



Precious Metals
Consortium



Precious Metals & Rhenium Consortium

General Assembly Meeting

5 & 6 June 2018 | Liège, Belgium



Precious Metals
Consortium

1. Welcome and Introduction

Guy Ethier, Umicore



1.1 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 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.
<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, quorum and apologies

Cf. attendance list

Quorum is reached: 61 % on 5 June

1.3 Approval of the agenda 5 June 2018 (1)

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 (December 2017, Brussels) and review of actions (cf. Preparatory note 0)

2. Update on PMC Projects

2.1. Ag projects

2.2. Refinables projects

2.3. Au Projects

2.4. PM CN Projects

1.3 Approval of the agenda 5 June (2)

2. Update on PMC Projects *(cont'd)*

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

2.12. SEA data gathering project

3. Closure of the meeting

1.4 Approval of the minutes of the previous meeting (December 2017) and review of actions

Actions	Who?	When?	Status
Officially notify SFPZ of its expulsion for defaults of payment	FC	December 2017	DONE
ReS7: Update the PMC product portfolio and inform the SIEF	AR	December 2017	DONE
Send to EPMF and PMC members: a summary of the restructuring proposal including consequences of not joining EPMF, together with the Articles of Association and Internal rules	FC	December 2017	DONE
Review the Articles of Association and Internal Rules	Members	15 February 2018	DONE
Send formal commitment of joining EPMF	Members	15 March 2018	DONE
Signature and approval of amended Articles of Association and Internal Rules by companies representative having legitimate authority	Members	5-6 June 2018	ONGOING

For approval



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2. Update on PMC Projects



2.1 Ag Project

Katrien Arijs

- **New chair and co-chair:** Clémence Siret (SAFT) and Rob Garrett (Ames)
- Update on:
 - 1) Substance Evaluation
 - 2) Water Framework Directive
 - 3) EOGRTS TP

2.1 Ag Project: Status – Substance Evaluation

Katrien Arijs

- Further info required to clarify initial concerns:



Information on **aquatic and soil ecotoxicity** of the smallest silver nanoform with the highest specific surface area registered under REACH as compared to ionic silver

Information on the **fate** of nanosilver in soil only in case any of the ecotoxicity tests show higher toxicity for nanosilver as compared to ionic silver

Information on the **uses** for each individual nanoform registered under REACH

- All results testing request 1 + data collection request 3 included in Ag dossier and submitted by LR and 2 co-registrants by 13 July 2017

2.1 Ag Project: Key milestones – Substance Evaluation

Katrien Arijis

- Results testing presented at SETAC Europe Annual Meeting in Rome



SETAC EUROPE 28th ANNUAL MEETING
13–17 MAY 2018 | ROME, ITALY

Responsible and Innovative Research for Environmental Quality

- Results soil testing accepted for publication in ET&C

Accepted Article

Environmental Toxicology and Chemistry

Environmental Toxicology

Transformation-Dissolution Reactions Partially Explain Adverse Effects of Metallic Silver Nanoparticles to Soil Nitrification in Different Soils

Jessica Bollyn, Bernd Willaert, Bart Kerré, Claudia Moens, Katrien Arijis, Jelle Mertens, Dean Leverett, Koen Oorts, and Erik Smolders

Environ Toxicol Chem., Accepted Article • DOI: 10.1002/etc.4161

Accepted Article

"Accepted Articles" are peer-reviewed, accepted manuscripts that have not been edited, formatted, or in any way altered by the authors since acceptance. They are citable by the Digital Object Identifier (DOI). After the manuscript is edited and formatted, it will be removed from the "Accepted Articles" Web site and published as an Early View article. Note that editing may introduce changes to the manuscript text and/or graphics which could affect content, and all legal disclaimers and ethical guidelines that apply to the journal pertain. SETAC cannot be held responsible for errors or consequences arising from the use of information contained in these manuscripts.

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2.1 Ag Project: Next steps – Substance Evaluation

Katrien Arijs

- Publication results aquatic testing
- Waiting for feedback eMSCA (by **13 July 2018**)

	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: Status – Water Framework Directive

Katrien Arijis

- **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 vs REACH PNEC of 40 ng/L

- **Further process:**

- Prioritisation exercise postponed: same time as overall WFD review
- European Commission proposed process and 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
 - Ag: 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: Status – Water Framework Directive

Katrien Arijns

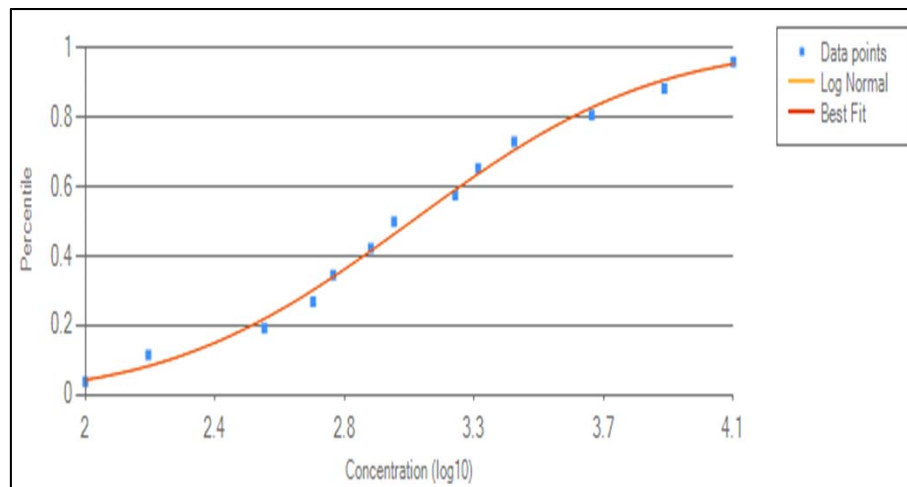
- **WL report** JRC: silver not proposed for WL
- **Further monitoring data:** JRC calculated new STE score which is now < 1.8 , while STE score > 1.8 was criterion for shortlisting
 - Await work sub-group on EQS before concluding
- **Silver specific sub-group**
 - **Sweden** (lead), Germany, Latvia, Denmark, France, EM & PMC
 - Original aim: agree on EQS early 2018 for all matrices that could be of relevance, incl. sediment → dossier to be presented to SCHEER
 - Starting point: JRC report, available studies from REACH, RIVM Ag ERL report, BPR, literature
 - Discussions still ongoing (cf. next slides)
- **European Commission**
 - Last WG Chem Meetings: PS list not a priority... focus on WL
 - No clear timing for PS

2.1 Ag Project: Key milestones – Water Framework Directive

Katrien Arijs

PMC revision silver PNEC/EQS freshwater

- (Re-)assessed data: new studies + previous studies REACH CSR / RIVM (+ comparison with PNEC derivations from REACH CSR / RIVM)



	Geomean
min (µg/L)	0.100
max (µg/L)	12.54
HC ₅ (µg/L) - LogNormal	0.104 (0.03-0.25)
HC ₅ (µg/L) - BestFit	0.104 (0.03-0.25)

AF 3

PNEC = 34.7 ng/L

- EQS guidance + REACH guidance:**

The output from an SSD-based EQS is considered reliable if the database contains preferably more than 15, but at least 10 NOECs/EC10s, from different species covering at least 8 taxonomic groups.

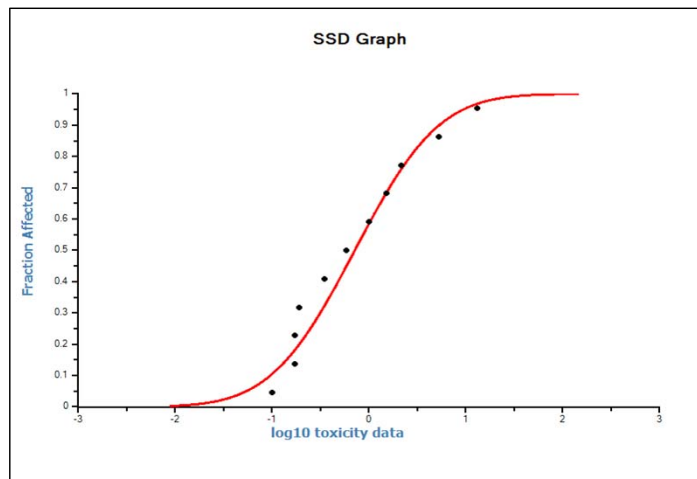
➔ Additional tests proposed

2.1 Ag Project: Key milestones – Water Framework Directive

Katrien Arijis

Sweden revision silver PNEC/EQS freshwater

- **Deterministic derivation** proposed as not enough tax groups
 - Lowest reliable EC₁₀: Schlich et al. (2017)
 - OECD 201 (algae test) with AgNO₃
 - EC₁₀ for *P. subcapitata* on the endpoints yield and growth rate is 0.10 µg/L (dissolved Ag)
 - AF of 10 → **EQS of 10 ng/L**
- **SSD** also conducted to compare outcome with deterministic derivation (7 tax groups)



HC5 results			
HC5 type	Value	log10(Value)	Description
LL HC5	0,009	-2,062	lower estimate of the HC5
HC5	0,050	-1,300	median estimate of the HC5
UL HC5	0,129	-0,855	upper estimate of the HC5
sprHC5	16,098	1,207	spread of the HC5 estimate

Median HC5: 0.05 µg.L⁻¹
AF of 5 → **EQS of 10 ng/L**

2.1 Ag Project: Next steps – Water Framework Directive

Katrien Arijns

- Currently **insufficient data for SSD**; PMC is performing additional tests
 - 1) 7d higher plant test (*Lemna minor* - OECD 221)
 - 2) 72h bluegreen alga test (*Anabaena flos-aquae* - OECD 201)
 - 3) 48h rotifer test (*Brachionus calyciflorus* - ASTM E1440-91)
 - Results available in June
- PMC commented on **discrepancies between SSD dataset PMC / Sweden**; Sweden will consider comments where possible, but if opposite views are identified these will be highlighted for the SCHEER's consideration
- PNEC < 40 ng/L may have impact on ES
 - Site-specific data old → **exposure data / modelling** to be checked
 - Importance of **bioavailability**

2.1 Ag Project: Status – EOGRTS TP

Katrien Arijs

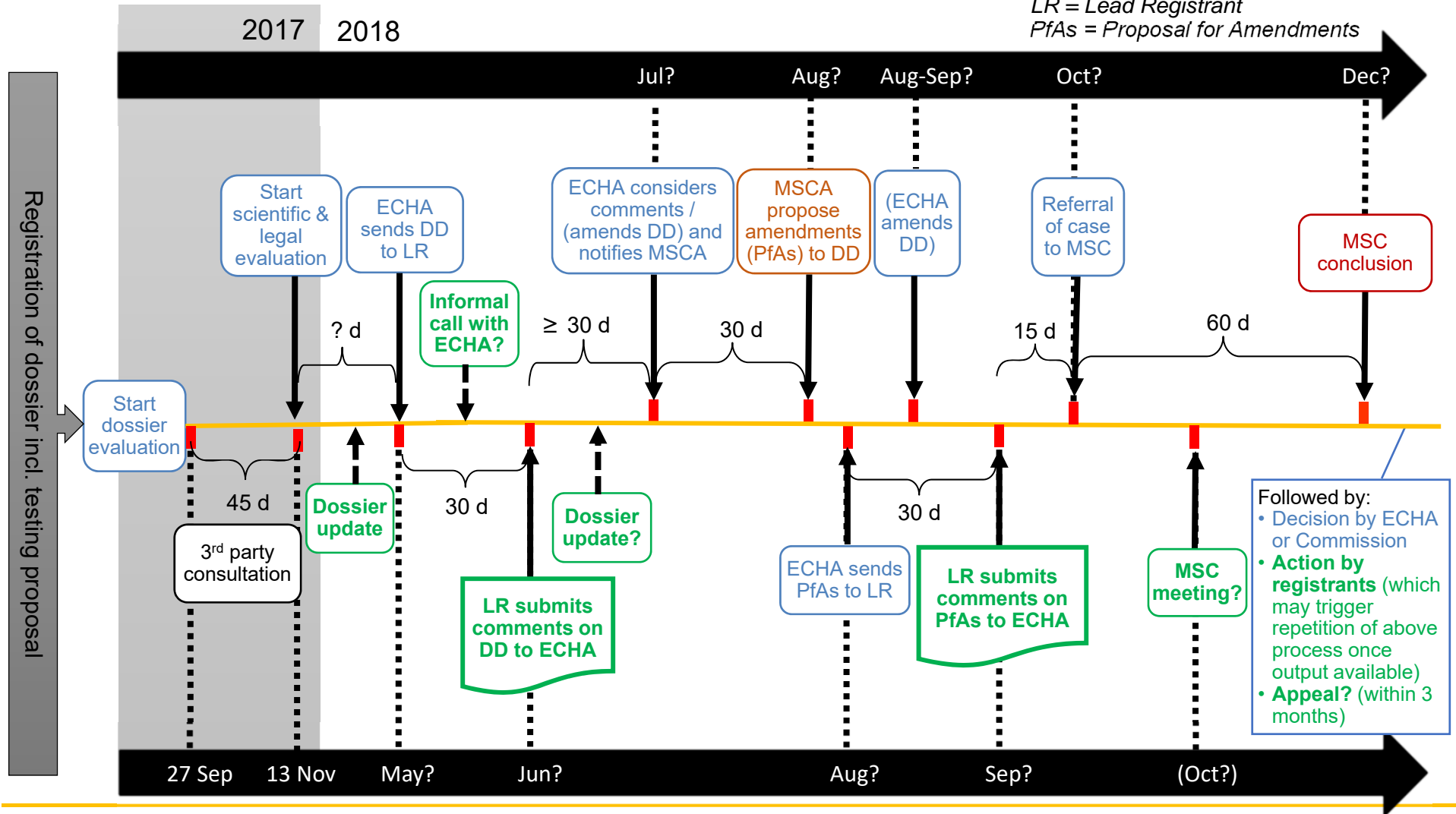
Testing proposal (TP) Extended One-Gen Repro Tox Study (EOGRTS)

- **Data gap** on reprotox → PMC submitted original TP for EOGRTS in 2015
- **Ag reprotox** → shifts in position since 2015:
 - 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
 - Still uncertainty on mode of action (**MoA**)
- Defence of TP key to sector but TP was outdated
- Even if TP accepted: outcome of EOGRTS is highly unpredictable and risk of classification as Repr cat. 1B still exists!

2.1 Ag Project: Status – EOGRTS TP

Katrien Arijs

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



2.1 Ag Project: Key milestones – EOGRTS TP

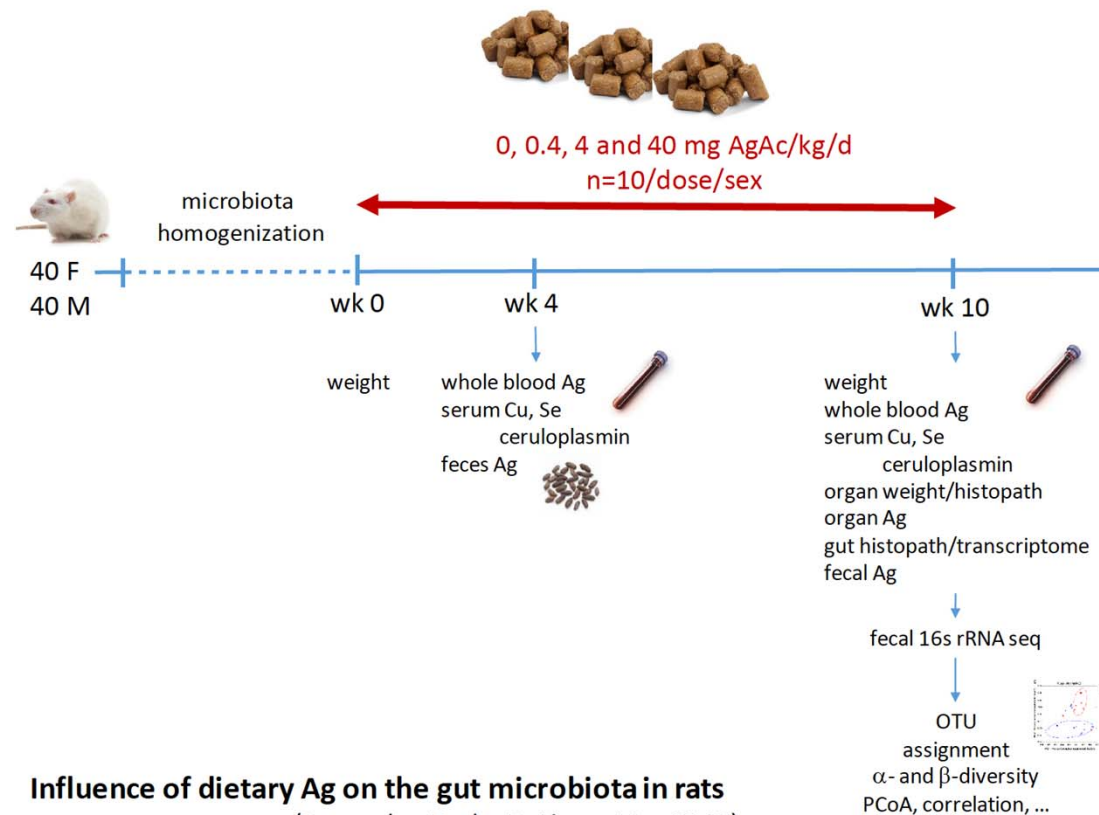
Katrien Arijis

- **Ag strategy doc** drafted to outline advocacy strategy
- Meeting with ECHA 15 March → **TP updated** early April:
 - Addition of recent studies to the TP / registration dossier
 - Addition of developmental immunotoxicity (DIT) cohort to the EOGRTS design
 - Need for enabling studies on the mode of action (MoA) prior to the EOGRTS final dose-setting and study start
 - Revision of dose-setting
- **MoA** enabling work:
 - Indirect effects via **gut microbiome**: strongest leverage point for PMC for questioning the outcomes in recent studies; could also provide argumentation pertinent to classification
 - Effects on **Cu homeostasis**

2.1 Ag Project: Next steps – EOGRTS TP

Katrien Arijns

- Comment on DD as needed
- Start gut microbiome study



2.2 Refinables Project: Status

Vincent Dunon

- **Update substance Identity iUVCB:**
 - Recent UVCB inquiry was successfully submitted to ECHA
 - SID template was well excepted by the ECHA SID unit, advised to reproduce this template when dealing with similar substances
 - Detailed manufacturing process
 - Explain source of variability
 - Clarify origin and variability source materials
 - Provide a typical set of data
 - Intermediates TF meeting/call in June '18

2.2 Refinables Project: Status

Vincent Dunon

- **Current list of Refinable dossiers:**

Name	Tonnage band	Lead Registrant
1.1 Gold Doré	10-100 t/a	TBD
1.2 Silver Doré	>1000 t/a	TBD
2 Matte, PM	100-1000 t/a	Glencore Nikkelverk AS
3.1 Slags, PM refining	>1000 t/a	TBD
3.2 Slags, production of PM containing materials other than doré	>1000 t/a	Umicore
4.1 Slimes , Ag electrolysis	100-1000 t/a	TBD
4.2 Slimes , Au electrolysis	100-1000 t/a	TBD
4.3 Residues from PM leaching and dissolution	> 1000 t/a	TBD
4.4 Precipitates from PM refining	100-1000 t/a	TBD
5.1 Matte leaching residue	>1000 t/a	Umicore
6.1 Ag electrolyte - SCC	>1000 t/a	KGHM
6.2 Au electrolyte - SCC	100-1000 t/a	Aurubis
6.3 Nitric acid solutions from PM leaching and dissolution	TBD	TBD
6.4 Hydrochloric acid solutions from PM leaching and dissolution	TBD	TBD
7 Flue dust, PM refining	100-1000 t/a	Johnson Matthey
8 Residues cementation and reduction, PM refining	100-1000 t/a	Hereaus
9.1 Materials for reclaim, PM with or without support	100-1000 t/a	Johnson Matthey
9.2 Materials for reclaim, PM in bricks, crucibles, trays, ...	100-1000 t/a	Johnson Matthey
9.3 Materials for reclaim, PM production by-products	100-1000 t/a	Johnson Matthey
10.2 Iron bullion, PGM rich	TBD	TBD

2.2 Refinables Project: Status

Vincent Dunon

- **Circular Economy Package:**

- EHS-week: Discussion different challenges and options EU communication document (COM(2018)32)
- **Public consultation:** “tick-box” exercise, estimated timing (was) April 2018
- Broaden the discussion to the whole EPMF consortium

2.2 Refinables Project: Key milestones

Vincent Dunon

- **Updated refinables list**
- **Updated tonnage band**
- Request for Offer sent out to external consultants for update of Environmental and Occupational exposure work.

2.2 Refinables Project: Next steps

Vincent Dunon

- **Substance identification (SID):**
 - Finalisation SID
- **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**

2.3 Au Project: Status

Vincent Dunon

- **Registration completed in March 2018**

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	Registered by LR in February 2018

- **No regulatory pressures**

2.3 Au Project: Key milestones

Vincent Dunon

- **Literature review (nano-)gold:**
 - Environment and fate: ongoing (PMC)
 - Human Health: Request for Offer sent out

2.3 Au Project: Next steps

Vincent Dunon

- Human Health literature review 2018 Q3
- *Ad hoc* dossier updates

2.4 PM CN- Project: Status

Vincent Dunon

- **Registration completed in January 2018**

Dossier	CAS	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	13967-50-5	Registered by LR in January 2018

- **Testing proposals:**

Dossier	Testing Proposal	Submission
KAu(CN) ₂	<i>In vivo</i> genetic toxicity	2016
KAg(CN) ₂	<i>In vivo</i> genetic toxicity	2018

2.4 PM CN- Project: Next steps

Vincent Dunon

- Second opinion on TP genotox of KAgCN_2
- *Ad hoc* dossier updates



PGMs: News

Jelle Mertens

- PGM WG/TE chair: Michael Thiel (BASF, Germany)

NEW: Arno Buthe (Heraeus, Germany) as co-chair

2.5 Ir Project: Status

Jelle Mertens

- REACH Registration of the Ir substances completed in 2016
- No regulatory pressure so far

2.5 Ir Project: Next steps

Jelle Mertens

- Literature review
- **2019:** update 2 dossier from Annex III to Annex VII (incl. data gap filling):
 - Ir metal
 - Diammonium hexachloroiridate

2.6 Pd Project: Status

Maxime Eliat

- REACH Registration of the Pd substances already completed in 2017
- No regulatory pressure yet

2.6 Pd Project: Key milestones

Maxime Eliat

- Expert review of 3 Pd dossiers by DHI started
- Start of the **testing program** to strengthen the registration dossiers
 - **PdO**: investigation of bio-elution and oxidizing properties

STATUS: sample isolation ongoing

- **Pd PNEC refinement**: additional ecotoxicity testing

STATUS: 2 algae tests ongoing with TAPdCl₂ and Pd acac

→ basis to decide on test compounds for further tests

→ Daphnia and ASRIT (*Activated Sludge Respiration Inhibition Assay*) assays will be run afterwards

2.6 Pd Project: Key milestones

Maxime Eliat

- Start of the testing program to strengthen the registration dossiers (*continued*)

- **Mammalian toxicity testing**

- **Na₂PdCl₄:**

- skin sensitisation to replace read-across

STATUS: test ongoing

- repeated dose toxicity & reprotox screening to replace read-across

STATUS: Dose Range Finder (DRF) reporting ongoing

- **TAPdCl₂:** in vitro genetox assay to replace weak studies

STATUS: AMES ongoing

2.6 Pd Project: Key milestones

Maxime Eliat

- Start of the testing program to strengthen the registration dossiers (*continued*)
 - **Mammalian toxicity testing**
 - **Pd acac:** repeated dose toxicity & reprotox screening to replace read-across

STATUS: DRF test ongoing

- **PdCl₂:**

- in vitro genotox assays to replace weak studies

STATUS: AMES & in vitro MLA scheduled for June-July

- repeated dose toxicity & reprotox screening to replace read-across

STATUS: prelim study finalised, DRF test ongoing

2.6 Pd Project: Next steps

Maxime Eliat

- Finalise the testing program and include the test results in the registration dossiers (CSR and IUCLID)
- Update the risk assessments with conclusions from test program (DNEL and PNEC derivation, update exposure scenarios)
- Update/develop RAAF reports
- Update dossiers following expert review
- Continue to review the OFI tracker and improve the quality of the dossiers
- Literature review
- **2019**: update 4 dossiers from Annex III to Annex VII (including data gap filling)

2.7 Pt Project: Status

Maxime Eliat

- REACH Registration of the Pt substances completed in February 2018
- Regulatory pressures:
 - Genotoxicity testing proposals
 - KC EOGRTS testing proposal

2.7 Pt Project: Key milestones

Maxime Eliat

- Start of the testing program to strengthen the registration dossiers

- **Mammalian toxicity testing**

- **PtO₂** (upgrade from Annex III -> VII)

- Skin sensitisation

STATUS: test ongoing

- In vitro genotox (AMES)

STATUS: test ongoing

- **Platinum dinitrate:** repeated dose toxicity & reprotox screening (to replace waiver and fill data gap)

STATUS: DRF test ongoing

2.7 Pt Project: Key milestones

Maxime Eliat

- **Karstedt Concentrate (KC)** dossier update submitted:
 - No comments from Reconsile before the deadline
 - Recent request from Reconsile to review – will be discussed with Tox Experts
- Expert review of 1 dossier by DHI started

2.7 Pt Project: Key milestones

Maxime Eliat

- Testing proposals **in vivo genotoxicity**:
 - **Tetraammine Platinum (TAPt)** read-across discussions with ECHA solved, read-across accepted to be plausible
 - Public consultation for *in vivo* genotoxicity testing proposals ongoing
 - **HHPA/2AE**: question ECHA on SID
 - SID & chemistry clarified, dossier updated by LR end May
 - All Pt TP to be reviewed simultaneously by authorities and treated as a group (no formal confirmation yet, but good cooperation with ECHA staff)

2.7 Pt Project: Next steps

Maxime Eliat

- Finalise the testing program and include the test results in the registration dossiers (CSR and IUCLID)
- Update the risk assessments with conclusions from test program (DNEL derivation, update exposure scenarios)
- Update dossiers following expert review
- Continue to review the OFI tracker and improve the quality of the dossiers
- Literature review
- **2019:** update 1 dossier from Annex III to Annex VII

2.7 Pt Project: Next steps

Maxime Eliat

- Set up the *in vivo* genotox testing program
 - PMC in the driving seat (IPA stepped back)
 - five Pt groups proposed
 - Pro-actively contact labs to be ready once the TP are accepted by ECHA
- KC: monitor TP for EOGRTS + comments from Reconsile

2.8 Rh Project: Status

Jelle Mertens

- REACH Registration of the Rh substances completed in May 2018
- Regulatory pressure:
 - *In vivo* genotoxicity testing proposal water soluble Rh(III) compounds

2.8 Rh Project: Key milestones

Jelle Mertens

- Start of the testing program to strengthen the registration dossiers
 - **Rh₂O₃** (update from annex III -> VII)
 - investigation of oxidizing properties

STATUS: sample isolation ongoing

- **Mammalian toxicity:**

- *In vitro* genotox (AMES)

STATUS: draft report reviewed, no mutagenic potential

- Acute toxicity (oral), skin and eye irritation/corrosion, skin sensitisation

STATUS: sample isolation ongoing

2.8 Rh Project: Key milestones

Jelle Mertens

- Start of the testing program to strengthen the registration dossiers (*continued*)
 - **Rhodium tris(2-ethylhexanoate)** (agreed testing poorly water soluble Rh(III) compounds)
 - *In vitro* genetox (AMES)

STATUS: test ongoing (no indication for mutagenic potential so far)

2.8 Rh Project: Next steps

Jelle Mertens

- Finalise the testing program and include the test results in the registration dossiers (CSR and IUCLID)
- Continue to review the OFI tracker and improve the quality of the dossiers
- Literature review
- Develop + include TP for in vivo genotoxicity for water soluble Rh(III) compounds
- **2019:** update 5 dossiers from Annex III to Annex VII (incl. data gap filling)

2.9 Ru Project: Status

Jelle Mertens

- REACH Registration of the Ru substances completed in February 2018
- No regulatory pressure so far

2.9 Ru Project: Key milestones

Jelle Mertens

- Start of the testing program to strengthen the registration dossiers

- **RuO₂** (update from annex III -> VII)

- **Mammalian toxicity:**

- *In vitro* genetox (AMES)

STATUS: reporting ongoing, no mutagenic potential

- Skin irritation/corrosion

STATUS: test ongoing

- Skin sensitisation

STATUS: test ongoing

2.9 Ru Project: Next steps

Jelle Mertens

- Finalise the testing program and include the test results in the registration dossiers (CSR and IUCLID)
- Continue to review the OFI tracker and improve the quality of the dossiers
- Literature review
- **2019:** update 2 dossiers from Annex III to Annex VII (incl. data gap filling)

2.10 Re Project: Status & key milestones

Katrien Arijs

- All dossiers completed and submitted in 2013 and 2014
- Yearly literature review - no need for updates
- Dirhenium heptasulphide removed from PMC inventory

2.10 Re Project: Next steps

Katrien Arijs

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

2.11 SVHC Roadmap Project: Status

France Capon

- **New chair and co-chair:** Dorothea Steiger (Heraeus) and Paul Ylioja (Johnson Matthey)
- **Inclusion of Pb metal in the Candidate List:** input into consultation
 - ⇒ Potential LAD: Q1 2022!!!
- **Authorisation and impurities/minor constituents** for recovered substances on their own or in mixtures: willingness to address SVHC in substance without listing the substance!
 - ⇒ Important impact on refinables!
- **Articles 58(2):** legal review and advocacy
 - ⇒ Publication of the “The VECCO Case And Beyond, What Uses Can Be Exempted From Authorisation Under Article 58(2) Of The REACH Regulation” by Mayer Brown

2.11 SVHC Roadmap Project: Next steps

France Capon

- **Prioritisation of PbO** into Authorisation: advocacy on article 58(2)

⇒ High risk to be prioritized

- **Listing of Pb** into Candidate List: advocacy on best RMOa: review of the existing OEL since only workplace exposure

⇒ High risk to be listed

- **Impurities/minor constituents in substances and Authorisation:** legal review requested by Eurometaux and advocacy ongoing with ECHA, Member States and Commission

⇒ High priority due to impact on refinables: event to be organized by EPMF in December (btb with GA)

2.12 SEA data gathering Project: introduction

Maxime Eliat

- In **August 2016**, agreed to proactively gather information:
 - Volume/tonnage per use
 - Key socio-economic information
- In November 2016, agreed on the project and the Assembly approved it in **December 2016**
- Learning period for the Secretariat and the companies
- **Spring 2017** start of the data gathering
 - Questionnaires
 - Interviews via phone
- **Beginning 2018** closure of the data gathering phase

2.12 SEA data gathering Project: status

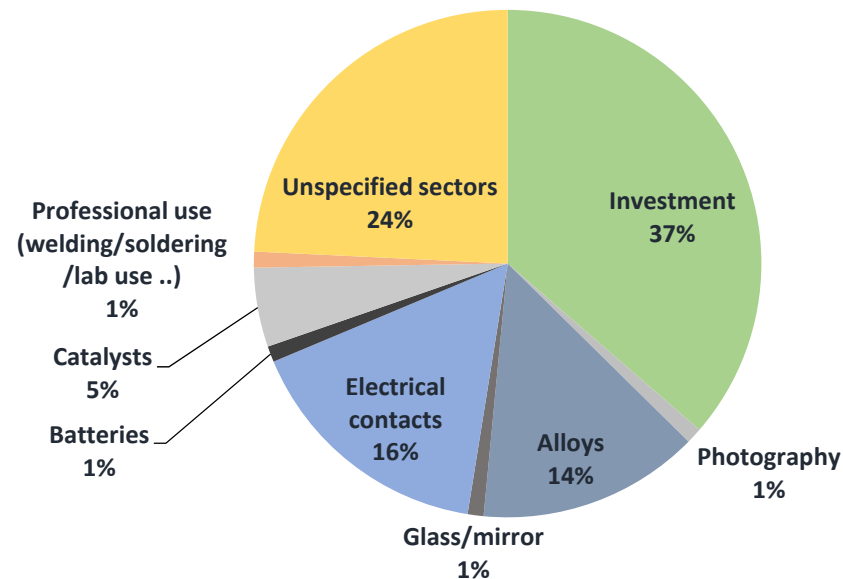
Maxime Eliat

- In **April 2018** the first Info Sheet for silver was circulated to the participating companies.
- Review of the comments currently in progress

2.12 SEA data gathering Project: Examples

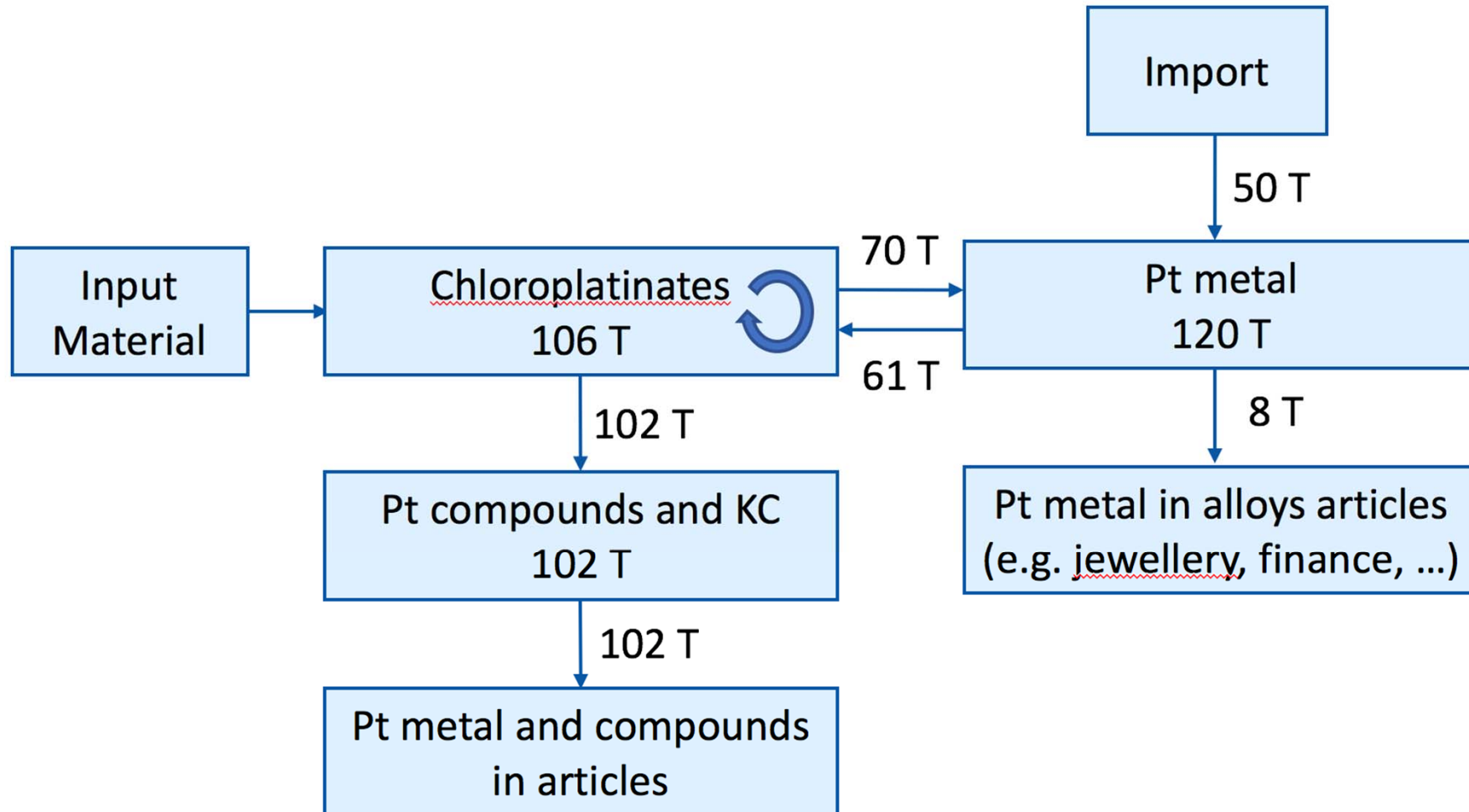
Maxime Eliat

**Distribution of silver and silver compounds
manufactured/imported by PMC members to
the different end sectors**



2.12 SEA data gathering Project: Examples

Maxime Eliat



2.12 SEA data gathering Project: learning lessons

Maxime Eliat

- Time consuming
- Use and exposure titles not always clear
- Some uses are missing in the ES while others are not needed
- Limited coverage for the metals due to distributors/traders
- Not covering companies outside the consortium (LoA, biocides, ...)
- Lawyers not fit for this kind of exercise, too technical

2.12 SEA data gathering Project: next steps

Maxime Eliat

Before summer

- Info Sheets for Pt, Au and PMCN have been drafted and will be circulated soon
- Info Sheets for Pd and Rh are still being drafted
- No Info Sheets will be drafted for Ru and Ir due to the limited number of registrants and low hazard profile of the group

2.12 SEA data gathering Project: next steps

Maxime Eliat

How to improve the exercise?

- Do we need to contact DUs?
- Can we use data available on REACH-IT to fill the gaps and ensure a better representativeness?
- Do we need to update the figures and at what frequency?

Recommendation from the GA?



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3. Closure of the meeting



PMC Assembly Evening

- The delegates will be picked up from the hotel's reception at 18:30 for a guided tour in Liège



- Visit of the Brasserie Curtius and Beer testing



- Dinner at the Brasserie Curtius





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4. Welcome and Introduction

Guy Ethier, Umicore

4.1 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 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.
<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.	



4.2 Tour de table, quorum and apologies

Cf. attendance list

Quorum is reached: 68 % on 6 June

4.3 Approval of the agenda 6 June 2018 (1)

4. Welcome and Introduction

4.1. Confidentiality and Competition Law

4.2. Tour de table, quorum and apologies

4.3. Approval of the agenda

5. PMC finances

5.1. 2017 audited accounts

5.2. 2018 status

6. PMC workplan 2018 : status

7. Data sharing status : REACH LoA

8. Termination of PMC agreement in December 2018

Coffee break

4.3 Approval of the agenda 6 June 2018 (2)

9. EPMF 2019 workplan : focus on the REACH platforms

10. MISA : Metals Sectorial Approach : status and next steps

11. Communication : Knowledge Management System

12. Closing remarks

Closure of the meeting and lunch



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5. PMC Finances

France Capon, EPMF

5.1. 2017 Audited accounts

		2017 Budget to be spent	2017 Budget to be invoiced	Expenses by 31/12/2017	Committed Expenses by 31/12/2017	TOTAL Expenses by 31/12/2017 + Committed	Remaining available budget (2017 budget- Expenses- Committed)	Simulation of 2017 collected money to be added to the reserves
2.1	Administrative costs	€ 617.250	€ 617.250	€ 558.909	€ 64.160	€ 623.069	€ -5.819	€ -5.819
2.2	Ag-applicable costs	€ 897.550	€ 862.550	€ 448.903	€ 72.000	€ 520.903	€ 376.647	€ 376.647
2.3	Au-applicable costs	€ 355.200	€ 201.200	€ 134.280	€ 3.752	€ 138.032	€ 217.168	€ 217.168
2.4	PM CN- -applicable costs	€ 72.700	€ 64.200	€ 84.489	€ 4.172	€ 88.661	-€ 15.961	-€ 15.961
2.5	PGM- applicable costs							
2.5a	Pt-applicable costs	€ 763.900	€ 738.400	€ 398.013	€ 366.094	€ 764.107	€ -207	€ 0
2.5b	Pd-applicable costs	€ 25.200	€ 25.200	€ 51.036	€ 288.833	€ 339.869	-€ 314.669	-€ 1.847
2.5c	Rh-applicable costs	€ 171.050	€ 153.550	€ 130.720	€ 55.495	€ 186.215	-€ 15.165	€ -15.165
2.5d	Ru-applicable costs	€ 501.700	€ 435.200	€ 229.350	€ 50.112	€ 279.462	€ 222.238	€ 222.238
2.5e	Ir-applicable costs	€ 13.850	€ 13.850	€ 13.919	€ 0	€ 13.919	€ -69	€ -69
2.6	Re-applicable costs	€ 7.400	€ 7.400	€ 4.947	€ 2.000	€ 6.947	€ 453	€ 453
2.7	Refinables-applicable costs	€ 772.700	€ 75.200	€ 27.895	€ 0	€ 27.895	€ 744.805	€ 744.805
2.8	SVHC Roadmap-applicable costs	€ 81.250	€ 61.250	€ 20.635	€ 0	€ 20.635	€ 60.615	€ 60.615
2.9	Ag Water Framework Directive costs	€ 100.000	€ 100.000	€ 54.761	€ 45.239	€ 100.000	€ 0	€ 0
	TOTAL	€ 4.379.750	€ 3.355.250	€ 2.157.857	€ 951.858	€ 3.109.715	€ 1.270.035	€ 1.583.064

Overall on track!

5.1. 2017 Audited accounts - comments

Overspent	Underspent
Admin: due to the work on the Knowledge Management Tool which was approved after approval of the budget and for which the Management Committee authorized in March 2017 to use 37.000€ from the reserves.	Ag: due to the fact that the results of the tier 1 nanosilver testing program allowed to skip tier 2 and to update the silver dossier in July 2017.
PM CN: due to additional analytical testing needed for the OECD 422 of Potassium dicyanoargentate. This has been discussed with the WG and approved by the Chair of the PM CN WG	Au: still linked to the reimbursement of the TCA testing study by Covance
Pd costs: seems to be in overspent but the costs used in 2017 have been taken mainly from the PGM horizontal costs that remain from the past cost sharing organization. Overall the costs are on track and only a limited amount has to be taken from the reserves. This additional work required in 2017 (after the registration) was identified and agreed by the WG in October 2017.	
Rh: due to additional work identified on genotoxicity during the course of 2017 and approved by the WG.	Ru: due to the contingency for testing which was not needed.
Ir: due to a slightly higher budget needed for the upgrade of IUCLID 5 files into IUCLID 6 files.	Refinables: due to the continuous discussions on SID and SIP. The amount will be allocated to the reserves which will be the basis of the 2018 work which will be defined in March 2018 by the relevant WG and in the context of the Metals and Inorganics Sectorial approach (MISA)
	SVHC: due to the leave of Marie Görkem and far less human resources allocated than previously budgeted.



5.1. Status of reserves 31 December 2017

- Accounts audited by external auditor
- Accounts reviewed by the Treasurer and Financial controller
- The PMC Management Committee recommends to the PMC GA to recommend to the EPMF GA to approve PMC accounts

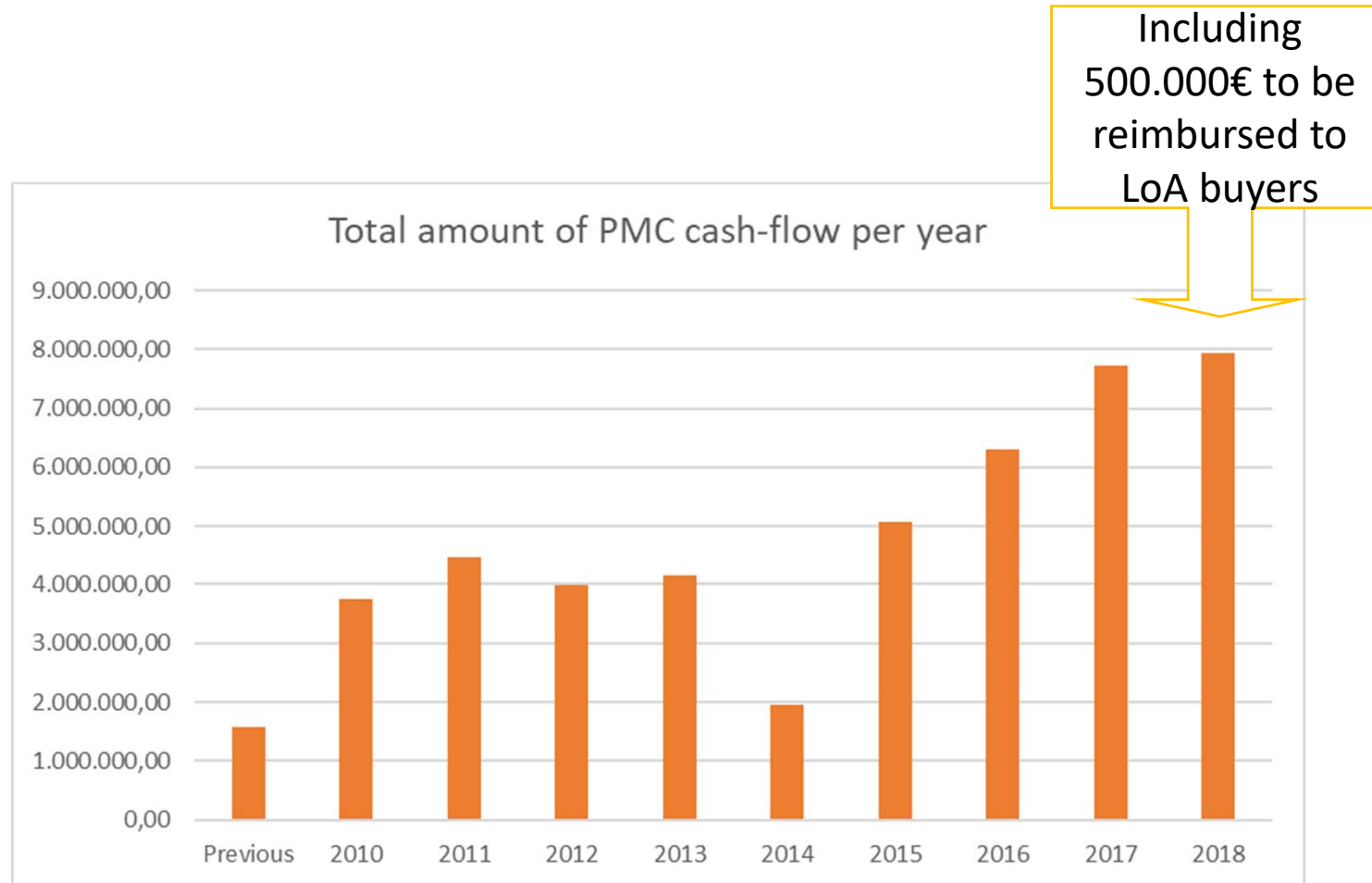
For recommendation to the EPMF GA

	TOTAL Reserves by 31/12/2017 (4)
Administrative costs	312.730 €
REACH Platform costs	6.310.326 €
Ag metal (including nano)	1.227.978 €
Ag compounds	588.337 €
Au metal	251.558 €
Au compounds	46.194 €
Ag cyanide/Potassium dicyanoargentate	184.649 €
Potassium dicyanoaurate	118.234 €
Pt metal	564.116 €
Chloroplatinates	387.866 €
Karstedt	90.292 €
Pt compounds (others)	129.927 €
Pd metal	129.108 €
Pd compounds	24.274 €
Rh metal	100.544 €
Rh III compounds	249.941 €
Rh compounds (others)	125.680 €
Ru metal	227.422 €
Ru compounds	490.818 €
Ir metal	53.938 €
Ir compounds	35.959 €
Re metal & compounds	355.509 €
Refinables	927.982 €
Non-REACH Platform costs	145.514 €
SVHC Roadmap	62.106 €
Silver EQS	0 €
Hydrazine	83.408 €
GRAND TOTAL	6.768.569 €

5.1. Estimated reserves End of 2018

	End 2018 estimated reserves				
	Use of reserves for 2018 budget (5)	LoA sold in 2018 (draft) (6)	Past dues invoiced and cashed in in 2018 (draft) (7)	LtU sold in 2018 (draft) (8)	TOTAL Estimation reserves end 2018 (9)
Administrative costs					312.730 €
REACH Platform costs	226.075 €	1.115.082 €	159.049 €	0 €	7.358.381 €
Ag metal (including nano)		377.895 €	44.394 €		1.650.267 €
Ag compounds		27.392 €	50.252 €		665.981 €
Au metal	48.258 €	114.785 €			318.086 €
Au compounds					46.194 €
Ag cyanide/Potassium dicyanoargentate					184.649 €
Potassium dicyanoaurate					118.234 €
Pt metal	10.264 €	173.347 €			727.199 €
Chloroplatinates					387.866 €
Karstedt		55.540 €			145.832 €
Pt compounds (others)		97.432 €	44.975 €		272.334 €
Pd metal	10.097 €	118.919 €			237.930 €
Pd compounds		32.640 €			56.914 €
Rh metal	8.020 €				92.524 €
Rh III compounds					249.941 €
Rh compounds (others)					125.680 €
Ru metal	9.627 €				217.795 €
Ru compounds	55.773 €				435.045 €
Ir metal	6.180 €				47.758 €
Ir compounds					35.959 €
Re metal & compounds	22.325 €	117.132 €			450.316 €
Refinables	55.531 €		19.428 €		891.878 €
Non-REACH Platform costs	0 €	0 €	0 €		272.500 €
SVHC Roadmap					62.106 €
Silver EQS					0 €
Hydrazine					83.408 €
Chemicals/waste/products Roadmap					
Occupational Health					
Water framework directive and PGMS					
Responsible sourcing					
Tax					
Communication & advocacy platform					126.986 €
GRAND TOTAL	226.075 €	1.115.082 €	159.049 €	0 €	7.943.611 €

5.1. History of reserves: 2007-2018



5.2. 2018 accounts – status Q1 2018

	2018 Approved Budget	Committed by 31/12/2017	2018 Cash-out (Approved Budget + Committed by 31/12/2017)	Expenses by 31/03/2018	2018 Committed Expenses	TOTAL Expenses by 31/03/2018 + 2018 Committed	Remaining available cash-out (2018 budget-Expenses-2018 Committed)	2018 Invoiced Budget
Administrative costs	€ 601.700	€ 64.160	€ 665.860	€ 125.698	€ 254.320	€ 380.018	€ 285.842	€ 601.700
Ag metal (including nano)	€ 937.603	€ 43.000	€ 980.603	€ 19.860	€ 110.969	€ 130.829	€ 849.774	€ 937.603
Ag compounds	€ 954.103	€ 29.000	€ 983.103	€ 20.502	€ 106.284	€ 126.786	€ 856.318	€ 954.103
Au metal	€ 48.258	€ 0	€ 48.258	€ 611	€ 8.706	€ 9.317	€ 38.941	€ 0
Au compounds	€ 37.008	€ 3.752	€ 40.760	€ 1.389	9.966 €	€ 11.355	€ 29.406	€ 37.008
Ag cyanide/Potassium dicyanoargentate	€ 14.255	€ 4.172	€ 18.427	€ 1.529	€ 7.628	€ 9.157	€ 9.271	€ 14.255
Potassium dicyanoaurate	€ 106.010	€ 0	€ 106.010	€ 682	€ 11.465	€ 12.147	€ 93.863	€ 106.010
Pt metal	€ 10.264	€ 0	€ 10.264	€ 445	€ 2.721	€ 3.166	€ 7.098	€ 0
Chloroplatinates	€ 59.927	€ 0	€ 59.927	€ 2.899	€ 22.786	€ 25.685	€ 34.242	€ 59.927
Karstedt	€ 50.047	€ 0	€ 50.047	€ 1.064	€ 16.676	€ 17.740	€ 32.307	€ 50.047
Pt compounds (others)	€ 296.393	€ 366.094	€ 662.487	€ 11.958	€ 273.201	€ 285.159	€ 377.328	€ 296.393
Pd metal	€ 10.097	€ 0	€ 10.097	€ 209	€ 3.255	€ 3.464	€ 6.633	€ 0
Pd compounds	€ 700.001	€ 288.833	€ 988.834	€ 27.599	€ 902.944	€ 930.543	€ 58.291	€ 700.001
Rh metal	€ 8.020	€ 0	€ 8.020	€ 0	€ 1.770	€ 1.770	€ 6.250	€ 0
Rh III compounds	€ 203.740	€ 55.495	€ 259.235	€ 12.133	€ 74.707	€ 86.840	€ 172.395	€ 203.740
Rh compounds (others)	€ 26.140	€ 0	€ 26.140	€ 1.955	€ 10.435	€ 12.390	€ 13.750	€ 26.140
Ru metal	€ 9.627	€ 0	€ 9.627	€ 209	€ 1.770	€ 1.979	€ 7.648	€ 0
Ru compounds	€ 55.773	€ 50.112	€ 105.885	€ 5.561	€ 40.740	€ 46.301	€ 59.584	€ 0
Ir metal	€ 6.180	€ 0	€ 6.180	€ 388	€ 792	€ 1.180	€ 5.000	€ 0
Ir compounds	€ 27.620	€ 0	€ 27.620	€ 388	€ 10.232	€ 10.620	€ 17.000	€ 27.620
Re metal & compounds	€ 22.325	€ 2.000	€ 24.325	€ 2.271	€ 3.453	€ 5.724	€ 18.601	€ 0
Refinables	€ 55.531	€ 0	€ 55.531	€ 7.701	€ 30.936	€ 38.637	€ 16.894	€ 0
SVHC Roadmap	€ 28.600	€ 0	€ 28.600	€ 2.700	€ 25.900	€ 28.600	€ 0	€ 28.600
Silver EQS	€ 20.000	€ 45.239	€ 65.239	€ 6.696	€ 29.260	€ 35.956	€ 29.283	€ 20.000
TOTAL	€ 4.289.224	€ 951.858	€ 5.241.082	€ 254.447	€ 1.960.916	€ 2.215.363	€ 3.025.719	€ 4.063.149



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6. PMC Workplan 2018: status

France Capon, EPMF

PMC Workplan 2018 : highlights



- SEv – waiting for outcome
- EQS: additional ecotox testing ongoing
- EOGRTs Testing Proposal (TP): DD expected soon



- Review of Substances Identification
- New effects and exposure assessments



- Litt review



- *In vivo* genotox TP: public consultation to be started



PMC Workplan 2018 : highlights



- Testing program on HH and envi to improve registration dossiers



- *In vivo* genotox TP: grouping approach
- EOGRTs TP for KC: public consultation to be started



- Testing program on HH
- *In vivo* genotox TP to be submitted for soluble Rh compounds



- Testing program HH



- Phys-chem testing



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7. Data-Sharing status

France Capon, EPMF



Data Sharing Status : REACH sold LoA in 2018

	Number of sold LoA's
Ag metal	12
Ag nitrate	1
Au metal	3
Pt metal	3
Karstedt concentrate	1
Pt dioxide	2
Pd metal	4
Pd monoxide	1
Re metal	2
Ammonium perrhenate	1
TOTAL	30

Last minute: in the meantime we've sold 10 additional LoAs (3 for Ag, 1 for Re, 2 for APR, 2 for Pt, 1 for Pd and 1 for Au) and some others are still ongoing.

Data Sharing Status : REACH LoA overview

Sold LoA overview between 2010 - April 2018 (update 03/05/2018)

	TOTAL 2010-2013		2016		2017		2018		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 €	Nb of sold LoA's	Total in €
Admin fees		808.500,00		Included		Included		Included		808.500,00
Ag	27	741.125,00	0	75.152,00	13	609.502,00	13	405.287,00	53	1.831.066,00
Ag metal	16	390.000,00	Updates	24.802,00	10	471.111,50	12	377.895,00	38	1.263.808,50
Ag nitrate	1	125,00	Updates	6.387,00	1	51.215,00	1	27.392,00	3	85.119,00
Disilver oxide	2	28.500,00	Updates	24.802,00	Updates	1.994,50			2	55.296,50
Ag chloride	4	276.500,00	Updates	6.387,00	1	42.590,50			5	325.477,50
Ag iodide	2	16.000,00	Updates	6.387,00					2	22.387,00
Ag bromide	2	30.000,00	Updates	6.387,00	1	42.590,50			3	78.977,50
Au	0	0	1	30.970,00	0	0	3	114.785,00	4	145.755,00
Au metal			1	30.970,00			3	114.785,00	4	145.755,00
Pt	0	0	0	0	3	166.620,00	6	326.319,00	9	492.939,00
Pt metal					2	111.080,00	3	173.347,00	5	284.427,00
Karstedt concentrate					1	55.540,00	1	55.540,00	2	111.080,00
Pt dioxide							2	97.432,00	2	97.432,00
Pd	0	0	0	0	4	50.791,00	5	151.559,00	9	202.350,00
Pd metal					2	25.395,50	4	118.919,00	6	144.314,50
Pd monoxide					1	24.325,50	1	32.640,00	2	56.965,50
Disodium tetrachloropalladate					1	1.070,00			1	1.070,00
Refinables	6	63.000,00	0	0	0	0	0	0	6	63.000,00
Slags, PM metal	2	21.000,00							2	21.000,00
Flue dust, Ag refining	1	10.500,00							1	10.500,00
Waste solids, PM refining	1	10.500,00							1	10.500,00
Doré	1	10.500,00							1	10.500,00
Slimes and sludges	1	10.500,00							1	10.500,00
Rhenium	0	0	0	0	4	154.940,00	3	117.132,00	7	272.072,00
Re metal					3	121.398,00	2	80.431,50	5	201.829,50
Ammonium perrenate					1	33.542,00	1	36.700,50	2	70.242,50
TOTAL	33	1.612.625,00	1	106.122,00	24	981.853,00	30	1.115.082,00	88	3.815.682,00

LoA: Post-2018 deadline actions

- During summer 2018: recalculation of the LoA costs for all substances taking into account all co-registrants
- Potential reimbursement or re invoicing of LoA purchasers to be discussed with the Board in November 2018
- Q3-Q4 2018: review of the LoA costs and especially the allocation of the administrative costs by the PMC Cost Sharing WG and the EPMF Board
- Q1 2019: Calculation of 2019 LoA costs taking into account the real costs for 2018 and the outcome of the Board regarding the administrative costs



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8. Termination of PMC agreement in December 2018

France Capon, EPMF

Termination of PMC agreement in December 2018

- Article 9.2.: This Agreement (as may be updated from time to time pursuant to a decision of the Assembly in accordance with Article 4.1.6.1 (b)) shall remain in full force and effect until the Consortium has achieved its purposes as per Article 2, or until terminated by decision of the Assembly as per Article 4.1.2 (m).
- Article 4.1.2. (m): The (Sub-)Assembly shall, within the budget and operational remit, take the necessary decisions related to the Consortium, its objectives and activities and shall in this regard, particularly, but not exclusively, come to a decision on proposal to end the Consortium and terminate this Consortium Agreement, provided that the Consortium has achieved its purposes as per Article 2.
- Decisions related to points (a), (b), (c), (d), (e), (f), (g), (h), (i), (j), (l) and (m) of Article 4.1.2 which shall be taken by a qualified majority of 2/3 (two-thirds) of the Members of the Assembly present or represented at a meeting.

The Management Committee recommends to the Assembly to terminate the PMC agreement in December 2018.

For approval





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9. EPMF 2019 workplan : focus on the REACH platforms

France Capon, EPMF

EPMF 2019 workplan - Focus on the REACH platforms

	2019 DRAFT Budget	FTE
Administrative costs	674.200 €	1,9
Salaries and salary-related costs	250.700 €	
Office costs	130.000 €	
Meeting, travel and accommodation costs	60.000 €	
External costs	233.500 €	

EPMF 2019 workplan

Focus on the REACH platforms

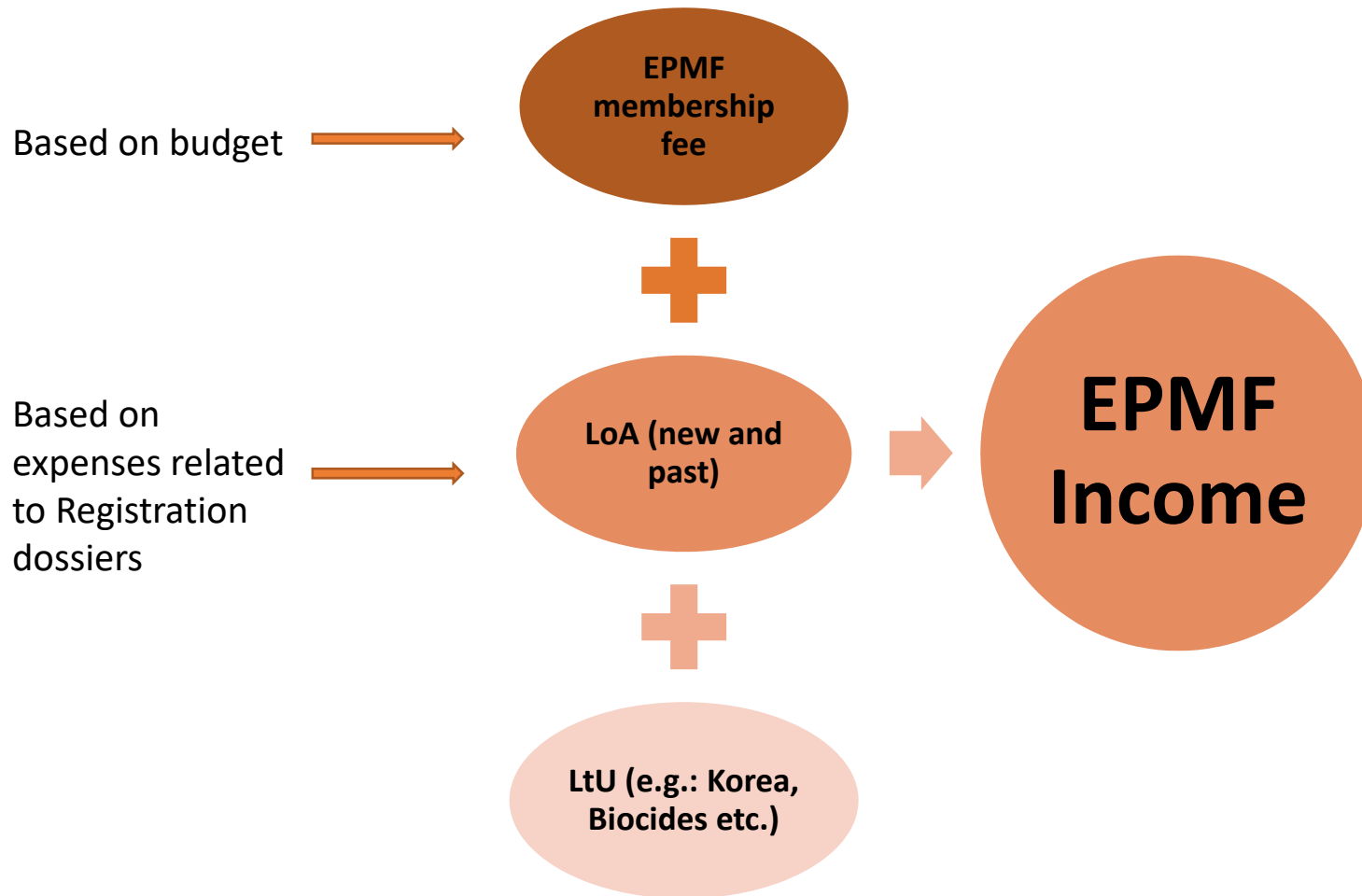
	2019 DRAFT Budget	FTE
REACH Platform costs	3.604.991 €	3,73
Ag metal (including nano)	137.071 €	0,50
Ag compounds	178.071 €	0,50
Au metal	22.927 €	0,05
Au compounds	47.997 €	0,10
Ag cyanide/Potassium dicyanoargentate	154.997 €	0,10
Potassium dicyanoaurate	33.000 €	0,05
Pt metal	21.157 €	0,04
Chloroplatinates	271.788 €	0,20
Karstedt	851.788 €	0,20
Pt compounds (others)	404.088 €	0,30
Pd metal	21.157 €	0,04
Pd compounds	257.048 €	0,40
Rh metal	21.157 €	0,04
Rh III compounds	219.088 €	0,30
Rh compounds (others)	178.788 €	0,20
Ru metal	21.157 €	0,04
Ru compounds	60.629 €	0,08
Ir metal	26.157 €	0,04
Ir compounds	67.157 €	0,04
Re metal & compounds	7.209 €	0,01
Refinables	602.558 €	0,50

EPMF 2019 workplan

Full overview

EPMF 2019			
	2019 DRAFT Budget	2019 Amount to be invoiced	FTE
Administrative costs	674.200 €	0 €	1,9
REACH Platform costs	3.604.991 €	0 €	3,73
Ag metal (including nano)	137.071 €		0,50
Ag compounds	178.071 €		0,50
Au metal	22.927 €		0,05
Au compounds	47.997 €		0,10
Ag cyanide/Potassium dicyanoargentate	154.997 €		0,10
Potassium dicyanoaurate	33.000 €		0,05
Pt metal	21.157 €		0,04
Chloroplatinates	271.788 €		0,20
Karstedt	851.788 €		0,20
Pt compounds (others)	404.088 €		0,30
Pd metal	21.157 €		0,04
Pd compounds	257.048 €		0,40
Rh metal	21.157 €		0,04
Rh III compounds	219.088 €		0,30
Rh compounds (others)	178.788 €		0,20
Ru metal	21.157 €		0,04
Ru compounds	60.629 €		0,08
Ir metal	26.157 €		0,04
Ir compounds	67.157 €		0,04
Re metal & compounds	7.209 €		0,01
Refinables	602.558 €		0,50
Non-REACH Platform costs	72.300 €	0 €	0,3
SVHC Roadmap	17.300 €		0,10
Silver EQS	0 €		
Chemicals/waste/products Roadmap	10.000 €		0,05
Occupational Health	10.000 €		0,05
Water framework directive and PGMS	0 €		
Responsible sourcing	10.000 €		0,05
Tax	0 €		
Communication & advocacy platform	25.000 €		0,05
GRAND TOTAL	4.351.491 €	0 €	5,93

EPMF income: post 2018



EPMF 2019 workplan - Focus on the REACH platforms

Silver metal Platform	
Manager: Katrien Arijs	2019 Budget: 137.071€
Mandate: The silver metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the silver dossier • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification. 	HR: 0,5 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Update of the HH and Envi RAAF (Read Across Assessment Framework) • EOGRTs testing and interpretation if TPs is accepted • Update of the CSR • Advocacy on CLH in biocides for silver active substances 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • The main challenge for silver and silver compounds will be the EOGRTs program and the potential consequences on the reprotox classification of silver. A strategy has been developed and is updated on a regular basis to address it taking into account the consequences on the silver market should this be considered as a reprotox cat 2 or 1B. 	



EPMF 2019 workplan - Focus on the REACH platforms

Silver compounds Platform	
Manager: Katrien Arijns	2019 Budget: 178.071€
Mandate: The silver compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the silver compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,5 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Update of the HH and Envi RAAF (Read Across Assessment Framework) • EOGRTs testing and interpretation of TP is accepted • Update of the CSR • Advocacy on CLH in biocides for silver active substances 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • The main challenge for silver and silver compounds will be the EOGRTs program and the potential consequences on the reprotox classification of silver. A strategy has been developed and is updated on a regular basis to address it taking into account the consequences on the silver market should this be considered as a reprotox cat 2 or 1B. 	



EPMF 2019 workplan - Focus on the REACH platforms

Gold Metal Platform	
Manager: Vincent Dunon	2019 Budget: 22.927€
Mandate: The gold metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the gold dossier • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,05 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Update of the dossiers (if necessary) 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • The increasing attention on nanos could trigger some challenges for the gold dossier in case of nanogold would be identified in the membership production. 	



EPMF 2019 workplan - Focus on the REACH platforms

Gold compounds Platform	
Manager: Vincent Dunon	2019 Budget: 47.997€
Mandate: The gold compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the gold compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,1 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Update of uses and ES • Testing of self-ignition for the Balsams dossier to replace weak waiver • Update of the dossiers 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • No immediate challenge identified so far. 	



EPMF 2019 workplan - Focus on the REACH platforms

Silver cyanide/Potassium dicyanoargentate Platform	
Manager: Vincent Dunon	2019 Budget: 154.997€
Mandate: The silver cyanides platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the silver cyanides dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,1 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Testing on mutagenicity (if TPs approved by ECHA) • Update of the dossiers 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges. 	



EPMF 2019 workplan - Focus on the REACH platforms

Potassium dicyanoaurate Platform	
Manager: Vincent Dunon	2019 Budget: 33.000€
Mandate: The gold cyanide platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the potassium dicyanoaurate dossier • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,05 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Testing on mutagenicity (if TPs approved by ECHA) 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges. 	



EPMF 2019 workplan - Focus on the REACH platforms

Platinum Metal Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 21.157€
Mandate: The platinum metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the platinum dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenge identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Chloroplatinates Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 271.788€
Mandate: The Chloroplatinates platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the chloroplatinates dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,2 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Dossier updates based on peer review by external experts • Genotoxicity testing program • Review of the shadow RMOas and potential advocacy activities in case of selection of CIPTs by ACROSS 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • Due to harmonized classification, the CIPTs could be screened in 2019 to be considered for further regulatory actions. • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges. 	



EPMF 2019 workplan - Focus on the REACH platforms

Karstedt Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 851.788€
Mandate: The Karstedt platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the Karstedt dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,2 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Review phys-chem section• EOGRTS (if TP approved by ECHA)• To conduct the testing program on reprotox. The next challenge could be a consequence on the classification and related regulatory challenges.	



EPMF 2019 workplan - Focus on the REACH platforms

Platinum compounds (others) Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 404.088€
Mandate: The platinum compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the platinum compounds dossiers• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,3 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review• Upgrade tetraammineplatinum dichloride from Annex III exempted dossier to Annex VII dossier.• Update of the read-across justification documents for ENV and HH• Genotoxicity testing program• Update of the dossiers	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.	



EPMF 2019 workplan - Focus on the REACH platforms

Palladium Metal Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 21.157€
Mandate: The palladium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the palladium dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenge identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Palladium compounds Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 257.048€
Mandate: The palladium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the palladium dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,4 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Upgrade palladium(II) acetate, tetraamminepalladium(II) nitrate, tetraamminepalladium(II) dihydroxide and palladium sulphate from Annex III exempted dossiers to Annex VII dossiers. • Update of the read-across justification documents for ENV and HH • Dossier updates based on peer review by external experts • Revision PNEC report • Update of the dossiers 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • No immediate challenge identified so far. 	



EPMF 2019 workplan - Focus on the REACH platforms

Rhodium Metal Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 21.157€
Mandate: The rhodium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the rhodium dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenge identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Rhodium III compounds Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 219.088€
<p>Mandate:</p> <p>The rhodium III compounds platform is related to the following obligations related to the REACH Implementation:</p> <ul style="list-style-type: none"> • Maintenance of the rhodium III compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,3 FTE
<p>Main tasks in 2019</p> <ul style="list-style-type: none"> • Literature review • Upgrade rhodium trichloride and dirhodium trisulphate from Annex III exempted dossiers to Annex VII dossiers. • Create the read-across justification documents for ENV and HH • In vivo mutagenicity testing (if TP approved by ECHA) • Update of the dossiers 	
<p>Potential challenges in 2019 and beyond</p> <ul style="list-style-type: none"> • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges. 	



EPMF 2019 workplan - Focus on the REACH platforms

Rhodium compounds (others) Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 178.788€
Mandate: The rhodium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the rhodium compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,2 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Upgrade dicarbonylpentane-2,4-dionato-O,O')rhodium, carbonyl(pentane-2,4-dionato-O,O')(triphenylphosphine)rhodium, tris(triphenylphosphine)rhodium(I) chloride from Annex III exempted dossiers to Annex VII dossiers. • Create the read-across justification documents for ENV and HH • Update of the dossiers 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • No immediate challenges identified so far. 	



EPMF 2019 workplan - Focus on the REACH platforms

Ruthenium Metal Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 21.157€
Mandate: The ruthenium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the ruthenium dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenges identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Ru compounds Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 60.629€
Mandate: The ruthenium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the ruthenium compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,08 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Literature review • Upgrade ruthenium acetate and tris(nitrato-O)nitrosylruthenium from Annex III exempted dossiers to Annex VII dossiers. • Create the read-across justification document for ENV • Update of the dossiers 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • No immediate challenges identified so far. 	



EPMF 2019 workplan - Focus on the REACH platforms

Iridium Metal Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 26.157€
Mandate: The iridium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the iridium dossier• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review• Upgrade of the dossier from Annex III exempted dossier to Annex VII dossier.	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenges identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Iridium compounds Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 67.157€
Mandate: The iridium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the iridium compounds dossiers• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,04 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review• Upgrade of diammonium hexachloroiridate from Annex III exempted dossier to Annex VII dossier.	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenges identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Rhenium metal and compounds Platform	
Managers: Katrien Arijns	2019 Budget: 7.209€
Mandate: The rhenium platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none">• Maintenance of the rhenium and rhenium compounds dossiers• Dossier and/or Substance Evaluation (if relevant)• Restriction (if relevant)• Authorisation (if relevant)• Harmonized classification	HR: 0,01 FTE
Main tasks in 2019 <ul style="list-style-type: none">• Literature review	
Potential challenges in 2019 and beyond <ul style="list-style-type: none">• No immediate challenges identified so far.	



EPMF 2019 workplan - Focus on the REACH platforms

Refinables Platform	
Managers: Vincent Dunon	2019 Budget: 602.558€
Mandate: The refinables platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> • Maintenance of the refinables dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification 	HR: 0,5 FTE
Main tasks in 2019 <ul style="list-style-type: none"> • Testing of phys-chem data gaps for split dossiers • T/D testing for updating the classification • Updating of the CSR including combined toxicity • Update of the dossiers based on the outcome of the MISA discussion on UVCB 	
Potential challenges in 2019 and beyond <ul style="list-style-type: none"> • The challenges are numerous: <ul style="list-style-type: none"> ○ the methodology used for the RA of the refinables could be challenged by ECHA requiring additional (validation) testing ○ the SID remains an uncertain area ○ the “substance in substance” approach promoted by Member States to tackle SVHC in substances ○ the lack of consistency between Circular Economy and Chemicals policy. 	





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10. MISA : Metals Sectorial Approach : status and next steps

France Capon, EPMF

MISA: background

2010 EU 7th Environmental Action Program

2018 EU Non-Toxic Environment Strategy

2020 SAICM 2020

2030 UN Sustainable Development Goal

2050

**TOWARDS
A NON-TOXIC
FUTURE**

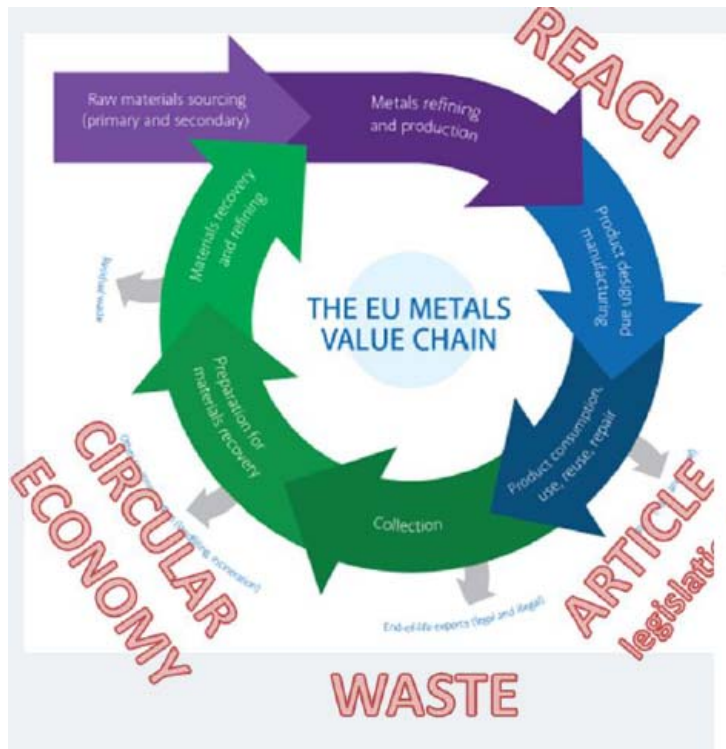
Handing chemical risks across consumer products, environment and food



SUSTAINABLE DEVELOPMENT GOALS
17 GOALS TO TRANSFORM OUR WORLD

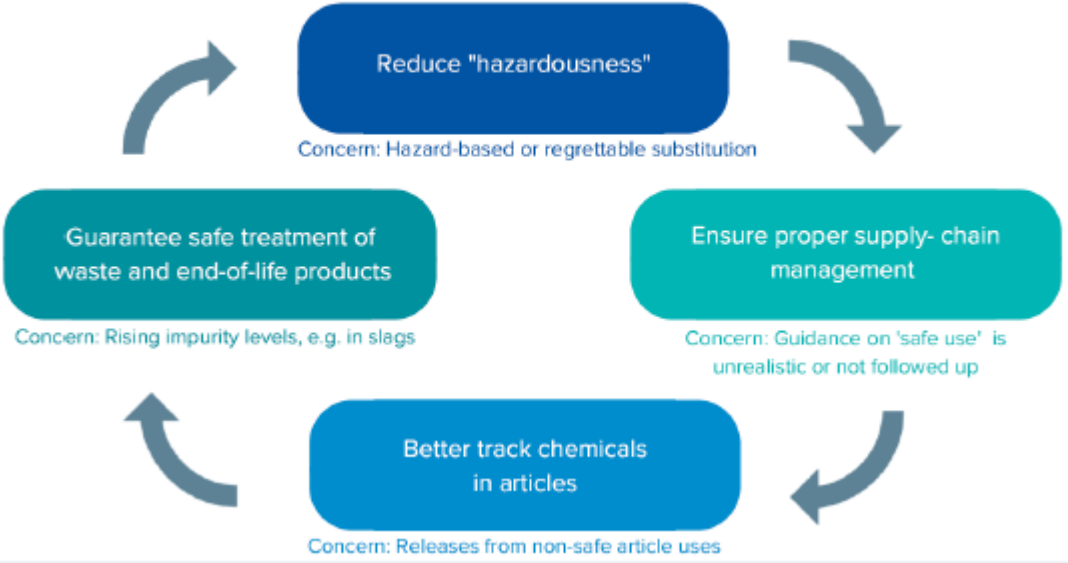


MISA: background



Important trends: closing the loop and non-toxic environment

Address all concerns with chemical substances



MISA: background

The concept: Continuous improvement of chemicals management according to defined and agreed priorities



MISA: two tracks

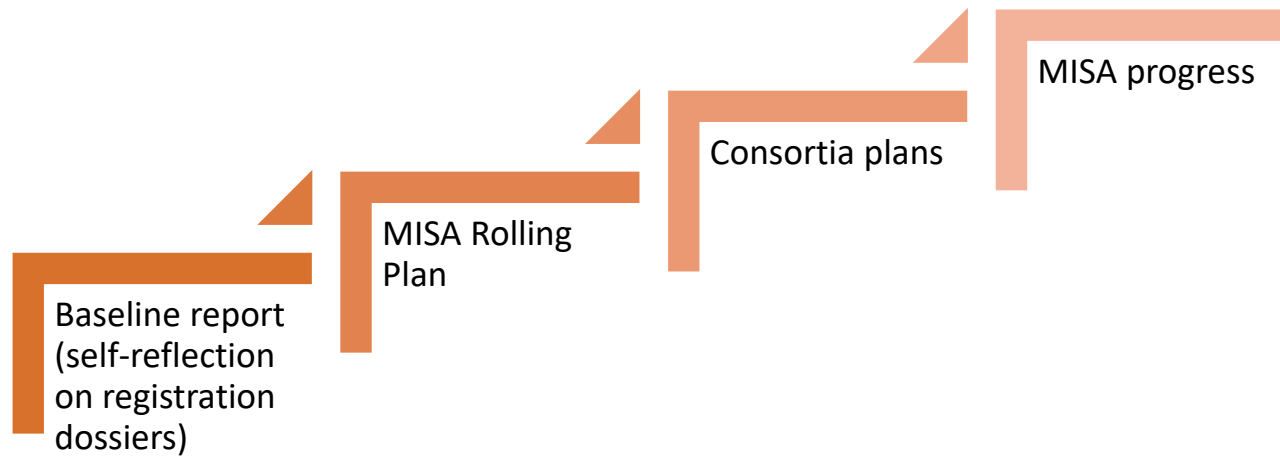
Track 1

- A gradual and planned improvement of the overall quality and structure of the metals chemicals management files

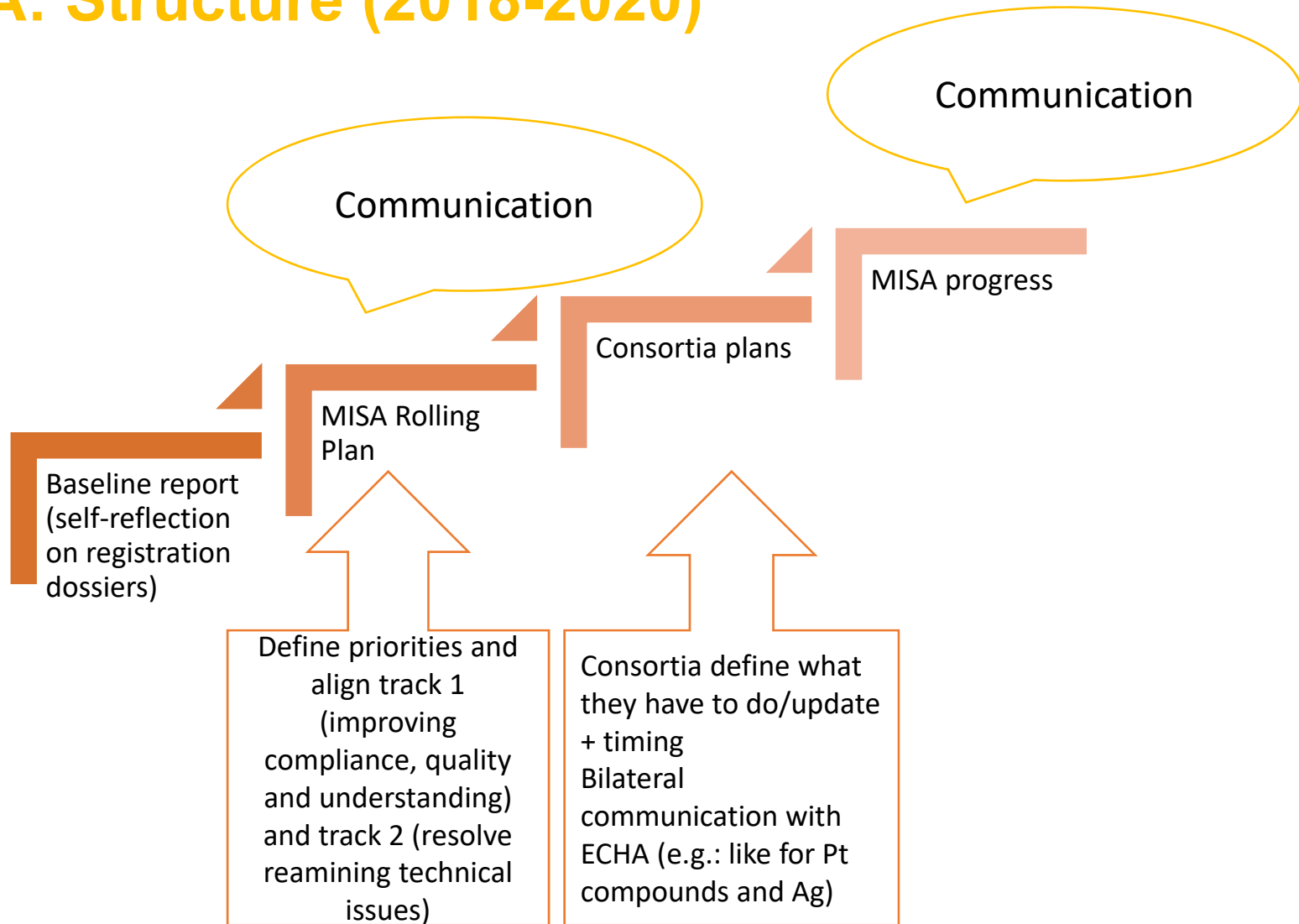
Track 2

- A program to resolve outstanding technical and methodological issues that allows improving the relevance of RA and RM of metals and inorganics

MISA: Structure (2018-2020)



MISA: Structure (2018-2020)



MISA: benefits for EPMF to join the initiative



Increasing importance of Chemicals Management in corporate values



REACH is an instrumental tool to meet international objectives for ECHA and companies



Precious Metals industry invested tremendous resources the past 10 years in REACH registration: need to be maintained, improved, used and valorized!



Open an collaborative dialogs with ECHA (and MS) proofed already its efficiency and efficacy (e.g.: Pt genotox, Ag evaluation, Ag testing proposal)

MISA: next steps

- By 15 June 2018:
 - Signature of the MISA Framework of cooperation by stakeholders (ECHA, Consortia/commodities, Eurometaux)
 - Approval of the rolling plan
- 2nd October 2018: Workshop on Effects endpoints (HH)
- 7th February 2019: Workshop on Effects endpoints (Envi)

The PMC Management Committee strongly recommends to the GA to approve the signature of the MoU and get involved into MISA



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11. Communication : Knowledge Management System

Cathy Martin, EPMF

Knowledge Management System - Aims

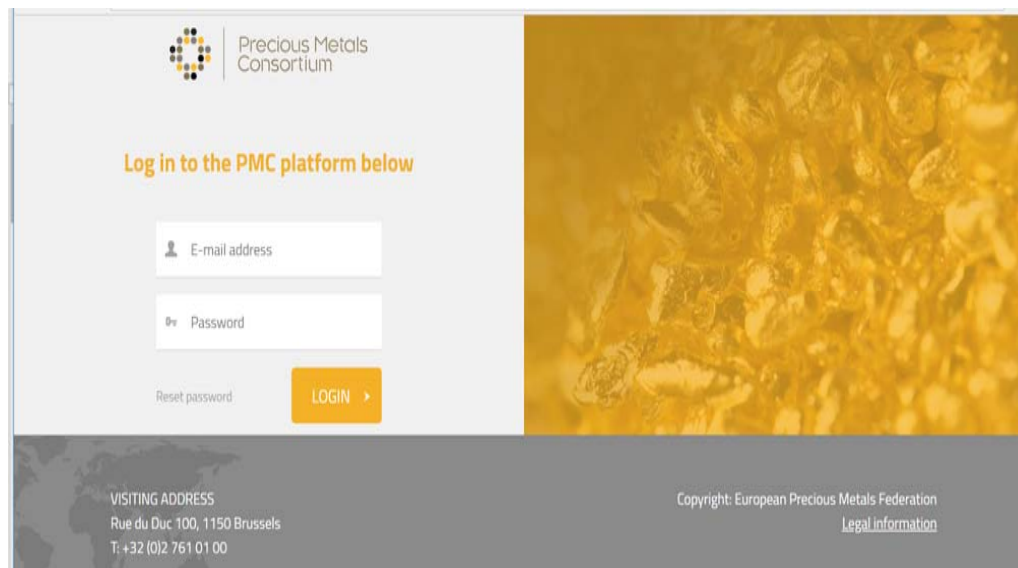
- System to archive data in a user-friendly format for
 - the PMC Secretariat (*change of staff, archiving*)
 - the Member Companies (*access limited to data related to the substances in the portfolio*)
- Two types of documents
 - Horizontal (*meeting minutes & prep docs, SVHC WG, ...*)
 - Vertical (*studies, IUCLID, CSR, RMOA, RA*), limited to substances (group) in scope

Knowledge Management System

- Already available:
 - Studies :
 - *Platinum and compounds*
 - *Iridium and compounds*
 - *Palladium and compounds*
 - *Rhodium and compounds are ongoing*
 - Newsletters : PMC Reach News, ECHA Newsletters, Eurometaux Chemicals Management News
- Work to be continued with the upload of studies, scientific publications, scientific interpretations, REACH registration dossiers, regulatory actions, and meeting documents
- Passwords will be sent soon to all members with user start-up guide

Knowledge Management System – User Start-up guide

- EPMF invitation email (subject “accept your invite”) - Click on “here” to accept the invite and get instructions to generate password
- For the future login : Homepage: <http://kms.epmf.be>

The image shows a screenshot of the EPMF login interface. At the top left is the EPMF logo and the text 'Precious Metals Consortium'. Below this, the text 'Log in to the PMC platform below' is displayed. There are two input fields: 'E-mail address' and 'Password'. A 'Reset password' link is located below the password field. A yellow 'LOGIN' button with a right-pointing arrow is positioned to the right of the password field. The background of the login area is a textured yellow. At the bottom of the page, there is a dark grey footer containing the 'VISITING ADDRESS' (Rue du Duc 100, 1150 Brussels, T: +32 (0)2 761 01 00), the copyright notice 'Copyright: European Precious Metals Federation', and a link for 'Legal information'.

- Enter your email address and password. In case of issue, please contact cathy.martin@epmf.be

Knowledge Management System – User Start-up guide

- To know more, please consult our:



Knowledge Management System User start up guide

- Or contact cathy.martin@epmf.be or audrey.rondepierre@epmf.be

Knowledge Management System

**Any feedback on the tool
and user start up guide is very welcome !**



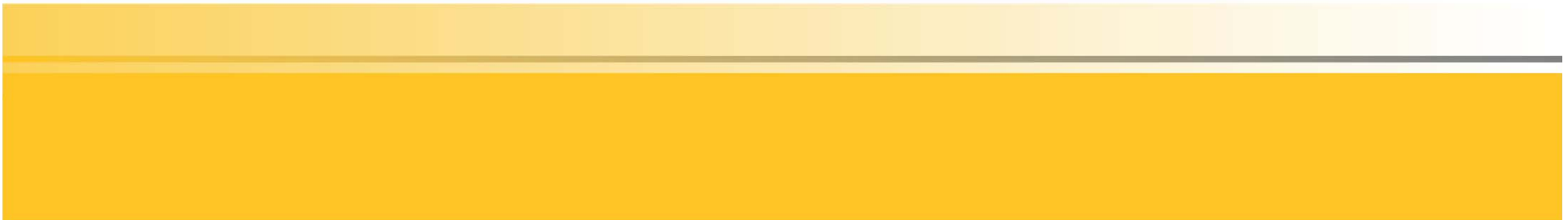
Please contact cathy.martin@epmf.be or audrey.rondepierre@epmf.be



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12. Closing remarks and next meeting

Guy Ethier, Umicore



Closing remarks and next meeting

- The last PMC General Assembly meeting will be organised on Tuesday 4 December 2018 in the afternoon at the Metals Conference Centre in Brussels
- This last PMC General Assembly will be organised back-to-back with the EPMF General Assembly which will take place on Wednesday 5 December 2018 at the Radisson Blue Royal Hotel in Brussels.

EPMF Members and candidate-members are invited to join!





THANK YOU

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