



Precious Metals
Consortium



Precious Metals & Rhenium Consortium

General Assembly Meeting

5 & 6 December 2017 | Brussels, Belgium



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1. Welcome and Introduction

Guy Ethier, Umicore



1.1 Confidentiality and Competition Law

DO	DON'T
Application of competition law	
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.
Consultation in Matters of Competition Law	
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.
Activities in any preliminary phase and at any other stage of operation of the Consortium	
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 or 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.
Exchange of Confidential Information	
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.
Documentation on Cooperation	
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, quorum and apologies

Cf. attendance list

Quorum is reached: 65 %



1.3 Approval of the agenda 5 December 2017

1. Welcome and Introduction

- 1.1. Confidentiality and Competition Law
- 1.2. Tour de table, quorum and apologies
- 1.3. Approval of the agenda
- 1.4. Approval of the minutes of the last meeting (June 2017, Pforzheim), including status of action items

2. Membership news

- 2.1. Expulsion of SFPZ for default of payment
- 2.3. Withdrawal of Dirhenium heptasulphide from the Re Sub-Assembly

3. PMC finances

- 3.1. 2017 status

4. 2017 PMC Workplan: timeline and registration status

1.3 Approval of the agenda 5 December 2017 *(cont'd)*

5. REACH LoA status

6. PMC after 2018: update and next steps

7. 2018 PMC Workplan and budget: a transition year

8. PMC agreement: updated Annex IX (Cost sharing)

9. Knowledge Management System

10. Brexit: status, consequences and scenarios for EPMF

11. Closing remarks

1.4 Approval of the minutes of the last meeting (June 2017) including status of action items

Actions	Who?	When?	Status
Send a doodle to the Management Committee to organize a conference call during summer to discuss 2018 budget/membership fee.	AR	ASAP	DONE
Review 2018 fee based on available reserves and 2018 forecast and new cost sharing formula	Management Committee	By 01/09/2017	DONE
Formally communicate to the producers the Karstedt communication strategy vis-à-vis SIEFs and DUs.	ME/JM	September 2017	DONE
Formal requests for approval of Varinor as new PMC member will be sent shortly to Management Committee and General Assembly	AR	June 2017	DONE
Knowledge Management tool - IP rules must be checked and addressed for the use of the data available on the tool	FC/K&L Gates	2nd ½ 2017	DONE
Update the cost sharing proposal with the new option including a simulation for 2018 budget in preparation of the approval of this option by the Assembly in December 2017	AR/FC	June 2017	DONE
Review the LoA costs after 2018 to ensure compliance with Implementing Act but also fair contribution to the maintenance of the dossiers.	Management Committee	2nd ½ 2017	DONE
Send a doodle to the Management Committee to organize a conference call during summer to discuss 2018 budget/membership fee.	AR	ASAP	DONE
Review 2018 fee based on available reserves and 2018 forecast and new cost sharing formula	Management Committee	By 01/09/2017	DONE

For approval



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2. Membership news

France Capon, EPMF



Membership news

- Expulsion of SFPZ for non-payment:
 - SFPZ is a member of Silver (1) and Refinables (1) Sub-Assemblies
 - After 3 reminders by email, one letter and two registered letters, 2017 fee is still not paid
 - As per article 4.2.2. (q), the Management Committee proposes the exclusion of SFZP including the following conditions accompanying such exclusion and in particular regarding to any funding obligation and right to use, cite or refer to Information:
 - SFPZ (and affiliates) will keep their rights until 2016 but not to the data and work done after that date due to the payment default in 2017. If SFPZ wants to have access to the subsequent updates they will have to buy LoA. No legal actions will be undertaken against SFPZ at this stage taking into account the costs benefits.

For approval

- Dirhenium Heptasulphide (EC 234-882-5) withdrawal:
 - No interest from the PMC registrant to register the substance
 - The Management Committee recommends to withdraw this substance from the Re Sub-Assembly

For approval



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3. PMC Finances

France Capon, EPMF

2017 accounts - Status

		2017 Budget <i>to be spent</i>	2017 Budget <i>to be invoiced</i>	Expenses by 31/10/2017
2.1	Administrative costs	€ 617.250	€ 617.250	€ 421.489
2.2	Ag-applicable costs	€ 897.550	€ 862.550	€ 414.977
2.3	Au-applicable costs	€ 355.200	€ 201.200	€ 117.158
2.4	PM CN- -applicable costs	€ 72.700	€ 64.200	€ 70.395
2.5a	Pt-applicable costs	€ 763.900	€ 738.400	€ 367.380
2.5b	Pd-applicable costs	€ 25.200	€ 25.200	€ 46.637
2.5c	Rh-applicable costs	€ 171.050	€ 153.550	€ 111.017
2.5d	Ru-applicable costs	€ 501.700	€ 435.200	€ 192.692
2.5e	Ir-applicable costs	€ 13.850	€ 13.850	€ 11.590
2.6	Re-applicable costs	€ 7.400	€ 7.400	€ 3.200
2.7	Refinables-applicable costs	€ 772.700	€ 75.200	€ 24.297
2.8	SVHC Roadmap-applicable costs	€ 81.250	€ 61.250	€ 18.523
2.9	Ag Water Framework Directive costs	€ 100.000	€ 100.000	€ 44.536
	TOTAL	€ 4.379.750	€ 3.355.250	€ 1.843.891



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4. 2017 PMC Workplan

France Capon, EPMF

Overall status of PMC Registration (1)

66 substances registered (+ refinables) and still 12 substances to be registered!

Name of the substance	Identification numbers		LR	Registered by LR
	CAS	EC		
Silver	7440-22-4	231-131-3	Aurubis	Nov 2010
Silver nitrate	7761-88-8	231-853-9	Ames	Nov 2010
Disilver oxide	20667-12-3	243-957-1	Ames	Oct 2010
Silver carbonate	534-16-7	208-590-3	Johnson Matthey	Mar 2012
Disilver(1+) sulphate	10294-26-5	233-653-7	Johnson Matthey	Mar 2012
Silver chloride	7783-90-6	232-033-3	Agfa Gevaert	Mar 2013
Silver bromide	7785-23-1	232-076-8	Agfa Gevaert	Mar 2013
Silver iodide	7783-96-2	232-038-0	Agfa Gevaert	Mar 2013
Gold	7440-57-5	231-165-9	C. Hafner	Apr 2016
Tetrachloroauric acid	16903-35-8	240-948-4	Johnson Matthey	
Aurio(1+) 2,6,6-trimethylbicyclo[3.1.1]heptanethiolate	68365-87-7	269-858-3	Johnson Matthey	Jun 2016
Balsams, copaiba, sulfurized, mixed with turpentine, gold salts (<i>UVCB!</i>)	68990-27-2	273-589-7	Heraeus	Apr 2016
Potassium dicyanoargentate	506-61-6	208-047-0	Saxonia Edelmetalle	
Silver cyanide	506-64-9	208-048-6	Saxonia Edelmetalle	Nov 2016
Potassium dicyanoaurate	13967-50-5	237-748-4	Umicore Galvanotechnik GmbH	Oct 2016

In GREEN = registered!

Overall status of PMC Registration (2)

Palladium	7440-05-3	231-115-6	Umicore NV/SA	Jan 2017
Palladium dichloride	7647-10-1	231-596-2	BASF	Jan 2017
Dihydrogen tetrachloropalladate(2-) (in solution)	16970-55-1	241-047-9	Heraeus	May 2017
Diamminedichloropalladium	14323-43-4	238-269-3	Heraeus	Jan 2017
Dichlorobis(triphenylphosphine)palladium	13965-03-2	237-744-2	Heraeus	Jan 2017
Palladium (II) di(4-oxopent-2-en-2-oate)	14024-61-4	237-859-8	Heraeus	Jan 2017
Palladium(II) acetate	3375-31-3	222-164-4	Heraeus	Oct 2016
Palladium monoxide	1314-08-5	215-218-3	Heraeus	Jan 2017
Tetraamminepalladium (II) nitrate	13601-08-6	237-078-2	Johnson Matthey	Jan 2017
Tetraamminepalladium(2+) dichloride	13815-17-3	237-489-7	Umicore AG&Co.KG	Mar 2017
Tetraamminepalladium(2+) dihydroxide	68413-68-3	270-241-6	Heraeus	May 2017
Tetrakis(triphenylphosphine)palladium	14221-01-3	238-086-9	Umicore AG&Co.KG	Mar 2017
Palladium sulphate	13566-03-5	236-957-8	Heraeus	May 2017
Tetraamminepalladium(2+) diacetate	61495-96-3	262-819-1	Umicore AG&Co.KG	Apr 2017
Disodium tetrachloropalladate	13820-53-6	237-502-6	BASF	Jan 2017
Palladium dinitrate (UVCB!)	10102-05-3	233-265-8	Heraeus	Apr 2017
Palladium dihydroxide	12135-22-7	235-219-2	Umicore AG&Co.KG	Apr 2017
Diammonium hexachloropalladate	19168-23-1	242-854-9	Johnson Matthey	Mar 2017
Dipotassium hexachloropalladate	16919-73-6	240-974-6	C. Hafner	Feb 2017
Platinum	7440-06-4	231-116-1	Vale	Jun 2017
Hexachloroplatinic acid	16941-12-1	241-010-7	Johnson Matthey	
Tetraammineplatinum dichloride	13933-32-9	237-706-5	Johnson Matthey	Feb 2017
Tetraammineplatinum dinitrate (in solution)	20634-12-2	243-929-9	Umicore AG&Co.KG	Aug 2017
Diammineplatinum (II) nitrite	14286-02-3	238-203-3	Heraeus	
Dipotassium tetrachloroplatinate	10025-99-7	233-050-9	Heraeus	
Platinum dioxide	1314-15-4	215-223-0	Umicore AG&Co.KG	Mar 2017
Dihydrogen hexahydroxyplatinate, compound with 2-aminoethanol (1:2) (in solution)	68133-90-4	268-717-3	BASF	
Dipotassium hexachloroplatinate	16921-30-5	240-979-3	Heraeus	
Platinum dinitrate (UVCB!)	18496-40-7	242-383-9	Heraeus	Jun 2017
Platinum, 1,3-diethenyl-1,1,3,3-tetramethyldisiloxane complexes / Karstedt concentrate (UVCB!)	68478-92-2	270-844-4	Heraeus	Feb 2017
Diammonium hexachloroplatinate	16919-58-7	240-973-0	Johnson Matthey	
Dihydrogen hexahydroxyplatinate	51850-20-5	257-471-2	Johnson Matthey	Jun 2017

In GREEN = registered!

Overall status of PMC Registration (3)

Iridium	7439-88-5	231-095-9	Johnson Matthey	May 2016
Hexachloroiridic acid, Hydrogen hexachloroiridate (IV) (UVCBI)	16941-92-7	241-012-8	Heraeus	June 2016
Diammonium hexachloroiridate	16940-92-4	241-007-0	Johnson Matthey	May 2016
Rhodium	7440-16-6	231-125-0	Johnson Matthey	Nov 2017
Carbonyl(pentane-2,4-dionato-O,O')(triphenylphosphine)rhodium	25470-96-6	247-015-0	Johnson Matthey	Oct 2016
Carbonylhydrotris(triphenylphosphine)rhodium	17185-29-4	241-230-3	Umicore AG&Co.KG	Mar 2017
Dicarbonyl(pentane-2,4-dionato-O,O')rhodium	14874-82-9	238-947-9	Umicore AG&Co.KG	Sep 2017
Rhodium tris(2-ethylhexanoate) (in solution)	20845-92-5	244-079-1	Heraeus	
Rhodium trichloride, hydrate	20765-98-4	606-630-8	Heraeus	Sep 2017
Di-μ-chloro-bis(hapto-1,5-cyclooctadiene)dirhodium(I)	12092-47-6	235-157-6	Heraeus	Sept 2016
Tris(triphenylphosphine) rhodium (I) chloride	14694-95-2	238-744-5	Umicore AG&Co.KG	Mar 2017
Rhodium triiodide	15492-38-3	239-521-5	Umicore AG&Co.KG	July 2017
Dirhodium trisulphate	10489-46-0	234-014-5	Umicore AG&Co.KG	
Dirhodium trioxide	12036-35-0	234-846-9	Umicore AG&Co.KG	July 2017
Rhodium (III) acetate (UVCBI)	42204-14-8	255-707-9	Umicore AG&Co.KG	July 2017
Rhodium trinitrate (UVCBI)	10139-58-9	233-397-6	Johnson Matthey	Nov 2017
Rhodium trihydroxide	21656-02-0	244-508-2	Heraeus	July 2017
Triammonium hexachlororhodate	15336-18-2	239-364-2	Vale	July 2017
Diammonium sodium hexakis(nitrito-N)rhodate	64164-17-6	264-713-0	Vale	July 2017
Ruthenium	7440-18-8	231-127-1	Heraeus	Nov 2017
Ruthenium trichloride, hydrate	14898-67-0	604-667-4	Heraeus	Nov 2017
Ruthenium (IV) oxide	12036-10-1	234-840-6	Heraeus	Nov 2017
Tris(nitrato-O)nitrosylruthenium	34513-98-9	252-068-8	Umicore AG&Co.KG	Feb 2017
Hexakis[μ-(acetato-O:O')]-μ3-oxo-triangulo-triruthenium acetate / Ruthenium acetate	55466-76-7	259-653-7	Johnson Matthey	
Tetraammonium decachloro-μ-oxodiruthenate(4-)	85392-65-0	286-924-7	Heraeus	Nov 2017
Ruthenium trihydroxide	12135-42-1	235-221-3	Umicore NV/SA	
Rhenium	7440-15-5	231-124-5	KGHM Metraco	Sept 2013
Perrhenic acid (in solution)	13768-11-1	237-380-4	Heraeus	Nov 2013
Ammonium perrhenate	13598-65-7	237-075-6	Heraeus	Jul 2013
Sodium rhenate (in aq. solution)	13472-33-8	236-742-9	Climax Molybdenum	Mar 2014
Potassium perrhenate	10466-65-6	233-953-8	Heraeus	Aug 2013
Refinables (ALL)				Nov 2010

In GREEN = registered!

Timeline

- **Gold**

- TCA: dossier sent to the WG for review – submission of the dossier is expected in **January 2018**.

- **PM CN**

- KCN Ag: should be submitted in **December 2017**.

- **Pt**

- Tetraammineplatinum dichloride and dinitrate dossiers: updates are ongoing to address ECHA comments on read-across approach and testing proposal. Updated dossiers need to be submitted **<13 December 2017**.
- Chloroplatinates dossiers: dossiers are currently being updated to address ECHA comments for TAPt dossiers on read-across approach and testing proposal. Dossiers to be submitted in **December 2017**.
- HHPA-2 aminoethanol dossier under approval: submission of the dossier is expected in **January 2018**.
- Diammineplatinum (II) nitrite: should be submitted in **December 2017**.
- Karstedt: updated dossiers under approval – should be submitted in **January 2018**.

Timeline

- Rh

- Rh tris(2-ethylhexanoate): additional phys-chem testing is running (due to change in registration strategy from solid to solution). Finalisation and submission of the dossier is expected in **March 2018**.
- Dirhodium trisulphate: should be submitted in **December 2017**.

- Ru

- Ru acetate and Ru trihydroxide: should be submitted in **December 2017**.

Overall registration is on time and finalized well before the 2018 registration deadline.



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5. Data sharing status

Audrey Rondepierre, EPMF

LoA status

- 59 LoA's sold since 2010:
 - > 40 LoA's for Ag sub-Assembly
 - > 1 LoA for Au sub-Assembly
 - > 4 LoA's for Pt sub-Assembly
 - > 4 LoA's for Pd sub-Assembly
 - > 6 LoA's for Refinables sub-Assembly
 - > 4 LoA's for Re sub-Assembly
- Approximately 50 additional requests (mainly for Ag, Pt and Re) have been received and dealt with but so far no other signed LoA

LoA status

- Total costs of sold LoA's: 2 756 140 euros
- All LoA sold in 2010 and 2012 have been reimbursed to members (827 000 €)
- As from 2013, money received from sold LoA's has been added to the reserves

LoA detailed overview

	TOTAL 2010-2013		2016		2017		GRAND TOTAL	
	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €
Admin fees		808.500,00		Included		Included		808.500,00
Ag	27	741.125,00	0	75.152,00	13	609.502,00	40	1.425.779,00
<i>Ag metal</i>	16	390.000,00	<i>Updates</i>	24.802,00	10	471.111,50	26	885.913,50
<i>Ag nitrate</i>	1	125,00	<i>Updates</i>	6.387,00	1	51.215,00	2	57.727,00
<i>Disilver oxide</i>	2	28.500,00	<i>Updates</i>	24.802,00	<i>Updates</i>	1.994,50	2	55.296,50
<i>Ag chloride</i>	4	276.500,00	<i>Updates</i>	6.387,00	1	42.590,50	5	325.477,50
<i>Ag iodide</i>	2	16.000,00	<i>Updates</i>	6.387,00			2	22.387,00
<i>Ag bromide</i>	2	30.000,00	<i>Updates</i>	6.387,00	1	42.590,50	3	78.977,50
Au	0	0	1	30.970,00	0	0	1	30.970,00
<i>Au metal</i>			1	30.970,00			1	30.970,00
Pt	0	0	0	0	4	222.160,00	4	222.160,00
<i>Pt metal</i>					2	111.080,00	2	111.080,00
<i>Karstedt concentrate</i>					2	111.080,00	2	111.080,00
Pd	0	0	0	0	4	50.791,00	4	50.791,00
<i>Pd metal</i>					2	25.395,50	2	25.395,50
<i>Pd monoxide</i>					1	24.325,50	1	24.325,50
<i>Disodium tetrachloropalladate</i>					1	1.070,00	1	1.070,00
Refinables	6	63.000,00	0	0	0	0	6	63.000,00
<i>Slags, PM metal</i>	2	21.000,00					2	21.000,00
<i>Flue dust, Ag refining</i>	1	10.500,00					1	10.500,00
<i>Waste solids, PM refining</i>	1	10.500,00					1	10.500,00
<i>Doré</i>	1	10.500,00					1	10.500,00
<i>Slimes and sludges</i>	1	10.500,00					1	10.500,00
Rhenium	0	0	0	0	4	154.940,00	4	154.940,00
<i>Re metal</i>					3	121.398,00	3	121.398,00
<i>Ammonium perrhenate</i>					1	33.542,00	1	33.542,00
TOTAL	33	1.612.625,00	1	106.122,00	25	1.037.393,00	59	2.756.140,00

In 2016-2017 the admin fees have been directly included in the metals applicable costs (following PMC updated cost-sharing formula)

LoA status: ongoing issues

- Based on Implementing Act on Data Sharing:
 - Itemisation of costs
 - Justifications of costs
- Despite itemisation and justification of costs, cost-sharing formula has been challenged by potential co-registrants
- Challenge for 2018: continuous communication



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6. PMC after 2018

France Capon, EPMF

Update

	Members A	Members B
Criteria	All nationalities	All nationalities
	Companies only	National or international associations
	Mandatory to contribute to REACH platforms and/or other platforms	Can only contribute to other platforms (non-REACH platforms)
Cost sharing for admin costs	Equal share or fixed fee (5000€) if only 1-2 Platforms	Equal share or fixed fee (5000€) if only 1-2 Platforms
Cost sharing for REACH platforms related to registration dossiers	Cost sharing formula of PMC for applicable costs	Not relevant
Cost sharing for other platforms	Equal share except if decided otherwise by the Board	Equal share except if decided otherwise by the Board
Voting rights at Assembly level	Based on vested interest For admin: 3 votes for equal share and 1 vote for fixed fee For platforms: one vote per member	Based on vested interest – no vote for REACH related issues For admin: 3 votes for equal share and 1 vote for fixed fee For platforms: one vote per member
Voting rights at Board level	1 vote per member	1 vote per member – no vote for REACH related issues
Governance	One representative/member in the Assembly	One representative/member in the Assembly
	Eligible to the Board (Members A from the Board eligible for Presidency and Vice-Presidence)	Eligible to the Board (Secretary General or Managing Directors of Members B from the Board not eligible for Presidency and Vice-Presidence – only companies representatives are)

New structure

REACH & CLP (linked to registration dossiers) platforms	Other platforms
1) Au metal	1) SVHC Roadmap
2) Au compounds	2) Ag EQS
3) Potassium dicyanoaurate	3) Chemicals/waste/products Roadmap
4) Ag metal (including nano)	4) Development and maintenance of Risk Register
5) Ag compounds	5) Occupational Health
6) Ag cyanide/Potassium dicyanoargentate	6) Water framework directive and PGMS
7) Ir metal	7) Responsible sourcing
8) Ir compounds	8) Tax
9) Pt metal	9) Communication and advocacy platform
10) Chloroplatinates	10) Food contact materials
11) Karstedt	11) Other?
12) Pt compounds (others)	
13) Pd metal	
14) Pd compounds	
15) Rh metal	
16) Rh III compounds	
17) Rh compounds (others)	
18) Ru	
19) Ru compounds	
20) Re	
21) Refinables	



Update – Non-REACH platforms

- **SVHC Roadmap**

- The main aims are to
 - Identify substances of relevance to EPMF impacted by regulatory measures like REACH or the Harmonized Classification & Labelling.
 - Identify policy issues of relevance to EPMF in the context of the Roadmap implementation (e.g. RMOA, recycling, REACH review etc.)
 - Conduct advocacy on relevant substances or policy issues in order to prevent or mitigate the potential impacts that the implementation of the Roadmap may have on the Precious Metals Industry.
- Substances falling in the remit of this Platforms are:
 - Substances which are (intentionally) used in Precious Metals production/recycling (e.g. as reagents or additives)
 - Substances which occur as by-products, or impurities or waste generated in Precious Metals production/recycling
 - Substances related to ancillary uses (e.g. RCF's, coal tar pitch)

N.B.: precious metals and compounds do not fall within the scope of this Platform even when addressed in the SVHC Roadmap. Any activity related to precious metals substances shall be addressed by the relevant Platforms.

Update – Non-REACH platforms

- **Ag Environmental Quality System (EQS)**

- dedicated to Ag under Water Framework Directive (WFD) and the potential prioritisation of silver for the derivation of a European EQS.
- The aims are to:
 - Build the scientific basis for the non-prioritisation of Ag under WFD
 - Provide the necessary scientific input in case of prioritisation of Ag under WFD
 - Conduct advocacy at the different level of the process to mitigate the impacts of a potential inclusion of Ag under the WFD.

- **Chemicals/waste/ product Roadmap**

- Address the interface between chemicals, products and waste legislation, including how to reduce the presence and improve the tracking of chemicals of concern in products.
- The aims of the Platform are to:
 - Ensure adequate input in preparation of the policy options to address the interface between chemicals, products and waste legislation
 - Review these options when available
 - Conduct advocacy activities to mitigate the impacts of these options on the chemicals management of precious metals and on circular economy.

Update – Non-REACH platforms

- **Development and Maintenance of the Risk Register**
 - The aims:
 - to develop and amend a Risk register allowing the Secretariat and the Board of EPMF to identify priorities for the EPMF workplan as potential needs to new Platforms.
 - to monitor regulatory initiatives which could have an impact on the precious metals industry.
- **Occupational Health**
 - The aims of the Occupation Health Platform are:
 - Monitor CAD and CMD related activities related to precious metals substances but also critical substances used in precious metals production.
 - Monitor interactions between REACH and OSH (e.g.: SCOEL/RAC)
 - Conduct advocacy activities related to OSH.

Update – Non-REACH platforms

- **Responsible sourcing**

- The aims of the Responsible sourcing Platform are:
 - To ensure a smooth implementation of the EU conflict minerals regulation as an adequate input into the different revisions of the regulation.
 - To follow the activities related to responsible sourcing at OECD level which could impact the EU regulation
 - To conduct the relevant advocacy activities to ensure a strong and credible responsible sourcing policy within the precious metals industry.

- **Tax**

- The aim of the Tax Platform is to follow and promote a consistent and harmonised implementation of the EU Directive 2006/112/EC on VAT which applies on the trading, hedging and other related precious metals activities in Europe such as:
 - Physical delivery of precious metals
 - Unallocated Metal Weight Accounts (UMWA) without physical delivery of precious metals
 - UMWA with physical delivery of precious metals
 - Tax vouchers
 - Transactions without change of ownership of precious metals (which must be differentiated from holding precious metals, and are also referred to as Intra-Community Supplies and Intra-Community Acquisitions)

Update – Non-REACH platforms

- **Communication and advocacy platform**

- The main aims of the Communication & advocacy Platform are:
 - To increase the visibility of the precious metals industry on the EU scene
 - To develop and maintain a strong advocacy network with authorities, other industry associations (like RJC and LBMA), social partners and NGOs
 - To organize communication and advocacy events (e.g.: authorities briefings etc)
 - To develop the relevant communication tools

- **Food contact materials**

- The main aims of the Food contact materials are:
 - To monitor the regulation and guidance related to food contact materials
 - To establish a strong network with the relevant downstream users impacted by the regulation
 - To gather additional data needed to address the new regulatory challenges related to food contact materials
 - To conduct the relevant advocacy activities to mitigate the impact of the regulation on the precious metals industry.

Next steps

- Articles of the Association: D8 available for review
- Internal rules: D6 available for review
- **End of November 2017:** Send the updated version of the Articles of Association and the Internal Rules to EPMF and PMC members
- **Q1 2018:** Ensure that EPMF and PMC members review the contracts to ensure a smooth approval process in June 2018
- **June 2018:**
 - Approval of the Articles of Association and Internal rules by EPMF members
 - Signature of the Articles of Association and Internal rules by PMC members
- **December 2018:** Formal termination of PMC agreement





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7. PMC 2018 Workplan and budget : a transition year

France Capon, EPMF



2018 WP

- Following the new structure
- WP developed on the basis of:
 - Opportunities For Improvements (OFI) tracker
 - Prioritisation criteria
- 2018: focus on development of new data to fill in critical data gaps
- 2019-2020: potential updates of some of the registration dossiers
- All platforms: there is a budget for:
 - literature review
 - IUCLID hosting
 - updates of uses and ES

2018 WP - highlights

- **Silver and silver compounds:**
 - Review of the uses and related exposure scenarios to ensure consistency in the exposure assessment with other PMC dossiers submitted more recently.
 - Additional ecotox work to support PNEC review
 - EOGRTs will be reviewed and assessed in 2018: increase of the budget due to additional work needed on immunotox
- **Au metal:** preliminary work on nanogold

N.B.: It is worth to note that similar work on **PGMs nanoforms**

- **Potassium dicyanoaurate:** the testing proposal for an OECD 474 (in vivo genetic toxicity) has been submitted to ECHA in 2016 and could be reviewed and assessed in 2018.
- **Chloroplatinates:** due to the high risk to see chloroplatinates screened for potential SVHC concerns, a series of improvements of the registration dossiers have been foreseen (secondary poisoning, an external peer review to better identified potential additional improvement areas)

2018 WP - highlights

- **Pt compounds (others):** OECD 422 test to address some weaknesses in the ITS/read-across on repeated-dose toxicity and reproductive toxicity for Pt nitrate.
- **Pd compounds:** external peer review of key dossiers, as an improvement of the environmental assessment including a review of the PNEC; OECD 422 test to address some weaknesses in the ITS/read-across on repeated-dose toxicity and reproductive toxicity. Upon the PGM WG recommendation, the budget has been increased to be able to conduct 3 OECD 422 tests.
- **Rh III compounds:** most of the activities will be related to mutagenicity and the follow-up of the testing proposal submitted in 2017. For all Rh trioxide a budget is foreseen updates of the Annex III exempted dossiers to an Annex VII dossier.
- **Refinables:** it is worth to note that these dossiers will probably need to be updated thanks to the finalisation of the discussions on substance ID but also the need to refine and update the exposure assessment and exposure scenarios. However, no significant budget will be needed due to the 2015-2017 carry over available in the reserves.
- **Ag EQS:** limited work is expected in 2018 but follow-up on EQS proposal (if any) will be needed.

2018 WP- Draft budget overview

	2018 Draft Budget
<i>Administrative costs</i>	601.700 €
<i>REACH Platform costs</i>	3.638.924 €
<i>Non-REACH Platform costs</i>	48.600 €
GRAND TOTAL	4.289.224 €

For approval

2018 WP- Draft budget (Admin costs details)

	2018 Draft Budget
Administrative costs	601.700 €
Salaries and salary-related costs	250.000 €
Office costs	80.000 €
Meeting, travel and accommodation costs	55.000 €
External costs	196.700 €
<i>Eurométaux REACH package</i>	58.000 €
<i>ICMM membership</i>	2.700 €
<i>Knowledge Management tool</i>	10.000 €
<i>Communication tool for SIEF Mgt</i>	10.000 €
<i>IUCLID IT Hosting system</i>	10.000 €
<i>Liability Insurance</i>	6.000 €
<i>Legal support</i>	50.000 €
<i>Accountancy and audits</i>	25.000 €
<i>ETAP membership + project</i>	20.000 €
<i>HETAP membership + project</i>	5.000 €
Restructuration	20.000 €

2018 WP- Draft budget (REACH Platform costs details)

	2018 Draft Budget
REACH Platform costs	3.638.924 €
Ag metal (including nano)	937.603 €
Ag compounds	954.103 €
Au metal	48.258 €
Au compounds	37.008 €
Ag cyanide/Potassium dicyanoargentate	14.255 €
Potassium dicyanoaurate	106.010 €
Pt metal	10.264 €
Chloroplatinates	59.927 €
Karstedt	50.047 €
Pt compounds (others)	296.393 €
Pd metal	10.097 €
Pd compounds	700.001 €
Rh metal	8.020 €
Rh III compounds	203.740 €
Rh compounds (others)	26.140 €
Ru metal	9.627 €
Ru compounds	55.773 €
Ir metal	6.180 €
Ir compounds	27.620 €
Re metal & compounds	22.325 €
Refinables	55.531 €

2018 WP- Draft budget (Non-REACH Platform costs)

	2018 Draft Budget
<i>Non-REACH Platform costs</i>	48.600 €
SVHC Roadmap	28.600 €
Silver EQS	20.000 €
Hydrazine	0 €

2018 accounts and reserves

- Cf. A3 table in meeting files (preparatory document No. 5)

2016-2018 Budget overview

	2016	2017	2018
Administrative costs	618 800	617 250	601 700
Ag specific costs	681 250	897 550	1 891 706
Au specific costs	122 700	355 200	85 266
PMCN- specific costs	388 500	72 700	120 266
Pt specific costs	1 183 955	763 900	416 632
Pd specific costs	572 405	25 200	710 098
Rh specific costs	162 470	171 050	237 900
Ru specific costs	558 420	501 700	65 400
Ir specific costs	1 000	13 850	33 800
Re specific costs	11 400	7 400	22 325
Refinables specific costs	772 550	772 700	55 531
SVHC-Roadmap specific costs	20 000	81 250	28 600
Ag EQS specific costs	0	100 000	20 000
TOTAL	5 093 450	4 379 750	4 289 224

N.B.: 2018 new cost structure has not been reflected, to allow a comparison with 2016-2017.



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8. PMC agreement: Updated Annex IX (cost sharing)

France Capon, EPMF

Updated Appendix IX

- **Admin. Costs:**

- Basic principle for all: equal share
- For companies and associations only interested into 1 or 2 platforms: annual fixed fee for the contribution to the administrative costs (5 000 € is proposed in 2018).

- **Non-REACH** (non-related to registration dossiers):

- An equal share is recommended as a starting point but could be reviewed in case the fairness principle could be challenged. In this case, an ad hoc cost sharing formula could be approved by the Board.

N.B.: As for Ag EQS, it is suggested to have SVHC Roadmap WG membership on a voluntary basis in the amended Appendix IX

- **REACH** (related to registration dossiers):

- Based on requirements (tonnage band, intermediate under SCC and Annex III exempted substances as listed in the PMC product portfolio)

For approval



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9. Knowledge Management System

Cathy Martin, EPMF

Knowledge Management System

What ?

- System to archive data in a user-friendly format
 - Scientific studies (by PMC, Companies)
 - Our scientific publications
 - Scientific interpretations (genotoxicity, read-across, PNEC&DNEL, ...)
 - REACH registration dossiers
 - Regulatory actions (summary & key docs on SE of Ag)
 - Meeting documents
 - Newsletter



Knowledge Management System

For Who ?

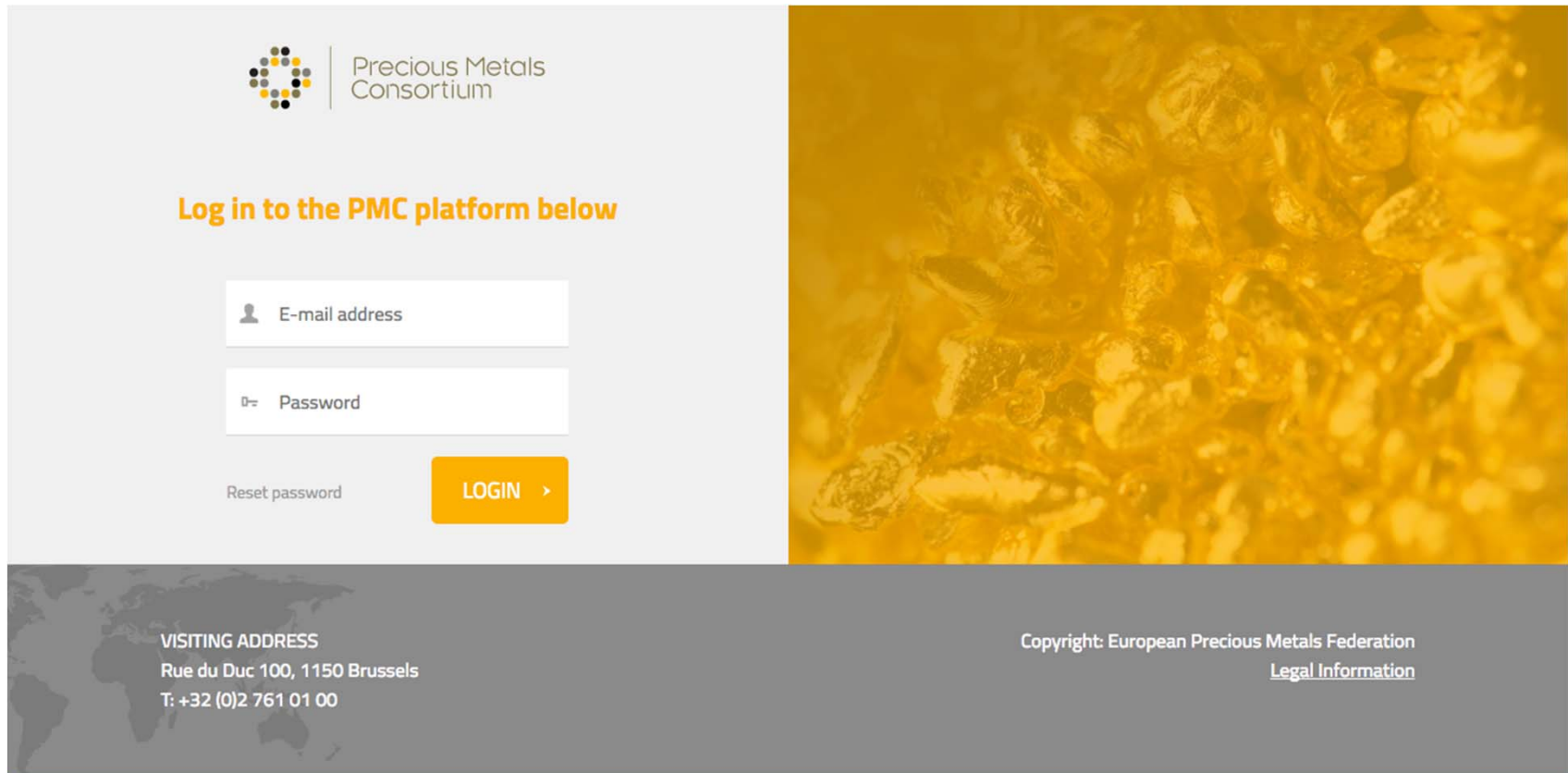
- Available for PMC Secretariat and Member Companies
- Access by Member Companies limited to data related to substances in portfolio


Knowledge Management System – How ? – step 1

- Invitation email to connect and create an account


Knowledge Management System – How ? – step 2


- Login



 Precious Metals Consortium

Log in to the PMC platform below

 E-mail address

 Password

[Reset password](#) **LOGIN >**

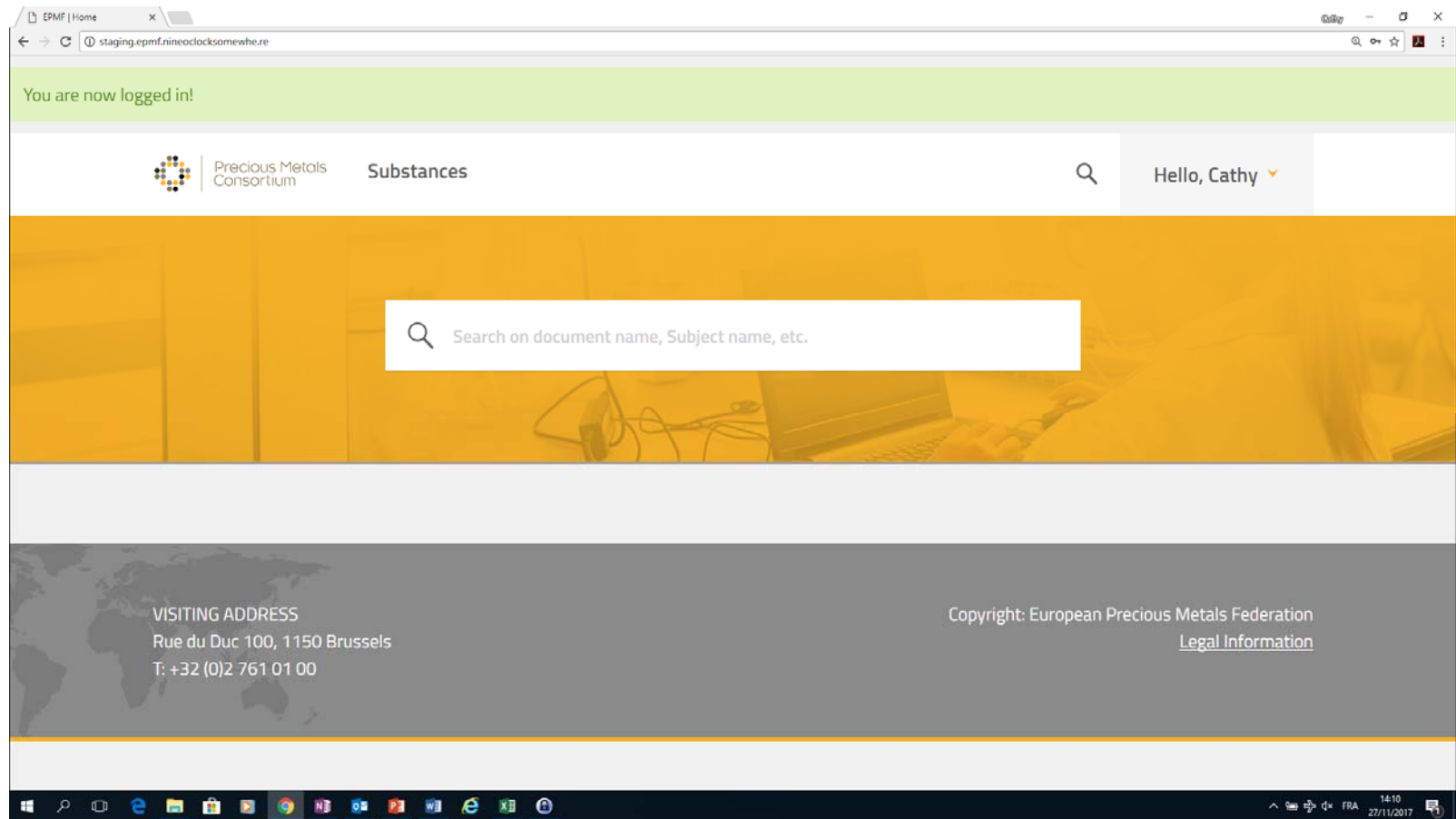
VISITING ADDRESS
Rue du Duc 100, 1150 Brussels
T: +32 (0)2 761 01 00

Copyright: European Precious Metals Federation
[Legal Information](#)

Knowledge Management System – How ? – step 3

Two navigations feasible :

- Search tool n° 1 via the welcome page by typing key words



Knowledge Management System – How ? – step 3

Two navigations feasible :

- Search tool n° 2 directly navigating through the substances via the buttons

The screenshot shows the user interface of the Knowledge Management System. At the top, a green bar indicates "You are now logged in!". Below this, the header includes the Precious Metals Consortium logo, the word "Substances", a search icon, and the user name "Marjan" with a "Logout" link. A large orange banner contains a search bar with the placeholder text "Search on document name, Subject name, etc.". Below the banner, a grid of substance buttons is displayed. Each button features a circular icon with the element symbol and atomic number, and a label below it. The substances shown are Gold (Au, 79), Iridium (Ir, 77), Palladium (Pd, 46), Platinum (Pt, 78), Rhenium (Re, 75), Rhodium (Rh, 45), Ruthenium (Ru, 44), and Silver (Ag, 47). There are also two buttons for "PM CN" and "Refinables". At the bottom, a dark grey footer contains the visiting address: "Rue du Duc 100, 1150 Brussels" and "T: +32 (0)2 761 01 00", along with copyright information for the European Precious Metals Federation and a link to "Legal Information".

Knowledge Management System

- Uploading of the documents will start in 2018
- A demo will be organized during 1st quarter 2018

**THANK YOU
FOR
YOUR ATTENTION !!!**

Question(s) ?



Should you have any question, remark or suggestion ... please feel free to contact me :

cathy.martin@epmf.be



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10. Brexit

France Capon, EPMF

Brexit status and consequences

- REACH and Brexit: All options are still open:
 - **No deal option** - similar to ECHA assumption to develop its new webpage
 - As 3rd country, a free trade agreement (like CETA) can be negotiated including some clauses on chemicals policy
 - A more extensive free trade agreement/tailor-made EEA
 - An EEA status can be negotiated ensuring that UK could still apply REACH in the future like Norway
 - No Brexit
- Request from UK Gvt: “We want existing registrations, authorisations and approvals to remain valid in both the EU and UK markets”
- Consequences: major uncertainty for business ... and PMC!
- Threats for PMC:
 - 26 substances with UK LR (3 companies)
 - IUCLID hosting in the UK
 - Others?
- How can we anticipate to reduce negative impact on EPMF/PMC and its membership?
 - **KEY:** understand the UK companies strategy as early as possible!

Brexit: to find the latest news

- European Commission: https://ec.europa.eu/commission/brexit-negotiations_en
- ECHA portal: <https://echa.europa.eu/uk-withdrawal-from-the-eu>
- Cefic: <http://www.cefic.org/Documents/RESOURCES/PositionPapers/Cefic-CIA-joint-statement-on-Brexit-and-the-future-November2017.pdf>
- CIA: <https://www.cia.org.uk/>
- UK Cross Sectors Group
- Chemical Watch: <https://chemicalwatch.com/brexit/>
-



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11. AOB & Closing remarks

Guy Ethier, Umicore



AOB

- SEA data gathering: update

PMC General Assembly dinner : Restaurant Atomium – Square de l'Atomium – 1020 Brussels

- Dinner planned at 7pm
- Bus will leave from hotel Marivaux entrance at 6:30pm
- Bus will go back to hotel Marivaux after dinner

> Let's gather at 6:30pm in the lobby!





THANK YOU

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1. Welcome and Introduction

Guy Ethier, Umicore



1.1 Confidentiality and Competition Law

DO	DON'T
Application of competition law	
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.
Consultation in Matters of Competition Law	
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.
Activities in any preliminary phase and at any other stage of operation of the Consortium	
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 or 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.
Exchange of Confidential Information	
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.
Documentation on Cooperation	
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, quorum and apologies

Cf. attendance list

Quorum is reached: 63 %



1.3 Approval of the agenda 6 December 2017

1. Welcome and Introduction

- 1.1. Confidentiality and Competition Law
- 1.2. Tour de table, quorum and apologies
- 1.3. Approval of the agenda

2. Update on PMC Projects

- 2.1. Ag projects
- 2.2. Refinables projects
- 2.3. Au Projects
- 2.4. PM CN Projects
- 2.5. Ir projects
- 2.6. Pd projects
- 2.7. Pt projects
- 2.8. Rh projects
- 2.9. Ru projects
- 2.10. Re projects
- 2.11. SVHC Roadmap project

4. A.O.B., next meetings and closing remarks



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2. Update on PMC Projects



2.1 Ag Project: Main achievements in 2017 - SEv

Katrien Arijs

Substance evaluation (SEv)

- Further info required to clarify initial concerns:
 1. Info on **ecotoxicity** on the **smallest Ag nanoform** with highest specific surface area registered + **phys-chem** characterisation of tested form
 2. Info on **fate** of nanoAg in soil **only** in case any of the ecotox tests show higher toxicity for nanoAg as compared to ionic silver
 3. Info on the **uses** for each individual nanoform registered

	What	When
1	Requests 1 & 3 of decision	13 July 2017
2	Requests 1, 2 & 3 of decision	14 January 2019

- **Testing request 1 + data collection request 3 finalised**

2.1 Ag Project: Main achievements in 2017 - SEv

Katrien Arijs

Ecotoxicity testing

- Comparison of toxicity of smallest nanoAg form registered and ionic silver (as AgNO₃)



- **Algae** growth inhibition test (OECD 201):

- AgNO₃ more toxic than nanoAg



- **Daphnia magna** reproduction test (OECD 211):

- AgNO₃ more toxic than nanoAg



- **Soil microorganisms** nitrification test (OECD 216):

- In 1 soil, AgNO₃ more toxic than nanoAg

- In 2 other soils no significant difference

SEv
Request 1

Phys-chem characterisation

- 2 Ag nanoforms registered under REACH: granulometry, specific surface area, surface treating agents, density, point of zero charge
- T/D testing only on smallest Ag nanoform

2.1 Ag Project: Main achievements in 2017 - SEv

Katrien Arijs

Information on uses

- Only 2 forms of nanoAg currently registered under REACH, < 3 t/a
- One industrial use and 2 ES for nanosilver included in the dossier:
 - 1) Manufacture of nanosilver
 - 2) Use of nanoAg at industrial site in sintering processes for production of electronics
- No nanoAg present in the end product (transformed to 'bulk' silver layer)
- Limited release to environment

**SEv
Request 3**

All results testing / data collection included in Ag dossier and submitted by LR and 2 co-registrants by **13 July 2017**

eMSCA has 12 months to evaluate new information

	Possible conclusion	eMSCA action
1	No further data needed	Submission of 'conclusion doc' to ECHA
2	Further info needed to address concern	New Draft Decision (incl. soil fate testing?)

2.1 Ag Project: Main achievements in 2017 - WFD

Katrien Arijs

Water Framework Directive (WFD)

- **Monitoring based exercise JRC:** Ag mentioned in short list of substances under further consideration for EQS derivation
- First draft **EQS dossier** by JRC: freshwater EQS of 10 ng/L proposed versus REACH PNEC of 40 ng/L
- March 2017 EC proposed **process & timeline** for review of PS list / WL:
 - **PS list:** confirmation of **PNEC** → re-run STE-score & conclude on shortlisting
 - PNECs to be discussed in **substance-specific sub-groups** → MS invited to lead
 - Silver: MS invited to send more **monitoring data**
 - Output of review PS list and use of work: **EQSs harmonised at EU-level** → MS encouraged to take into account shortlisted substances for 3rd RBMP
 - Output of review PS list may include identification of substances for which analysis shows potential risk at EU level, but for which insufficient monitoring data to conclude → considered for inclusion in **WL**

2.1 Ag Project: Main achievements in 2017 - WFD

Katrien Arijs

- Draft **WL report** JRC: silver not proposed for WL
- **Further monitoring data:** JRC calculated new STE score which is now < 1.8 , while STE score > 1.8 was criterion for shortlisting
 - Await work sub-group on EQS before concluding
- **Silver specific sub-group**
 - **Sweden** (lead), Germany, Latvia, Denmark, France, EM & PMC
 - Agree on EQS early 2018 for all matrices that could be of relevance, including sediment
 - Starting point: JRC report, available studies from REACH, RIVM Ag ERL report, BPR, ...
- **PMC** (re-)assessed ecotox dataset
 - Freshwater: assessment ongoing, based on SSD
 - Sediment: current studies not suitable for PNEC-derivation → Ag WG agreed to perform well-designed sediment tests if REACH sediment PNEC is challenged

2.1 Ag Project: Main achievements in 2017 - CLH SCAS

Katrien Arijs

CLH proposals silver active substances (SCAS) under BPR

- 3 CLH proposals submitted by Kemi:
 - **Silver zeolite (SZ) and Silver copper zeolite (SCZ):**
 - **Repr Cat. 2** classification: no substance-specific data available; conservative approach using same classification as SZZ
 - **Env** classification: Aq. acute 1 & chronic 1: similar approach to SZZ
 - **Silver sodium zirconium hydrogen phosphate (SSZHP):**
 - **No Repr** classification: 2-gen study with SSZHP available that 'did not result in effects meeting criteria for classification'
 - **Env** classification: Aq. acute 1 & chronic 1: similar approach to SZZ
 - **PMC commenting:**
 - Repr classification SZ and SCZ:
 - Re-iterate earlier PMC comments SZZ + commentary on recent Sprando et al. study
 - Mode of action still lacking → link to EOGRTS Testing Proposal
 - Environmental classifications: re-iterate earlier PMC comments SZZ
 - Comments will be drafted and sent for review once public consultation has started
-

2.1 Ag Project: Main challenges in 2018

Katrien Arijs

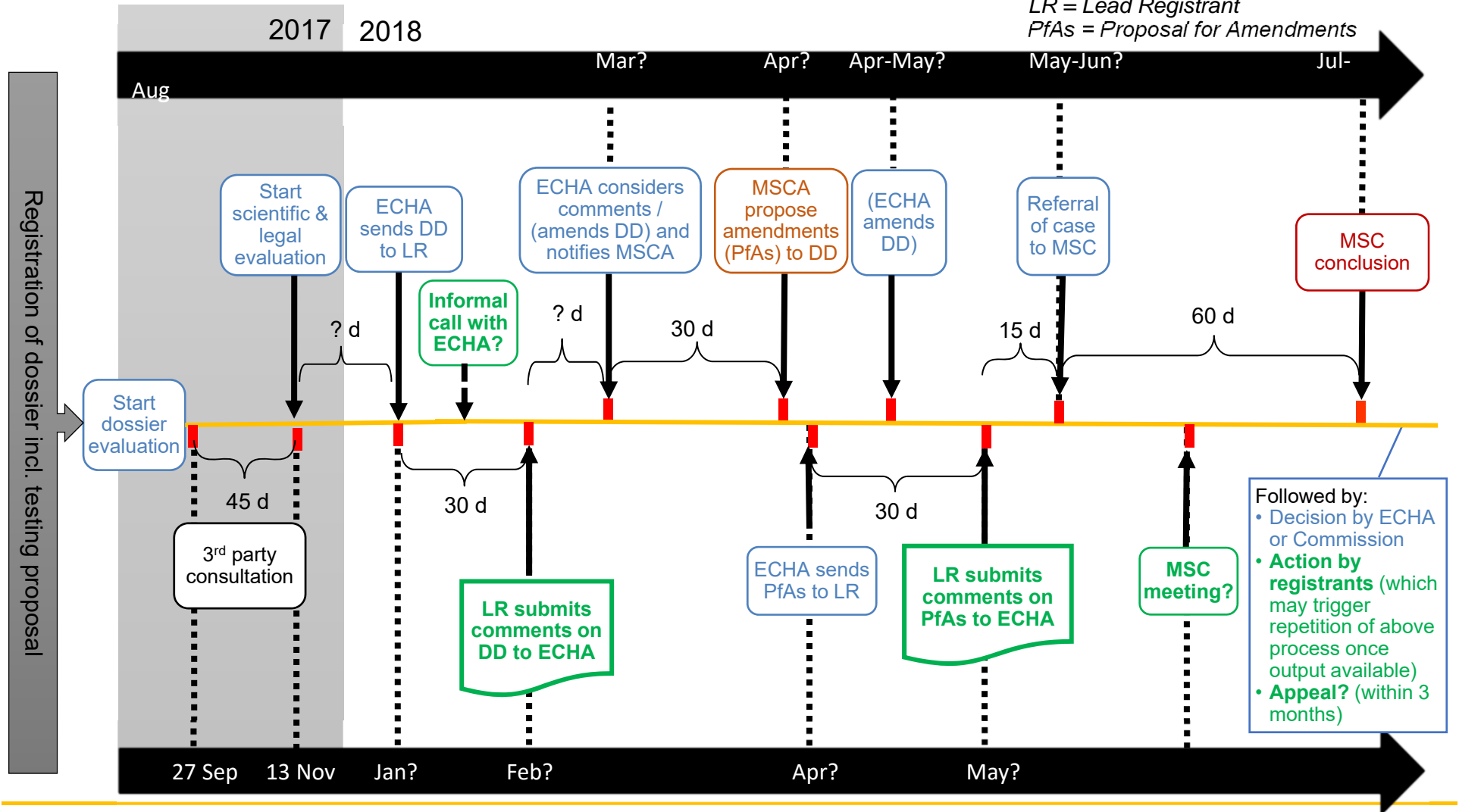
- All platforms
 - Literature review
 - Update of uses and exposure scenarios
 - Update of PNECs / additional tests
 - Dossier evaluation: EOGRTS

- Silver metal
 - CLH proposals
 - Substance evaluation conclusion?

2.1 Ag Project: Main challenges in 2018 - EOGRTS TP

Katrien Arijs

DD = Draft Decision
 LR = Lead Registrant
 PfAs = Proposal for Amendments



2.1 Ag Project: Main challenges in 2018 - EOGRTS TP

Katrien Arijs

Testing proposal (TP) Extended One-Gen Repro Tox Study (EOGRTS)

- **Ag reprotox** → shifts in position over last 2 years:
 - SCAS CLH outcome: ECHA RAC precedent → classification of SZZ Repr Cat. 2; RAC mainly attribute effects to Ag⁺
 - More data emerging on SCAS (further 2-gen reprotox study data; developmental effects a focal point)
 - New data (2016/17) on Ag⁺, incl. new developmental immunotoxicity (DIT) data
 - Overall balance of evidence: shifted adversely
- Defence of TP key to sector but TP now outdated → **complex EOGRTS**
- Preparing update TP + enabling work

2.1 Ag Project: 2018 Budget

Katrien Arijs

Ag metal (incl. nano)	€
REACH dossier maintenance	80 250
REACH evaluation	750 000
REACH CLP	15 000
Internal and external fixed Managers	92 353
TOTAL	937 603

Ag compounds	€
REACH dossier maintenance	111 750
REACH evaluation	750 000
Internal and external fixed Managers	92 353
TOTAL	954 103

2.2 Refinables Project: Main achievements in 2017

Vincent Dunon

Substance identification (SID)

- **iUVCB SID discussions Eurométaux / ECHA:**
 - Improve / refine SID of the refinables dossiers following the **SIP**
 - Currently no alignment is reached with ECHA
 - Try to reduce / define factors of variability
 - Use Assessment Entities (AEs): discussions with ECHA
 - Increase transparency dossiers
 - Show consistency of our approach

2.2 Refinables Project: Main challenges in 2018

Vincent Dunon

Substance identification (SID):

- Finalisation SID
- Input to discussions Eurométaux / ECHA

Effects assessment and classification:

- Classification review following SID review
- T/D testing & phys-chem testing for splitted dossiers
- Validation testing **if needed**

Exposure and risk assessment:

- MvE assessment, combined toxicity, update exposure & risk assessment

Compilation of IUCLID 6 files & Registration Dossiers



2.2 Refinables Project: 2018 budget

Vincent Dunon

Refinables	€
REACH dossier maintenance	20 000
Internal and external fixed Managers	35 531
TOTAL	55 531

N.B.: only the minimum budget was foreseen and reserves are sufficient to cover the work to be done

2.3 Au Project: Main achievements in 2017

Vincent Dunon

Dossier	CAS	Status
Gold	7440-57-5	Registered by LR in April 2016
Balsams, ...	68990-27-2	Registered by LR in April 2016
Aurio(1+)...	68365-87-7	Registered by LR in June 2016
Tetrachloroauric acid	16903-35-8	Review by WG , registration January 2018

2.3 Au Project: Main challenges in 2018

Vincent Dunon

Gold metal:

- General updates
- Literature review nano-Au

Gold compounds:

- General updates

2.3 Au Project: 2018 Budget

Vincent Dunon

Gold metal	€
REACH dossier maintenance	39 375
Internal and external fixed Managers	8 883
TOTAL	48 258

Gold compounds	€
REACH dossier maintenance	28 125
Internal and external fixed Managers	8 883
TOTAL	37 008

2.4 PM CN- Project: Main achievements in 2017

Vincent Dunon

Dossier	CAS nr	Status
AgCN	506-64-9	Registered by LR in December 2016
KAu(CN) ₂	13967-50-5	Registered by LR in October 2016
KAg(CN) ₂	506-61-6	Registered by LR in December 2017

2.4 PM CN- Project: Main challenges in 2018

Vincent Dunon

AgCN & KAg(CN)₂:

- General updates

KAu(CN)₂:

- General updates
- Testing proposal: *in vivo* genetic toxicity



2.4 PM CN- Project: 2018 Budget

Vincent Dunon

Ag cyanide and Potassium dicyanorgentate	€
REACH dossier maintenance	8 333
Internal and external fixed Managers	5 922
TOTAL	14 255

Potassium dicyanoaurate	€
REACH dossier maintenance	4 167
REACH evaluation	90 000
Internal and external fixed Managers	11 843
TOTAL	106 010



2.5 Ir Project: Main achievements in 2017

Jelle Mertens

- All Ir substances in PMC scope registered by Lead Registrant

Name of the substance	Identification numbers		Tonnage band	LR	Registered by LR
	CAS	EC			
Iridium	7439-88-5	231-095-9	1-10 t/a (Annex III)	Johnson Matthey	May 2016
Hexachloroiridic acid, Hydrogen hexachloroiridate (IV) (UVCB!)	16941-92-7	241-012-8	1-10 t/a (Annex III)	Heraeus	June 2016
Diammonium hexachloroiridate	16940-92-4	241-007-0	1-10 t/a (Annex III)	Johnson Matthey	May 2016

2.5 Ir Project: Main challenges in 2018

Jelle Mertens

- Co-registrants invited to register well ahead of ECHA deadline (May 2018)
- Requests coming from LoA buyers (e.g.: composition, uses, etc.)

2.5 Ir Project: 2018 budget

Jelle Mertens

Iridium metal	€
REACH dossier maintenance	5 000
Internal and external fixed Managers	1 180
TOTAL	6 180

Iridium compounds	€
REACH dossier maintenance	17 000
Internal and external fixed Managers	10 620
TOTAL	27 620

2.6 Pd Project: Main achievements in 2017

Maxime Eliat

- Palladium metal and all palladium compounds have been registered

Name of the substance	Identification numbers		Tonnage band	LR	Registered by LR
	CAS	EC			
Palladium	7440-05-3	231-115-6	10-100 t/a	Umicore NV/SA	Jan 2017
Palladium dichloride	7647-10-1	231-596-2	10-100 t/a	BASF	Jan 2017
Dihydrogen tetrachloropalladate(2-) (in solution)	16970-55-1	241-047-9	10-100 t/a	Heraeus	May 2017
Diamminedichloropalladium	14323-43-4	238-269-3	10-100 t/a	Heraeus	Jan 2017
Dichlorobis(triphenylphosphine)palladium	13965-03-2	237-744-2	1-10 t/a (Annex III)	Heraeus	Jan 2017
Palladium (II) di(4-oxopent-2-en-2-oate)	14024-61-4	237-859-8	10-100 t/a	Heraeus	Jan 2017
Palladium(II) acetate	3375-31-3	222-164-4	1-10 t/a (Annex III)	Heraeus	Oct 2016
Palladium monoxide	1314-08-5	215-218-3	1-10 t/a	Heraeus	Jan 2017
Tetraamminepalladium (II) nitrate	13601-08-6	237-078-2	1-10 t/a (Annex III)	Johnson Matthey	Jan 2017
Tetraamminepalladium(2+) dichloride	13815-17-3	237-489-7	10-100 t/a	Umicore AG&Co.KG	Mar 2017
Tetraamminepalladium(2+) dihydroxide	68413-68-3	270-241-6	1-10 t/a (Annex III)	Heraeus	May 2017
Tetrakis(triphenylphosphine)palladium	14221-01-3	238-086-9	1-10 t/a (Annex III)	Umicore AG&Co.KG	Mar 2017
Palladium sulphate	13566-03-5	236-957-8	1-10 t/a (Annex III)	Heraeus	May 2017
Tetraamminepalladium(2+) diacetate	61495-96-3	262-819-1	10-100 t/a	Umicore AG&Co.KG	Apr 2017
Disodium tetrachloropalladate	13820-53-6	237-502-6	10-100 t/a	BASF	Jan 2017
Palladium dinitrate (UVCBI)	10102-05-3	233-265-8	10-100 t/a	Heraeus	Apr 2017
Palladium dihydroxide	12135-22-7	235-219-2	10-100 t/a	Umicore AG&Co.KG	Apr 2017
Diammonium hexachloropalladate	19168-23-1	242-854-9	10-100 t/a	Johnson Matthey	Mar 2017
Dipotassium hexachloropalladate	16919-73-6	240-974-6	10-100 t/a	C. Hafner	Feb 2017



2.6 Pd Project: Main achievements in 2017

Maxime Eliat

- In 2017, all Pd substances in the PMC scope have been registered by the LR
- Pd registrations learnt us a lot about the ECHA manual completeness check

2.6 Pd Project: Main challenges in 2018

Maxime Eliat

- General maintenance
 - Literature review (incl PGM nanos)
 - Expert review of the dossiers to get a second opinion
 - Small updates/improvements based on the OFI tracker
- REACH registrations:
 - Co-registrants invited to register well ahead of ECHA deadline (May 2018)
 - Requests coming from LoA buyers (e.g.: composition, uses, etc.)

2.6 Pd Project: Main challenges in 2018

Maxime Eliat

- Updates for 2018:
 - PNEC refinement: perform additional ecotox testing and derive a PNEC for three Pd groups (\leftrightarrow current generic Pd PNEC)
 - PdO dossier improvement: perform additional bio-elution testing and test for oxidising properties
 - Pd genotox: perform 3 in vitro genotox testings to replace weak studies (PdCl₂ & TAPdCl₂)
 - Skin sensitisation NaTCIPd: perform substance specific in vivo skin sensitisation test
 - Data gap filling RDT/Reprotox screening: perform 3 repeated dose toxicity and reprotox screening studies to get rid of weak read-across
 - Uncomplexed & partially-complexed Pd(II) Salts (3 PMC substances): PdCl₂ as test substance
 - TetraCIPd RA group (3 PMC substances): NaTCIPd as test substance
 - Pdacac

N.B.: a part of the work started in 2017 under existing budget

2.6 Pd Project: 2018 Budget

Maxime Eliat

Palladium metal	€
REACH dossier maintenance	6 842
Internal and external fixed Managers	3 255
TOTAL	10 097

Palladium compounds	€
REACH dossier maintenance	638 158
Internal and external fixed Managers	61 843
TOTAL	700 001

2.7 Pt Project: Main achievements in 2017

Maxime Eliat

- Platinum metal and 6 platinum compounds have been registered in 2017

Name of the substance	Identification numbers		Tonnage band	LR	Registered by LR
	CAS	EC			
Platinum	7440-06-4	231-116-1	10-100 t/a	Vale	Jun 2017
Hexachloroplatinic acid	16941-12-1	241-010-7	10-100 t/a	Johnson Matthey	
Tetraammineplatinum dichloride	13933-32-9	237-706-5	1-10 t/a (Annex III)	Johnson Matthey	Feb 2017
Tetraammineplatinum dinitrate (in solution)	20634-12-2	243-929-9	1-10t/a	Umicore AG&Co.KG	Aug 2017
Diammineplatinum (II) nitrite	14286-02-3	238-203-3	1-10 t/a (Annex III)	Heraeus	
Dipotassium tetrachloroplatinate	10025-99-7	233-050-9	1-10 t/a (Annex III)	Heraeus	
Platinum dioxide	1314-15-4	215-223-0	1-10 t/a (Annex III)	Umicore AG&Co.KG	Mar 2017
Dihydrogen hexahydroxyplatinate, compound with 2-aminoethanol (1:2) (in solution)	68133-90-4	268-717-3	10-100 t/a	BASF	
Dipotassium hexachloroplatinate	16921-30-5	240-979-3	10-100 t/a	Heraeus	
Platinum dinitrate (UVCB!)	18496-40-7	242-383-9	10-100 t/a	Heraeus	Jun 2017
Platinum, 1,3-diethenyl-1,1,3,3-tetramethyldisiloxane complexes / Karstedt concentrate (UVCB!)	68478-92-2	270-844-4	10-100 t/a	Heraeus	Feb 2017
Diammonium hexachloroplatinate	16919-58-7	240-973-0	10-100 t/a	Johnson Matthey	
Dihydrogen hexahydroxyplatinate	51850-20-5	257-471-2	10-100 t/a	Johnson Matthey	Jun 2017

2.7 Pt Project: Main achievements in 2017

Maxime Eliat

- Four chloroplatinate dossiers will still be registered by LR < end 2017
- Diammineplatinum dinitrite:
 - AnnexIII exempted dossier
 - Review & approval currently ongoing
 - Available for registration by LR < end 2017
- HHPA-2AE
 - Mammalian tox testing finalised, DNELs derived and ES created
 - Dossier completed except for
 - Some phys-chem endpoints (additional testing required – cfr PMCs experience with ECHA Manual Completeness Check)
 - TP for in vivo genotoxicity (under discussion by PGM Tox Experts)
 - Partial review & approval currently ongoing
 - Fast track approval for the missing parts in January 2018

2.7 Pt Project: Main achievements in 2017

Maxime Eliat

- Karstedt Concentrate:
 - Registration in line with agreed deadline Reconsile
 - Update of KC due to classification as Repro tox Cat 2:
 - Main changes: generation ES & inclusion TP for Extended One Generation Reproductive Toxicity assay
 - Update finalised and reviewed by the WG
 - Approval process ongoing
 - First LoA signed by Reconsile member company
 - Review by Reconsile?
- TP for in vivo genotoxicity of platinum dossiers: first discussions with ECHA following the draft decision on the TAPt diacetate dossier (outside PMC scope)

2.7 Pt Project: Main challenges in 2018

Maxime Eliat

- General maintenance
 - Literature review (incl PGM nanos)
 - Expert review of the dossiers to get a second opinion
 - Small updates/improvements based on the OFI tracker
- REACH registrations:
 - Have registration dossier HHPA-2AE available for LR registration in January 2018
 - Co-registrants invited to register well ahead of ECHA deadline (May 2018)
 - Requests coming from LoA buyers (e.g.: composition, uses, etc.)

2.7 Pt Project: Main challenges in 2018

Maxime Eliat

- Discussions with ECHA on in vivo TP
 - ECHA has reviewed the TP for some TAPt compounds, dossiers updated accordingly
 - Try to have the TP for all Pt compounds considered together by ECHA (and not in isolation per group)
- Updates for 2018 (cfr. discussions PGM BtB meetings in October):
 - PtO₂: update dossier from AnnexIII to AnnexVII
 - need for mammalian tox testing: skin sensitisation and AMES
 - Secondary poisoning ClPTs: literature search
 - Data gap filling RDT/Reprotox screening: perform a repeated dose toxicity and reprotox screening study with Pt dinitrate to replace waiver

N.B.: a part of the work started in 2017 under existing budget

2.7 Pt Project: 2018 Budget (1)

Maxime Eliat

Platinum metal	€
REACH dossier maintenance	7 308
Internal and external fixed Managers	2 957
TOTAL	10 264

Chloroplatinates	€
REACH dossier maintenance	29 231
REACH authorisation	10 000
Internal and external fixed Managers	20 696
TOTAL	59 927

2.7 Pt Project: 2018 Budget (2)

Maxime Eliat

Karstedt	€
REACH dossier maintenance	32 307
Internal and external fixed Managers	17 740
TOTAL	50 047

Platinum compounds (others)	€
REACH registration	15 000
REACH dossier maintenance	263 653
Internal and external fixed Managers	17 740
TOTAL	296 393

2.8 Rh Project: Main achievements in 2017

Jelle Mertens

- Dossiers Rh metal and 13 Rh compounds registered by LR

Name of the substance	Identification numbers		Tonnage band	LR	Registered by LR
	CAS	EC			
Rhodium	7440-16-6	231-125-0	1-10 t/a	Johnson Matthey	Nov 2017
Carbonyl(pentane-2,4-dionato-O,O')(triphenylphosphine)rhodium	25470-96-6	247-015-0	1-10 t/a (Annex III)	Johnson Matthey	Oct 2016
Carbonylhydrotris(triphenylphosphine)rhodium	17185-29-4	241-230-3	1-10 t/a (Annex III)	Umicore AG&Co.KG	Mar 2017
Dicarbonyl(pentane-2,4-dionato-O,O')rhodium	14874-82-9	238-947-9	1-10 t/a (Annex III)	Umicore AG&Co.KG	Sep 2017
Rhodium tris(2-ethylhexanoate) (in solution)	20845-92-5	244-079-1	1-10 t/a (Annex III)	Heraeus	
Rhodium trichloride, hydrate	20765-98-4	606-630-8	1-10 t/a (Annex III)	Heraeus	Sep 2017
Di- μ -chloro-bis(hapto-1,5-cyclooctadiene)dirhodium(I)	12092-47-6	235-157-6	1-10 t/a (Annex III)	Heraeus	Sept 2016
Tris(triphenylphosphine) rhodium (I) chloride	14694-95-2	238-744-5	1-10 t/a (Annex III)	Umicore AG&Co.KG	Mar 2017
Rhodium triiodide	15492-38-3	239-521-5	1-10 t/a (Annex III)	Umicore AG&Co.KG	July 2017
Dirhodium trisulphate	10489-46-0	234-014-5	1-10 t/a (Annex III)	Umicore AG&Co.KG	
Dirhodium trioxide	12036-35-0	234-846-9	1-10 t/a (Annex III)	Umicore AG&Co.KG	July 2017
Rhodium (III) acetate (UVCBI)	42204-14-8	255-707-9	1-10 t/a (Annex III)	Umicore AG&Co.KG	July 2017
Rhodium trinitrate (UVCBI)	10139-58-9	233-397-6	1-10 t/a	Johnson Matthey	Nov 2017
Rhodium trihydroxide	21656-02-0	244-508-2	1-10 t/a (Annex III)	Heraeus	July 2017
Triammonium hexachlororhodate	15336-18-2	239-364-2	1-10 t/a (Annex III)	Vale	July 2017
Diammonium sodium hexakis(nitrito-N)rhodate	64164-17-6	264-713-0	10-100 t/a	Vale	July 2017

2.8 Rh Project: Main achievements in 2017 (1/3)

Jelle Mertens

- Rh metal: submitted as Annex VII dossier (1-10 tpa), Annex VIII draft available
- Diammonium sodium hexakis (nitrito-N) rhodate:
 - Annex VIII dossier (10-100 tpa)
 - DNELs & PNECs derived
 - Exposure scenarios generated
- Dirhodium trisulphate:
 - Annex III exempted dossier
 - All required phys-chem testing finalised
 - Review & approval currently ongoing
 - Available for registration by LR <end 2017

2.8 Rh Project: Main achievements in 2017 (2/3)

Jelle Mertens

- Rhodium tris(2-ethylhexanoate)
 - Registration 1-10 tpa (AnnexIII)
 - Dossier delayed...the sequel
 - <2016: registration as solution
 - ↪ 2016: attempts to isolate as solid (phys-chem testing on hold)
 - ↪ June 2017: withdrawal of registration
 - ↪ August 2017: request to register as solution, phys-chem testing initiated
 - ↪ Sept 2017: two compositions need inclusion in dossier, phys-chem testing 2nd composition initiated
 - ↪ Today ... Phys-Chem testing running
 - Aim: have registration dossier available **Feb-March 2018**

2.8 Rh Project: Main achievements in 2017 (3/3)

Jelle Mertens

- Rh(III) genotoxicity:
 - AMES testing:
 - Rh trihydroxide tested, no genotoxic activity
 - Rh trioxide: DRF finalised, full test put on hold (cfr decision spring BtB meeting)
 - Rh tris(2-ethylhexanoate): on hold (cfr previous slide)
 - Internal review document drafted
 - Bioelution testing:
 - Solution mimicking human gastric solution
 - Results confirmed PMC grouping:
 - Water soluble Rh(III) cmpds – dissolve \pm completely
 - Non water soluble Rh(III) cmpds – dissolve much less
 - PMC TE discussion on next steps (20 Nov)

2.8 Rh Project: Main challenges in 2018 (1/)

Jelle Mertens

REACH registrations:

- Have registration dossier Rh tris(2-ethylhexanoate) available for LR registration in Feb/March 2018
- Co-registrants invited to register well ahead of ECHA deadline (May 2018)
- Requests coming from LoA buyers (e.g.: composition, uses, etc.)

Rh(III) genotox:

- AMES: finalise testing Rh trioxide and Rh tris(2-ethylhexanoate)
- Water soluble Rh(III) compounds: include testing proposal for in vivo genotox testing
- Poorly water soluble Rh(III) compounds: develop WoE argumentation to support grouping and absence of genotoxic potency via
 - further chemistry testing with Rh triiodide
 - desktop research

2.8 Rh Project: Main challenges in 2018 (2/)

Jelle Mertens

Rh trioxide:

- Update dossier from AnnexIII to AnnexVII
 - mammalian tox testing: acute toxicity (oral), skin irritation/ corrosion, eye irritation/corrosion, skin sensitisation
- Phys-Chem properties: test for oxidising properties (to replace waiver)

General maintenance

- Literature review (incl PGM nanos)
- Small updates/improvements based on the OFI tracker

N.B.: a part of the work started in 2017 under existing budget

2.8 Rh Project: 2018 Budget

Jelle Mertens

Rhodium metal	€
REACH dossier maintenance	6 250
Internal and external fixed Managers	1 770
TOTAL	8 020
Rhodium III compounds	€
REACH registration	7 500
REACH dossier maintenance	75 000
REACH evaluation	100 000
Internal and external fixed Managers	21 240
TOTAL	203 740
Rhodium compounds (others)	€
REACH registration	7 500
REACH dossier maintenance	6 250
Internal and external fixed Managers	12 390
TOTAL	26 140

2.9 Ru Project: Main achievements in 2017 (1/3)

Jelle Mertens

Dossiers Ru metal and 4 Ru compounds registered by LR

Name of the substance	Identification numbers		Tonnage band	LR	Registered by LR
	CAS	EC			
Ruthenium	7440-18-8	231-127-1	10-100 t/a	Heraeus	Nov 2017
Ruthenium trichloride, hydrate	14898-67-0	604-667-4	10-100 t/a	Heraeus	Nov 2017
Ruthenium (IV) oxide	12036-10-1	234-840-6	1-10 t/a (Annex III)	Heraeus	Nov 2017
Tris(nitrato-O)nitrosylruthenium	34513-98-9	252-068-8	1-10 t/a (Annex III)	Umicore AG&Co.KG	Feb 2017
Hexakis[μ-(acetato-O:O')]-μ ³ -oxo-triangulo-triruthenium acetate / Ruthenium acetate	55466-76-7	259-653-7	1-10 t/a (Annex III)	Johnson Matthey	
Tetraammonium decachloro-μ-oxidiruthenate(4-)	85392-65-0	286-924-7	10-100 t/a	Heraeus	Nov 2017
Ruthenium trihydroxide	12135-42-1	235-221-3	1-10 t/a (Annex III)	Umicore NV/SA	



2.9 Ru Project: Main achievements in 2017 (2/3)

Jelle Mertens

Ru metal: registered as Annex VIII dossier (10-100 tpa)

Ru trichloride,hydrate and Tetraammonium decachloro-mu-oxodiruthenate

- Registered as Annex VIII dossiers (10-100 tpa)
- Environmental and mammalian tox testing finalised
- PNEC and DNEL derived
- Exposure scenarios drafted

Ruthenium trihydroxide:

- AnnexIII exempted dossier
- All required phys-chem testing finalised
- Review & approval currently ongoing
- Available for registration by LR <end 2017

2.9 Ru Project: Main achievements in 2017 (3/3)

Jelle Mertens

Ruthenium acetate:

- Dossier reviewed and approved
- Submission by LR pending :
 - Company owned data included (non-PMC member)
 - Discussions with company on data-sharing / LtU ongoing since mid 2017
 - Process in final steps, expected to be finalised <end 2017

2.9 Ru Project: 2018 Budget

Jelle Mertens

Ruthenium metal	€
REACH dossier maintenance	7 857
Internal and external fixed Managers	1 770
TOTAL	9 627

Ruthenium compounds	€
REACH registration	22 143
Internal and external fixed Managers	33 630
TOTAL	55 773

2.9 Ru Project: Main challenges in 2018

Jelle Mertens

REACH registrations:

- Co-registrants invited to register well ahead of ECHA deadline (May 2018)
- Requests coming from LoA buyers (e.g.: composition, uses, etc.)

Ru(IV) oxide:

- update dossier from AnnexIII to AnnexVII
→ mammalian tox testing: skin irritation/corrosion, skin sensitisation,
AMES

General maintenance

- Literature review (incl PGM nanos)
- Small updates/improvements based on the OFI tracker

2.10 Re Project: Main achievements in 2017

Katrien Arijs

- Literature review ongoing (WCA/Bibra)

2.10 Re Project: Main challenges in 2018

Katrien Arijs

- Literature review
- Phys-chem testing
- Improvements / updates of CSR and IUCLID

2.10 Re Project: 2018 Budget

Katrien Arijs

Rhenium metal & compounds	€
REACH dossier maintenance	18 500
Internal and external fixed Managers	3 825
TOTAL	22 325

2.11 SVHC Roadmap Project: Main achievements in 2017

France Capon

- **SVHC monitoring tool** is now in place: Chemycal
 - Companies specific report will be sent 4 times/year
 - Email alerts will be used in case of urgency
- **PbO** - Intermediate guidance:
 - Aim: clarify the regulatory status of PbO in precious metals refining
 - Conclusions:
 - Case 1: PbO used in order to produce a PM Lead alloy (UVCB): intermediate use
 - Case 2.1: Pb(PbO) as carrier metal in the refining of PM (and non-PM) – Pb/PbO present in input material: this is not a use of Pb/PbO, and not relevant for the intermediate discussion
 - Case 2.2: Pb(PbO) as carrier metal in the refining of PM (and non-PM) – Pb/PbO added to form a slag: intermediate use
 - Case 3: PbO used in fire assay: NOT an intermediate use
 - Status: final Industry guidance under review by ECHA
 - Next steps: meeting with ECHA and publication of the guidance

2.11 SVHC Roadmap Project: Main achievements in 2017

France Capon

- **Article 58(2)** interpretation
 - Background: Prioritisation of Pb compounds into Authorisation – exemption could be granted under article 58(2) (substances and uses already regulated under other EU legislation)
 - ECHA recommendation to Commission requested some legal review
 - Co-funded project was conducted and the outcome will be used for next advocacy steps
 - Critical issue due to precedent setting

2.11 SVHC Roadmap Project: Main challenges in 2018

Inclusion of Pb into PACT – potential listing into Candidate list

Increasing activities on Substitution at EU and MS level

Prioritisation of PbO into Autorisation

Continuous scrutiny on RCFs and Borates but unclear timing

Memorandum of understanding still expected on REACH and OHS



2.11 SVHC Roadmap Project: 2018 Budget

France Capon

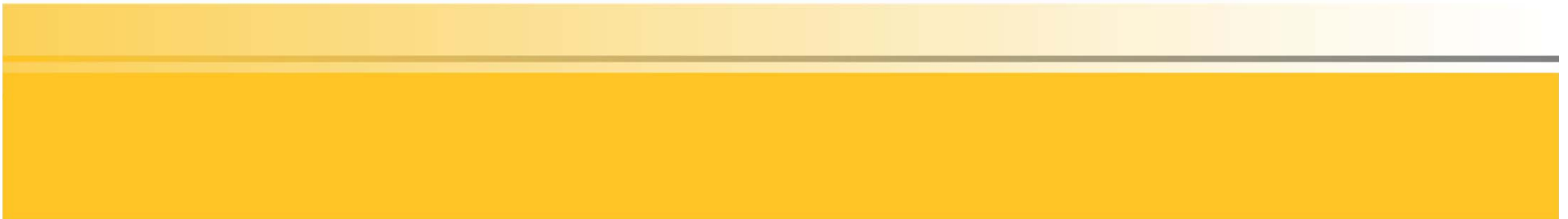
	€
Internal and external fixed Managers	23 600
Monitoring tool	5 000
TOTAL	28 600



Precious Metals
Consortium

3. A.O.B., next meetings and closing remarks

Guy Ethier, Umicore



3. A.O.B., next meetings and closing remarks

- Next General Assembly:
 - > Liège, 5 and 6 June 2018





THANK YOU

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