



PGM Work Group meeting

Reading, 29th of September 2009
Johnson Matthey Technology Centre



Agenda

1. Introduction
2. Sameness, Lead Registrants and preferred registration timing
3. Budget progress
4. PGM project
5. AOB, next meeting & conclusion



1. Introduction



1.2 Participants

<i>Dave Boyd</i>	Johnson Matthey	United Kingdom
<i>Philip Copestake</i>	BIBRA	United Kingdom
<i>Mark Crane</i>	WCA	United Kingdom
<i>Michael Halhaed</i>	Anglo Platinum	South Africa
<i>Tim Hird</i>	EPMF	Belgium
<i>Michael Huber</i>	Wieland Dental + Technik	Germany
<i>Erin Logan</i>	WCA	United Kingdom
<i>Adam Peters</i>	WCA	United Kingdom
<i>Mark Raffray</i>	Johnson Matthey	United Kingdom
<i>Klaus Rothenbacher</i>	EPMF	Belgium
<i>Mike Shepherd</i>	Vale Inco	United Kingdom
<i>Chantré Viviers</i>	Heraeus	Germany
<i>Roland Winde</i>	Umicore	Germany



Objectives of today's meeting

- Meet with WCA (Ecotox) and BIBRA (Tox) representatives
- Discuss next steps of PGM project with a focus on testing strategy (first tier)
- Prepare SIEF communication initiative



2. Sameness, Lead Registrant and preferred registration timing



2.1 Quick recap on pre-SIEF status

- Recent/final PGM indicative list available in handouts
- 57 of 74 in-scope PGM materials have no Consortium SFF:
 - 8/74 have Consortium Member as SFF
 - 9/74 have non-Consortium Members (consultancies such as Ecomundo, B-lands Consulting, etc.) as SFF
 - Identify critical/strategic PGM materials, and
 - Agree on strategy:
 1. By-pass current non-Consortium SFF
 2. Ask current non-Consortium SFF to untick SFF box (need to be ticked by Consortium Member immediately after)



No company has so far volunteered for the position of LR - see discussion under 2.3



2.2 Consortium presentation letter

- Two-pages letter sent to all pre-SIEFs
 - Consortium exists
 - Work is in progress
 - No response expected
- Next communications with pre-SIEFs:
 1. Registration intentions (tonnage and deadline confirmation) and data availability
 2. Sameness and Lead Registrant
 3. Membership, Letter of access, SIEF agreement



Considering number of PGMs, need to agree on priority-based approach



2.3 Sameness

Background:

- In preparing for pre-registration, PMC has categorised PGMs as mono-constituent and UVCB materials
- PMC launched several data requests to confirm sameness:
 - PSD for all crystalline, powder and grain forms < 100 μm (including so-called "sponges")
 - IR spectra for all solids
 - Raman spectra for all solutions



2.3 Sameness (cont.)

Next steps:

- Beyond sameness discussions, potential registrants must provide analytical information that supports their registration under a particular entry.
- For this, **Consortium must agree on standard analytical method:**
 - PSD and IR for solids, Raman for solutions - **other suggestions?**
 - Once agreed, detail conditions for PSD, IR, Raman so that everyone applies comparable protocol \rightarrow comparable results
- Then, each potential registrant to perform required tests



2.3 Sameness, proposed ID card

Simple/mono-constituent materials
→ Relatively straightforward

Complex/UVCB materials
→ 100% matching unlikely

Sameness is not more difficult to prove, it just requires more evidence

- Three template/models (in handouts):
 - Ni alloy scrap
 - Refinables
 - CEFIC model
 - Other



2.3 Sameness, proposed ID card (cont.)

How easily can Members provide information required in each model?
Minimum/typical data set listed here below:

- **Chemical name**
- **Composition:**
 - Mono-constituent, multi-constituent or UVCB
 - Brief description
 - Degree of purity
 - Typical concentration/concentration ranges of constituents, impurities and additives
- **Analytical method and spectra data:**
 - Analysis type
 - Tested substance
 - Method used
- **Origin**
- **Physical state**
- **Form** (if crystals, powder, grain, requires PSD)
- **Colour**
- **Odour**
- **Substance-type**

	More complex
	Simple

ID Cards can perhaps be pre-populated by WCA?



2.3 Sameness, proposed ID card (cont.)

- ID cards aim at launching substance sameness confirmation exercise
 - In Consortium
 - In pre-SIEF
- Considering number of PGM, need to agree on prioritisation:
 - Substance vs. Intermediate?
 - CSA/CSR + 2013 registrations first?
 - Per family? Pt family, then Pd family, etc.?
 - Per category? Pt0, Pt4, Pd0, etc.?
 - Test materials?
 - Other criteria?

PGM WG to propose prioritisation approach (same as for pre-SIEF communication strategy discussed under 2.2)



2.3 Sameness, purity

- Suggested to separate pure from impure (metallic) PGM: two dossiers
- See full proposal in handouts

	Pure	Impure
PGM content	> 99,95 %	80-99,94 %
Registration dossier	Substance	Intermediate
Information requirements	Annex VII and Annex VIII	Any existing available
Dossier preparation	PGM project with WCA	To be discussed



2.3 Lead Registrants

1. LR volunteers submit nominations
2. LR is nominated:
 - In Consortium (PGM Members)
 - In pre-SIEF
3. LR sends e-mail notification to ECHA
4. LR opens joint submission object onto REACH IT under specifically agreed name and receives token security number
5. LR provides token security number to joint submissioners (JS):
 - Consortium Members
 - Pre-registrants having purchased a letter of access



2.3 Lead Registrants (cont.)

6. JS add themselves on the joint submission in REACH IT using agreed name and token
7. LR completes IUCLID 5 LR-specific sections (joint sections completed by Secretariat)
8. LR submits joint dossier to ECHA
9. LR gives JS green light to submit their own dossier
10. JS submit their respective individual dossiers to ECHA



2.3 Lead Registrants (cont.)

- Once priority substances identified, need to progress with:
 - ID card preparation
 - Nomination of Lead Registrant
- Need to avoid “self-appointed SFF” to take the lead
- Moreover, when launching test programme, ideal for potential Lead Registrant to be sample provider!

Two reasons to start moving!
Read LR document and volunteer now!

For PGM WG to suggest deadline for first LR nominations



2.4 Joint submission: how?

- Open doors policy?
 - Fair, transparent and non-discriminatory
 - Decreases overall costs
 - Increases number of co-owners
 - Quorated meeting more difficult
 - Decision-making more complex
- Letter of access?
 - Conditions and price shall be fair, transparent and non-discriminatory
 - Members reimbursed with Letter of access moneys
 - Limited number of co-owners
 - No obligation/need to attend meetings
 - Easier decision-making

PGM WG to agree on preference



2.5 Preferred registration timing



Good to know:



- Legal deadline for PGM is 2013 to the earliest → we have more time than other metals



- Members' staff will be very busy with 2010 registration obligations → need to distribute workload over several years



- Useful to learn from earliest registrations to improve following ones → avoid rushing



- After 2010, Consortium membership may be reduced due to 2010 registrations → administrative costs increase for "remaining" members



- By December 2010, need to submit classification and labelling notification → need to develop minimum information to support classification

PGM WG to agree on preferred timing for PGM project plan

Precious Metals and Rhenium Co



3. Budget progress





3.1 Generic costs

- REACHsuite
 - Originally: 65000 €
 - Signed for: 60000 €

Now ready to communicate "massively" with pre-SIEFs

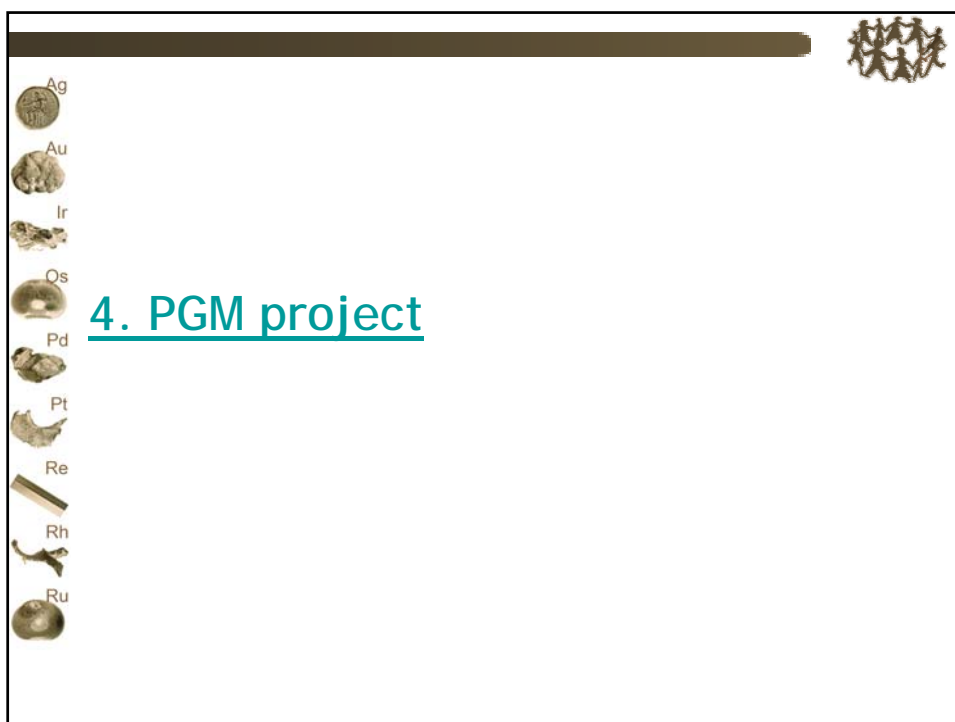
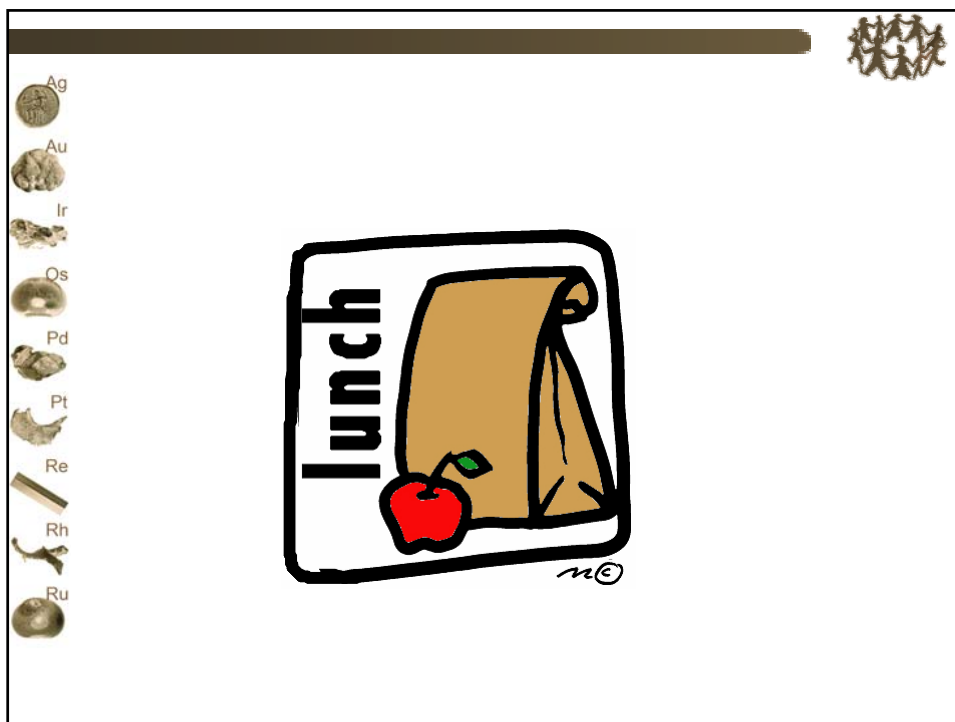
- Conscious of current economic restrictions, PMC staff have minimised travel expenses and maximised webinars, teleconferences, back-to-back/parallel meetings



3.2 PGM-specific costs

	2008	2009 (up until Sep 2009)	TOTAL
Invoiced	300 000 €	543 900 €	843 900 €
Spent	31 450 €	49 000 €	80 450 €
Left	268 550 €	494 900 €	763 450 €

Available for upcoming sample purchase and testing programme (as from September 2009)





4.1 Overall project progress

- **Jan-Jun 2008:** search for potential CROs
- **Jun 2008:** first meeting with WCA and request for service offer/tender
- **Sep 2008:** final proposal approved
- **Sep 2007 - Sep 2008:** gather available data
- **Dec - Jun 2009:** Category building for read-across and preliminary testing recommendation
- **Aug 2009:** closing down of PGM inventory
- **Sep 2009:** Full testing recommendation
- **TODAY:** Discuss testing recommendations



4.2 Phase II: Category building

- Several preliminary categories proposed based on oxidation state:
 - Need to assess existing data to confirm category approach
 - Need to fill in basic phys-chem data gaps to confirm read-across possibilities
- **How to address organo-metallics?**



4.3 Phase III: Testing strategy

- Several tiers of tests proposed:
 - Water solubility and T/D
 - Phys-chem properties
 - Ecotox
 - Tox } Could be launched together
- First tier to be launched as from 30th September 2009
- Final report to be delivered after full ITS or several testing tiers agreed (end of Oct 2009)



4.4 Phase IV: CSA/CSR

- 17 material requires CSA/CSR:
 - 8 Pt substances
 - 7 Pd substances
 - 3 Rh substances
 - 2 Ru substances
- All 74 substances require a classification and labelling notification by December 2010
- **First step:**
 - Identify uses of PGM materials
 - Identify likely emissions and exposure



4.5 Phase V: IUCLID 5 compilation

- Registration means:
 - Preparation of IUCLID 5 dossier (OECD IT format with specific fields)
 - Submission of IUCLID 5 dossier through REACH IT (ECHA IT platform)
 - Payment of Registration fee to the ECHA
- IUCLID 5 files include:
 - Registrant-specific fields (Lead Registrant and each joint registrant)
 - Joint submission-specific fields (Lead Registrant)
- Joint submission-specific fields include:
 - Registrant and substance identification-specific fields
 - Technical Dossier (phys-chem, ecotox and tox endpoints)



4.5 Phase V: IUCLID 5 compilation (cont.)

- **WCA**: completes technical fields
- **Lead Registrant** (with support of PMC Secretariat): completes LR and joint submission-specific fields
- **Joint registrants** (with support of PMC Secretariat): complete legal entity-specific fields



4.6 Project timeline towards Registration



- Preferred registration deadline as per PGM WG
- WCA's recommendations

→ Overall timeline



5. AOB



5.2 Next meeting

- Recap on next steps/agreed actions
- Need for teleconference/meeting?



Thank you for your participation!

Have a safe journey back home!