



EPMF Workplan 2019

May 2018, Draft 2



Introduction

2019 is the first year of the new EPMF structure, integrating the different platforms of interest selected by the EPMF members to better address the new challenges faced by the Precious Metals industry. This is the opportunity to launch a new format of the EPMF workplan based on the new platforms. The workplan is developed based on different sources:

- For non-REACH issues, a Risk register has been developed to identify the regulatory threat and trends in the 3 coming years
- For the REACH issues, the Secretariat has established from one side an OFI ('Opportunities for Improvements') tracker (available in the Knowledge Management System) and on the other side some prioritisation criteria (see Annex 1) to develop a rolling plan for the maintenance and update of the registration dossiers. The Metals and Inorganic Sectorial Approach (MISA) launched with ECHA in 2018 for 2 years will be also an important driver in the drafting process of the workplan. For all REACH platforms, a budget has been foreseen for conducting a literature review, for the IUCLID hosting and potential updates of uses and ES (e.g.: following a DUs request or newly available data). This will not lead automatically to a need to the submission of an update the dossiers in 2019.

The aim of the workplan is to capture in a simple and structured way for each platform:

- The budget
- The HR
- The main tasks
- The main challenges for the coming years and beyond



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:

- 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

- 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

- 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.

Silver compounds Platform

Manager: Katrien Arijs

2019 Budget: 178.071€

Mandate:

The **silver compounds platform** is related to the following obligations related to the REACH Implementation:

- 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

- 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

- 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.

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:

- 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

- Literature review
- Update of the dossiers (if necessary)

Potential challenges in 2019 and beyond

- The increasing attention on nanos could trigger some challenges for the gold dossier in case of nanogold would be identified in the membership production.

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:

- Maintenance of the gold compounds dossiers

HR: 0,1 FTE



• Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification	
Main tasks in 2019 • 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 • No immediate challenge identified so far.	

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: • 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 • Literature review • Testing on mutagenicity (if TPs approved by ECHA) • Update of the dossiers	
Potential challenges in 2019 and beyond • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.	

Potassium dicyanoaurate Platform

Manager: Vincent Dunon	2019 Budget: 33.000€
Mandate:	HR: 0,05 FTE



The **gold cyanide platform** is related to the following obligations related to the REACH Implementation:

- Maintenance of the potassium dicyanoaurate dossier
- Dossier and/or Substance Evaluation (if relevant)
- Restriction (if relevant)
- Authorisation (if relevant)
- Harmonized classification

Main tasks in 2019

- Literature review
- Testing on mutagenicity (if TPs approved by ECHA)

Potential challenges in 2019 and beyond

- To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.

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:

- 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

- Literature review

Potential challenges in 2019 and beyond

- No immediate challenge identified so far.

Chloroplatinates Platform

Managers: Jelle Mertens/Maxime Eliat

2019 Budget: 271.788€

Mandate:

HR: 0,2 FTE



The Chloroplatinates platform is related to the following obligations related to the REACH Implementation:

- Maintenance of the chloroplatinates dossiers
- Dossier and/or Substance Evaluation (if relevant)
- Restriction (if relevant)
- Authorisation (if relevant)
- Harmonized classification

Main tasks in 2019

- 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

- 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.

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:

- 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

- Review phys-chem section
- EOGRS (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.

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: • 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 • 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 • To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.	

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: • 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 • Literature review	
Potential challenges in 2019 and beyond • No immediate challenge identified so far.	



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:

- 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

- 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

- No immediate challenge identified so far.

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:

- 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



- Literature review

Potential challenges in 2019 and beyond

- No immediate challenge identified so far.

Rhodium III compounds Platform

Managers: Jelle Mertens/Maxime Eliat

2019 Budget: 219.088€

Mandate:

The rhodium III compounds platform is related to the following obligations related to the REACH Implementation:

- 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

Main tasks in 2019

- 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

Potential challenges in 2019 and beyond

- To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.

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:

- Maintenance of the rhodium compounds dossiers
- Dossier and/or Substance Evaluation (if relevant)

HR: 0,2 FTE



• Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification	
Main tasks in 2019 • 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 • No immediate challenges identified so far.	

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: • 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 • Literature review	
Potential challenges in 2019 and beyond • No immediate challenges identified so far.	

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:	HR: 0,08 FTE



• Maintenance of the ruthenium compounds dossiers • Dossier and/or Substance Evaluation (if relevant) • Restriction (if relevant) • Authorisation (if relevant) • Harmonized classification	
Main tasks in 2019 • 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 • No immediate challenges identified so far.	

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: • 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 • Literature review • Upgrade of the dossier from Annex III exempted dossier to Annex VII dossier.	
Potential challenges in 2019 and beyond • No immediate challenges identified so far.	

Iridium compounds Platform	
Managers: Jelle Mertens/Maxime Eliat	2019 Budget: 67.157€
Mandate:	HR: 0,04 FTE



The **iridium compounds platform** is related to the following obligations related to the REACH Implementation:

- Maintenance of the iridium compounds dossiers
- Dossier and/or Substance Evaluation (if relevant)
- Restriction (if relevant)
- Authorisation (if relevant)
- Harmonized classification

Main tasks in 2019

- Literature review
- Upgrade of diammonium hexachloroiridate from Annex III exempted dossier to Annex VII dossier.

Potential challenges in 2019 and beyond

- No immediate challenges identified so far.

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:

- 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

- Literature review

Potential challenges in 2019 and beyond

- No immediate challenges identified so far.

Refinables Platform

Managers: Vincent Dunon

2019 Budget: 602.558€

Mandate:

HR: 0,5 FTE



The **refinables platform** is related to the following obligations related to the REACH Implementation:

- Maintenance of the refinables dossiers
- Dossier and/or Substance Evaluation (if relevant)
- Restriction (if relevant)
- Authorisation (if relevant)
- Harmonized classification

Main tasks in 2019

- 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

- The challenges are numerous:
 - o the methodology used for the RA of the refinables could be challenged by ECHA requiring additional (validation) testing
 - o the SID remains an uncertain area
 - o the “substance in substance” approach promoted by Member States to tackle SVHC in substances
 - o the lack of consistency between Circular Economy and Chemicals policy.

SVHC Roadmap Platform

Managers: Jelle Mertens/France Capon

2019 Budget: 17.300€

Mandate:

- 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:

HR: 0,1 FTE



- 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)	
Main tasks in 2019 - SVHC monitoring - Advocacy on Minor constituents Risk Management	
Potential challenges in 2019 and beyond - The “substance in substance” approach promoted by Member States to tackle SVHC in substances which could impact a lot of substances used or produced by EPMF members. - The prioritisation of key substances for the production of precious metals like hydrazine, Pb, Borates etc.	

Water Framework Directive and silver Platform – DORMANT

Managers: Katrien Arijns	2019 Budget: /
Mandate: - Build the scientific basis for the non-prioritisation of silver under WFD - Provide the necessary scientific input in case of prioritisation of silver under WFD - Conduct advocacy at the different level of the process to mitigate the impacts of a potential inclusion of Ag under the WFD.	HR: /
Main tasks in 2019 /	
Potential challenges in 2019 and beyond /	

Water Framework Directive and PGM Platform – DORMANT

Managers: Jelle Mertens	2019 Budget: /
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Mandate: • Build the scientific basis for the non-prioritisation of PGMs under WFD • Provide the necessary scientific input in case of prioritisation of PGMs under WFD • Conduct advocacy at the different level of the process to mitigate the impacts of a potential inclusion of PGMs under the WFD.	HR: /
Main tasks in 2019 • /	
Potential challenges in 2019 and beyond • /	

Chemicals/Waste/Product Roadmap Platform	
Managers: France Capon	2019 Budget: 10.000€
Mandate: • Ensure adequate input in preparation of the policy options to address the interface between chemicals, products and waste legislation • Review and influence 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. • Promote consistency between Chemicals Management and Circular Economy	HR: 0,05 FTE
Main tasks in 2019 • Monitor and influence the future actions recommended by the Commission as an outcome of the chemicals/waste/product Roadmap survey.	
Potential challenges in 2019 and beyond • Inconsistencies between Circular Economy and Chemicals management targets.	



Occupational Health Platform

Managers: France Capon

2019 Budget: 10.000€

Mandate:

- Monitor CAD and CMD related activities related to precious metals substances but also critical substances used in precious metals production. (e.g.: inclusion of reprotox within CMD)
- Monitor interactions between REACH and OSH (e.g.: SCOEL/RAC)
- Conduct advocacy activities related to OSH.

HR: 0,05

Main tasks in 2019

- Develop and advocate a position regarding the inclusion of reprotox into CMD
- Active contribution to CII initiative on REACH and OSH
- Develop and advocate a position on the Memorandum of Understanding from the EC on REACH and OSH

Potential challenges in 2019 and beyond

- Prioritisation of substances used (Pb) or produced (CIPTs) by the Commission to derive or update an OEL. This could be also an opportunity if the relevant data are available and the correct methodology is used by RAC.

Responsible Sourcing Platform

Managers: France Capon

2019 Budget: 10.000€

Mandate:

- 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.

HR: 0,05 FTE

Main tasks in 2019

- Monitor OECD activities on Responsible sourcing
- Monitor issue of the different guidance to implement the EU legislation on conflict minerals



- Continuous advocacy to remove the threshold on Au from the EU legislation
- Prepare a position regarding the inclusion of other Precious Metals in the EU legislation

Potential challenges in 2019 and beyond

- The listing of other precious metals into the EU regulation
- The continuous use of a threshold to define the legal obligations of the stakeholders
- The lack of consideration for imposing mandatory application of the EU regulation throughout the supply chain.

Tax Platform – DORMANT

Managers: France Capon

2019 Budget: /

Mandate:

- Physical delivery of precious metals
- Unallocated Metal Weight Accounts (UMWA) without/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)

HR: /

Main tasks in 2019

- Monitor EU activities related to VAT
- Assess the impact of the Brexit on the VAT EU discussions

Potential challenges in 2019 and beyond

- Discrepancies between the VAT regimes in the different Member States.

Communication and advocacy Platform

Managers: France Capon

2019 Budget: 25.000€

Mandate:

- 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, social partners and NGOs
- To organize communication and advocacy events (e.g.: authorities briefings etc.)

HR: 0,05 FTE



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| <ul style="list-style-type: none">• To develop the relevant communication tools | |
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Main tasks in 2019

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| <ul style="list-style-type: none">• Organize an event with authorities to advocate EPMF position on critical topics• Contribute to Eurometaux Member States outreach tour on metals specific issues |
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Budget 2019 Overview

	EPMF 2019	
	2019 draft budget	FTE
A. ADMINISTRATIVE COSTS	674.200 €	1,9
1. Salaries and salary-related costs	250.700 €	
2. Office costs	130.000 €	
3. Meeting, travel and accommodation costs	60.000 €	
4. External costs	233.500 €	
B. REACH PLATFORM COSTS	3.604.991 €	3,73
1. Ag metal (including nano)	137.071 €	0,5
1.1 REACH registration	0 €	
1.2 REACH dossier maintenance	21.000 €	
1.3 REACH evaluation	0 €	
1.4 REACH classification & labelling	10.000 €	
1.5 REACH authorisation	0 €	
1.6 Internal and external fixed Scientific Managers	94.214 €	
1.7 IUCLID IT hosting system	476 €	
1.8 Knowledge Management tool + hosting	905 €	
1.9 SIEF communication tool	476 €	
1.10 Science budget	10.000 €	



2. Ag compounds	178.071 €	0,5
2.1 REACH registration	0 €	
2.2 REACH dossier maintenance	62.000 €	
2.3 REACH evaluation	0 €	
2.4 REACH classification & labelling	10.000 €	
2.5 REACH authorisation	0 €	
2.6 Internal and external fixed Scientific Managers	94.214 €	
2.7 IUCLID IT hosting system	476 €	
2.8 Knowledge Management tool + hosting	905 €	
2.9 SIEF communication tool	476 €	
2.10 Science budget	10.000 €	
3. Au metal	22.927 €	0,05
3.1 REACH registration	0 €	
3.2 REACH dossier maintenance	11.000 €	
3.3 REACH evaluation	0 €	
3.4 REACH classification & labelling	0 €	
3.5 REACH authorisation	0 €	
3.6 Internal and external fixed Scientific Managers	10.070 €	
3.7 IUCLID IT hosting system	476 €	
3.8 Knowledge Management tool + hosting	905 €	
3.9 SIEF communication tool	476 €	
4. Au compounds	47.997 €	0,1
4.1 REACH registration	0 €	
4.2 REACH dossier maintenance	16.000 €	
4.3 REACH evaluation	0 €	
4.4 REACH classification & labelling	0 €	
4.5 REACH authorisation	0 €	
4.6 Internal and external fixed Scientific Managers	20.140 €	
4.7 IUCLID IT hosting system	476 €	
4.8 Knowledge Management tool + hosting	905 €	
4.9 SIEF communication tool	476 €	
4.10 Science budget	10.000 €	



5. Ag cyanide/Potassium dicyanoargentate	154.997 €	0,1
5.1 REACH registration	0 €	
5.2 REACH dossier maintenance	6.000 €	
5.3 REACH evaluation	120.000 €	
5.4 REACH classification & labelling	0 €	
5.5 REACH authorisation	0 €	
5.6 Internal and external fixed Scientific Managers	20.140 €	
5.7 IUCLID IT hosting system	476 €	
5.8 Knowledge Management tool + hosting	905 €	
5.9 SIEF communication tool	476 €	
5.10 Science budget	7.000 €	
6. Potassium dicyanoaurate	33.000 €	0,05
6.1 REACH registration	0 €	
6.2 REACH dossier maintenance	3.000 €	
6.3 REACH evaluation	15.000 €	
6.4 REACH classification & labelling	0 €	
6.5 REACH authorisation	0 €	
6.6 Internal and external fixed Scientific Managers	10.143 €	
6.7 IUCLID IT hosting system	476 €	
6.8 Knowledge Management tool + hosting	905 €	
6.9 SIEF communication tool	476 €	
6.10 Science budget	3.000 €	
7. Pt metal	21.157 €	0,04
7.1 REACH registration	0 €	
7.2 REACH dossier maintenance	13.000 €	
7.3 REACH evaluation	0 €	
7.4 REACH classification & labelling	0 €	
7.5 REACH authorisation	0 €	
7.6 Internal and external fixed Scientific Managers	6.300 €	
7.7 IUCLID IT hosting system	476 €	
7.8 Knowledge Management tool + hosting	905 €	
7.9 SIEF communication tool	476 €	



8. Chloroplatinates	271.788 €	0,2
8.1 REACH registration	0 €	
8.2 REACH dossier maintenance	23.000 €	
8.3 REACH evaluation	200.000 €	
8.4 REACH classification & labelling	0 €	
8.5 REACH authorisation	15.000 €	
8.6 Internal and external fixed Scientific Managers	31.930 €	
8.7 IUCLID IT hosting system	476 €	
8.8 Knowledge Management tool + hosting	905 €	
8.9 SIEF communication tool	476 €	
9. Karstedt	851.788 €	0,2
9.1 REACH registration	0 €	
9.2 REACH dossier maintenance	18.000 €	
9.3 REACH evaluation	800.000 €	
9.4 REACH classification & labelling	0 €	
9.5 REACH authorisation	0 €	
9.6 Internal and external fixed Scientific Managers	31.930 €	
9.7 IUCLID IT hosting system	476 €	
9.8 Knowledge Management tool + hosting	905 €	
9.9 SIEF communication tool	476 €	
10. Pt compounds (others)	404.088 €	0,3
10.1 REACH registration	0 €	
10.2 REACH dossier maintenance	45.000 €	
10.3 REACH evaluation	300.000 €	
10.4 REACH classification & labelling	0 €	
10.5 REACH authorisation	0 €	
10.6 Internal and external fixed Scientific Managers	47.230 €	
10.7 IUCLID IT hosting system	476 €	
10.8 Knowledge Management tool + hosting	905 €	
10.9 SIEF communication tool	476 €	
10.10 Science budget	10.000 €	



11. Pd metal	21.157 €	0,04
11.1 REACH registration	0 €	
11.2 REACH dossier maintenance	13.000 €	
11.3 REACH evaluation	0 €	
11.4 REACH classification & labelling	0 €	
11.5 REACH authorisation	0 €	
11.6 Internal and external fixed Scientific Managers	6.300 €	
11.7 IUCLID IT hosting system	476 €	
11.8 Knowledge Management tool + hosting	905 €	
11.9 SIEF communication tool	476 €	
12. Pd compounds	257.048 €	0,4
12.1 REACH registration	0 €	
12.2 REACH dossier maintenance	180.000 €	
12.3 REACH evaluation	0 €	
12.4 REACH classification & labelling	0 €	
12.5 REACH authorisation	0 €	
12.6 Internal and external fixed Scientific Managers	65.191 €	
12.7 IUCLID IT hosting system	476 €	
12.8 Knowledge Management tool + hosting	905 €	
12.9 SIEF communication tool	476 €	
12.10 Science budget	10.000 €	
13. Rh metal	21.157 €	0,04
13.1 REACH registration	0 €	
13.2 REACH dossier maintenance	13.000 €	
13.3 REACH evaluation	0 €	
13.4 REACH classification & labelling	0 €	
13.5 REACH authorisation	0 €	
13.6 Internal and external fixed Scientific Managers	6.300 €	
13.7 IUCLID IT hosting system	476 €	
13.8 Knowledge Management tool + hosting	905 €	
13.9 SIEF communication tool	476 €	



14. Rh III compounds	219.088 €	0,3
14.1 REACH registration	0 €	
14.2 REACH dossier maintenance	65.000 €	
14.3 REACH evaluation	95.000 €	
14.4 REACH classification & labelling	0 €	
14.5 REACH authorisation	0 €	
14.6 Internal and external fixed Scientific Managers	47.230 €	
14.7 IUCLID IT hosting system	476 €	
14.8 Knowledge Management tool + hosting	905 €	
14.9 SIEF communication tool	476 €	
14.9 Science budget	10.000 €	
15. Rh compounds (others)	178.788 €	0,2
15.1 REACH registration	0 €	
15.2 REACH dossier maintenance	145.000 €	
15.3 REACH evaluation	0 €	
15.4 REACH classification & labelling	0 €	
15.5 REACH authorisation	0 €	
15.6 Internal and external fixed Scientific Managers	31.930 €	
15.7 IUCLID IT hosting system	476 €	
15.8 Knowledge Management tool + hosting	905 €	
15.9 SIEF communication tool	476 €	
16. Ru metal	21.157 €	0,04
16.1 REACH registration	0 €	
16.2 REACH dossier maintenance	13.000 €	
16.3 REACH evaluation	0 €	
16.4 REACH classification & labelling	0 €	
16.5 REACH authorisation	0 €	
16.6 Internal and external fixed Scientific Managers	6.300 €	
16.7 IUCLID IT hosting system	476 €	
16.8 Knowledge Management tool + hosting	905 €	
16.9 SIEF communication tool	476 €	



17. Ru compounds	60.629 €	0,08
17.1 REACH registration	0 €	
17.2 REACH dossier maintenance	36.000 €	
17.3 REACH evaluation	0 €	
17.4 REACH classification & labelling	0 €	
17.5 REACH authorisation	0 €	
17.6 Internal and external fixed Scientific Managers	12.772 €	
17.7 IUCLID IT hosting system	476 €	
17.8 Knowledge Management tool + hosting	905 €	
17.9 SIEF communication tool	476 €	
17.10 Science budget	10.000 €	
18. Ir metal	26.157 €	0,04
18.1 REACH registration	0 €	
18.2 REACH dossier maintenance	18.000 €	
18.3 REACH evaluation	0 €	
18.4 REACH classification & labelling	0 €	
18.5 REACH authorisation	0 €	
18.6 Internal and external fixed Scientific Managers	6.300 €	
18.7 IUCLID IT hosting system	476 €	
18.8 Knowledge Management tool + hosting	905 €	
18.9 SIEF communication tool	476 €	
19. Ir compounds	67.157 €	0,04
19.1 REACH registration	0 €	
19.2 REACH dossier maintenance	59.000 €	
19.3 REACH evaluation	0 €	
19.4 REACH classification & labelling	0 €	
19.5 REACH authorisation	0 €	
19.6 Internal and external fixed Scientific Managers	6.300 €	
19.7 IUCLID IT hosting system	476 €	
19.8 Knowledge Management tool + hosting	905 €	
19.9 SIEF communication tool	476 €	



20. Re metal & compounds	7.209 €	0,01
20.1 REACH registration	0 €	
20.2 REACH dossier maintenance	3.500 €	
20.3 REACH evaluation	0 €	
20.4 REACH classification & labelling	0 €	
20.5 REACH authorisation	0 €	
20.6 Internal and external fixed Scientific Managers	1.852 €	
20.7 IUCLID IT hosting system	476 €	
20.8 Knowledge Management tool + hosting	905 €	
20.9 SIEF communication tool	476 €	
21. Refinables	602.558 €	0,5
21.1 REACH registration	0 €	
21.2 REACH dossier maintenance	500.000 €	
21.3 REACH evaluation	0 €	
21.4 REACH classification & labelling	0 €	
21.5 REACH authorisation	0 €	
21.6 Internal and external fixed Scientific Managers	100.701 €	
21.7 IUCLID IT hosting system	476 €	
21.8 Knowledge Management tool + hosting	905 €	
21.9 SIEF communication tool	476 €	



C. NON-REACH PLATFORM COSTS	72.300 €	0,3
1. SVHC Roadmap	17.300,00 €	0,1
1.1 Monitoring tool	5.000 €	
1.2 Internal and external fixed Scientific Managers	12.300 €	
2. Silver EQS	0 €	
3. Chemicals/waste/products Roadmap	10.000,00 €	0,05
3.1 Internal and external fixed Scientific Managers	10.000 €	
4. Occupational Health	10.000,00 €	0,05
4.1 Internal and external fixed Scientific Managers	10.000 €	
5. Water framework directive and PGMS	0 €	
6. Responsible sourcing	10.000,00 €	0,05
6.1 Internal and external fixed Scientific Managers	10.000 €	
7. Tax	0 €	
8. Communication & advocacy platform	25.000 €	0,05
8.1 Communication & Advocacy platform	15.000 €	
8.2 Internal and external fixed Scientific Managers	10.000 €	
GRAND TOTAL	4.351.491 €	5,93



Annex 1: Criteria for prioritisation of substances in view of maintenance/update of registration dossiers

The criteria selected by PMC in order to identify priority substances are mainly based on ECHA's screening criteria for further regulatory measures.

Hazard criteria: In line with ECHA's screening approach, the first category of criteria applied by PMC relates to hazards. A distinction is made between the hazards which are screened in priority by ECHA since they may lead to the SVHC status, in the case of PMC substances **sensitization (skin and respiratory) and STOT**, and **other relevant hazards**, in particular aquatic toxicity, which may trigger other risk management measures such as a REACH restriction or Substance Evaluation.

Non-hazard criteria: Non-hazard criteria are used by ECHA on top of hazard criteria in order to assess the risk dimension. Non-hazard criteria relate primarily to exposure and volumes. Widespread uses (professional or consumer uses) get prioritized over fully contained uses. Similarly, high tonnages get prioritised over lower tonnages. On this basis, PMC selected the following three non-hazard criteria to guide prioritisation: **1/ tonnage registration band; 2/ existence of a CSR/exposure scenarios and 3/ Widespread use.**

Data improvement needs: Authorities need to have a good understanding of both hazards and exposure aspects of a substance. This requires testing results, monitoring data, precise use descriptions and tonnage information. PMC has set up an internal tracker of 'Opportunities for Improvement' for registration dossiers to report areas with data gaps. As regards **hazards**, data improvement needs relate for instance to pending testing proposals on critical endpoints or weaknesses in read-across. As regards **exposure**, it covers aspects such as lack of monitoring data, RCRs above 0,7 or unclear use descriptors.

Other criteria: This last category includes complementary criteria that may be useful to refine the assessment. Whether the substance is an **Annex III exempted substance** or not belongs to such criteria. While it may not be a decisive criterion, it may support prioritisation where needed and especially depending on the outcome of the discussions related to the increase of 1-10t related requirements.

There is also a criterion indicating the **number of identified uses for the substance**. Substances with a similar profile but with a higher number of uses may have to be prioritised over substances with a more limited number of uses, unless widespread.

Finally, we have added the criterion of **relevant regulatory developments** in order to include information on regulatory actions or trends that may impact our substances and therefore their prioritisation.