



PRECIOUS METALS AND RHENIUM CONSORTIUM
PGM WORK GROUP FACE-TO-FACE MEETING
Chairperson: *Dave Boyd (Johnson Matthey)*

29 September 2009 (10:30 - 15:30 BST)

Platinum Room

Johnson Matthey Technology Centre
Blounts Court, Sonning Common
Reading RG4 9NH, UNITED KINGDOM

PARTICIPANTS

Dave Boyd	Johnson Matthey	UK
Mark Crane*	WCA	UK
Philip Copestake*	BIBRA	UK
Michael Halhead	Anglo Platinum	UK
Tim Hird	EPMF	Belgium
Sarah Hottenroth**	Umicore	Germany
Michael Huber	Wieland Dental + Technik	Germany
Erin Logan*	WCA	UK
Adam Peters*	WCA	UK
Mark Raffray*	Johnson Matthey	UK
Klaus Rothenbacher*	EPMF	Belgium
Mike Shepherd	Vale Inco Europe	UK
Chantré Viviers	Heraeus	Germany
Roland Winde	Umicore	Germany

* Participated on Agenda items 4 & 5

** Participated on Agenda items 4 & 5 via conference call

MINUTES PGM MEETING

1. Introduction and Welcome

- | | |
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| 1.1. Confidentiality and Competition Law | The attendees were reminded on their commitment to comply with Confidentiality and Competition Law provisions. A list of Do's & Don'ts is available on request to the Secretariat |
| 1.2 Tour de table and apologies | Apologies received from:-
Edwin Broekaert, Umicore, <i>Belgium</i> , Heinz-Günter Schenzel, Carl Hafner, <i>Germany</i> , Hege Stubberud Xstrata Nickel, <i>Norway</i> , Michael Turner-Jones Lonmin, <i>South Africa</i> |
| 1.3 Approval of the Agenda | The agenda (Annex 1) was approved. The slides presented at the meeting are available in Annex 2. |

2. Sameness, Lead Registrants, pre-SIEFs and preferred registration timing (T. Hird)

- | | |
|--|--|
| 2.1 Pre-SIEFs: status of number of pre-registrants and SFF | No Consortium member has so far volunteered for the role of Lead Registrant in any of the 74 in-scope PGMs. See 2.3.3 below. LRs are only required to complete 3 out of the 13 sections in IUCLID 5. |
| 2.2 Consortium's presentation letter | Introductory letter from the Consortium has been sent. No conclusion reached as to the timing of our next communication. |



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2.3 ID Cards, sameness, and Lead Registrants

Of the three ID card templates circulated it was felt the CEFIC one was designed for organics and asked for too much information, the one drafted by the Refinables group is not suitable for mono-constituents. Unsure about its suitability for UVCBs. Therefore not suitable for PGMs. Intermediates only require Annex VII data and consequently the ID card goes too far.

No speciation is required for UVCBs of any PGMs, a simple process description is all that is needed, and spectroscopy will determine sameness in the mono-constituents. It was therefore generally agreed that the ID card proposed by the Ni Alloy Scrap was suitable and if some spectroscopic data and molecular formula were to be added to it this is all that is needed. Cost was raised as a concern if the consultants pre-populate the ID cards. **Post-meeting note 1:** The need for analytical information to identify, describe and confirm sameness of substances is an ongoing debate which will be addressed at a next PGM WG meeting.

AP: Secretariat to prepare final template and circulate for comment. Post-meeting note 2: Proposal circulated for PMC Assembly meeting 3 Dec 2009.

2.3.1 Sameness: agree on purity threshold - update on latest PGM indicative list, discussion about proposed approaches

In Spring 2008 Members had been requested by the Secretariat to supply data including PSD for all crystalline, powder and grain forms (including sponges), IR spectra for solids and Raman spectra for all solutions.

It was agreed that these analytical methods were ok for the mono-constituents and that Raman and IR offered reasonable compromise techniques to maximise the chance of sameness in the SIEFs.

Resulting from personnel changes since the request for the above data, some individuals were not sure what their respective companies had submitted.

AP: Secretariat to come up with a summary of submissions by company to establish who needs chasing up for what.

Some intermediates are UVCBs and further discussion around these and substance sameness needs to be scheduled (cf. Post-meeting note 1).

The suggestion to separate pure from impure metallic PGMs thereby requiring two technical dossiers was agreed however, the group wanted the pure substance threshold raising to 99.99% (no products are sold with a purity < 99.99%), with the impure being anything below this down to 80%.

AP: Secretariat based upon the above agreed purity thresholds to quantify how many impure products there are, analyse the budgetary implications and report back. Post Meeting Note 3: The final registration dossier approach needs to be compliant with RIP guidelines on handling of mono-constituent substances. No decision was reached as to who would carry out the dossier preparation on the impure products but post meeting this can now be clarified as an action point for the Secretariat. The final approach is pending Assembly meeting discussion and decision (3 Dec 2009). The way M/I substances are handled is likely to differ from TII.

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- 2.3.2** Identify priorities: by registration deadlines?
By family (Pt, Pd, etc.)? By category (Pt4, Pd0, etc.)?
- Suggested to use same category for prioritisation as for read across
- Refer to additional comments in item 2.5 of the agenda.
- 2.3.3** Need to identify volunteer LR for “priority” substances
(1) read LR document,
(2) assess strategic substances and (3) volunteer
- In the absence of volunteer Members for the role of Lead Registrants the group felt that it was up to the Secretariat to come up with a list of potential LRs based on the tonnages submitted by individual members. This including subsequent approaches to potential LRs should be an action on the Secretariat for reasons of confidentiality.
- No deadline was arrived at for LR nominations.
- 2.4** Joint submission: membership or letters of access?
- See comments in agenda item 2.4.1
- 2.4.1** Any experience on/suggestion for letters of access?
- One comment made was that an Open Doors policy had been seen not to work in another consortium and there was concern that there should be no free ride for latecomers to the PMRC, although everyone was reminded that latecomers do still have to pay membership fees. In conclusion it was felt that the Letter of Access route should be given further consideration and proposed to Members.
- 2.5** Preferred registration timing: pros and cons of speeding up or taking the necessary time
- It had been assumed that the earliest deadline for PGM registration is 2013. The discussion around purity threshold in item 2.3.1 of the agenda resulted in this and agenda item 2.3.2 not being progressed but instead identified a potential issue. Concern was expressed that if an impure product has a purity range from 80%-99.98% then it is feasible that it may contain 0.1% of a CMR or R50/R53 thereby bringing the registration requirement forward to 2010. It was felt that elemental analysis of the impure products is needed to establish risk of classification. Some intermediates are thought to be potentially at risk.

Agreed AP: Secretariat to ask all members for an elemental analysis of the impure products. Post-meeting 4: Following latest exchanges with Eurométaux and other metals consortia, it was clarified that registration deadlines are triggered

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by the classification of a substance, not by the classification of an impurity contained in the substance. Further refinement on this view will be obtained by the Secretariat.

Preference is for PSD on reference materials to be done in-house but not all Members have a test method.

AP: Secretariat to obtain test method and circulate.

3. Budget progress (informative) (T. Hird)

- 3.1** Generic costs: REACHsuite and other €5K of cost savings have been achieved in the first year of implementation plus reduction in cost in subsequent years. Cost effective means of familiarising Secretariat & PMC Members with the IT platform will be exploited.
- 3.2** PGM-specific costs: Phase I, pilot phase II, etc. It was reported that the budget for PGMs is currently looking healthy, with €763K remaining available for upcoming sample purchase and testing programme. The question was raised as to how much of this amount is already committed in contracted consultants' fees. **Post-meeting note 5:** To be responded at PMC Assembly meeting on 3 Dec 2009.

4. PGM Project Development and Progress

- 4.1** Overall project progress (T. Hird) A category approach is being adopted to reduce costs and needs for testing, with amines and chloroplatinates also being looked at.
A brief update on the project was given listing historical and current milestones, noting that September's full testing recommendation is only a draft at this stage and was subject to discussion and outcome from the next part of the agenda.
- 4.2** Phase II: Category building and phys-chem. data gap filling (M. Crane) WCA reported that this phase of the project is in progress and currently ahead of the proposed schedule with over 50% of the work completed. There are relatively few published data on PGMs but 111 studies submitted by PMRC members on other PGM substances may be helpful for read across or weight of evidence.
Good progress has been made on the initial Robust Study Summary drafts some of which came out of the pilot phase. BIBRA reported extensive opportunities exist for read-across as there are very few gaps.

NB: Data on substances no longer being registered can still be used for purposes of read across.

There are no issues on Osmium as an intermediate as only available data is required. **Post meeting note 6:** the query around Os appearing on the indicative list as a substance has now been clarified with the Members concerned and it is confirmed that Os has intermediate status only.
Same applies as in 4.2.

Report due in approximately six weeks.

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- 4.3 Phase III:** Priority is being given to how much ecotox testing is required with solubility at the forefront of determining this.
- Testing strategy
- solubility,
T/D, ecotox
and tox
(M. Crane)
- Agreement was reached that we are to go ahead with TD testing on metals + oxides with CANMET in Canada (Easter 2010). Other considerations included AQura (Germany), CIMM (Chile) and ECT Consulting.

On the draft ITS AQura have indicated the sample sizes needed and security at the labs is being checked out by WCA. Split batch sampling is not good for UVCBs and in the final report, due end of November, WCA will indicate the batch size required for sampling purposes. This will include a full list of recommendations in tabular form first concentrating on solubility followed by TDP protocol and ecotox testing. It is not yet known if human health tests are needed but this will be clarified in the November report.

Agreement with PMRC will then be reached on which tests are performed and with which CROs. It was noted that Harlan have a lack of experience in dealing with metals.

There are no tox or ecotox data requirements under CLP.

AP: WCA to confirm testing requirements

- 4.4 Phase IV:** See annexed presentation (Annex 2), no additional comments
- CSA/CSR -
future steps
(M. Crane)

- 4.5 Phase V: IUCLID** Once letters of access have been issued there will be the need to send out IUCLID5 files which can be cumbersome in nature. A IUCLID5 hosting facility with restricted levels of access to a secure server would negate the need for this. One German company (Technidata) is offering this facility at c. €500 per month per licence. WCA also offer this facility. The PMRC needs to take a decision if this is needed but generally accepted by all as a good idea. **Post meeting note 7:** more information will be presented at the Assembly meeting in December.
- 5 - General &
bibliographical
input +
confidentiality
issues (M.
Crane)

On exposures - WCA will cut down the Eurometaux multi-metal questionnaire which will be sent out in January 2010 by the Secretariat in line with the original proposal.

The Pilot Phase II substances hexachloroplatinic acid and dipotassium tetrachloroplatinate are already classified under Annex 1 of the Dangerous Substances Directive. This should be added to the indicative list. Since CPA's tonnage band is > 10 t/a, a CSA is needed. For all other substances the need for exposure data will be decided at a later date and will depend on whether the



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substance is classified as dangerous / is in applicable tonnage band to trigger requirement.

4.6 Project timeline towards registration deadlines (*D. Boyd and M. Raffray*)

No conclusion reached as to the preferred registration deadline.

AP: Secretariat to prepare a project plan for circulation.

5. AOB, next meeting, and closing remarks (*D. Boyd*)

No AOB was raised and the meeting was closed at 15:45.

AP: Secretariat to propose date of next meeting

Annexes:

1. Agenda
2. PMRC slide set presented at the meeting
 - 2.1 Slide set presented by WCA
3. PGM Inventory
4. Particle size quotation
5. Re ID card model
6. Ni-alloy ID card
7. SIP template model
8. Proposal for impure metals containing intermediates
9. PGM testing table
10. WCA slide set presented at the meeting

Table 1. List of action points agreed at PGM WG meeting in Sonning, 29 Sep 2009

	Action Point	Who?	When?
1.	2.3 Prepare final ID card template and circulate for comment	Secretariat	Circulated for Assembly meeting 3 Dec 2009
2.	2.3.1 i) Summarise data submissions by company to establish who needs chasing up for what.	Secretariat	For next WG meeting
	ii) Quantify how many impure products there are, analyse the budgetary implications and report back	Secretariat	For next WG meeting
3.	2.5 i) Ask all members for an elemental analysis of the impure products	Secretariat	Pending refinement on the view relating to impurities



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	ii) Obtain PSD test method and circulate.	Secretariat	As soon as possible so data is available by next WG meeting
4.	4.3 Confirm Phase III testing requirements	WCA	End of Jan 2010
5.	4.6 Prepare a project plan for circulation	Secretariat	Now to be handed out at Assembly meeting 3 Dec 2009

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