



MINUTES

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

1. Welcome and introduction.

- 1.1. **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.

2. Scope of the PGM CSA/CSR + ES work

2.1. PGM inventory (Cf. Annex 3) and project status (availability on PNEC and DNEL).

7 Pt and 9 Pd substances are currently > 10 t/a and classified for environment / human health endpoints in the PMC inventory (dd 10 April 2012), hence requiring a CSR. These have been declared by a total of 12 PMC Members, ranging from 1 to 9 companies per substance. Depending on the outcome of the on-going testing programme, additional PGM > 10 t/a may require a CSR.

2.2. 2013 priority: Diamminedichloropalladium (DDP) & Pd family.

From all the confirmed substances requiring a CSR, only DDP requires full registration in 2013. Therefore, data collection and assessment will be prioritized for DDP and/or the Pd family (effects from and exposure to Pd ion). **DP1**

2.3. Pd metal?

Even though a CSR and full ES are not required for the metallic PGM (> 10 t/a but not hazardous), PMC Members agree that a (qualitative) CSR-type of report to document effects and exposure patterns should be prepared for Pd metal. **DP2**

Pd monoxide (> 10 t/a but not classified) was found to be completely insoluble (0,00 µg/l) in a TD test, and is therefore unlikely to be environmentally hazardous. Currently an ES is not necessary but pending the outcome of the on-going testing programme, this may change. Pending the outcome of the on-going testing programme, for Pd dioxide (> 10 t/a and physico-chemical classification), the CSR and ES will be limited to physico-chemical properties. **DP3**

This means that the 9 Pd substances currently in scope for a CSR and ES could become 12 (and the number of companies involved increase from 12 to 19).

2.4. Other PGM.

The other registrations due by 2013 are SCC intermediates and hence do not require a CSR and ES.

Other PGM due for registration by 2018 and (possibly) requiring a CSR include:

- 7 Pt substances > 10 t/a and classified for environment / human health endpoints and hence requiring a CSR. For these substances, workplace exposure data collection and assessment is on-going at IPA level;
- 1 Rh substance > 10 t/a and with physico-chemical hazard, for which the testing programme is on-going and the CSR may be limited;
- 2 Ru substances > 10 t/a and with no hazard, unless the on-going testing programme proves differently.

Ir substances are all in the < 10 t/a band and hence do not require a CSR.



2.5. ES: Environment, man via the environment, workplace, consumer, exposure via food, combined exposure, waste.

The ES for each compound will include various exposure pathways:

- Environment: emissions to environment versus PNEC for all environmental compartments;
- Man via the environment: exposure via environment / food versus DNEL;
- Workplace: occupational exposure versus DNEL for each relevant route of exposure;
- Consumer: emissions from consumer goods versus DNEL (It will need to be discussed how exactly to handle jewellery exposure);
- Exposure via food: presence in food versus DNEL;
- Combined exposure: all in one scenario;
- Waste: emissions from waste streams versus PNEC and DNEL? A multi-metallic methodology is currently being developed by ARCHE under the umbrella of Eurométaux.

WCA will be responsible for the environmental exposure assessment, exposure of man via the environment and waste exposure. EBRC will be responsible for the occupational exposure scenarios and for the consumer, food and combined exposure work.

To collect all necessary information for the CSRs and ESs, 4 excel-based questionnaires / collection forms will be used:

1. Use questionnaire;
2. Environmental emissions questionnaire;
3. Workplace exposure questionnaire;
4. Workplace exposure data collection form.

In a first stage, data will be collected on Pd compounds.

3. Use questionnaire.

3.1. Aim of the questionnaire.

- The use questionnaire aims at collecting information on all identified uses of registrants and their DUs to be added into IUCLID 5 (for all tonnage bands), and addressed in the CSA/CSR and ES preparation (if required). Non-reported uses may not be covered and hence be considered as non-authorized in the EU.
- It is stressed that the use questionnaire will have to be filled out for all used Pd substances intended for registration (i.e. not just >10 t/a and hazardous Pd substances). A separate questionnaire should be completed for each substance.
- The use information needs to cover the entire life cycle of the substance for Industrial, Professional and Consumer uses.
- The use information is recorded and communicated using the Use Descriptor System (a system of use descriptors to standardise the description of the uses of the substances, allowing easier communication).
- Responses will be treated in strict confidence and will be used to develop Generic Exposure Scenarios, build short titles for the ESs and group uses with similar potential exposure patterns.

3.2. Live presentation of the questionnaire, identification of critical data entry fields, and Q&A.

Following a live presentation of the questionnaire, some adjustments/clarifications should be made (AP2):

- Check if proper confidentiality disclaimer appears on front page.
- Remove/update unavailable/irrelevant link on SPIN.
- Add cover letter to the questionnaire explaining the process and steps to be followed and why. AP1
- Clearly mention in the cover e-mail/letter that the questionnaire has to be sent to DUs. the cover letter should have a note that if a DU receives the same



questionnaire from several suppliers, only one of them should be completed and returned (via the supplier or directly to the project coordinator). If questionnaires from DUs are sent back to PMC members, they should check if all uses are covered before forwarding to the project coordinator.

- Add a (qualitative) definition of low, medium and high dusty material (cf. RiCoG) to make sure everyone has the same understanding.

Other comments made:

- Creating one questionnaire to collect data on uses and exposure together is not possible, since we first need to know and group uses before we can collect exposure data, and prepare the ESs in an iterative manner for the identified uses. If we already ask for exposure data before having identified the relevant uses, the data collected will not have been allocated to the relevant use or exposure pattern/profile and be more difficult to use.
- New uses that appear between now and the 2018 registration deadline can still be added to the process.

The questionnaire was already circulated with an end of June deadline. Only 2 responses were received so far. The questionnaire will be updated and re-circulated with the cover letter, and the deadline for completion will be extended to end of July/end of August (responses will be collected in 2 batches). [AP3-5](#)

After the uses have been grouped, the list of aggregated uses will be circulated to manufacturers and DUs to check if all uses are covered. [AP6-7](#)

4. Environmental emissions questionnaire.

4.1. Environmental ES building approach.

The environmental emissions questionnaire captures information on:

- Tonnage (needed for calculation of the emission fraction);
- Potential emissions to air (i.e. stack emissions) and water (i.e. waste-water discharge);
- Risk Management Measures (RMMs) and treatment efficiencies;
- Monitoring data (including background concentrations if available);
- Confounding factors (e.g. other sources of exposure of the same metal).

The questionnaire will be addressed to manufacturers for now. Depending on the identified uses, a DU questionnaire can be sent later.

4.2. Aim of the questionnaire.

The compiled data will be used:

- To develop a Generic Exposure Scenario (GES) for use in the CSA/CSR. The GES is a sector-wide approach to exposure assessment and represents a reasonable worst-case scenario. A maximum of 4 GESs will be developed (with/without WWTP, with/without STP). Each company will need to be able to prove they fit into the parameters set in the GES.
- As initial dataset for the site-specific risk assessment. If Tier 1 assessment indicates a risk (i.e. if RCR close to 1), additional data may be required for higher tier modelling.

4.3. Live presentation of the questionnaire, identification of critical data entry fields, and Q&A.

Following a live presentation of the questionnaire, some adjustments/clarifications should be made ([AP8](#)):

- Check if proper confidentiality disclaimer appears on front page.
- Add reference to “Pd metal equivalent” wherever data is requested (e.g. tonnage).
- Insist on need to avoid text in number fields.

Other comments made on the environmental emissions questionnaire:



- It is not possible to differentiate between environmental emissions from Pd production and from refinables. However, the assessment is site specific and embraces all Pd emissions of the site. Refinement can be done later if needed (if risk identified).
- Some companies have measured Pd emissions but have not identified any emission above the detection limit. This will be reported in the questionnaire.
- Where limit values are presented for concentrations and volumes discharged, the recommended approach is to use 50% of the limit of detection (LoD). The PNEC and LoD for Pd will have to be checked. The PNEC for Pd should be available end of July.
- There should be no emissions to soil as this is illegal in the EU (but possibly indirectly following deposition after emission to air).
- Basic information on waste needs to be included for all tonnage bands. If materials are recycled internally (e.g. refinables), they are not considered waste since re-used. [AP12](#)
- The more data provided by companies through the questionnaires, the more statistically robust the emission factors (important parameter for GES) will be. Therefore, companies are encouraged to provide as much data as possible.

The questionnaire will be circulated with the cover letter, and the deadline for completion will be end of July/end of August (responses will be collected in 2 batches). [AP9-10](#)

A first draft of the GES will be developed in September. [AP11](#)

5. Workplace exposure questionnaire.

5.1. Workplace ES building approach.

The workplace ES includes:

- Title and description of ES;
- Product characteristics;
- Operational conditions (OCs) and risk management measures (RMMs);
- Exposure estimation;
- Guidance for compliance checking (for DU).

Firstly, a detailed exposure assessment at the manufacturing level will be conducted (where measured exposure data are most likely available). Subsequently, read-across will be done to exposure scenarios at the DU-level. Only if such read-across could not be justified or if DUs are not able to comply with the proposed RMMs, further information would be required from DU directly.

5.2. List of workplaces.

To facilitate the development of ESs, the exposure assessment will be based on activity classes (AC), grouping processes/workplaces for Pd ([DP5](#)). Several processes (with similar OCs and RMMs) are grouped in 1 activity class to decrease the confidentiality issue and the number of questionnaires. This was not done for the PM Refinables, but when analysing the responses to the questionnaires, it turned out a lot of processes could be grouped.

These ACs will be:

- Included in the occupational exposure questionnaire for manufacturers to collect further information on RMMs and OCs for each of the relevant AC.
- Included in the submission form for measured inhalation exposure data and available measured data from manufacturers should be assigned to these AC.

Originally, 7 workplaces were proposed by EBRC and sent to industry experts of 4 different companies for modification/confirmation/discussion. This resulted in the need for 1 additional workplace and modified wording to better reflect activities.

If RMMs and OCs are not the same within 1 AC, it is suggested to make the distinction between low hazard and high hazard potential - EBRC to decide how to address this in the questionnaire.



PMC members are asked to carefully review the 8 ACs for their relevance, usage of appropriate terminology and completeness. [AP13](#)

5.3. Aim of the questionnaire.

Aim of the workplace exposure questionnaire is to collect information on workplaces, OCs and RMMs implemented on sites.

5.4. Live presentation of the questionnaire, identification critical data entry fields, and Q&A.

Following adjustments/clarifications should be made to the workplace exposure questionnaire ([AP15](#)):

- Check if proper confidentiality disclaimer appears on front page.
- Where furnace loading is mentioned, add unloading.
- Add column/worksheet to allow low and high profile RMM and OC description.

Other comments made on the workplace exposure questionnaire:

- For the ACs, qualitative guidance on dustiness is included from the MEASE glossary and a quantitative example. It is noted that for this example, the RDM method was used and figures might be different with different tests.
- The workplace ES will be developed per AC and not per substance. At a later stage, ACs can be assigned to substances.
- It is assumed that the questionnaire addresses every workplace where there is risk of Pd exposure (in the form of a given compound subject to registration).

Following adjustments/clarifications should be made to the data submission form for measured workplace exposure data ([AP15](#)):

- Check if proper confidentiality disclaimer appears on front page.
- Insist on need to submit all available data over last ten years if OCs and RMMs as described in the questionnaire have not significantly changed during this period.
- Replace workplace code by activity code.
- Add comment column to allow e.g. justification of exposure endpoints > OEL with additional information on applicable PPE.

Other comments made on the data submission form:

- Dermal exposure is not addressed; if needed, a separate submission form will be created.
- 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 workplace exposure questionnaire and data submission form will be circulated with the cover letter, and the deadline for completion will be end of July/end of August (responses will be collected in 2 batches). [AP16-17](#)

6. Next steps.

6.1. Site-visits?

Not required for EBRC and WCA.

6.2. Roles and responsibilities, coordination and project management.

Cf. slide 53 in Annex 2.

6.3. Timeline for DDP/Pd data collection, data refinement/generation and ES preparation (in tiers).



Cf. slides 54-56 in Annex 2. It is noted that the OECD 422 RDT study will need to be repeated.

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

It is proposed to have the next PGM Exposure Scenario meetings early October and early December.
An e-mail will be sent around to check which time is best for all. **AP19**

Annexes

1. Agenda & list of participants
2. Slides presented at the meeting
3. PGM inventory

Decisions

Table 1. Decisions made at the 27 June 2012 PGM Exposure Scenario meeting in Brussels

Scope of the PGM CSA/R + ES work	
1.	Data collection and assessment will be prioritized for DDP and/or the Pd family.
2.	A (qualitative) CSR-type of report to document effects and exposure patterns will be prepared for Pd metal.
3.	For Pd dioxide, the CSR and ES will be limited to physico-chemical properties.
Data collection	
4.	To collect all necessary information for the CSRs and ESs, 4 excel-based questionnaires / collection forms will be used: 1) Use questionnaire; 2) Environmental emissions questionnaire; 3) Workplace exposure questionnaire; 4) Workplace exposure data collection form.
5.	The workplace exposure assessment will be based on activity classes (AC), grouping workplaces for Pd.

Actions

Table 2. Actions agreed at the 27 June PGM Exposure Scenario meeting in Brussels

	What?	Who?	When?
Data collection general			
1.	Prepare cover letter explaining the background and approach of the data collection exercise to manufacturers / importers and DUs, to be circulated with the questionnaires.	PMC Sec with input WCA & EBRC	ASAP
Use questionnaire for Pd compounds			
2.	Reflect comments of PMC Members and adapt use questionnaire for re-circulation.	WCA & EBRC	ASAP
3.	Together with cover letter, re-circulate updated use questionnaire to PMC Members to collect use information on all Pd substances and intermediates in scope. Mention clearly that questionnaire should be forwarded to DUs.	PMC Sec/KA	3 Jul 2012
4.	Forward use questionnaire to their DUs.	PMC Members	As soon as available
5.	Complete use questionnaire for each Pd substance intended for registration (1 per substance) and for the entire life cycle of the substance and return to project coordinator (directly or via the supplier).	PMC Members & DUs	By end Jul / end Aug 2012
6.	Group uses with similar potential exposure patterns based on results of the use questionnaire.	WCA & EBRC	Sep 2012



7.	Check list of grouped uses for completeness.	PMC Members & DUs	Sep 2012
Environmental emissions questionnaire			
8.	Reflect comments of PMC Members and adapt environmental emissions questionnaire for circulation.	WCA	ASAP
9.	Together with cover letter, circulate updated environmental emissions questionnaire to PMC Members to collect environmental emission information on Pd and Pd substances.	PMC Sec/KA	3 Jul 2012
10.	Complete environmental emissions questionnaire for each site producing Pd and/or Pd substances (1 per site) and return to project coordinator.	PMC Members	By end Jul / end Aug 2012
11.	Develop first draft of Generic Exposure Scenario (GES) for Pd and Pd substances based on data provided in the environmental emissions questionnaire.	WCA	End Sep 2012
12.	Perform short literature search of Pd in waste.	WCA	Jul-Aug 2012
Workplace exposure questionnaire			
13.	Circulate list of activity classes for review.	EBRC	3 Jul 2012
14.	Check list of activity classes for their relevance, usage of appropriate terminology and completeness and provide comments.	PMC Members	By 9 Jul 2012
15.	Reflect comments of PMC Members and update: - list of activity classes; - workplace exposure questionnaire; - data collection form.	EBRC	By 12 Jul 2012
16.	Together with cover letter, circulate updated workplace exposure questionnaire and data collection form to PMC Members to collect occupational exposure information on Pd and Pd substances.	PMC Sec/KA	12 Jul 2012
17.	Complete workplace exposure questionnaire and data collection form for each site producing Pd and/or Pd substances and return to project coordinator.	PMC Members	By end Jul / end Aug 2012
18.	Develop first draft of workplace ES for Pd and Pd substances using OEL.	EBRC	Early Oct 2012
Next meetings			
19.	Organise next PGM ES meetings.	PMC Sec/KA	Early Oct / early Dec 2012