Precious Metals Consortium

Chloroplatinates sub-group – Conference call on Implementation Qualitative approach under REACH

Minutes, Brussels, 23 March 2016 (14-14.45)

Participants: Mark Raffray, Mike Shepherd (Vale), Olga Duerr (BASF) Steven Verberckmoes (Umicore), Nissanka Rajapakse and Mark Hosford (Johnson Matthey), Roland Brasch and Herbert Fuchs (Heraeus), France Capon, Klaus Rothenbacher and Jelle Mertens (PMC)
Apologies: Michael Huber (CHafner)

Slides of the meeting: cfr Annex I

1. Welcome, anti-trust admonition and tour-de-table

Draft agenda approved by participants (cfr. Annex II)

2. Background, objectives and remit (cf. Slides)

3. Election Chair of this Sub-Group

Steven Verberckmoes expressed interest to become chair of this subgroup to the PMC secretariat ahead of current call. The group unanimously approved his chairmanship.
No co-chair has been identified during the call.

4. Highlighting of various stakeholders

EBRC: contracted to do the human health exposure and risk assessment, and draft the exposure scenarios (environmental sections by WCA). Most guidance from the group might be needed for this task.
Bibra: contracted to derive DNELs.
IPA/STF: in charge of the OELs discussions and of the related studies. PMC activities need to be streamlined/coordinated with IPA/STF.
There is no immediate need for Downstream Users involvement for current activities, as main uses are intermediate uses or in catalysts and these uses are well represented by the current membership.
The potential role and involvement of IPA/STF was further clarified. Key is that IPA has an international composition and focus including the regulatory context. Their key work priority has been Platinate Salt Sensitation (PSS) related to chloroplatinates exposure (development of a cohesive program of voluntary workplace control actions - several areas are relevant to this PMC subgroup's objectives).

The focus of IPA/STF is OEL-related, whereas the one for PMC is REACH-related. During a discussion between IPA and the PMC Secretariat, it has been agreed that some involvement of STF representatives in the sub-group would be advantageous to avoid duplication of work, to complement each other but not substitute, and to facilitate information exchange. Current Chairs of STF are Mark Raffray and Umicore, and Mark Raffray is part of the current PMC Subgroup.

5. Timeline

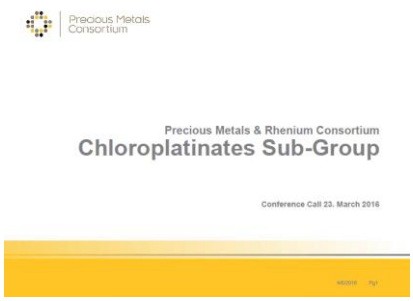
The internal PMC timeline foresees development of DNELs for the Pt group (including Chloroplatinates) by the end of March 2016 (*post meeting note: deadline met by Bibra*), and EBRC has been informed about the PMC decision to go forward with a qualitative risk assessment approach for Chloroplatinates (deadline for exposure/risk assessment: 30 June 2016).
Discussions on the draft REACH dossiers will take place during the BtB meetings in October, and draft dossiers should be available end December 2016 to initiate the approval process in January 2016.
It is worth to highight that this timeline is different from the one of IPA/STF for the OELs project and the development of the program of voluntary workplace actions by industry.

6. Technical approach

The aim of this group is to provide (scientific) justification showing that risks are adequately controlled when a qualitative approach is used in the ClPt REACH dossiers. The steps to be followed are outlined in ECHA Practical Guidance R15 (fig 2.2). It will be challenging, but there are sufficient supportive data available. Key is to decide what pieces of information are most useful and how to implement and present them.
Main tasks: document the underlaying rationale, and agree on the practical implementation strategy in the REACH dossier. Open issues: what with dermal assessment, how to integrate the Margin of Exposure, and how to address the ACGIH rationale for the OEL in the REACH dossiers. It needs to be checked what information EBRC can/should use in the REACH dossiers (eg. data of Heederick *et al.* study).
When finalised, it is suggested to carefully consider the potential implications (related to e.g. adequate control of risks) for and with DUs, as the documentation and decisions are only based on the knowledge of PMC members which are not representing all the DUs.
It is stressed that a qualitative assessment in no sustainable solution on the long-term: the ClPt dossiers will likely be under scrutiny soon after registration (registration end 2017 -> screening by authorities in 2018?). The process, level of detail, and exact timing of regulatory actions is unpredictable, but can reasonably be expected to follow soon after registration (the risk is high, and most likely foreseen at mid-term rather than long-term) and might put the sector under pressure. It was questioned whether the proposed way forward for the REACH registrations and the expected (subsequent) regulatory actions under REACH might speed-up the derivation of an OEL by SCOEL. This is considered unlikely, but the REACH regulatory actions might as well put the sector under stress.
The involvement of STF might be key at this point. It is suggested to raise with the STF a few questions about to the expected derivation of a threshold value or RMM stategy to the STF (discussion during April 2016 meeting).

It is suggested to have a brainstorming on the above during the April PMC BtB meetings. All participants are invited to provide input ahead of the meeting. Regarding the timing for deliverables, it is suggested to discuss and agree during the BtB meeting.

Annex I: SLIDES OF THE MEETING



Annex II: AGENDA

1. Welcome & Introduction
2. Objective/ Remit of the group
3. Election of chair
4. Stakeholders
5. Time frame
6. Overall technical approach