner and (lead) registrants can plan in advance. PMC is currently developing the strategy and details will be presented at the following meeting. [AP32](#)

9 AOB, next meetings/calls and closing remarks

9.1 Substance identity

It was noted that ECHA has announced potential publication of new guidance for substance sameness of UVCBs in 2015. This may have implications for the PGMs and additional analyses may be required in light



of the new guidance. It was suggested to revisit this issue once additional information is available. **AP33-34**

9.2 ECHA CMR review

- ECHA is prioritising CMR substances for risk management: they cross-checked if registrants / notifiers have used the correct harmonised classifications, and also reviewed other registered / notified CMR substances with a classification more stringent than the harmonised one or with no harmonised classification. More than 1000 CMR substances have been flagged that may undergo further regulatory action.
- Hexachloroiridic acid and Rhodium trichloride are among the flagged substances, as for both substances, one notifier has reported a classification as Carc. Cat. 2. The PMC Secretariat is not aware of any data supporting these classifications but is currently trying to identify the underlying data via SIEF / CLP platform. **AP34**

9.3 RMOs for chloroplatinates

The PMC Secretariat proposes to conduct the RMO exercise on chloroplatinates, to check if the RMO mock up at Eurométaux level works for respiratory sensitizers and STOT RE. This was agreed by the PGM WG. **AP35**

The next PGM WG meeting will be held 14 October 2015, 13:00 - 17:00 CET at the Metals Conference Centre in Brussels.

Annexes

1. Agenda & list of participants
2. Slides presented at the meeting
3. Declared uses Pt and Pt substances

10 Actions

Table 1. Actions agreed at the 25 March PGM Work Group meeting in Brussels

	What?	Who?	When?	Status
1.	Provide recent IPA publication to EBRC	D. Boyd	Once available	
Substance identification and sameness				
2.	Circulate (updated) PGM ID cards to PGM WG	KA	By end 2015	
3.	Finalise testing programme on Ru compounds	KR	Q3/4 2016	
4.	Registration dossier for Karstedt concentrate: • Discuss transfer of LR role with the Reconsile Consortium • Start work programme for preparation 10-100 t/a dossier • Assess impact of above on 2015/2016 budget/HR	FC KR FC/KR	Q2 2015	
5.	Assess which PGM materials potentially meet the nanomaterial definition / need characterisation testing and inform the PMC Secretariat accordingly	PGM registrants	By 3 Apr 2015	done
6.	Compile a confidential list of substances to be tested for nanomaterial characterisation	KR	By 8 Apr 2015	done



7.	Request quotes from suitable labs for characterisation of nanomaterials, and set up a framework contract with the recommended lab	KR	ASAP	done
8.	Perform a literature search to compare effect levels of nano-PGMs versus 'bulk' PGMs	PMC Sec / Consultants	Q2 2015	
9.	Inform the PMC Management Committee / PMC Assembly and at a later stage SIEF about the changes in PMC's scope (removal of 5 substances + tonnage band changes) and update the PGM indicative list accordingly after approval by MC and Assembly.	FC/KR	Q2 2015	
10.	Develop an updated work plan for the substances with tonnage band / registration deadline changes	FC/KR	ASAP	
11.	Review the budget and HR assessment for the tonnage band increases, and discuss options to address the additional resource need with the PMC Mgmt Cttee	FC	By end Apr 2015	
12.	Decide on how to address additional resource need for the PGM project following tonnage band increases	PMC Assembly	4 Jun 2015	
Testing programme, PNEC/DNEL refinements and CLP update				
13.	Follow up STOT RE 1 classification for Diammonium Hexachloroplatinate, Hexachloroplatinic acid and Dipotassium hexachloroplatinate with registrants	KR	ASAP	done
14.	Derive Pt PNECs	WCA	Q2 2015	
15.	Derive Ru and Rh PNECs once ecotoxicity testing data are available	WCA	When ecotox testing finalised	
16.	Derive DNELs once acute / repeated dose / reprotox testing data are available	bibra	When mamm. tox. testing finalised	
17.	Follow up with the corresponding LR's regarding required updates of the CLP notifications	KR	When all testing finalised (unless more urgent action needed)	
Identified uses				
18.	Circulate latest list of Pd/Pt uses to PGM WG for review	KR	ASAP	done
19.	Review list of Pd/Pt uses and send comments/additions to PMC Sec	PGM WG	30 Apr 2015	
20.	Update the minutes of the 19 June 2013 PGM WG meeting as suggested on slide 40 in Annex 2	KR	ASAP	done
21.	Define article service life (incl. 2 examples) and check case-by-case with the companies that reported Pd/Pt catalyst use if an article service life needs to be included	KR / WCA	Q2 2015	
22.	Launch the pilot case on DU exposure assessment with a PGM substance	KR/FC	Q2/3 2015	
23.	Check the Umicore handbook on PGM chemistry and available plating references for information on speciation for surface treated articles	Umicore / Johnson Matthey	Q2 2015	
Environmental emissions of Pd and Pd compounds				
24.	Circulate WCA sediment sampling protocol to PGM WG	KR	ASAP	
25.	If not participating yet, inform the PMC Sec / WCA of wish to participate in the site-specific monitoring programme and indicate if own sediment sampling can be done based on WCA sampling protocol	PGM WG	By end May 2015	



26.	Contract local consultants for sediment sampling on sites in mainland Europe	WCA	By end June 2015	
27.	Check with lab how long samples are stored / if retrospective analysis is possible	WCA	Apr 2015	done
28.	Add PGMs to their routine air monitoring if possible	PGM WG	Q2-Q3 2015	
Occupational exposure of Pd/Pd compounds and Pt/Pt compounds				
29.	Inform PMC Secretariat if any objections to using the workplace-specific ES approach for Pt substances	PGM WG	By 3 Apr 2015	
30.	Clarify outstanding issues with companies regarding the Pt occupational exposure questionnaires	EBRC	June 2015	
31.	Follow up IPA dataset	EBRC	Q2 2015	
Other				
32.	Prioritise registration batches for the 63 PGM substances	KR/FC	Apr-May 2015	
33.	Review if additional characterisation is required for PGMs	PGM WG	Once new guidance is available	
34.	Identify underlying data for Carc. Cat. 2 classification of Hexachloroiridic acid and Rhodium trichloride notified to the CLP inventory (via SIEF / CLP platform)	KR	Apr-May 2015	
35.	Contact Michel vd Straeten in inform him that PMC would like to start the RMO work now	FC	Apr-May 2015	