

**From:** Klaus Rothenbacher <rothenbacher@epmf.be>  
**Subject:** Pd PNECs - read across approach  
**Date:** 7 Jun 2013 17:29:49 GMT+02:00  
**To:** mhalhead@halhead.org, nevillep@angloplat.com, Manfred.Probst@c-hafner.de, giovanni.prelazzi@chimet.com, braibant@epmf.be, bodo.berkner@ferro.com, peter.grohnert@heraeus.com, ruediger.thiele@heraeus.com, angela.alderman@matthey.com, boydda@matthey.com, mark.raffray@matthey.com, christine.bourda@metalor.com, aurelie.normand@metalor.com, francisco.boo@metalor.com, mari.jarvikivi@nornik.fi, info@safimet.com, fehse@saxonia.de, marie-laure.ledrich@luxcontrol.com, guy.ethier@umicore.com, marleen.vandenbergh@umicore.com, Heike.Kinz@eu.umicore.com, roland.winde@eu.umicore.com, Nathalie.Dom@eu.umicore.com, steven.verberckmoes@umicore.com, edwin.broekaert@umicore.com, mike.dutton@vale.com, mike.shepherd@vale.com, Carole.Wilson@vale.com, roland.brasch@heraeus.com, michael.huber@wieland-edelmetalle.de, heik@xstratanickel.no, hstubberud@xstratanickel.no, massimo.blattner@valcambi.com  
**Cc:** Katrien Arijs <katrien.arijs@arche-consulting.be>, rothenbacher@epmf.be  
► 1 Attachment, 264 KB

---

## **To the PGM WG**

FYI - An outstanding action point from the last PGM WG meeting was for PMC to discuss the read-across strategy for Pd(IV) substances (ecotox testing) with WCA and to propose a way forward. I have asked WCA to write up the outcome of our discussion in a document that could be attached to our dossiers as a justification for our Pd read across approach (this is one of the main points of interest at ECHA). Please see attached.

Dave has kindly prepared a discussion paper on the (in)stability of hexachloropalladates, concluding that they are not stable in biological or environmental systems. This was supported by JM with additional measurements to determine the actual degradation rate, as there was no published data available. The paper concludes that the half-life of hexachloropalladates in water is in the range of seconds to minutes (168 s in our case). OECD guidance suggests that in such cases the degradation products are tested, which would be Pd(II) in our case. Therefore, no PNECs for Pd(IV) substances will be derived but we will use the Pd(II) PNECs.

As discussed earlier, we propose a worst-case read across from DDP to Pd(II) compounds. This read across is not perfect but we think this is a pragmatic approach and conservative (based on worst-case read across) and therefore is justified. This is also documented in the attached read across justification document.

We will also put this point on the agenda for a brief discussion at the next PGM WG meeting, in case you have any questions or would like to discuss.

Kind regards,

Klaus Rothenbacher

Dr. Klaus Rothenbacher  
Scientific Manager  
Precious Metals and Rhenium Consortium  
European Precious Metals Federation

Avenue de Broqueville 12  
1150 Brussels  
BELGIUM

Phone: + 32 (0) 2 775 63 09  
Fax: + 32 (0) 2 779 05 23  
e-mail: [rothenbacher@epmf.be](mailto:rothenbacher@epmf.be)  
Website: [www.epmf.be](http://www.epmf.be)

*In providing consultation or other assistance with respect to health, safety or environment 'HSE' issues, EPMF, its employees, consultants, and all EPMF members disclaim any and all liability for any claim whatsoever that arises from the provision of HSE advice and services rendered through EPMF. All warranties and representations, express or implied, are disclaimed. Neither EPMF, its employees, consultants nor any member of EPMF makes any warranty whatsoever with regard to the HSE advice and/or services rendered.*



[PGMs Phase ...ocx \(264 KB\)](#)