



MINUTES

Refinables WG Meeting

Chair: Michiel Ceulemans (Umicore, Belgium)
11 October 2018, 9:30 – 12:00 CET



1. Welcome and Introduction

1.1. Reminder on Confidentiality and Competition Law

Participants are reminded on their obligation to comply with confidentiality and competition laws. All participants to the meeting are acting as moderators in this respect.

1.2. Tour de table and apologies

The list of participants is available in Annex 1.

1.3. Approval of the agenda

The draft agenda is approved as distributed and is available in Annex 1.

1.4. Approval of the minutes

The minutes of the WG meeting on the March 15, 2018 are approved.

1.5. Status of actions

The status of actions that were agreed are presented on slides 7 of the meeting's slide deck (Annex 2). Discussion on substance ID between ECHA and Eurometaux are still ongoing and input will be given by us when needed. **[A1]** SIPs still need to be created for the 'Solutions from PM leaching dissolution' and drafts should be available by end of 2018. **[A2]** Update of the classification for the first prioritised dossiers is ongoing and finalisation foreseen for Q4 2018. **[A3]** Other actions were finalised or cancelled.

2. Refinables Portfolio

2.1. Scope Registration updates

There are 21 refinables identified within the EPMF consortium (, based on the different processes that take place in the refining industry. Based on composition data that was received a dossier for Cu-bullion has been included in the scope. Tonnage bands and SCC/non-SCC status have been updated.

Post-meeting note: The status of 4.1 slimes, Ag electrolysis has been changed to non-SCC

Some discussion were ongoing regarding to include the water content in the calculations of the tonnages of the solutions from PM leaching and dissolution. As requested a guideline for the PMGs describing on how to deal with solutions for tonnage calculations is attached as Annex 3. Here is described that the default approach for solutions is to consider these as mixtures and register only the substance as such. In this case the solvent can be subtracted from the tonnage band calculations. If substances are not able to be isolated in a stable solid form the solution as such can be registered with the solvent being an integral part of the substance. The solvent should be included in the tonnage band



calculations. Next working group meeting we will discuss and should come to an agreement, based on the substance ID guidance from the PGMs, on how to calculate the tonnages for the solutions from PM leaching and dissolution.

2.2. Approval Lead Registrants

Lead registrants were assigned to all dossiers, except the re-added Cu Bullion, PMG rich, and were approved by the WG. The LR of the Cu bullion will be assigned during the next meeting. The complete list of LRs can be found on slide 12.

A complete overview of the refinable portfolio and lead registrants can be found in Annex 4.

3. Substance Identity of PM Refinables

3.1. Update discussion Eurometaux and ECHA

An update was given on the discussions of the intermediates taskforce. Here the SID sectorial guidance for inorganic pigments was presented and shown that this is only limited applicable for the inorganic intermediates for metal refining.

Recent iUVCB inquiries were accepted by ECHA and concerning the SID more information/clarifications are asked on the sources and the processes. On top more specific data will be requested from each legal entity (slide 15) and a draft template is attached in the Annex 5.

3.2. Refinements SIP

Doré and Bullion dossiers

Differences in composition of the different Dorés and Bullions were shown on slide 17. Based on this data and of the original doré dossier in 2014, it was proposed and agreed to have two different Doré dossier specific for respectively gold and silver and two bullion dossiers for iron and copper. The two bullion dossiers will be considered as new dossiers and registration should be complete using an inquiry.

Materials for reclaim

In this SIP there was a discrepancy between the material description and the composition profile. This was corrected and care should be taken for the other dossiers.

Decision tree

The decision tree needs to properly reflect all the refinable substances in our portfolio. Discussions were held to allocate the new dossiers for solutions from PM leaching. It is not sure that solution from PM leaching solemnly would fit under the “leaching and dissolution” process and not under “precipitation and crystallisation”. Allocation of these refinables should be made based on the description in the SIP profile. Heraeus will take the lead on updating the decision tree and will take a closer look if a separate refinable is needed for the “precipitation and crystallisation” process. **[A4]**



Also it was made clear that the processes in the decision tree had been agreed before and therefore should be kept as previously decided. Moreover, the solemn purpose of the decision tree is to allocate the different refinables according to their specific process and does not reflect the sequence of process steps during refining.

3.1. Other issues

For updating the refinable dossiers according to the proposed splits, the original dossier will be kept for one of the splits and new dossiers will be created for the others with a link to the original dossier.

4. Status Refinable Updates

4.1. Phys-Chem data gaps

An overview of the physchem data gaps are given on slide 23. For the slags it should be checked with the LR that the data generated before belongs to either the slags, doré furnace or slags, other.

In the dossiers the flammability is waived based on expert judgment and no appropriate column II waiver is available in the guidance. This could trigger problems on registration and the endpoint should best be completed using either test data or supportive information. For the doré and slags a publication describing the process could be used, were it explains that these refinables are the products of melting processes.

Post-meeting note: Test data for phys-chem endpoints do not need to meet GLP. Therefore, also in house test data could be used for completing these endpoints. On a case-by-case basis the best approach to complete this endpoint should be chosen.

4.2. Environmental and Exposure Assessment

As agreed during the WG meeting a general CSR (worst case scenario) will be drafted besides the legal entity specific CSRs.

For the human health exposure scenarios, inclusion into CHESAR will be complicated and can only be partially implemented. This is because we don't have data sharing agreements for all the substances in the scope of the assessment and because CHESAR does not allow the inclusion of biomonitoring data into the risk assessment. CHESAR will be used for the environmental risk assessment and for the human health partial implementation will be done to avoid misinterpretations and inclusion of biomonitoring.

4.3. Classification

Classification groupings will be made based on the table presented on slide 26. In general the elemental composition of each grouping will be based on the company specific compositions that will have similar obligations for Transport & Packaging, Permits and SEVESO. Where needed also a non-classified composition will be provided (e.g. silver and gold doré).



5. Implementation circular economy package

The public consultation on the interface between legislation on chemical, product and waste is started and will close 29th of October. No further actions are required from our side and input will jointly be given by Eurometaux.

6. iUVCBs under MISA

In a second phase of MISA the iUVCBs will be tackled next year and some preparatory discussions have been conducted. To initiated the discussions it is requested to provide ECHA an revised SID guidance by December 2018. Eurometaux will again provide our update approach for defining the iUVCBs based on the SIP. Reflection on a pilot formatting-case is expected by end of January 2019. EPMF will keep on following the discussion regarding the iUVCBs under MISA and contribute were needed to the discussions to defend our position. **[A5]**

7. Budget

Budget estimates were made for the update of the refinable dossiers and presented on slide 33. Most costs are related to the testing of phys-chem data gaps of the splitted dossiers.

More accurate figures will be known when the scope of the refinable dossiers has been finalised and when more accurate figures of the consultancy costs are known.

Main tasks in 2019:

- Additional Phys-Chem and T/D testing for splitted dossiers
- Update of CSR including combined toxicity
- Self-ignition testing for balsams to replace waiver
- Update of the dossiers based on the outcome of the MISA discussion on UVCB

The budget projections of 2019 can be found on slide 21.

8. AOB, next meetings/calls and closing remarks

- PMC General Assembly will be held from 4 to 5 December 2018 in Brussels.
- Next Refinables Work Group Meetings will be held the 3rd of April 2019, Brussels



9. List of actions

Table 1. Actions agreed on at the Refinables WG meeting of 11 October '18

[A]	WHAT	WHO	WHEN
1	Follow-up ECHA / Eurométaux discussions on iUVCB SID and give input when needed	PMC	Continuous
2	Drafting of SIPs for the Solutions from PM leaching and dissolution	Aurubis	Q4 2018
3	Update of classification and classification groups for the prioritised refinables	EPMF	Q4 2018
4	Update decision tree	Heraeus	Q1 2019
5	Follow-up and giving input for the iUVCBs under MISA	EPMF	Continuous

10. List of Annexes

1. Approved Agenda and List of participants
2. Slides presented during the meeting
3. PGM substance ID guidance
4. Overview refinables portfolio
5. Draft template SID & Inquiry LE specific