



Precious Metals
Consortium

Precious Metals & Rhenium Consortium

PM Refinables Task Force Meeting

19 October 2017 | Brussels



Precious Metals
Consortium

1. Welcome and introduction

Nathalie Dom (Umicore, Belgium)

1.1 Reminder on confidentiality and competition law

DO	DON'T
<u>Application of competition law</u>	
Art. 101 and 102 TFEU may be applicable to the conclusion of any preliminary agreement and activities of any preliminary phase.	Don't assume that conflicts with competition law are excluded simply by the fact that the Agreement complies with the provisions of the REACH Regulation.
<u>Consultation in Matters of Competition Law</u>	
Consult an in-house legal expert or the compliance officer of your company or an external lawyer whenever there are uncertainties respecting compliance with competition law. Stop all meetings/discussions which are not in compliance with these Compliance Guidelines until a legal expert has been involved.	Don't assume that these Compliance Guidelines deal with all competition law issues exhaustively. Basically, compliance with Art. 101 and 102 TFEU can be determined only on the basis of market impact in each individual case. These Compliance Guidelines may therefore be regarded only as a means of providing general conduct recommendations.
<u>Activities in any preliminary phase and at any other stage of operation of the Consortium</u>	
Restrict cooperation within the scope of the preliminary phase to the initially defined goals and purposes of the cooperation.	Pursuant to Art. 101 and 102 TFEU, activities which have the object of the effect of preventing, restricting and/or distorting competition are prohibited within the scope of this Agreement, including: <ul style="list-style-type: none"> - Coming to agreement, including arrangements or collusions, about prices, markets and customers (see Art. 101 paragraph 1 a)-e) TFEU); - Joint boycotting of other companies; - The unjustified unequal treatment of trade partners; - The abusive exploitation of a dominating market position.
<u>Exchange of Confidential Information</u>	
Involve a Trustee for the exchange of Confidential Information.	The exchange of Information concerning market behaviour and having the object or the effect of preventing, restricting and/or distorting competition is inadmissible; in particular, this relates to : <ul style="list-style-type: none"> - Production capacities; - Productions or sales volumes; - Import volumes; - Market shares; - Price policy; - Distribution and marketing terms; - Marketing strategies; - Information regarding the relationship with suppliers.
<u>Documentation on Cooperation</u>	
Keep minutes of all meetings which detail the subject of the meeting. In case of uncertainty, have the contents of the minutes reviewed by an external legal expert prior to sending them to all parties of the Agreement. Stop all meetings which are not in compliance with these Guidelines until a legal expert has been involved.	

1.2 Tour de table and apologies

Cf. list of participants in agenda

1.3 Approval of the agenda

1. Welcome and Introduction

- Reminder on confidentiality and competition law
- Tour de table and apologies
- Approval of the agenda
- Approval of the minutes of the last meeting (23.06.2017) and status of action points

2. Substance Identity (SID) of PM Refinables

- Update on discussion Eurométaux and ECHA
- Update on site visits Umicore by ECHA

3. Budget

- Tasks and budget projections 2018

4. AOB, next meetings/calls and closing remarks

1.4 Approval of the minutes of the last meeting (23 June 2017)

- The previous PMCN Work Group meeting was held on 23 June 2017
- Draft minutes were distributed on 10 October 2017

→ *Are the minutes of the WG meeting held on 23 June 2017 approved?*

Status of actions

[A]	WHAT	WHO	STATUS
	Substance Identity (SID)		
1	Follow-up ECHA / Eurométaux discussions on iUVCB SID and give input when needed	PMC sec	Ongoing
	Classification update		
2	Derive updated classifications based on updated SID	PMC sec	On hold



2. Substance Identity (SID) of PM Refinables

Update on discussion Eurometaux and ECHA

- Informal discussions with ECHA (Hélène Maud, Computational Unit)
 - How to use Assessment Entities (AEs) to improve transparency
 - List AEs for Human health and Environment used in the dossier
 - Avoiding duplications in dossier
- We have provide information on the assessment approach and consistency across different consortia.
- Eurometaux Intermediates Taskforce meeting: October - November

Update on discussion Eurometaux and ECHA

Recommendations of the EM intermediates TF:

- Environment and Human Health:

- Link to SID: input values used: **Generic composition = across industry**, for each elemental constituent:

- Typical concentration = average of LE typicals
- Minimum concentration = minimum of LE typicals
- Maximum concentration = maximum of LE typicals or concentration limit
- Maximum of LE maxima

→ sensitivity analysis

→ used for classification

Update on discussion Eurometaux and ECHA

Classification exercise, e.g. Silver Doré

Endpoint	EU-CLP	Main drivers
Acute toxicity-oral	Not classified	
Acute toxicity-dermal	Not classified	
Acute toxicity-inhalation	Cat. 4; H332	Te, Se, As, Cd
Skin corrosion/irritation	Not classified	
Serious eye damage/eye irritation	Not classified	
Respiratory or skin sensitisation	Skin Sens. Cat. 1B; H317	Te
Germ cell mutagenicity	Not classified	
Carcinogenicity	Not classified	
Reproductive toxicity	Cat. 1A; H360	Te, Pb
Specific target organ toxicity - single exposure	Not classified	
Specific target organ toxicity - repeated exposure	Cat. 1; H372	Pb
Aspiration hazard	Not classified	
Hazardous to aquatic environment - ACUTE	Not classified	
Hazardous to aquatic environment - CHRONIC	Not classified	

Update on discussion Eurometaux and ECHA

Classification exercise, e.g. Silver Doré

Endpoint	EU-CLP		Main drivers
	Typical	Sensitivity	
Acute toxicity-oral	Not classified	Cat. 4; H302	Se
Acute toxicity-dermal	Not classified		
Acute toxicity-inhalation	Cat. 4; H332		Te, Se, As, Cd
Skin corrosion/irritation	Not classified		
Serious eye damage/eye irritation	Not classified		
Respiratory or skin sensitisation	Skin Sens. Cat. 1B; H317		Te
Germ cell mutagenicity	Not classified		
Carcinogenicity	Not classified	Cat. 2; H351	Sb
Reproductive toxicity	Cat. 1A; H360		Te, Pb
Specific target organ toxicity - single exposure	Not classified		
Specific target organ toxicity - repeated exposure	Cat. 1; H372		Pb
Aspiration hazard	Not classified		
Hazardous to aquatic environment - ACUTE	Not classified		
Hazardous to aquatic environment - CHRONIC	Not classified		

Overestimation of hazards! Total composition **maxTyp ~140%**

Update on discussion Eurometaux and ECHA

Take home messages:

- **No alignment yet with ECHA**, thought discussion have moved to a broader perspective than SID.
- Await the **intermediate TF** meeting to start updating of the dossiers and draft a timeline
- How to identify **classifications categories** of the refined SID?
Is this still needed?
- **Sensitivity analysis to identify classification drivers** that fall outside the typical concentration range.



umicore
Precious Metals Refining

Access to raw materials
Interface waste/chemicals



Refining



Raw materials
supply



Sampling &
assaying



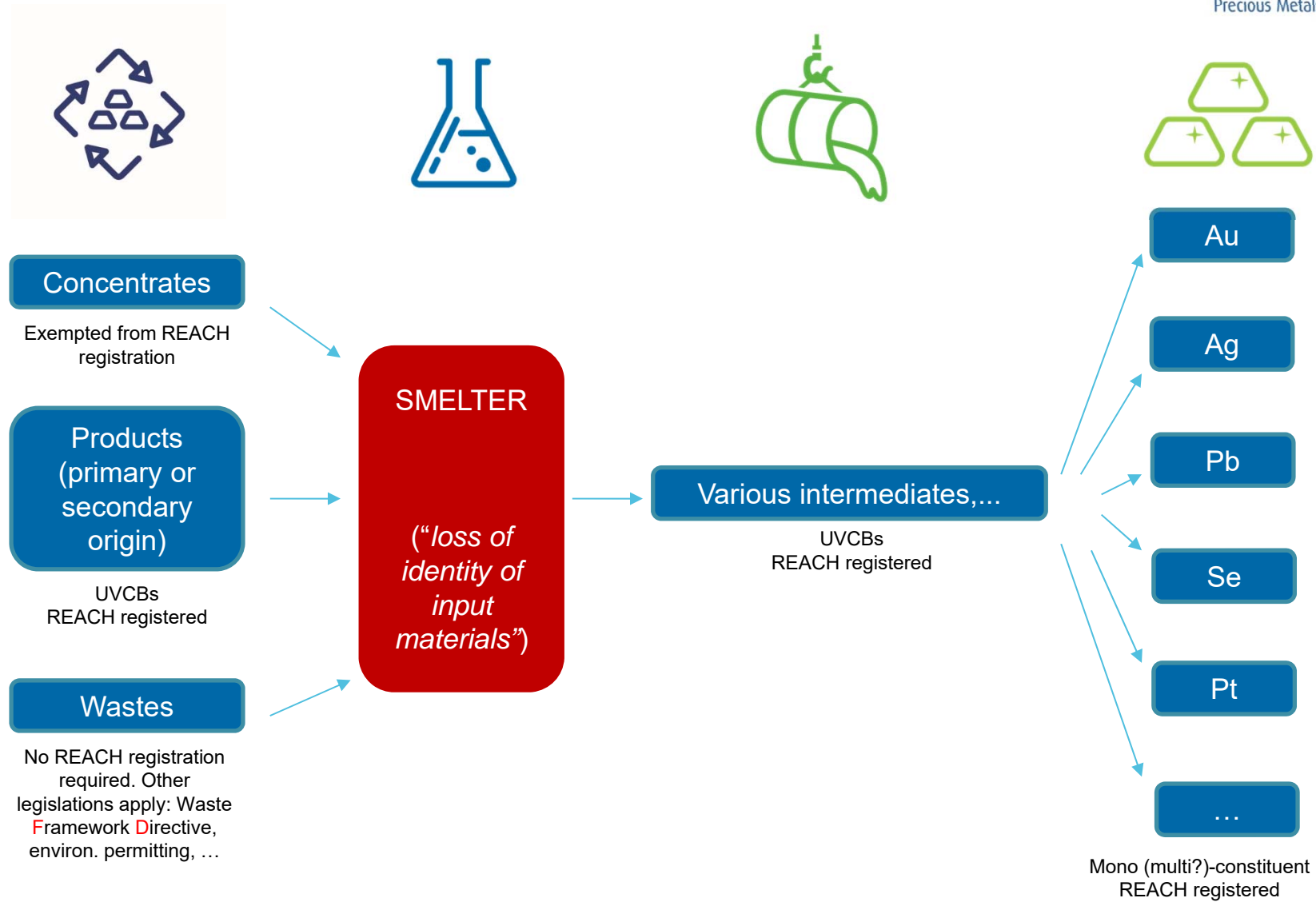
Smelting
& refining

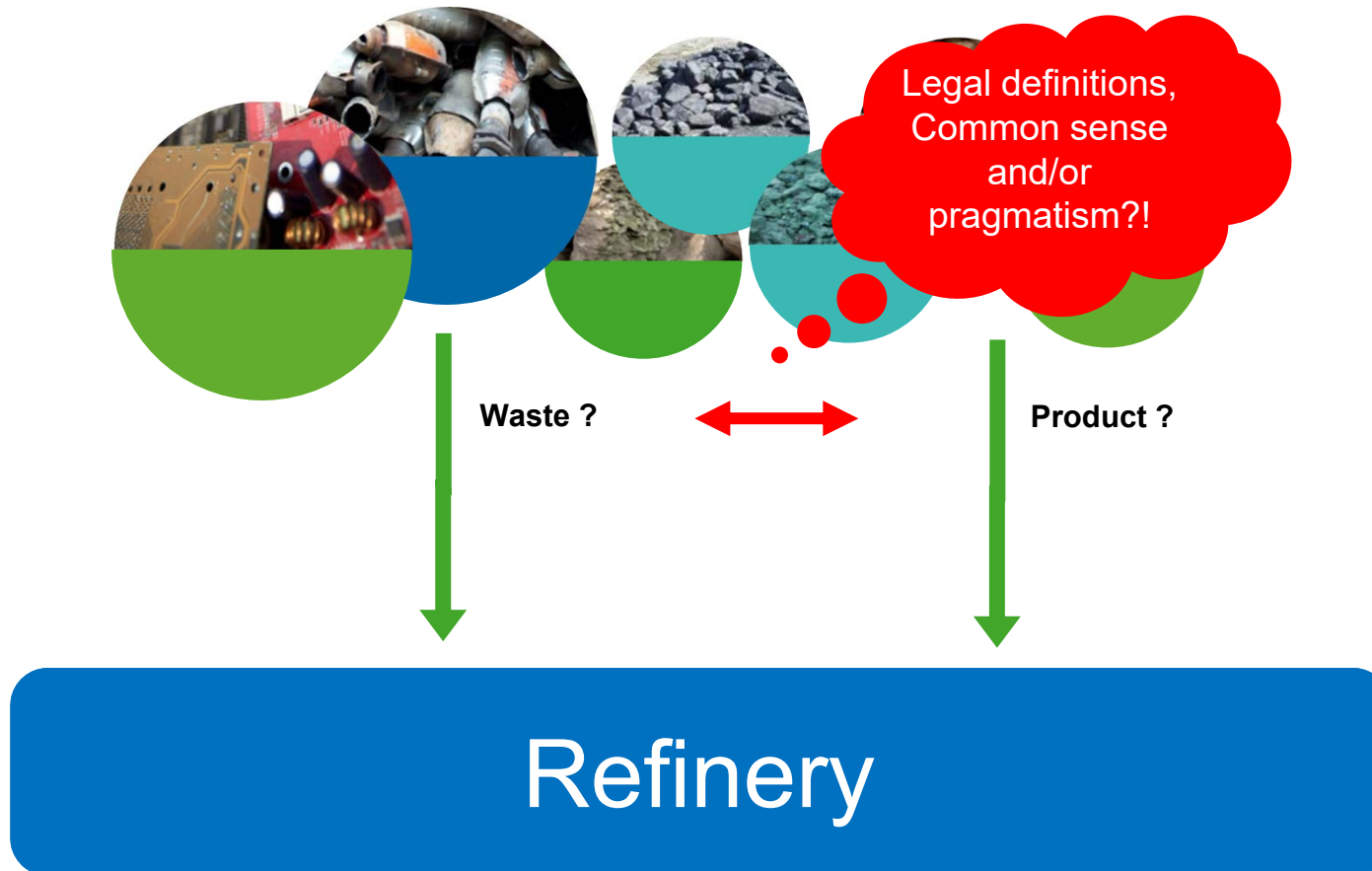


Metal sales

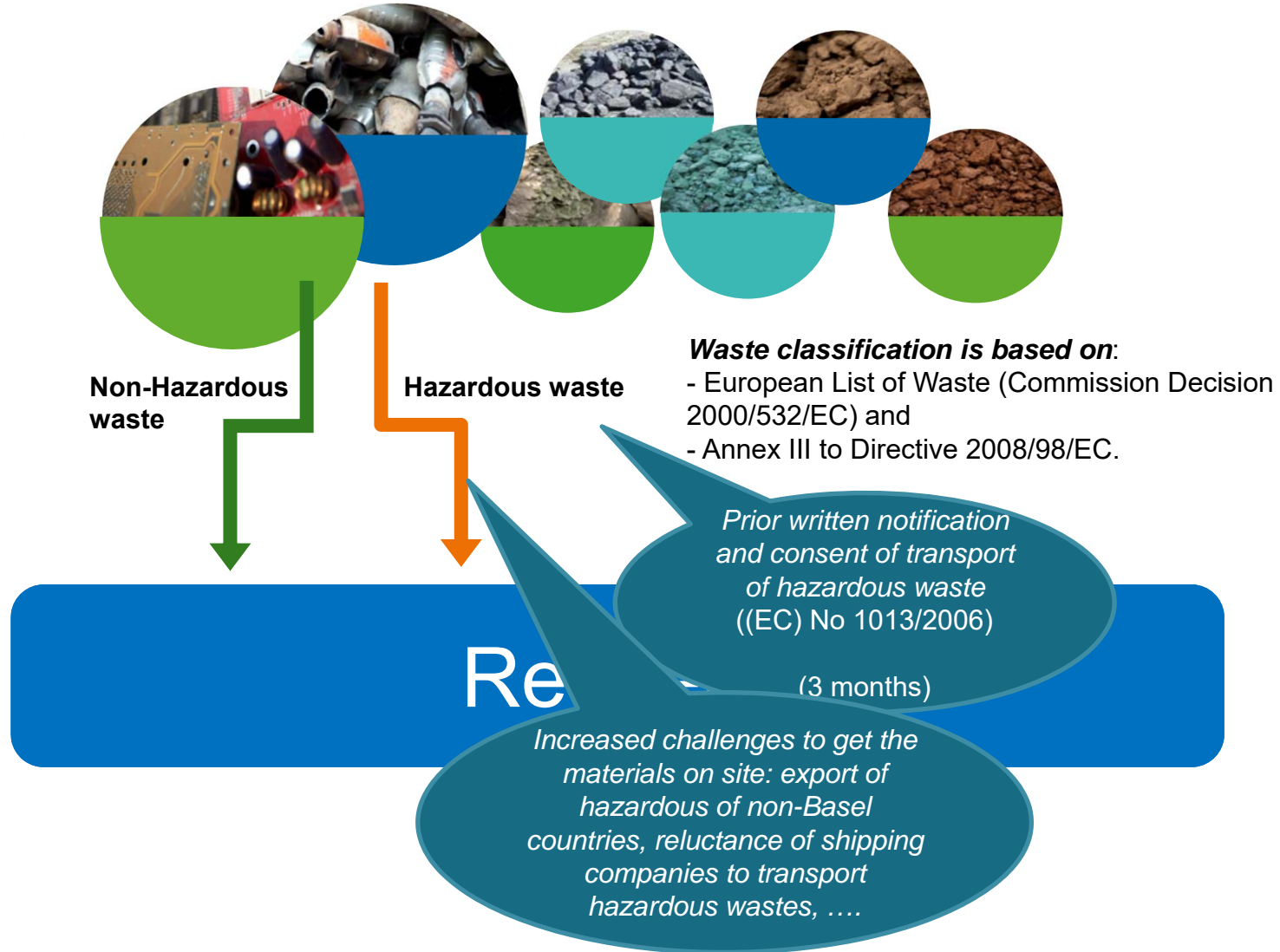


CUSTOMER SUPPORT





Raw materials - waste



Raw materials - products

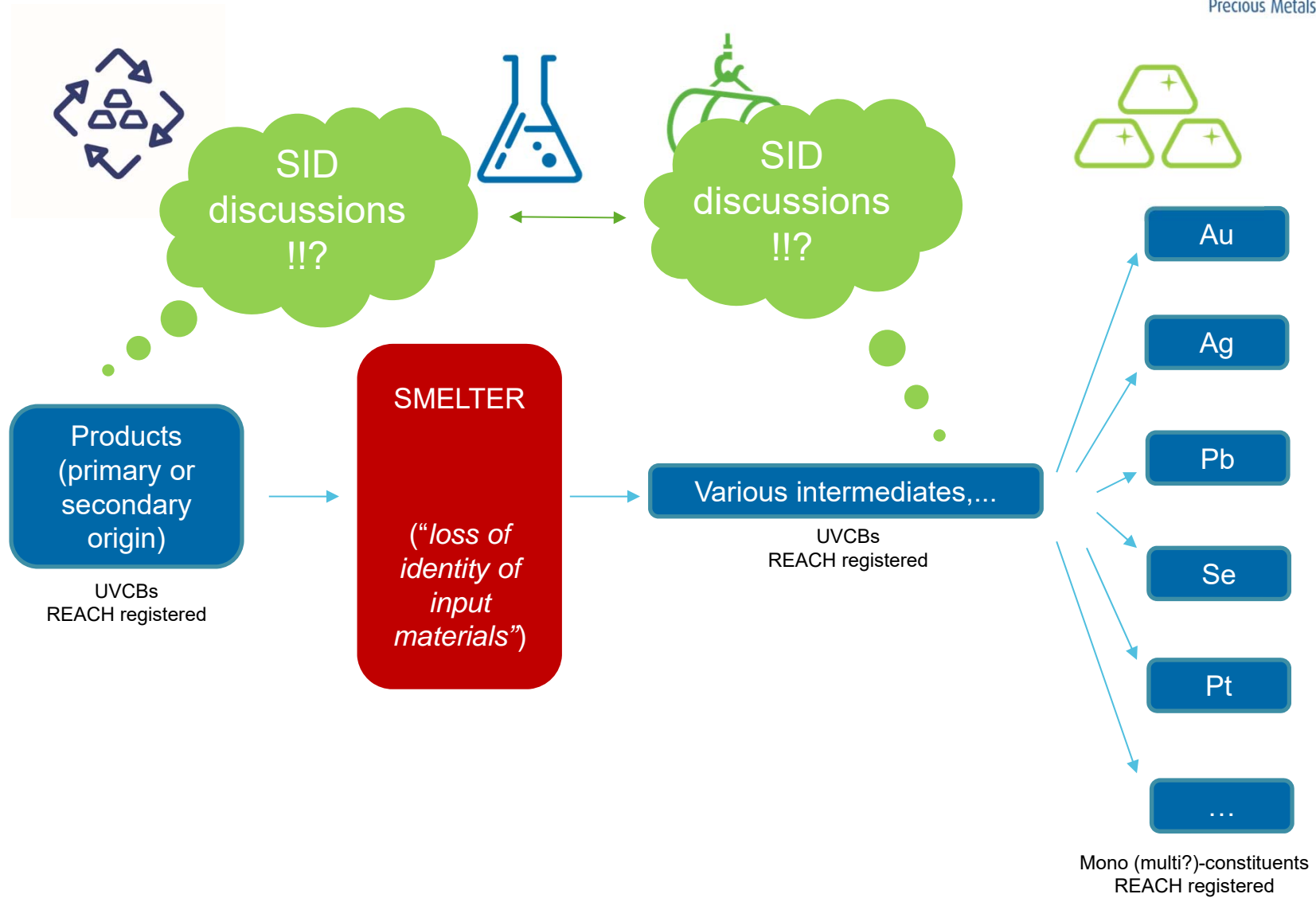


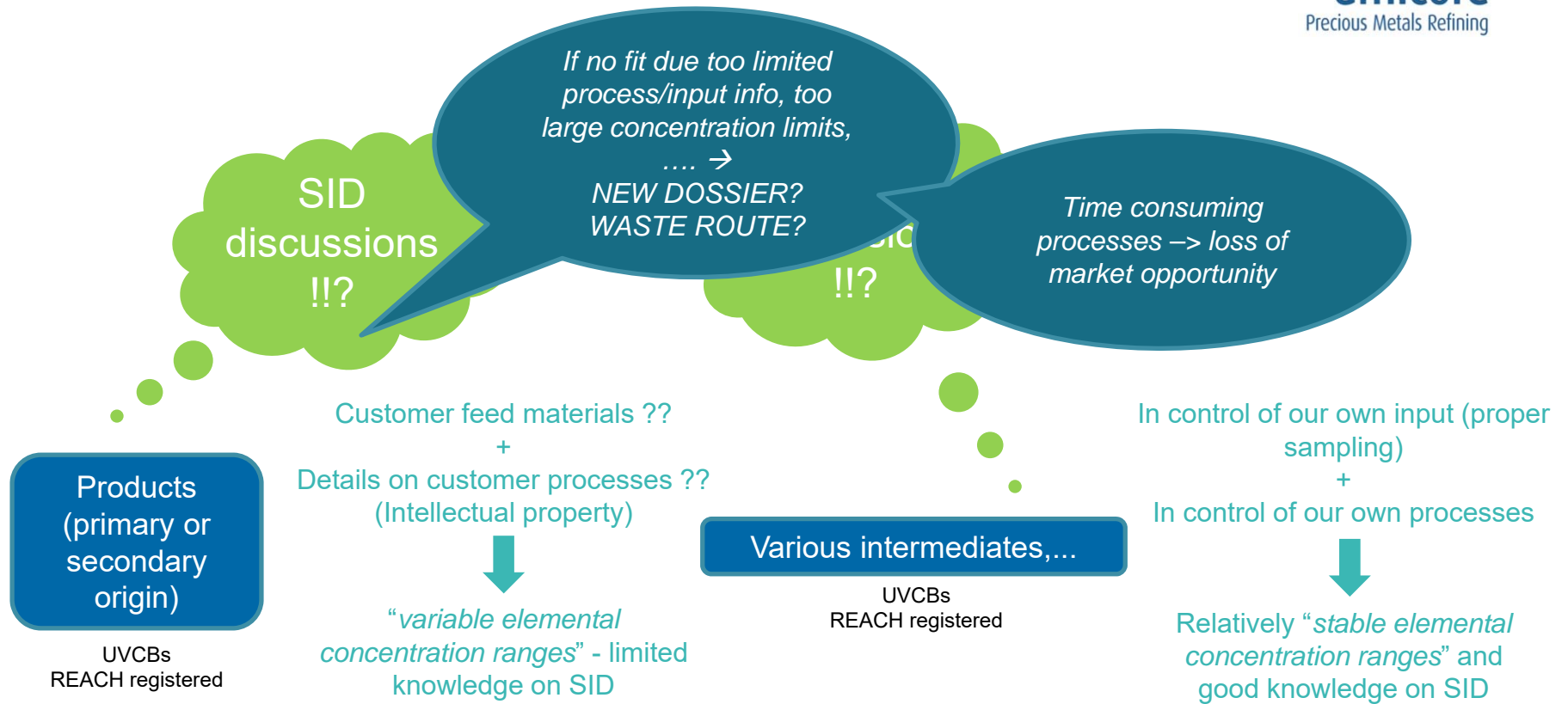
UVCB REACH registration:

- EU-supply : supplier's REACH registration
- non-EU sply : Umicore as EU importer

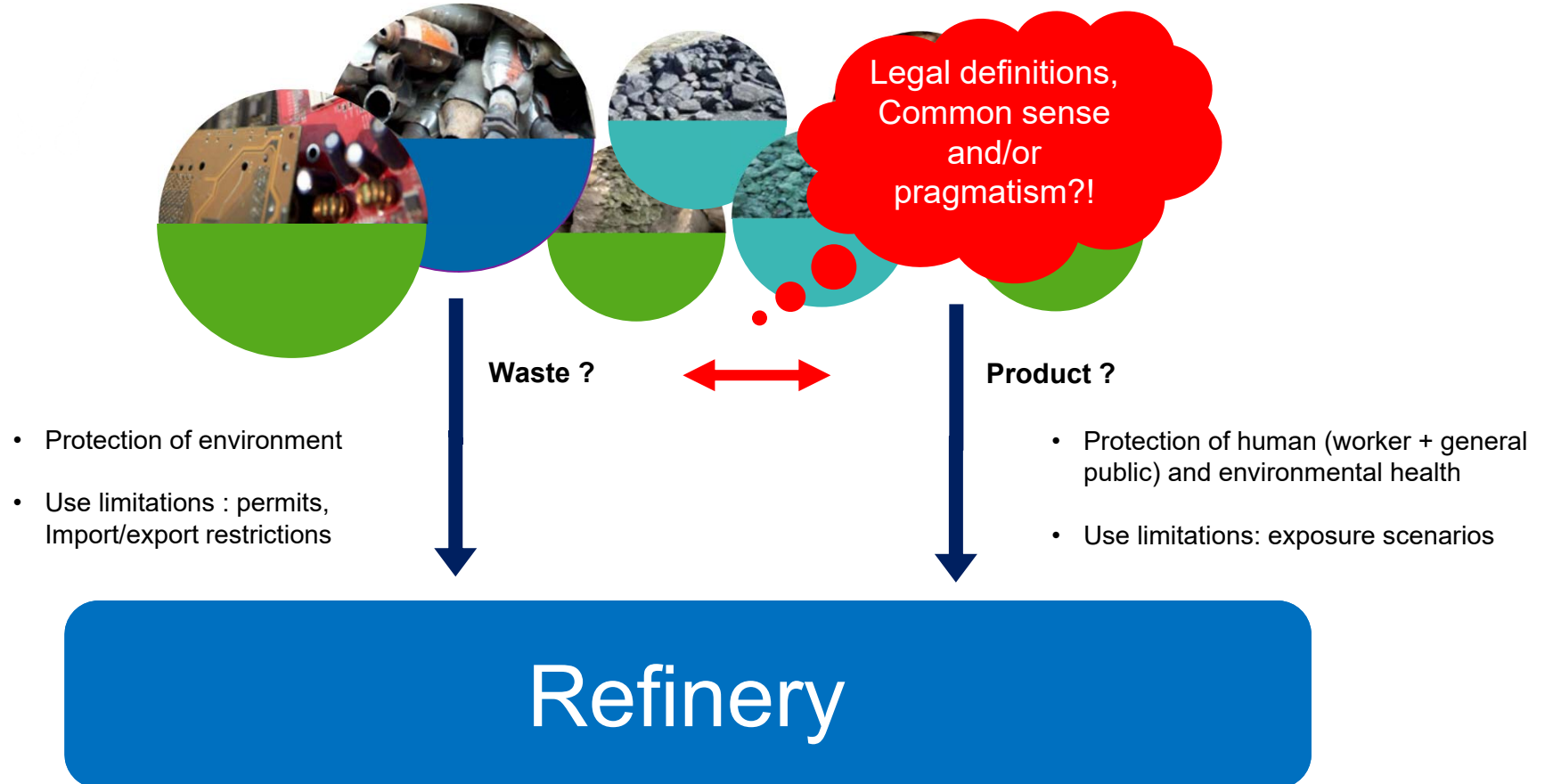
product

Refinery

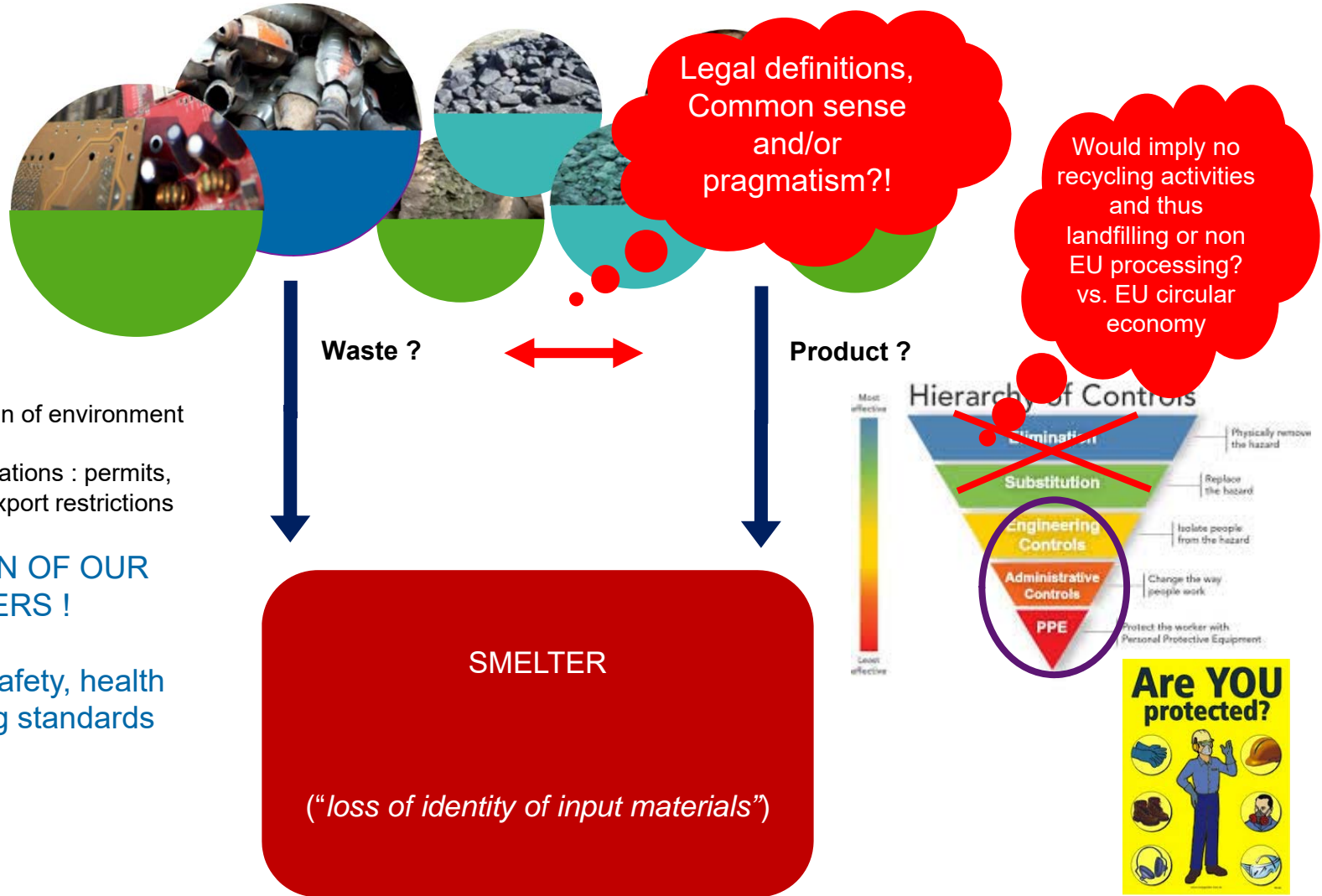




Raw materials – waste vs. REACH (product)



Raw materials – waste vs. REACH (product)



Summary

- We sample and analyze all materials extensively
- We protect our workers
- We protect our environment
- UVCBs: limited to industrial use in the NF metals industry

We don't need narrow SIDs to know and control environmental and occupations hazards.

Risk management measures will remain the same.



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3. Budget

Tasks and Budget projections 2018

	Refinables
<i>Rolling Maintenance</i>	-
<i>Further Improvements</i>	€ 20.000
Expert review	€ 20.000
<i>REACH Evaluation</i>	-
<i>Scientific Manager</i>	€ 35.531,33
Total	€ 55.531,33

€ 1 million carryover to budget 2018 for updating and splitting the dossiers.



4. Final remarks

2017 expenses

2017 Budget to be spent	Expenses by 31/08/2017
772 700 €	15 388 €

Any other business

- A.O.B.
- Actions summary
- Conclusions
- Next meeting/conf call:
 - PMC General Assembly meeting: **5-6 December 2017, Brussels**
 - Next Refinables Work Group meetings: **13-15 March 2017, Brussels**
 - + Ad-hoc meetings/conf call



THANK YOU

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