



Secretariat: K. Rothenbacher & C. Braibant (EPMF, Belgium)

31 May 2012 (11:00 - 16:00)
Metals Conference Centre - Gold Room
Rue du Duc 100 - 1150 Brussels (BELGIUM)

Summary and conclusions of the meeting

1. Scope

- 7 Pt and 9 Pd substances are currently > 10 t/a and classified in the PMC inventory (dd 6 March 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
- From all the confirmed substances requiring a CSR, only Diamminedichloropalladium (DDP) requires full registration in 2013; it is hence likely that data collection and assessment will be prioritized for DDP and/or the Pd family
- **ACTION PMC:** Decide whether a CSA/CSR and ES should be prepared for the metallic PGM not requiring one (not hazardous)

2. Responsibilities

- WCA will have the overall responsibility for the CSA/CSR and ES preparation, and uploading into IUCLID 5
- WCA will be responsible for the environmental exposure assessment, exposure of man via the environment and waste exposure. As regards waste:
 - A multi-metallic methodology is being developed by ARCHE under the umbrella of Eurométaux; PMC is not yet actively contributing to this work but should do shortly and report to WCA as soon as possible (**ACTION PMC:** Liaise with Eurométaux on waste exposure scenario work programme)
 - In the meantime, WCA will use the existing ECHA Guidance to develop a waste scenario for DDP, to be used: (1) as such in the absence of any other input in the registration of DDP, or (2) as a starting point to be refined with the output of the multi-metallic methodology
- EBRC will be responsible for the occupational exposure scenarios and potentially for the consumer and combined exposure work (**ACTION EBRC:** Quote for consumer and combined exposure work if relevant/in due course)
- Katrien Arijs (ARCHE) will provide coordination and secretariat support for Phase IV of the PGM project (circulation of questionnaires, collection of responses, first screening of responses for completeness (not accuracy), conference calls and meetings preparation, minutes, action points follow-up, etc.)

3. Effects data - timing

- Only effects data available to date is reported in PMC's inventories under classification - can be used as (evolving) reference to prepare exposure assessment
- Sensitisation: DDP is not a sensitiser based on measured data (LLNA);
- Dermal penetration: no measured data are available for this. It was suggested to use HERAG default assumptions for the time being.
- PNEC/DNEL derivation:
 - PNEC likely to be available in Sep 2012

Contact Info of the Consortium

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- (Indicative) DNEL for DDP not available before Dec 2012/Feb 2013
- Remaining PNEC and DNEL for other PGM not available before 2014
- In the absence of DNEL before end 2012, so EBRC can prepare, it is proposed to use existing OEL as references instead:
 - OEL for (soluble) Pt and (soluble) Rh are 2 and 1 $\mu\text{g}/\text{m}^3$ respectively (cf. EBRC quote dd 29 Dec 2011, page 4)
 - No OEL is available for Pd; the WHO IPCS monograph confirms that no exposure limit can be derived due to lack of data. However the same report recommends an exposure limit value of 15 $\mu\text{g}/\text{m}^3$ Pd for dentists (**ACTION EBRC**: Use as reference only, unless basis for this recommendation can be verified)
- Read across strategy - not discussed (**ACTION WCA**: summarise read-across strategy for Pd family in 2-3 pages for EBRC's information)

4. Questionnaire

- Three questionnaires will be necessary: one to collect information on uses and physical forms, one to collect information on workplaces and workplace exposure, and one to collect information on environmental emissions
- **Use questionnaire:**
 - Aim: collect information on uses to be added into IUCLID 5, and addressed in the CSA/CSR + ES preparation. Considering the lack of clarity which still exists on the actual forms of the PGM substances declared by PMC Members, it is proposed to include a request to specify the form of the substance associated to each use
 - **ACTION PMC/WCA**: Circulate use questionnaire used in Re project for completion by EBRC
 - **ACTION EBRC**: Complete use questionnaire and return to PMC/WCA
 - **ACTION PMC**: Circulate questionnaire to PMC Members to collect use information on all Pd substances and intermediates in scope
- **Environmental exposure questionnaire:**
 - Aim: collect information on environmental emissions management and data from sites
 - **ACTION WCA**: Finalise environmental exposure questionnaire for all Pd, circulate prior to and present at 27 Jun 2012 PGM ES meeting in Brussels
- **Workplace exposure questionnaire:**
 - Aim: collect information on workplaces, operational conditions and risk management measures implemented on sites (a data collection template is circulated subsequently to those sites having confirmed the availability and willingness to share their monitoring data)
 - **ACTION EBRC**: List typical (process-based) workplaces based on document provided by PMC
 - **ACTION PMC**: Circulate typical list to short-list of PGM/Pd/DDP experts among membership for confirmation, completion, refinement, etc. and confirm whether or not DDP and other Pd are handled in similar (process-based) workplaces
 - **ACTION EBRC**: Finalise list of workplaces, prepare workplace exposure questionnaire for DDP only or all relevant Pd substances (if they all have similar operational conditions), and present at 27 Jun 2012 PGM ES meeting in Brussels

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- CHESAR
 - Tool to help companies carry out their CSA/CSR, ES and e-SDS in a semi-automated manner
 - A new CHESAR version will be released in summer 2012
 - CHESAR use will be compulsory as from 2014
 - There were different views if we should use it in our dossier (would make collaboration WCA/EBRCA easier and require less manual editing vs. being test case for potentially imperfect software resulting in very long ES)
 - It was decided to evaluate the new version if use is suitable, perhaps with DDP, and decide then

5. Timeline

w/c 7 Jun 2012	Circulate use questionnaire
w/c 18 Jun 2012	Circulate environmental questionnaire and list of workplaces to PGM ES meeting participants
27 Jun 2012	Present use, environmental and workplace exposure questionnaires
w/c 2 Jul 2012	Circulate environmental and workplace exposure questionnaires (tentative deadline for response: 31 Jul 2012)
End Sep 2012	First draft environmental ES for all Pd substances
Early Oct 2012	PGM ES meeting to discuss environmental ES and review status of occupational ES (first draft workplace ES for DDP/Pd substances using OEL (not for distribution, only for PMC secretariat information/identification of key data gaps))
End Dec 2012	Second draft workplace ES for DDP/Pd substances using tentative DNEL (may be distributed outside PMC secretariat if tentative DNEL likely to be final)
Feb 2013	Finalise ES based on final DNEL and PGM ES meeting to review/discuss final draft environmental and workplace ES
Mar 2013	Finalisation of CSA/CSR + ES for DDP and inclusion in May 2013 Dossier

6. PGM ES meeting preparation

- Early start on the 27 Jun 2012
- **ACTION PMC:** Prepare draft Agenda and circulate to EBRC and WCA for approval
- **ACTION EBRC** and **WCA:** Amend/approve draft Agenda
- **ACTION EBRC:** Send list of workplaces for circulation as background document to participants of PGM ES meeting
- **ACTION WCA:** Send environmental questionnaire for circulation as background document to participants of PGM ES meeting
- **ACTION EBRC** and **WCA:** Prepare “live” presentation of questionnaire at meeting