GENERAL comments

- We have repeatedly reinstated that we do not have data on water solubility and will most probably have even less chance (or none) of finding T/D information (only two labs provide this service and queues are huge – we need to consider alternative solutions).
- Need for clear recommendation on which substances should be tested for water solubility. Ideal candidates should be future source substances from which information can be read-across. How have/will these be identified?
- Particularly missing: Klimisch ranking, description of data on out of scope substances that has been gathered in Phase I. By the way:
  - How useful can information on ELINCS substances be?
  - Has recently forwarded data been of any use?
- How come a budget prediction can be provided for the pilot project when there is actually no way of achieving any of the objectives of this project without actually entering a full Phase II?
- Since individual substance data is not providing necessary start level, possibility of looking at existing reviews which cover several PGM? In addition, invitation to look at other physicochemical parameters.

SPECIFIC comments

- On page 8, item 1: there is a contradiction between the first and the last sentence. Are physicochemical properties applicable or not for read-across?
- On page 8, item 2: what arguments/data supports your assumption on the potential for Pt 4+ ion toxicity?
- On page 9, item 3: considering that "it may be more useful to assess all of the data for a metal at the same time", is there still a need to have a pilot project instead of a stepwise approach?
- On page 9, fore last paragraph: can the assumption that "the metal in solution will have the same oxidation state as the parent compound" be considered as a default or conservative approach? Would it be scientifically sound?
- On page 11, items 1 to 3: Zuzana has circulated several requests for all remaining information on Pt and Pd substances from our Members, without much success. It is now time to search for other sources of data or come up with clear data gap filling recommendations.
- On page 11, item 4: Is the approach of using information on out of scope substances not also applicable for Pt 4+ gap filling?
- On page 13, second paragraph: Where do the numbers of (robust) study summaries come from?
- Appendices:
  - Endpoints marked in orange "potential to read-across from a substance in the category or REACH Annex Adaptation" – which category if these do not yet exist?
  - Intermediates: although only "any existing available information" is needed, we need to have enough information to come up with a classification proposal

Contact Info of the Consortium
Avenue de Broqueville, 12 – BE-1150 Brussels
Tel.: +32 2 775 63 23 **Fax:** +32 2 779 05 23 **Mobile:** +32 473 52 52 73
E-mail: braibant@epmf.be **Website:** www.epmf.be