



Mr Koen Oorts  
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Kortrijksesteenweg 302  
9000 Gent  
BELGIUM

24<sup>th</sup> of September 2008

Dear Koen,

**RE: TAP's comments on phase Ila ENV report of silver project.**

Thank you for your response to our previous message sent on the 7<sup>th</sup> of July. The Management Committee and the Technical Advisory Panel highly welcomed your professional attitude.

We are very pleased to see that you will soon be issuing a revised report including a comprehensive literature search and quality screening of all studies on bioaccumulation and adsorption/desorption. As you indicated, in the event you exceed the extra 50 studies by more than 20% you had based your budget for phase Ila on, please keep us informed before continuing the work.

In order to cooperate with you in the preparation of this revised report, we here below provide you with some comments and requests on the original draft phase Ila report (tables 1 and 2). Please feel free to contact us if needed. We would be very pleased if you could confirm when exactly this revised report will be available and provide us with any feed-back you would already have on phase IIb at this stage.

Thank you in advance for your effort.

Kind regards,

Caroline Braibant  
Secretariat & Trustee  
Precious Metals and Rhenium Consortium

**on behalf of: Dr Andrew Griffiths**  
Chair, Management Committee\*  
Precious Metals and Rhenium Consortium

*\*The Chairperson of the Management Committee acts as the official external Representative of the Precious Metals and Rhenium Consortium. As such, he is authorised to enter into agreements and/or contracts with third parties on behalf of the individual Members of the Consortium for the purpose of the Agreement. Liability remains with each Member of the Consortium and any obligation of the Consortium shall be borne pro rata between the relevant Members. No one third party shall be entitled to pursue any relevant Member for more than that Member's pro rate share of the relevant liability.*



Table 1. Technical comments on May 2008 phase Ila ENV report of the silver project.

Item	Report page number	Remark
1	49/51	<p>The NOEC selected for derivation of the aquatic PNEC is based on the chronic mortality NOEC for invertebrates. If the Bielmyer <i>et al.</i> (2002) report is to be considered as the pivotal study for this purpose it is noted that:</p> <ol style="list-style-type: none"> <li>The reported concentrations are nominal rather than actual (measured) concentrations.</li> <li>As indicated in the study summary on page 72, the mortality NOEC is actually below the detection limit.</li> <li>The NOEC of 0,1 µg Ag/l is apparently below the NOEC values obtained in two other studies of comparable duration in the same species where a non-lethal endpoint (reproduction) was under consideration (Rodgers <i>et al.</i>, 1997; Naddy <i>et al.</i>, 2007). The latter reports – where measured rather than nominal concentrations are reported – established NOEC approximately 5 to 42-fold higher than the Bielmyer <i>et al.</i> study.</li> </ol> <p>Taking into account the additive methodological limitations of the Bielmyer <i>et al.</i> work (in the context of the commentary on criteria for robustness in the original EURAS Phase I report), and its incongruent outcome, are there sufficient grounds to prefer it over the alternative of the chronic fish mortality NOEC for deriving the PNEC? It is noted that the latter endpoint appears to be particularly reliable since it is derived as a geo-mean from six separate studies in <i>Oncorhynchus mykiss</i> all of which are categorised as K1 quality.</p>
2	49	<p>In section 2.6, and to provide linkage with the Phase I report, would it be possible to include commentary as to what additional data would be required in order to proceed with a SSD approach for PNEC derivation? In particular:</p> <ol style="list-style-type: none"> <li>Relating to additional species/taxa endpoints compared to the dataset established from the Phase Ila project.</li> <li>Whether such an approach is liable to substantially reduce the Assessment Factor in comparison to that applicable if an algal study (algae growth inhibition test with silver nitrate OECD 201) were to be progressed to generate a NOEC from a third trophic level.</li> </ol>
3	52	<p>Is there any way to have a (translated) non-Japanese version of the Hagioita <i>et al.</i>, 1995 study?</p>
4	53	<p>UNEP report Concise International Chemical Assessment Document 44, Silver And Silver Compounds: Environmental Aspects contains some information relevant to this section – to what extent was this taken into account?</p>



Table 2. Typographical/layout comments and requests on May 2008 phase Ila ENV report of the silver project.

Item	Report page number	Remark
1	14	For corroboration, could you provide the Secretariat with a list of all the silver studies you have received and screened?
2	42	Table 14 header should be "Chronic aquatic AgCl toxicity to fish".
4	53	Please include the full definition of acronym BCF (Bio-Concentration Factor).
5	54/55	Could the table scheme/legend be amended to one which is more legible if the report is viewed as monochrome (covering hard copy situations).
6	56	Section 4.2, second paragraph: could the statement on non-read across situations and the likely counter-ions involved be made more definitive/inclusive as to all the affected silver compounds.
7	58	Please kindly provide us with cost predictions for each recommended test.
8	66	The title refers only to summaries compiled in the first phase of the project, but the Annex includes studies also from Phase Ila.